



OREGON HOUSING *and* COMMUNITY SERVICES

State of Oregon

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

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

Approved by HUD September 30, 2022

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Non-Substantial Action Plan Amendment #1

This document constitutes the first Amendment (non-substantial) to the State of Oregon CDBG-DR Public Action Plan.

The purpose of this Action Plan Amendment (APA) Number 1 to Oregon's Public Action Plan (Approved by HUD September 30, 2022) is to provide non-substantial clarifications to certain programs. The APA is considered non-substantial because the clarifications and additions do not meet the following Substantial APA criteria:

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

The following changes to the Action Plan are made in this non-substantial Amendment:

Previous Page #	New Page #	Section	Summary of Changes
163	172	Section 5.1.2.1.2	<p><u>Homeowner Assistance and Reconstruction Program (HARP)</u></p> <p>Changed the language from:</p> <p><i>"...the State will either manage the recovery on behalf of applicants or will provide construction advisory services to applicants as they complete their recovery."</i></p> <p>To:</p> <p><i>"...the State will either manage the recovery on behalf of applicants or will provide construction advisory services to applicants as they complete their recovery. When managing the recovery on behalf of applicants, the State may do so either directly or by investing in parks, subrecipients, or local governments through the activities described in On-site and Off-site Improvements for Reconstruction."</i></p> <p>This amendment does not result in a change in program benefit but gives OHCS more flexibility in how</p>

Previous Page #	New Page #	Section	Summary of Changes
			the program can help applicants who have struggled to initiate their recovery.
	176	Section 5.1.2.4	<p><u>HARP CDBG-DR Eligible Activities</u></p> <p>The original program description identified the use of CDBG-DR funds for acquisition, as a necessary activity to help homeowners recover. Acquisition is a broad term, and OHCS intended to use that term to be inclusive of a variety of scenarios, including for the acquisition of real property, acquiring manufactured homes, and acquiring a home that is or will be located on a different site if an applicant's damaged property is no longer available to them. This programmatic flexibility is necessary to accommodate a variety of homeowner scenarios, including to help homeowners who were on leased land, who have been unable to rebuild on the damaged site due to land use or other feasibility issues, or other similar challenges that will be further defined in program policy. While the broad description of acquisition is included this eligible activity, OHCS clarified this section of the Action Plan to include homeownership activities (Section 105(a) 24), which allows for the acquisition of housing that will be occupied by the homebuyers.</p>
	178	Section 5.1.2.4	<p><u>HARP CDBG-DR Maximum Assistance for Single-Family Site Built Residences (Homeowner Managed Projects)</u></p> <p>OHCS clarified that the program may allow for limited exceptions to the \$155 per square foot maximum award cap to rehabilitate the damaged home to program standards by adding the following language to the Award Cap language:</p> <p><i>“Exceptions may be made for such reasons as: to accommodate households with members living with disabilities; households living in rural communities where there is limited access to builders and/or when building costs are higher because of travel costs; or to address other circumstances that OHCS determines to</i></p>

Previous Page #	New Page #	Section	Summary of Changes
			<p><i>be necessary and reasonable for providing equitable access to program assistance."</i></p>
	178	Section 5.1.2.4	<p><u>HARP CDBG-DR Maximum Assistance for Manufactured Homes (Homeowner Managed Projects)</u></p> <p>Removed the requirement that to participate in a Homeowner Managed Project, applicants must have put down at least 10% of the total cost to purchase a replacement manufactured or modular home. Removing this procedural requirement does not impact programmatic eligibility; it provides otherwise eligible applicants with more flexibility in how they receive assistance from the program.</p>
172	180	Section 5.1.2.9	<p><u>HARP Method of Distribution</u></p> <p>OHCS is amending the language around how the program provides assistance to eligible applicants, and is removing the requirement that in order to participate in a Homeowner Managed Project (and not just be limited to a ReOregon Managed Project), applicants have to have put down at least 10% of the total cost to purchase a replacement manufactured or modular home. Clarifying the ways in which the program will support program participants does not impact programmatic eligibility or amend a program benefit; it provides otherwise eligible applicants with more flexibility in how they receive assistance from the program.</p> <p>Through this amendment, OHCS is also amending the following language from:</p> <p><i>"The State is the administering entity for the program and will ensure all applicant files are compliant prior to grant execution or award denial. The State may engage subrecipients to support applicants through outreach and engagement, editing and translating program materials for readability, program intake and processing, and/or to provide other related services</i></p>

Previous Page #	New Page #	Section	Summary of Changes
			<p>that facilitate or expedite the application review process. All final award decisions will be made by the State.</p> <p>Homeowners will sign a grant agreement with the State prior to receiving assistance from the program. As described in more detail in program policies and procedures, the State will provide assistance to eligible homeowners through the following methods of distribution:</p> <ul style="list-style-type: none"> <p>ReOregon Managed Projects (manufactured homeowners who have not yet started their recovery). The State will manage and complete the replacement of damaged manufactured or modular homes on behalf of homeowners who have not yet executed replacement contracts or who have put down less than 10% of the purchase price of a replacement unit. The State will contract with vendors and dealers directly to carry out the housing replacement activities. The State will require contractors to provide program participants with a 1-year warranty on the construction or replacement home.</p> <p>Homeowner Managed Projects (site-built and manufactured homeowners who have started their recovery). If participants have executed contracts at the time of application but have not yet completed their repairs, reconstruction, or replacement and are unable to complete their recovery, the State may provide direct gap assistance to homeowners. In this scenario, homeowners continue to manage their own contractors or dealers through their remaining recovery activities, provided the contractors and scope of work meet program requirements and the project meets environmental, asbestos, lead-based paint, and other applicable abatement and mitigation requirements. The State will provide construction advisory and housing navigation services for all homeowners who receive assistance directly from the program.</p> <p>On-site and Off-site Improvements for Reconstruction In some cases in order to replace damaged housing, the State may need to invest in the development of manufactured housing parks and/or improvements to local infrastructure. To accommodate these situations,</p>



Previous Page #	New Page #	Section	Summary of Changes
			<p><i>the State may provide assistance directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing. The State will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER can pay for infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER, and those costs may be covered under HARP."</i></p> <p><i>To:</i></p> <p><i>"The State is the administering entity for the program and will ensure all applicant files are compliant prior to grant execution or award denial. The State may engage subrecipients to support applicants through outreach and engagement, editing and translating program materials for readability, program intake and processing, and/or to provide other related services that facilitate or expedite the application review process. Homeowners will sign a grant agreement with the State prior to receiving assistance from the program.</i></p> <p><i>The Accessory Dwelling Unit Program may be administered by the State and/or through a subrecipient.</i></p> <p><i>As described in more detail in program policies and procedures, the State will provide assistance to eligible homeowners for unmet needs related to:</i></p> <ul style="list-style-type: none"> <i>• The replacement, reconstruction, rehabilitation, retrofit of the damaged home on the same site as the damaged home, or</i> <i>• The replacement of the damaged home and homeownership on an alternative site. The details of how this option will be provided to eligible applicants will be detailed in program policies and procedures. It may include providing direct assistance to eligible applicants for them to purchase their replacement home or facilitating the purchase of a ReOregon or otherwise publicly subsidized home.</i>

Previous Page #	New Page #	Section	Summary of Changes
			<p><i>On-site and Off-site Improvements for Reconstruction for ReOregon subsidized homes</i></p> <p><i>To replace damaged housing in certain locations, the State may need to invest in the development of replacement housing and/or improvements to local infrastructure. To accommodate these situations, the State may provide assistance directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing. The State will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER can pay for infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER, and those costs may be covered under HARP."</i></p>
	182	Section 5.1.2.10	<p><u>HARP Competitive Application Review</u></p> <p>In line with the amendments above related to ReOregon Managed Projects, OHCS is making the following amendment from:</p> <p><i>"The State may make direct allocations or competitively select subrecipients or local governments to carry out necessary public improvements needed to build housing.</i></p> <p><i>When such services or activities are needed, the State will competitively procure developers or vendors needed to carry out program activities."</i></p> <p>To:</p> <p><i>"The State may make direct allocations or competitively select subrecipients or local governments to carry out necessary improvements needed to build housing.</i></p>

Previous Page #	New Page #	Section	Summary of Changes										
			<p><i>When such services or activities are needed, the State – or the applicable entity - will competitively procure developers or vendors needed to carry out program activities."</i></p>										
181	191	Section 5.1.3.6.1	<p><u>Homeownership Opportunities Program Property Affordability Period Resale Requirements</u></p> <p>To streamline the implementation of the New Housing Development component of HOP, through this Action Plan Amendment, OHCS is clarifying that the property affordability period is tied to all applicable sites within a development owned by the manufactured housing park owner or site developer. This does not change the eligibility or intent of the property affordability period, but it reflects the responsibility for park owners or developers to maintain park or site affordability for qualified homeowners or tenants in their CDBG-DR funded developments for extended periods of time. OHCS is making the following change from:</p> <p><i>"The property affordability period is tied to the amount of assistance provided for the home, including any new housing production subsidy and homeownership assistance provided to the applicant.</i></p> <p><i>Table 82: Property Resale Affordability Period Homeownership Assistance Amount</i></p> <table border="1" data-bbox="641 1388 1414 1862"> <thead> <tr> <th data-bbox="641 1388 1013 1566">Homeownership Assistance Amount (including New Housing Production Subsidy)</th> <th data-bbox="1013 1388 1414 1566">Property Period of Affordability (in years)</th> </tr> </thead> <tbody> <tr> <td data-bbox="641 1566 1013 1625">Less than \$15,000</td> <td data-bbox="1013 1566 1414 1625">5</td> </tr> <tr> <td data-bbox="641 1625 1013 1686">\$15,000 to \$40,000</td> <td data-bbox="1013 1625 1414 1686">10</td> </tr> <tr> <td data-bbox="641 1686 1013 1747">\$40,001 to \$99,999</td> <td data-bbox="1013 1686 1414 1747">15</td> </tr> <tr> <td data-bbox="641 1747 1013 1862">More than \$100,000</td> <td data-bbox="1013 1747 1414 1862">50 years for homebuyer owned property or 99-year renewable</td> </tr> </tbody> </table>	Homeownership Assistance Amount (including New Housing Production Subsidy)	Property Period of Affordability (in years)	Less than \$15,000	5	\$15,000 to \$40,000	10	\$40,001 to \$99,999	15	More than \$100,000	50 years for homebuyer owned property or 99-year renewable
Homeownership Assistance Amount (including New Housing Production Subsidy)	Property Period of Affordability (in years)												
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\$40,001 to \$99,999	15												
More than \$100,000	50 years for homebuyer owned property or 99-year renewable												

Previous Page #	New Page #	Section	Summary of Changes									
			<p style="text-align: right;"><i>affordable leasehold for land trust or non-profit owned property</i></p> <p>To:</p> <p><i>“Property resale affordability periods will be managed and enforced by the MH Park owner or site developer and will be for a minimum of 30 years. If other state or federal funding sources require longer affordability periods, then the developer or MH Park owner will be required to comply with the longer of the two affordability periods.”</i></p> <p>The remaining language related to Resale Requirements is unchanged through this APA.</p>									
	198	Section 5.2.1.8	<p>OHCS added the value of each of the allocations made to the counties and changed the language from:</p> <p><i>“OHCS will calculate allocations to each of the 8 counties based on relative infrastructure, small business, and housing damages, and mitigation needs. The allocations will be published in program guidelines.”</i></p> <p>To:</p> <p><i>“OHCS calculated allocations to each of the 8 counties based on relative infrastructure, small business, and housing damages, and mitigation needs. The methodology and data used to calculate the allocations are included in the program guidelines.</i></p> <table border="1" data-bbox="641 1690 1416 1877"> <thead> <tr> <th>MID County</th> <th>Percent of Total PIER Program Allocation</th> <th>PIER Allocation</th> </tr> </thead> <tbody> <tr> <td>Clackamas</td> <td>5.7%</td> <td>\$ 2,415,826</td> </tr> <tr> <td>Douglas</td> <td>5.7%</td> <td>\$ 2,399,446</td> </tr> </tbody> </table>	MID County	Percent of Total PIER Program Allocation	PIER Allocation	Clackamas	5.7%	\$ 2,415,826	Douglas	5.7%	\$ 2,399,446
MID County	Percent of Total PIER Program Allocation	PIER Allocation										
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			<table border="1"> <tr> <td>Jackson</td> <td>32.9%</td> <td>\$ 13,849,117</td> </tr> <tr> <td>Klamath</td> <td>4.0%</td> <td>\$ 1,703,097</td> </tr> <tr> <td>Lane</td> <td>18.8%</td> <td>\$ 7,926,980</td> </tr> <tr> <td>Lincoln</td> <td>6.4%</td> <td>\$ 2,684,967</td> </tr> <tr> <td>Linn</td> <td>7.4%</td> <td>\$ 3,110,691</td> </tr> <tr> <td>Marion</td> <td>19.1%</td> <td>\$ 8,027,045</td> </tr> <tr> <td>Total of MIDs</td> <td>100.0%</td> <td>\$ 42,117,170</td> </tr> </table> <p>“</p>	Jackson	32.9%	\$ 13,849,117	Klamath	4.0%	\$ 1,703,097	Lane	18.8%	\$ 7,926,980	Lincoln	6.4%	\$ 2,684,967	Linn	7.4%	\$ 3,110,691	Marion	19.1%	\$ 8,027,045	Total of MIDs	100.0%	\$ 42,117,170
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Marion	19.1%	\$ 8,027,045																						
Total of MIDs	100.0%	\$ 42,117,170																						
186	197	Section 5.2.1.3	<p>In Section 5.2.1.1 Program Description of the Planning, Infrastructure, and Economic Revitalization Program (PIER), OHCS included non-profit organizations as eligible entities. Through this technical clarification, OHCS is carrying that eligibility into Section 5.2.1.3 Program Eligibility by changing from:</p> <p>“Eligible Applicants: <i>Eligible applicants include, but are not limited to, the following:</i></p> <ul style="list-style-type: none"> • <i>Tribal, State, county, and municipal governments, agencies, districts, and authorities</i> • <i>Schools (K–12)</i> • <i>Public housing authorities</i> • <i>Other public or quasi-public entities</i> • <i>Nonprofit entity with a specific public role described in an Oregon revised statute (e.g., soil and water conservation districts)”</i> <p>To:</p> <p>“Eligible Applicants: <i>Eligible applicants include, but are not limited to, the following:</i></p> <ul style="list-style-type: none"> • <i>Tribal, State, county, and municipal governments, agencies, districts, and authorities</i> • <i>Schools (K–12)</i> • <i>Public housing authorities</i> • <i>Other public or quasi-public entities</i> 																					

Previous Page #	New Page #	Section	Summary of Changes
			<ul style="list-style-type: none"> • <i>Nonprofit organizations authorized to carry out CDBG-DR eligible activities, including but not limited to those with a specific public role described in an Oregon revised statute (e.g., soil and water conservation districts)"</i>
190	201	Section 5.3.1.1	<p>In the Initial Public Action Plan, OHCS requested a waiver from HUD to allow for the provision of rental and other eligible intermediate housing assistance for up to 36 months. Through Memorandum 23-01, HUD approved a waiver for the provision of rental assistance (e.g. rent, security deposits, and utility deposits) and utility payments for up to 24 months. Therefore, IHA is being amended to provide eligible assistance for up to 24 months.</p>
	203	Section 5.3.1.4	<p>Through this amendment, the State is adding the language below. This amendment does not change program eligibility or program benefit but may impact the timing of when eligible residents may receive funding.</p> <p><i>"To ensure the program meets the most urgent needs of low-income residents with verified loss from the disaster, the State may implement a phased or prioritized approach that will be published in program policies and procedures."</i></p>
	204	Section 5.3.1.5	<p>Based on HUD's Memorandum 23-01, the State is limited to providing assistance for up to 24 months. In the Initial Action Plan, the duration of assistance was contingent upon HUD waiver approval; therefore, through this technical clarification, the State is adjusting the maximum from up to 36 months to up to 24 months and adding a reference to Memorandum 23-01 to the CDBG-DR eligible activities.</p>

Previous Page #	New Page #	Section	Summary of Changes
		Section 6.2.3	<p>Based on HUD’s Memorandum 23-01, the State is limited to providing rental assistance for up to 24 months. Through this clarification, OHCS is amending Section 6.2.3 to reference the waiver request and clarifying the allowance of rental assistance for up to 24 months. The language in the Extension of Rental Assistance Section will be amended from:</p> <p><i>“The State of Oregon is requesting to provide up to 36 months of rental assistance to households impacted by a covered disaster when those households do not meet the definition of a “displaced person” under the URA.”</i></p> <p>To:</p> <p><i>“OHCS requested a waiver from HUD to allow for the provision of rental and other eligible intermediate housing assistance for up to 36 months. Through Memorandum 23-01, HUD approved a waiver for the provision of rental assistance (e.g. rent, security deposits, and utility deposits) and utility payments for up to 24 months.”</i></p>

1. Executive Summary

1.1 Overview

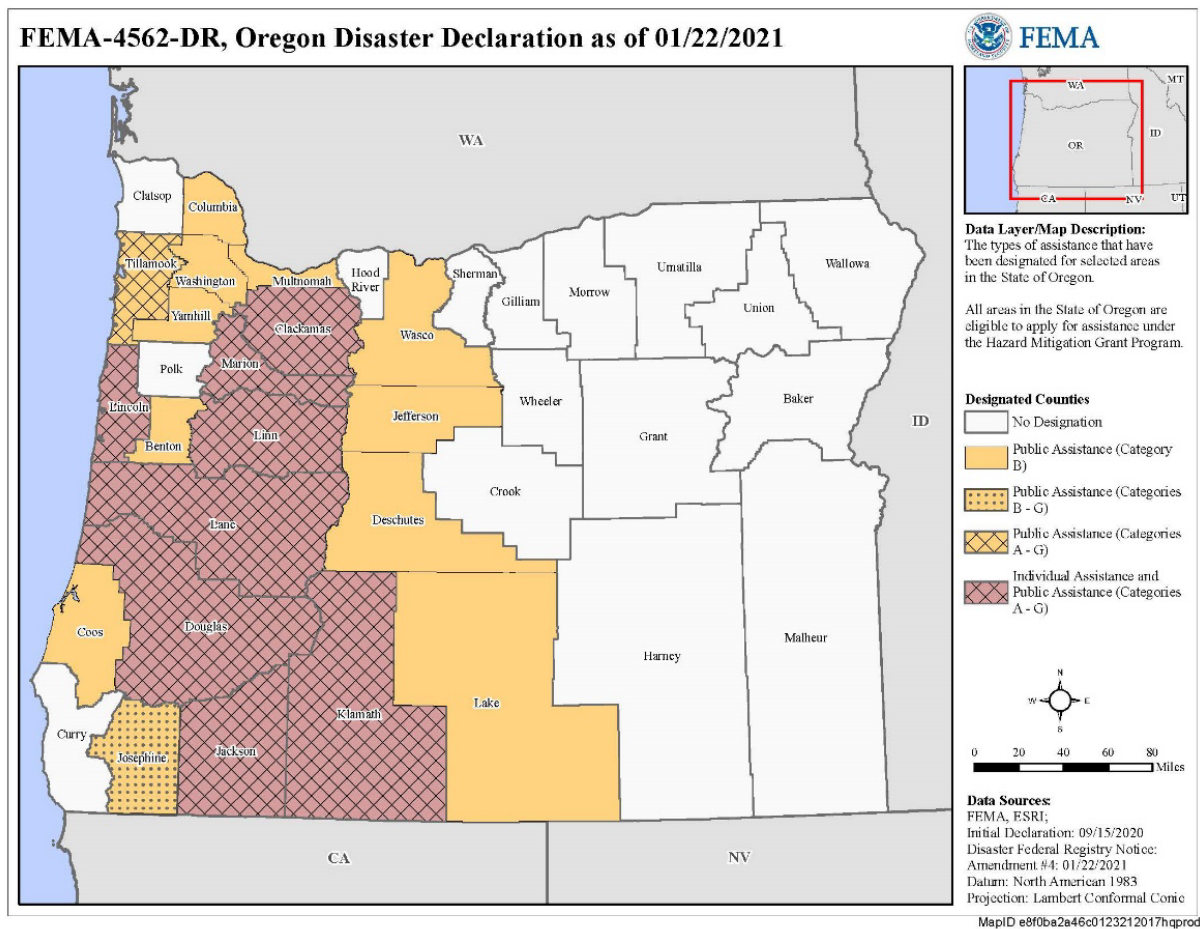
The U.S. Department of Housing and Urban Development (HUD) announced that the State of Oregon (State or grantee) will receive \$422,286,000 in funding to support long-term recovery and mitigation efforts following the 2020 Wildfires (DR-4562) through the Oregon Housing and Community Services Department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

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

1.2 Disaster-Specific Overview

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

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



On September 8, 2020, Oregon's wildfire season was exacerbated by a historically extreme wind event. Extremely dry 25- to 50-mile per hour (mph) winds (with gusts up to 60 mph) spread throughout Oregon. The gale force winds downed power lines and toppled trees, which sparked new fires and made existing fires spread faster than firefighters could contain.

It was not just the extreme wind in Oregon that caused the fires to spread so quickly. In 2020, most of Oregon was classified as being under severe drought. This resulted in low moisture content vegetation (fuel loads), making the landscape more receptive to igniting and burning more quickly and intensely than previous wildfires in Oregon.

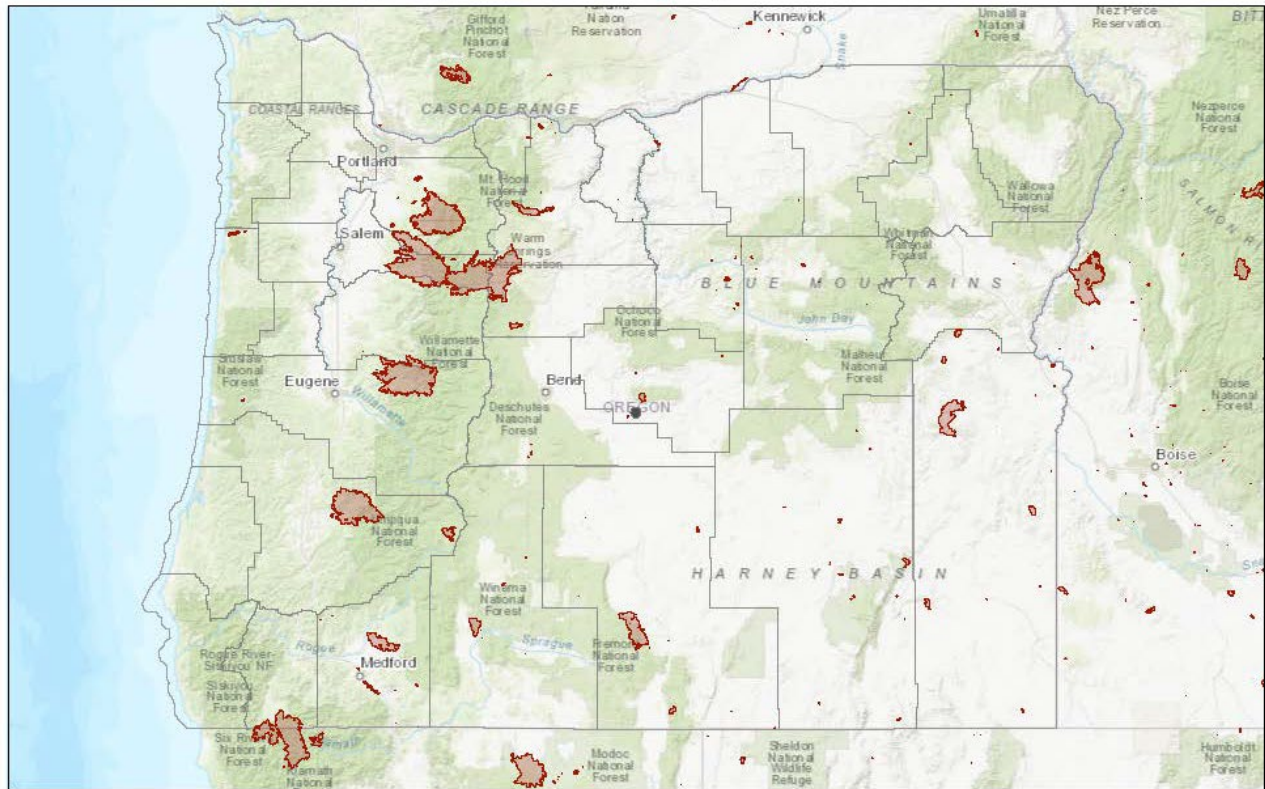
In total, the DR-4562 event included 21 fires and burned more than 1.2 million acres. Five of the fires grew into megafires, defined as fires that burn areas larger than 100,000 acres. Oregon had never experienced more than one fire over 100,000 acres

during a fire season in the State's recorded history. All major fires were contained by early December 2020.



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

Figure 2: 2020 Wildfires: Map of Burn Scar Areas

Oregon 2020 Wildfires County Level Burn Scar



2/2/2022, 10:27:14 AM

 County Boundaries
 2020 Wildfire Perimeters

1:4,622,324
 0 25 50 100 mi
 0 45 90 180 km
 Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS

Made by User

Made with the Interim Housing GeoFinder by Oregon State University Extension Service Fire Program. Oregon State University, Oregon State University Extension Service Fire Program, and any data provider disclaims any and all liability for damages from usage of

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

- The Archie Creek fire in Douglas County burned more than 131,000 acres and destroyed more than 100 homes between September 7, 2020, and a containment date of November 16, 2020.
- The Holiday Farm fire in Lane and Linn counties burned more than 170,000 acres and destroyed more than 700 structures between the start date on September 7, 2020, and a containment date on November 23, 2020.

- The Beachie Creek and Lionshead fires started as separate fires on August 16, 2020, and merged in Clackamas, Linn, and Marion counties on September 8, 2020. The two fires combined to burn nearly 400,000 acres and more than 1,000 structures.
- The Riverside fire in Clackamas County that burned from September 8 to December 3, 2020, destroyed more than 100 structures.
- The Alameda Fire in Jackson County lasted just 6 days, from September 8 to September 14, 2020, and burned around 3,000 acres. Despite the relatively small size and short duration, the fire destroyed 2,500 homes.

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

In addition to the fires' and winds' impacts on homes and residents, they damaged roads, streetlights, irrigation systems, electrical lines, water delivery systems, and other public infrastructure. Indeed, at least 923 nonresidential buildings across seven counties were damaged or destroyed. Nine State highways and two interstate highways were forced to close due to fire hazards and many remained closed for extended periods of time due to damage. In Lane County alone, a reported 246,000 consumers were without power, either from public safety power shutoffs or damage to utility infrastructure, and more than

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

40 miles of electrical infrastructure required complete replacement. In addition, a communications tower on Mt. Hagen was destroyed, resulting in several citizens not receiving evacuation notices, while damage to the Blue River Water District delivery system resulted in the loss of potable water service to roughly 400 people.

Fire stations in McKenzie Bridge, White City, and Phoenix were damaged or destroyed by fire. Several towns in Jackson County, including Phoenix and Talent, suffered significant damage to roads, street signs, and guardrails, and the county lost several vehicles, outbuildings, tools, and equipment. Among the hardest hit towns, Phoenix suffered damages involving every category of work, including those to police patrol units, public buildings, waterlines, playgrounds, benches, picnic tables, and park restrooms, and the Southern Oregon Education Service District lost its entire 35,000-square foot campus. The fires also left behind more than 90,000 hazardous burned trees, as well as ash and debris, which needed to be removed to allow for reconstruction, with many such trees threatening public safety or impeding roads. All told, preliminary damage assessments conducted as part of the FEMA Public Assistance Program estimate more than \$114 million in permanent work across categories C through G. Information for this section was extracted from the following sources:

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

1.3 Summary

1.3.1 Needs Assessments and Guiding Principles

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

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

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

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

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

Based on the assessment made to date, the 2020 Wildfires and winds severely damaged or destroyed more than 4,300 housing units across eight counties and burned more than 1.2 million acres across 20 out of Oregon's 36 counties, leaving behind a trail of devastated homes, public infrastructure, forests, watersheds, and businesses. Based on the Unmet Needs Assessment, the State has calculated a total of nearly \$1.9 billion in housing, infrastructure, economic revitalization, and mitigation recovery needs. This estimate is incomplete. For instance, per HUD-guidance the State drew on Small Business Administration (SBA) datasets to understand the losses experienced by businesses, but only 136 of hundreds of impacted businesses applied for SBA assistance. The State continues to work with local governments to calculate a more

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

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

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

accurate value of unmet infrastructure and economic revitalization needs. This number includes an alternate methodology for calculating the housing recovery need, which is reflected in the Data and Methodology section of this Action Plan. At the time of the assessment, the State has identified under \$1.5 billion in other federal, State, and private insurance resources available to meet the recovery needs of the State, leaving a total projected unmet need of over \$440 million. This estimate also includes over \$1 billion in private insurance proceeds, which includes an unknown amount of insurance provided for personal contents, vehicles, and other activities that were not included in the needs calculation. Therefore this estimate is projected to be conservative in estimating the actual costs for long-term recovery from the 2020 Wildfires.

1.3.2 CDBG-DR Budget

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

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

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

- **Program Administration Costs:** Limited to 5%—or \$21,114,300—of the total allocation.
- **Mitigation Activities:** At least 15%—or \$55,081,000—must be used for mitigation activities and/or through the incorporation of mitigation measures into recovery activities. The State plans on incorporating resilience and mitigation measures into all construction and planning programs. The State will define mitigation activities and establish mitigation measures within each program. Table 1 below includes an estimate of the percentage of total

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

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

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

program costs that will be considered “mitigation activities.” The mitigation estimates for the housing activities are high because the State anticipates reconstructing homes to be more resilient to future hazards in their respective areas.

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

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

Table 1: Oregon’s CDBG-DR Program Allocation

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

Program	\$ Allocation	% of Total Allocation	Est. % to Mitigation Activities	Est. % to HUD Defined MID areas	Est. % to LMI
Total	\$422,286,000				
% of Total	100%	100%	77%	99%	79%

1.4 Unmet Needs and Proposed Allocations

Table 2: Unmet Needs and Proposed Allocations

Category	Remaining Unmet Needs	% of Unmet Needs	Program Allocation Amounts*	% of Program Allocation
Housing	\$242,758,000	55%	\$344,019,379	81.5%
Infrastructure	\$171,300,000	38%	\$42,117,170	10.0%
Economic Revitalization	\$29,974,000	7%	\$0	0%
Public Services	N/A	N/A	\$12,035,151	2.9%
Planning	N/A	N/A	\$3,000,000	0.7%
Administrative Costs	N/A	N/A	\$21,114,300	5.0%
Total	\$444,032,000	100%	\$422,286,000	100%

* Program allocation amounts include project delivery costs.

2. Unmet Needs Assessment

2.1 Overview

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

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

2.1.1 Unmet Recovery Needs

Table 3 provides a summary of disaster impacts using federally available data from DR-4562 using an SBA–FEMA multiplier methodology that is similar to the one outlined in the Federal Register Notice (described in the Data and Methodology section of this Action Plan), as well as the methods for estimating unmet infrastructure and economic revitalization needs described in the Federal Register Notice. The unmet need is calculated by subtracting the resources available from the value of the total damages. However, the “Other Resources Available” includes private insurance paid claims for personal contents, loss of vehicles, and other expenses that are not included in the “Total

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

Impact" assessment. This assessment significantly undervalues the remaining costs of damages and repairs from DR-4562.

Table 3: HUD Unmet Needs Methodology

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

Table 4 provides a summary of disaster impacts from DR-4562 using an alternative methodology (described in the Data and Methodology section of this Action Plan) that considers the costs of recovering resiliently and equitably, given the affordable housing recovery needs and current increased reconstruction costs faced in the MID areas. This methodology is more reflective of the actual unmet need, which the State anticipates exceeds \$443 million. However, the "Other Resources Available" includes private insurance paid claims for personal contents, loss of vehicles, and other expenses that are not included in the "Total Impact assessment." Therefore, the State anticipates this unmet need to undervalue the unmet recovery needs.

Table 4: Alternative Unmet Needs Methodology

Category	Data Source	Total Impact	Resources Available	Unmet Need (Total Impact less Applied Resources)	% of Total
Housing	Estimated Reconstruction or Replacement of Damaged Housing Units	\$1,318,697,000	\$1,126,953,000*	\$241,758,000	55%
Infrastructure	FEMA Public Assistance (Cat C-G + 15% Resilience)	\$130,533,000	\$102,156,000	\$28,377,000	6%
	FEMA Hazard Mitigation Grant Program	\$129,188,000	\$136,269,000	\$(7,081,000)	(2)%
	Additional Resilient Infrastructure Needs	\$281,965,000	\$131,965,000	\$150,000,000	34%

Category	Data Source	Total Impact	Resources Available	Unmet Need (Total Impact less Applied Resources)	% of Total
Economic Revitalization	SBA – Commercial Loss	\$32,089,000	\$1,994,000	\$29,974,000	7%
	Additional Commercial Losses – Line Item not Included in Calculation	Assessment still underway	\$124,378,000		
TOTAL		\$1,892,470,000	\$1,499,340,000	\$443,030,000	100%

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

2.1.2 Ongoing Hazards and Risks

Wildfires have become more common and widespread in Oregon over the past few decades, and they often threaten communities where development (including housing) encroaches upon forest lands that are susceptible to fire. The total area burned by wildfire in the United States, including in Oregon, has increased significantly since the 1980s, and nine of the 10 years with the most acreage burned have occurred since 2010s.¹ The table below highlights some of the more recent wildfire events and demonstrates an increased frequency of wildfires in Oregon. The two most recent events (in 2020 and 2021) were significantly more destructive than events in previous years, which is a trend that is unlikely to reverse in the face of climate change, extreme heat, and drought. The State of Oregon is experiencing a heightened risk of fire danger due to drought, tree mortality, and an increase in severe weather events.

Table 5: Chronology of Recent Severe Oregon Fires

Year	County	Description of Wildfire Event
2002	Josephine	Biscuit Fire destroyed four primary residences and 10 other structures, and put 15,000 residents on evacuation notice.
2010	Jackson	Oak Knoll Fire destroyed 11 homes in fewer than 45 minutes in Ashland.
2014	Wallowa	Buzzard Complex Fire burned more than 400,000 acres and significantly impacted rangeland and cattle farms.
2014	Grant	South Fork Complex Fire started with lightning strikes and burned 62,476 acres.

¹ Oregon State University, [Fire FAQs—Have the size and severity of forest wildfires increased in Oregon and across the West? | OSU Extension Catalog | Oregon State University](#)

Year	County	Description of Wildfire Event
2015	Grant	Canyon Creek Complex Fire started by lightning and burned 110,422 acres, destroying more private property than any Oregon wildfire in the previous 80 years. The wildfire destroyed 43 homes and almost 100 other structures.
2015	Wallowa	Grizzly Bear Complex Fire started by lightning and burned 82,659 acres. The wildfire destroyed two homes and dozens of other structures.
2017	Multiple Counties	Over 1,000 fires (including Chetco Bar and Eagle Creek) started as human-ignited or ignited by lightening strikes, burning a total area of over 451,000 acres.
2020	Multiple Counties	Multiple Names/DR-4562 fires killed at least 11 people, burned more than 1 million acres, and destroyed more than 4,300 homes.
2021	Multiple Counties	More than 1,000 fires have burned more than 518,303 acres and destroyed more than 40 structures.

Including the risks from wildfires, Oregon is vulnerable to additional disasters as described in the Mitigation Needs Assessment section of this Action Plan. The 2020 Wildfires occurred during the ongoing COVID-19 pandemic response effort, and at the time of publication, COVID-19 continues to present additional risk to recovering communities and residents. During the development of this Action Plan, OHCS consulted with the Oregon OEM, DLCD, and local governments to understand the current and projected natural hazards and risks faced in the MID areas. For the creation of the Mitigation Needs Assessment, OHCS also drew heavily from the State's Natural Hazards Mitigation Plan and local mitigation plans. Table 6 summarizes the highest natural hazard risks and threats faced in the MID areas. These risks and hazards will be factored into Oregon's recovery and mitigation programming, as described further in each of the program sections and applicable sections under General Requirements.

Table 6: Summary of Natural Hazards Across HUD-Identified Most Impacted and Distressed Areas

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

2.1.3 HUD-Identified Most Impacted and Distressed Areas

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

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

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

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

2.1.4 Grantee-Identified Most Impacted and Distressed Areas

The Consolidated Notice allows Oregon to determine where to use up to 20% of the remaining amount of the CDBG-DR grant, provided that the funds are used to address unmet needs within areas that received a presidentially declared disaster declaration identified within DR-4562. The counties in Table 7 are all included in the presidentially declared disaster declaration for DR-4562. Of the FEMA Individual Assistance Program (IA) counties, only Klamath County is not included in the HUD-identified MID areas.

Table 7: DR-4562 Presidentialy Declared Disaster Counties and Categories of Awarded Public Assistance

County	FEMAPA Cat A	FEMAPA Cat B	FEMAPA Cat C	FEMAPA Cat D	FEMAPA Cat E	FEMAPA Cat F	FEMAPA Cat G	FEMA IA
Benton	X							
Clackamas	X	X	X	X	X	X	X	X
Columbia	X							
Coos	X							
Deschutes	X							

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

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

- Klamath County

2.2 Housing Unmet Needs

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

This section of the Unmet Needs Assessment summarizes the disaster impacts on housing, drawing on data collected from FEMA IA, SBA Home Loans, private insurance providers, other State agencies, local governments, and nonprofits. This section also includes information on certain pre-disaster housing conditions that will impact State and local housing recovery efforts. OHCS also has analyzed barriers to access to recovery for protected classes, vulnerable populations, and underserved communities. The information captured herein and additional information collected through the public comment period and stakeholder consultation were used to develop the programs identified later in this Action Plan.

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

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

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

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

2.2.1 Disaster Damage and Impacts Summary of Need

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

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

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

Table 8: Comparison of Need Calculation Methodologies

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

2.2.1.1 Limitations of Federal and Private Data

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

- **FEMA Individual Assistance (IA) Data:** The FEMA IA tables are included in the sections further below, as they are the data required by HUD. These aggregate tables were prepared by FEMA with data current as of February 15, 2022. The FEMA registration data are incomplete in presenting the full picture of the impacts on housing. Participation and registration with FEMA IA are voluntary. The process can be overwhelming for survivors because of the documentation requirements, proof of ownership, limitations on legal residency status, and eligibility criteria that require appeals or follow-up from the participants, including from those households that are underinsured. Since the 2020 Wildfires, FEMA has undertaken considerable steps to make the FEMA IA application and documentation processes more streamlined and equitable, but at the time of FEMA IA intake for DR-4562, many of those processes were not in place. In addition, during the intake process for DR-4562, there was a coordinated application fraud scheme that is being investigated by FEMA and flagged within the FEMA IA data, which does call into question the accuracy of the FEMA IA data. Due to the timing of DR-4562 and its overlap with COVID-19, the FEMA housing damage assessments were not performed in person. It also is important to note that FEMA IA Home Repair Assistance is intended to make the damaged home safe, sanitary, or functional. It is not intended to return the home to its pre-disaster condition and therefore neither the FEMA verified loss nor the FEMA IA award amounts should be used as a proxy for the actual costs to reconstruct or replace wildfire damaged or destroyed residential properties.
- **SBA Home Data:** The SBA disaster loan program also is a voluntary program and it is limited to impacted homeowners. SBA residential, fully repayable loans are limited to homeowners and homeowners must qualify through SBA's underwriting and eligibility review processes to access SBA loans. SBA verified loss data provide a better picture of the full cost of repair and replacement, as SBA loan amounts are based on an inspection that covers the full cost to restore a home. However, the SBA data are incomplete and fail to include many impacted residential structures.
- **Private Insurance Data:** While States can rely on National Flood Insurance Program data for events such as floods and hurricanes, fire damage and claims data must be collected from individual insurance companies. Individual insurance companies are inconsistent in how they categorize policies and claims, and they do not report insurance information into a centrally managed database. OHCS has worked closely with the Oregon Division of Financial Regulation and the State Insurance Commissioner to collect aggregate commercial and residential claims information through a data call to insurance providers. The data provided indicated that:

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

- **Residential and commercial data:** Based on the 2020 data, there were 14,836 residential and commercial claims, of which 9,454 resulted in some form of eligible payment. Of those eligible claims, 4,123 represented a “total loss” or destroyed property. The total “case incurred loss” or the amount the insurance companies anticipate paying out for all claims was just under \$1.5 billion.
- **Residential only data:** Based on 2021 data, there were 13,220 residential claims, of which 9,577 resulted in some form of eligible payment. Of those eligible claims, 2,792 represented a “total loss” or destroyed property. The total “case incurred loss” or the amount the insurance companies anticipate paying out for all residential claims is just over \$1 billion.

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

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

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

2.2.1.2 State and Local Housing Impact Data

The Oregon OEM is the State agency charged with leading and coordinating disaster response efforts. Beginning the week of September 28, 2020, while the disaster declaration was still open and ongoing, OEM conducted joint preliminary damage assessments with local government partners. These assessments indicated that more than 4,300 homes were significantly damaged or destroyed. OEM maintains an updated website storyboard with recorded numbers of destroyed and significantly damaged residential properties.² This assessment was subsequently updated with additional assessment information from local jurisdictions. The total number of homes (by structure type) that were either Major Damaged or Destroyed, as assessed by the State and local jurisdictions, is included in the table below. However, the State acknowledges that this dataset may exclude impacted residents and is continuing to work with local community-based organizations, community action agencies, and other housing support groups to understand the impacts on residents that were not captured in the State and local government assessments.

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

Table 9: Damaged or Destroyed Homes and Home Types by County

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

² Oregon Office of Emergency Management, Damage Assessment, [Damage Assessment | 2020 Oregon Wildfire Response and Recovery Overview \(arcgis.com\)](https://arcgis.com)

2.2.2 Affordable Housing Shortage and Rising Costs

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

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

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

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

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

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

2.2.2.1 Pre-Disaster Owner-Occupied and Rental Vacancy Rates

HUD's "Market at a Glance" includes a snapshot of the most current vacancy data available for the State of Oregon and the impacted counties. Statewide, the data indicate a 2019 total housing stock of 1.8 million units, with an average 2017–2019 rental vacancy rate around 4% and a sales vacancy rate around 1.3%. Compared with the national averages of 6.7% and 1.4%,⁵ respectively, even before the disaster event, Oregon lacked sufficient housing to meet the demand. The impacted county pre-disaster vacancy rate data range from 0.7% (Douglas) to 6.1% (Lincoln) for rentals, and 0.8% (Lane) to 3.8% (Jackson) for sales. Naturally, the major damage and destruction, as reported by OHCS, of more than 4,300 units in the impacted counties will significantly affect vacancy rates as survivors vie for available housing.

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

Table 10: Pre-Disaster Residential Percentages

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

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

Source: 2019 American Community Survey 5-year Estimates

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

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

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

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

Source: 2019 American Community Survey 5-year Estimates

2.2.2.2 Pre-Disaster Rent Burden

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

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

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

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

2.2.2.3 Pre-Disaster Housing Value Range

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

Table 11: Evidence of Cost Burden by County

County	Median Home Value (in \$)	Median Gross Rent (in \$ per month)	Building Permits Issued (2020)
Clackamas	\$395,100	\$1,295	2,011
Douglas	\$199,200	\$824	243
Jackson	\$280,300	\$993	886
Klamath	\$170,600	\$772	152
Lane	\$263,200	\$989	1,391
Lincoln	\$251,200	\$924	250
Linn	\$221,600	\$964	796
Marion	\$247,100	\$985	1,743
TOTAL	N/A	N/A	7,472

Source: U.S. Census Bureau QuickFacts.⁸

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

2.2.3 **Role of Manufactured Housing as Affordable Housing in Oregon**

A manufactured housing unit (MHU), mobile home, or manufactured home is a type of prefabricated housing that is constructed in a factory and then transported to a site, to owned or leased land or a manufactured housing park for installation. These homes are built to a federal code administered by HUD that went into effect in 1976. Factory-built homes constructed before 1976 are called “mobile homes.” Modular home components also are prefabricated in a factory but differ from MHUs because

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

they are built to a local building code, assembled on the permanent housing site, and cannot be easily transported to another site.

2.2.3.1 Manufactured Housing in Oregon

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

In 2017, the State revised their land use statutes to facilitate the expansion of manufactured housing opportunities. The State directed local governments to revise their comprehensive land use plans to include manufactured homes in their urban growth boundaries as “needed housing”¹⁰ inside urban growth boundaries. The State also disallowed local governments from setting tighter restrictions on manufactured homes and the placement of MHUs than those set forth by the State.

2.2.3.2 Housing Affordability and Manufactured Housing

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

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

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

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

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

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

value—meaning that they depreciate over time and the coverage only provides the current depreciated value. This has a significant impact on disaster-affected MHUs.

The costs for renting pads or lots in privately owned MHPs are increasing in many HUD-identified MID areas and throughout the State. OHCS has worked closely with local nonprofit organizations,¹² resident cooperatives, housing authorities, and other entities to preserve the affordability of pad or lot rents and prevent MHP closures through their Preservation of Manufactured Dwelling Parks Program and various other multifamily development and/or land acquisition programs.¹³

2.2.4 Labor Shortages and Increased Costs of Residential Construction

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

As described in Table 12 below, 2,500 housing units were destroyed or damaged in Jackson County in the 2020 Wildfires, a number that is 2.5 times the number of residential building permits issued in 2019. Lane County lost 615 homes—all in unincorporated communities of the McKenzie River Valley—which is three times greater than the average number of annual permits issued by the county in its unincorporated

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

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

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

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

area. Across the State, the number of homes damaged or destroyed equate to 19% of all residential building permits in one year.¹⁶ In addition to the magnitude of loss, these figures speak to the scale of the rebuilding challenges in the impacted rural communities and underscore how important local and contractor capacity will be to housing recovery. Like much of the country, Oregon was far behind in producing sufficient housing to meet current and future demand, even before the wildfires.

Table 12: 2020 Wildfire Destruction and Damages as a Percentage of Annual Residential Building Permits

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

Sources:

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

2.2.4.1 Sheltering and Transitional Housing Post-Disaster

Following the disaster declaration, FEMA, Oregon OEM, the Oregon Health Authority, the Oregon Department of Human Services, Red Cross, and OHCS worked to develop a range of sheltering and housing solutions, using a multi-phased operations approach, as described in the Disaster Sheltering and Housing Strategy.¹⁷ Since the declaration, FEMA approved multiple transitional housing programs and related supports for

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

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

Oregon's survivors, including non-congregate sheltering and FEMA Direct Housing missions in Jackson, Lane, Linn, and Marion counties.

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

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

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

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

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

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

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

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

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

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

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

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

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

2.2.5.2 FEMA IA – Owner Occupied

Table 13: FEMA IA Owner-Occupied by County

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

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

2.2.5.3 FEMA IA – Tenant Applications

Table 14: FEMA IA Tenant by County

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

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

2.2.5.4 FEMA IA – Applications by Housing Type

Table 15: FEMA IA Applications by Housing Type

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

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

2.2.5.5 FEMA Real Property Damage: Owner-Occupied Units

Table 16: FEMA IA Owner-Occupied Damage Level by County

County	Severe	Major – High	Major – Low	Minor – High	Minor – Low
Clackamas	7	9	0	0	114
Douglas	17	8	1	0	75
Jackson	710	62	1	1	155

County	Severe	Major – High	Major – Low	Minor – High	Minor – Low
Klamath	1	0	0	0	19
Lane	53	22	0	4	100
Lincoln	73	14	0	1	42
Linn	19	2	0	5	46
Marion	73	24	1	2	86
TOTAL	953	141	3	13	637

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

2.2.5.6 FEMA Real Property Damage: Rental Units

Table 17: FEMA IA Tenant Damage Level by County

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

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

2.2.6 Public Housing and Affordable Housing

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

2.2.6.1 Housing Choice Voucher Households²²

Housing choice voucher (HCV) households are qualified low-income, senior, and/or disabled households receiving rental assistance (a subsidy) to live in participating rental

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

housing (with landlords) in their communities. These eight PHAs assist 1,428 households with public housing and 12,104 households with subsidies.

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

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

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

2.2.6.2 OHCS Housing Portfolio²³

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

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

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

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

Table 18: OHCS Assisted Severely Damaged Housing Projects

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

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

2.2.6.3 Multi-Family HUD-Assisted Housing

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

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

Table 19: HUD Assisted Properties

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

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

2.2.6.4 Public Housing Authorities Damaged

The State communicated with each public housing authority during the development of the Housing Impact Assessment in early 2021 and followed up during the development of the Unmet Needs Assessment in fall 2021 for the initial Action Plan. Only

the Housing Authority of Jackson County faced unmet recovery needs for their impacted properties and the State has provided significant resources through Disaster tax credits, modular homes, and state funding to help address their unmet recovery needs and build additional affordable housing.

Table 20: Public Housing Authority Impacted Properties

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

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

2.2.6.5 Owner with Unmet Needs in a Floodplain

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

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

Owner-Occupied Homes in a Special Flood Hazard Area				
Damage Category	All Owners	MHU Owners	No HOI	No Flood Ins
Severe	4	4	4	4

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

2.2.6.6 Insurance Claims and Losses in Disaster-Impacted Areas

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

Table 21: Residential Insurance Claims by County

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

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

2.2.6.7 Total Home Loans Approved by the SBA

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

Table 22: Home Loans Approved by SBA

(a) Number of Home Loans with Cancelled Loans

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

(b) Number of Home Loans without Cancelled Loans

County	No. of Home Loans Without Cancelled Loans
Clackamas	20
Douglas	4
Jackson	147
Klamath	1
Lane	22
Lincoln	26
Linn	11
Marion	42
TOTAL	273

Data from SBA Reports, January 2022.

2.2.7 Social Equity, Fair Housing, and Civil Rights

2.2.7.1 Affirmatively Further Fair Housing

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

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

- Members of protected classes, particularly people with disabilities and people of color experience disparities in rental housing choice.
- People of color disproportionately experience barriers to attaining homeownership.
- Members of protected classes disproportionately experience barriers to accessing economic opportunity.
- Residents still lack knowledge of their fair housing rights, are not empowered to take action, and have very limited fair housing resources locally.

²⁴ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/conplan/2021-2025%20Action%20Plan/State-of-Oregon-2021-2025-AI.pdf>, pages 11-16.

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

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

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

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

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

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

2.2.7.2.1 Housing Stability Council and OHCS Statewide Housing Plan

2.2.7.2.1.1 Housing Stability Council

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

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

Per their charter, the Council:²⁸

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

2.2.7.2.1.2 Statewide Housing Plan

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

- Equity and Racial Justice
- Homelessness
- Permanent Supportive Housing

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

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

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

- Affordable Rental Housing
- Homeownership
- Rural Communities

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

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

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

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

OHCS will apply a targeted universalism approach to designing and implementing CDBG-DR programs. Within a targeted universalism framework, universal goals are established for all groups concerned. The framework then uses targeted processes and strategies to achieve those goals, based upon how different groups are situated within structures, culture, and across geographies to obtain the universal goal. Targeted universalism is a platform to operationalize programs that move all groups toward the universal policy goal, as well as a way of communicating and publicly marketing such programs in an inclusive, bridging manner. It is an approach that supports the needs of

particular groups, including those in the majority, while reminding everyone that we are all part of the same social and civic fabric.³⁰ Through this process, the State will develop specific solutions to address unmet needs, incorporating those solutions into a universal goal-oriented framework to equitably benefit all groups involved.

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

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

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

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

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

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

2.2.7.2.2 Individuals Living with Disabilities

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

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

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

- **Issue No. 4: Including Disability Access in Hazard Mitigation Strategies.** Accessible elevation can be a barrier for people with mobility disabilities and older adults who are aging in place. Elevated homes can disrupt community visitability and can be daunting for individuals who need zero-step entry and egress.

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

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

2.2.7.2.3 Latine Individuals and Households

2.2.7.2.3.1 Impediments

The State has identified wildfire impacts and recovery barriers for Latine communities as a special area of need and focus. In addition to barriers to homeownership described under the Analysis of Impediments to Fair Housing Choice, the 2016 *Latinos in Oregon: Trends and Opportunities in a Changing State*³² identifies additional barriers faced by Latine individuals and households in Oregon:

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

2.2.7.2.3.2 Oregon's Growing Latine Workforce and Continued Economic Disadvantage

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

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

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

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

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

Table 23 provides a breakdown of migrant/seasonal households by impacted county.

³³ Ibid, page 18.

³⁴ Ibid, page 2.

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

Table 23: 2020 Wildfire-Impacted County Migrant and Seasonal Household Members

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

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

2.2.7.2.3.3 Survey of Disaster Impacted Latine Households

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

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

- 34 single-parent households
- An average family size of 3.2 members
- 30 people who identified as having a disability
- 5% older than age 62

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

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

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

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

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

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

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

2.2.7.2.4 Impacts on Individuals and Households Experiencing Homelessness

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

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

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

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

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

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

increases in homelessness from 2019 to 2021, with the largest increases in Marion (250) and Clackamas (247) counties.

Table 24: Point-in-Time by County

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

Source: Oregon Statewide Homelessness Estimates 2021 Report

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

- Lane County saw an overall increase from 1,132 households served in July–August 2020, to 1,677 households served in September–October 2020, to 2,412 households served in December 2020 – January 2021. Of the households served, 89% were childless adults.
- Marion County saw an overall increase from 742 households served in July–August 2020, to 971 households served in September–October 2020, to 1,107 households served in December 2020 – January 2021. More than 80% of the households served were childless adults.
- Jackson County saw a slight decrease from 206 to 194 in the number of households served from July–August to September–October 2020, followed by an overall increase to 253 served in December 2020 – January 2021. Of the households served, 80% were childless adults.

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

2.2.7.2.5 Rural Housing Challenges

Oregon's pre-disaster housing stock was concentrated near metropolitan areas. This is because Oregon is one of the few states that has established urban growth boundaries (UGB),³⁹ which promote growth in urban zones while also restricting residential development of rural farm and forest land. Thus, the low level of pre-disaster housing stock in rural areas has made community housing stock especially vulnerable to natural hazards, such as wildfires, flooding, and landslides. This, in combination with the shortage of labor and construction supplies, has added to the challenges faced by rural communities in rebuilding and replacing destroyed housing.

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

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

2.2.7.2.6 Racially or Ethnically Concentrated Areas of Poverty

HUD defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) as an area where there a significant number of racial and/or ethnic minorities living in poverty. HUD has developed a census tract-based definition of R/ECAPs.⁴⁰ The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. HUD uses a definition of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line.⁴¹ Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this

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

⁴⁰ HUD, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), 2018. <https://www.arcgis.com/home/item.html?id=56de4ede8264fe5a344da9811ef5d6e>

with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

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

Figure 3. R/ECAP Areas, MID Counties

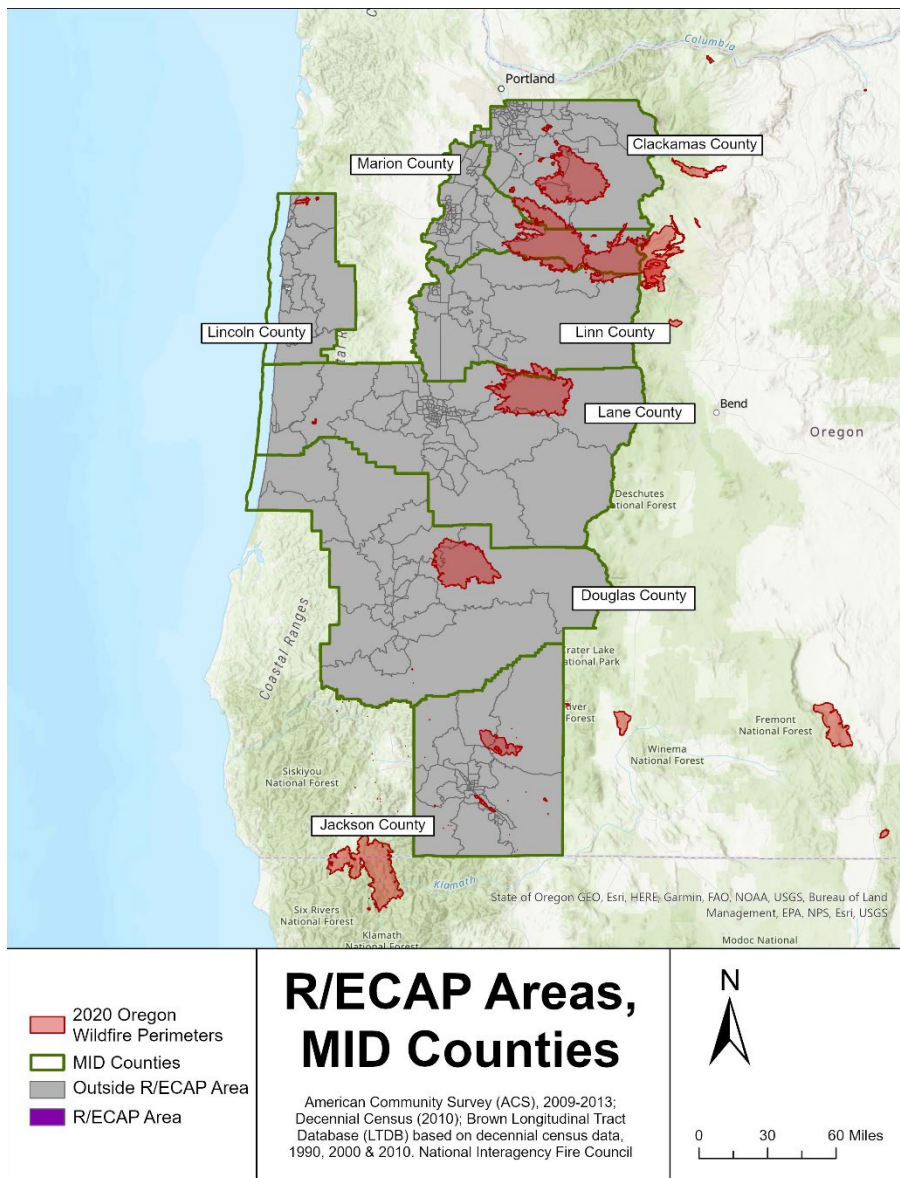


Figure 4. Race and Ethnicity Dot Density, MID Counties

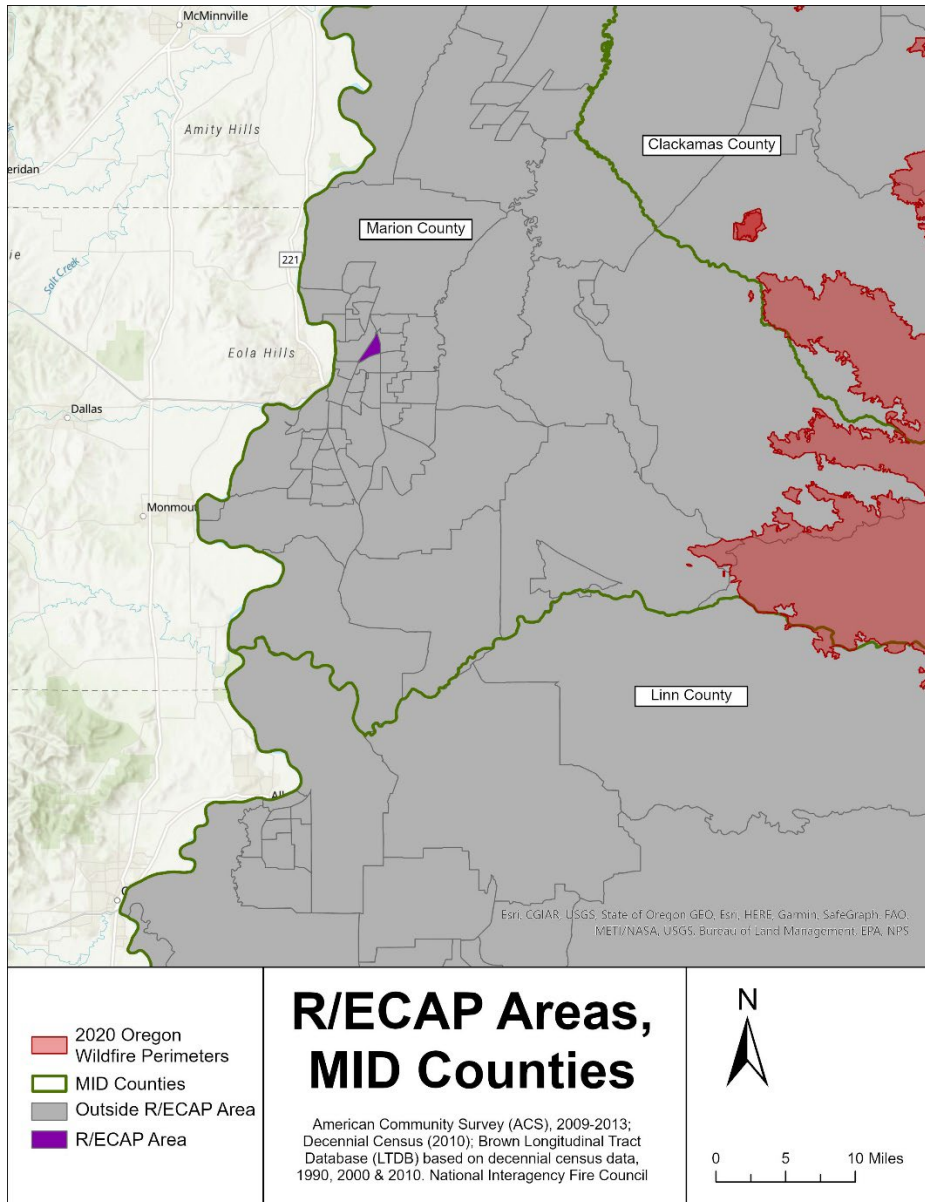
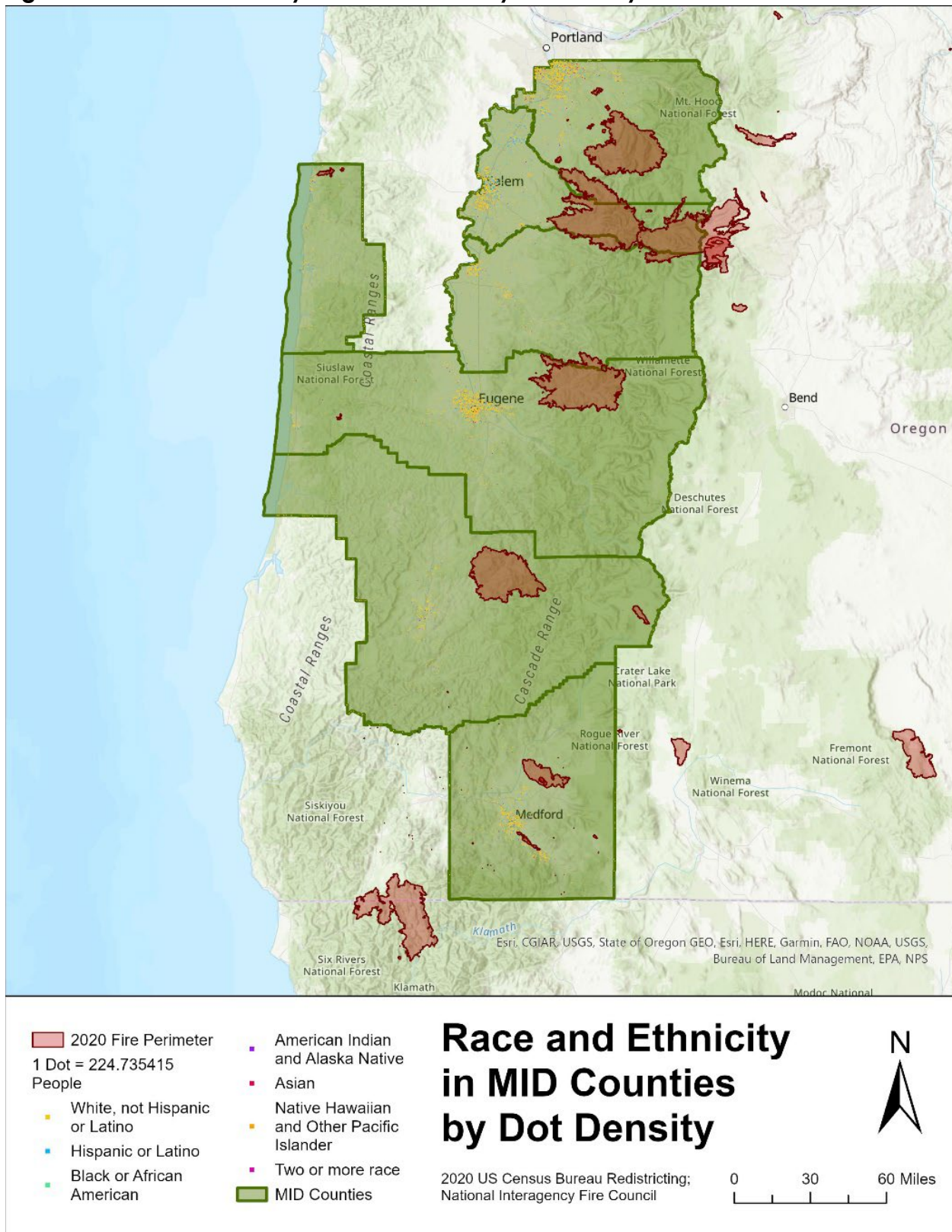




Figure 5. Race and Ethnicity in MID Counties by Dot Density



2.2.7.2.7 Underserved Communities

The State has mapped the burn scar areas from the 2020 Wildfires with the geographic boundaries of Tribal Areas and Opportunity Zones in Figures 3 through 6 below. These maps identify those areas that HUD has identified as underserved communities at the census tract level (Opportunity Zones) and on the Tribal Area scale. Due to the rural and diverse nature of the impacts from the 2020 Wildfires, OHCS also will use more refined and focused data analysis, mapping, and community data gathered through the Action Plan and the program design stakeholder consultation process to understand which neighborhoods and communities have been historically underserved. The State will also review other information that may indicate whether a community is underserved, including those census tracts that were eligible for opportunity zone designation and areas eligible for New Market Tax Credits.

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

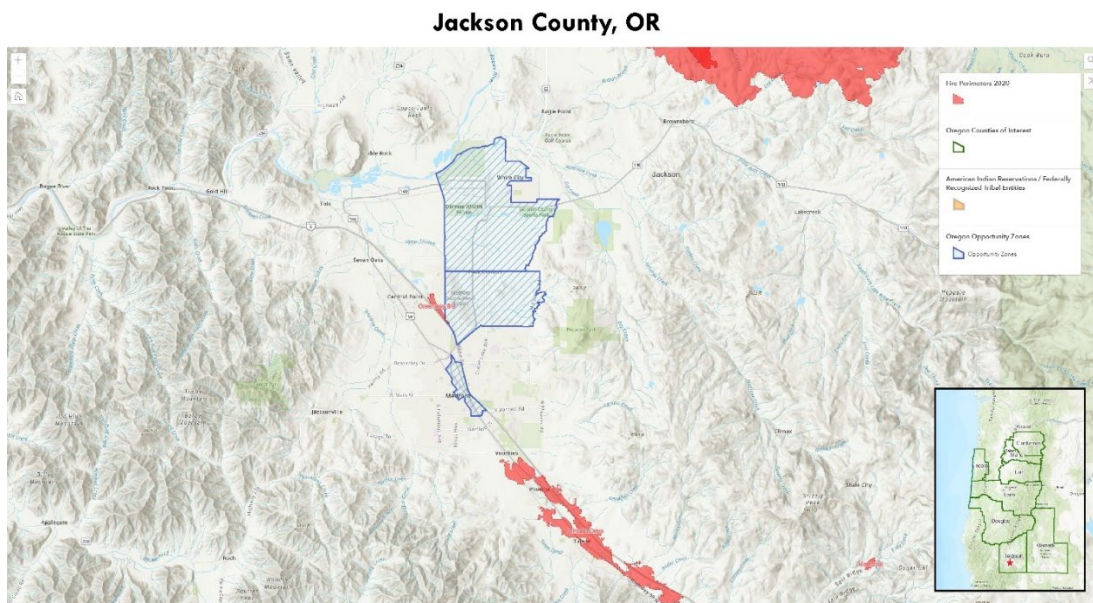


Figure 7: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Klamath County

Klamath County, OR

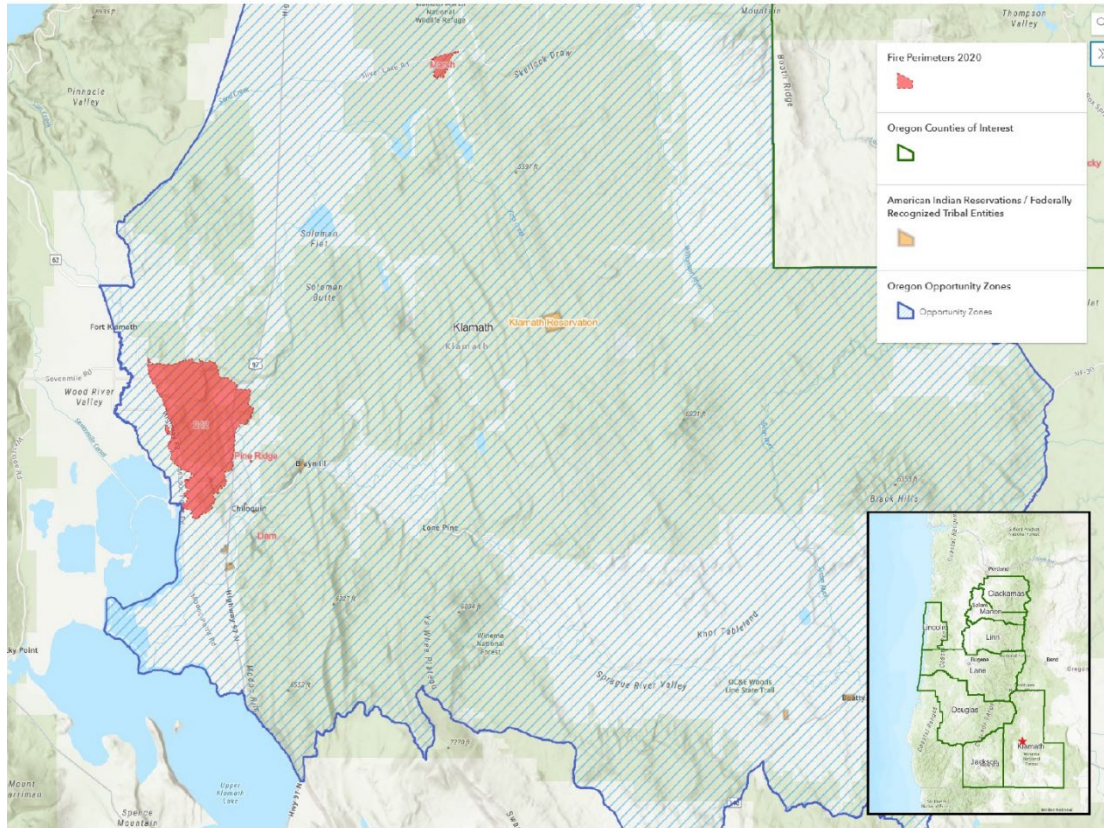


Figure 8: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Marion County

Marion County, OR

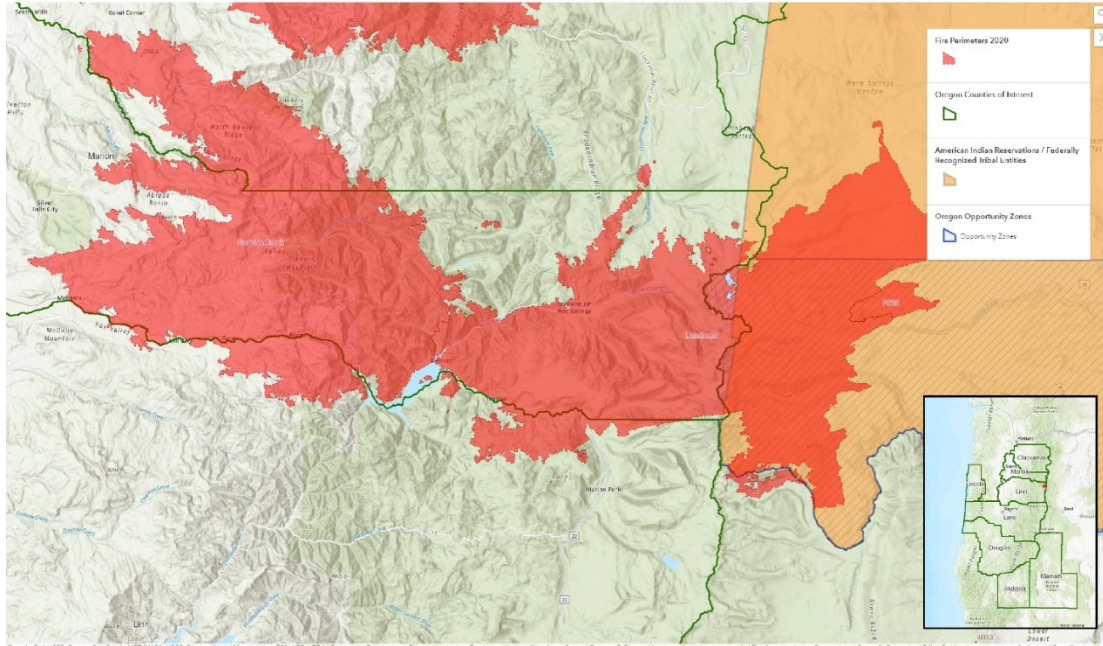
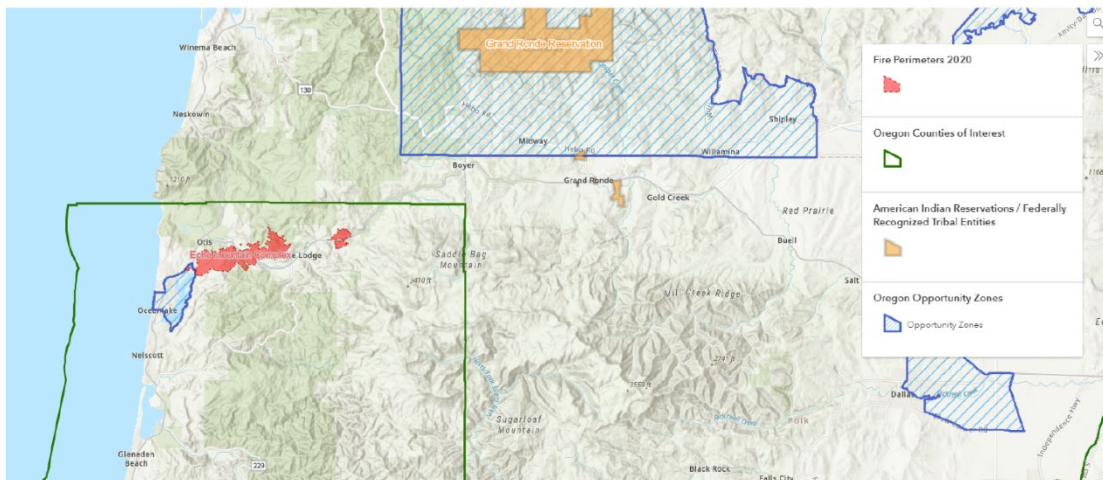


Figure 9: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Lincoln County

Lincoln County, OR



2.2.7.2.7.1 Tribal Areas

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

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

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

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

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

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

2.2.7.2.7.2 Opportunity Zones

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

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

2.2.7.2.7.3 Social Vulnerability Index and Disadvantaged Communities

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

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

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

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

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

Both Klamath and Marion counties have an SVI percentile of more than 0.8 (0.91 and 0.88, respectively), indicating that their populations are more vulnerable than 80% of other counties in the United States. In addition, Jackson, Douglas, Lane, and Linn counties all have an SVI percentile above 0.5 (0.71, 0.68, 0.54, and 0.57, respectively). At the finer level of detail provided by the census tract map, it is clear that the 242 Fire (Klamath County), Alameda Fire (Jackson County), and Archie Creek Fire (Douglas County) took place in census tracts with high SVI.

Figure 10: Overall Social Vulnerability Index Percentile in Oregon Counties

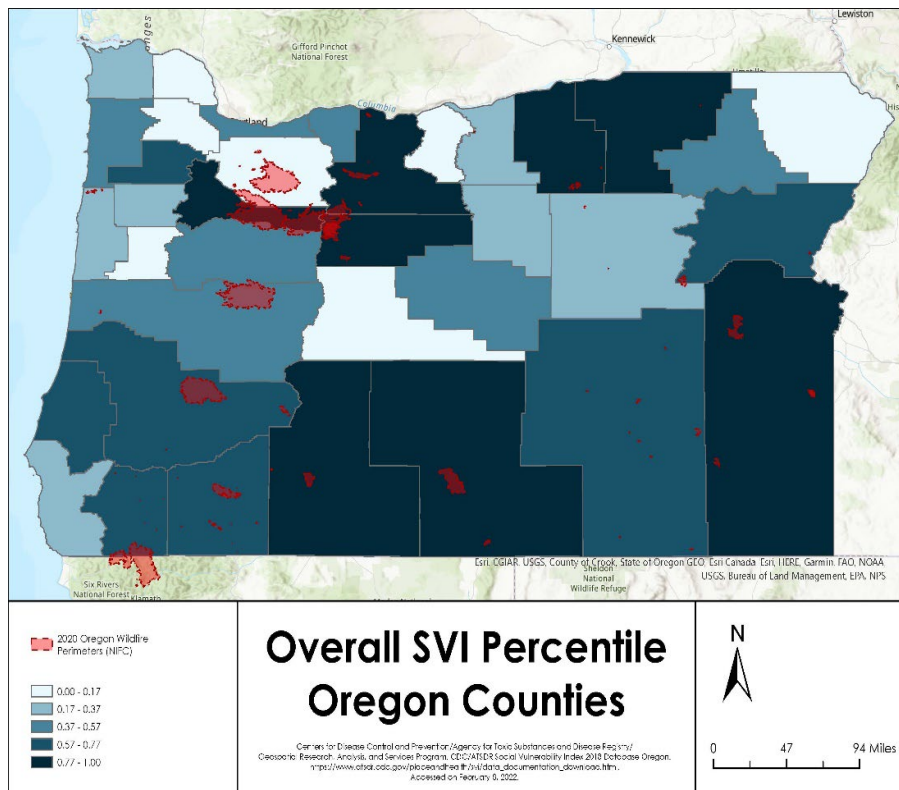
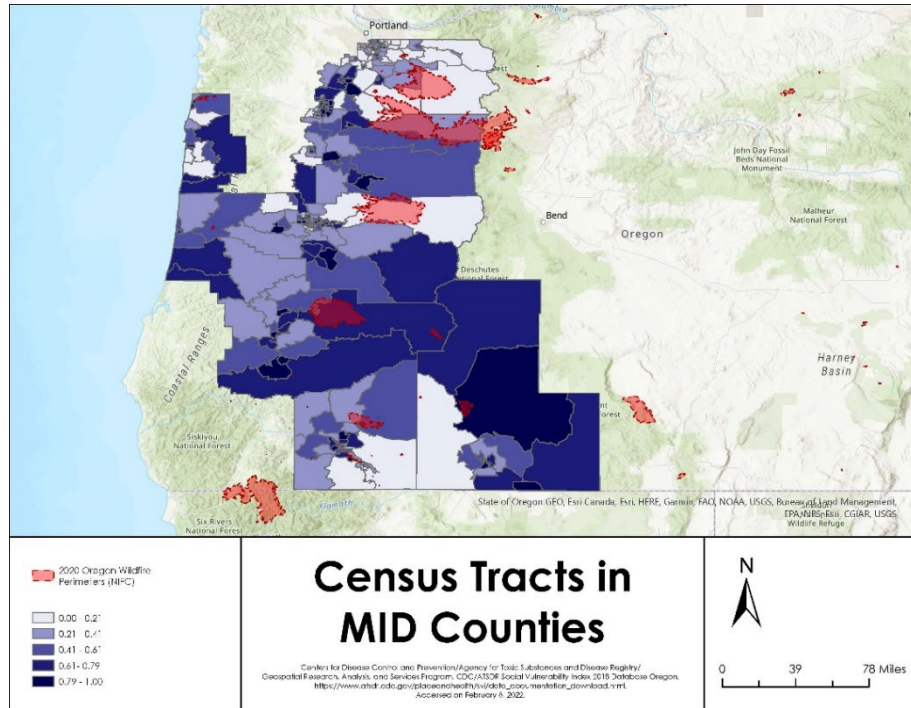


Figure 11: Social Vulnerability Index Percentile by Census Tract and Burn Scar Areas



2.2.7.2.8 Coordination and Engagement

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

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

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

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

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

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

2.2.7.2.8.2 Regional Housing Needs Assessment

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

and use.⁴⁵ On March 1, 2021, OHCS submitted and presented their report to the State legislature along with DLCD's assessment.

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

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

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

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

2.2.7.2.8.3 OHCS and the Oregon Disaster Recovery Housing Task Force

The Oregon Disaster Recovery Plan was developed by the Oregon Military Department and OEM and published in March 2018.⁴⁹ The plan is an all-hazards document that gives the State a scalable recovery organization that can be implemented for incidents of varying levels of complexity. This plan guides the State's recovery operations while complementing and supporting the response and recovery plans and procedures of

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

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

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

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

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

responding agencies; local and tribal governments; special districts; and other public, nonprofit/volunteer, and private sector entities.

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

Table 25: State Recovery Function by Agency

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

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

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

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

recovery, following the State of Oregon Equity Framework,⁵¹ which defines the following historically and currently underserved communities:

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

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

- **Goal 1: Create intermediate housing solutions.** Provide short-term living solutions for wildfire survivors to meet basic needs with a focus on providing the support and services necessary to find and secure longer term housing.
- **Goal 2: Bolster local capacity.** Increase local capacity to promote an intermediate and permanent housing supply.
- **Goal 3: Expedite the delivery of permanent housing solutions.** Provide cross-cutting strategies that facilitate all housing types, tenures, and income levels that result in new construction and reconstruction in wildfire-impacted counties by 2025.

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

- **Goal 4: Build community and family resilience.** Ensure that, as families and communities rebuild, they can incorporate lessons from the 2020 Wildfires and strengthen their ability to withstand future natural disasters with minimal disruption.

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

2.2.7.2.8.4 Governor's Wildfire Economic Recovery Council

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

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

- Focus on equitable delivery of emergency preparedness and recovery programs to ensure that underrepresented community members have a voice.
- Leverage public investment to rebuild the housing units that were lost in the impacted communities.
- Bolster community support and workforce development so that communities are the authors of their own recovery.
- Use State funds to fully leverage FEMA's Hazard Mitigation Grant Program to reduce future wildfire and associated risks, prioritizing the communities impacted by the 2020 Wildfires.

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

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

- Ensure that FEMA mitigation funds are considered for all FEMA Public Assistance Program repair or replacement projects.
- Address utility issues related to sewer systems, broadband, water quality, and power lines.

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

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

The Task Force published their report in January 2022.⁵⁴ To develop meaningful recommendations, the Task Force investigated existing datasets, both looking at national statistics and Oregon-specific information. What the data demonstrated is that the percentage of homelessness is greater than the percentage of the population in Oregon for Black, American Indian or Alaska Native, and Native Hawaiian or Other Pacific Islander (in some cases, as much as four times more homelessness than their share of the total State population).

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

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

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

2.2.7.3 Statewide Demographics and Disaster-Impacted Populations

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

Table 26: Race and Ethnicity

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

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

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

Table 27: Age and Sex

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

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

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

Table 28: Social Vulnerability and Protected Classes

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

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

2.2.7.4 Education Demographics

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

Table 29: Education Demographics

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

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

2.2.7.5 Income Demographics

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

Table 30: Income

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

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

2.2.7.6 LMI Analysis – Statewide

The programs in this plan have been designed to prioritize low-and-moderate income (LMI) persons and meet the overall LMI benefit expenditure requirements in aggregate. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent of the total allocation must be expended to benefit populations within the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size. The tables (31 and 32) below illustrate the number of LMI persons living in disaster and non-disaster impacted counties. The percentages of LMI persons living in the most impacted and distressed areas are more than twice the statewide percentage with Lane County having the highest percentage of 42.29% LMI persons living in their county. The information is critical to the strategic planning of investing the funds to benefit LMI households through public services programs, affordable housing, and homeownership opportunities.

Table 31: Statewide LMI

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

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

2.2.7.7 LMI Analysis – Federally Declared Disaster Areas

Table 32: LMI by County

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

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

2.2.7.8 Manufactured Homes Impacted by Disaster

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

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

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

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

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

Table 33: Manufactured Homes

County	No. of Units	Percentage of Total Units in County	Unmet Need
Clackamas	19	7.0%	\$2,530,516
Douglas	32	5.2%	\$4,222,801
Jackson	938	53.4%	\$116,921,994

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

County	No. of Units	Percentage of Total Units in County	Unmet Need
Klamath	4	10.8%	\$553,213
Lane	84	21.1%	\$11,134,430
Lincoln	126	53.6%	\$16,421,808
Linn	24	18.6%	\$3,097,086
Marion	76	19.2%	\$10,078,270
Total	1,303		\$164,960,118

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

2.2.7.9 SNAP and D-SNAP Applicants Impacted by Disaster

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

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

Table 34: SNAP and D-SNAP Applicants Impacted by Disaster

County	# SNAP Households	# SNAP Individuals	# Households Issued D-SNAP	# Individuals Issued D-SNAP
HUD and Grantee MIDs				
Clackamas	Data pending	Data pending	40	Data pending
Douglas	Data pending	Data pending	207	Data pending
Jackson	Data pending	Data pending	417	Data pending
Klamath	Data pending	Data pending	36	Data pending
Lane	Data pending	Data pending	181	Data pending
Lincoln	Data pending	Data pending	160	Data pending
Linn	Data pending	Data pending	93	Data pending
Marion	Data pending	Data pending	416	Data pending

Source: ODHS DCM Profile Report

2.2.7.10 Limited English Proficiency Breakdown

Language can be a barrier for individuals and households to get access to the resources and services they need for a full recovery. Not knowing English can impede a person's ability to understand what resources are available to them, how to access the resources, and their ability to communicate their needs for a full recovery. To assist the state in removing the barrier, the tables below (35 and 36) breaks down persons who are affected by this barrier living in the disaster declared counties. In all of the counties Spanish is the language that has the highest percentage of persons who speak it. The state uses this information for their Citizen Participation Plan and will consider it in the implementation of their recovery programs to ensure that the language barrier is removed. Public information is translated into Spanish and interpreters are available to assist in communications. For all other languages, translation and interpreters will be made available as needed.

Table 35: Breakdown of Limited English Proficiency

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

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

2.2.7.10 Languages Spoken Within the State

Table 36: Languages Spoken within the State

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

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

2.2.7.11 Affected Continuum of Care Entities

Individuals and households experiencing homelessness are vulnerable in disasters because many of them do not have a permanent home and lack the resources to receive communication about disasters. Most do not have any means of transportation to gather their belongings and evacuate. Many struggle with mental illness, they are traumatized by their situation of not knowing where their next meal is coming from or where they will sleep at night. It takes targeted and specialized support services and outreach that builds trust to help them get into safe affordable permanent supportive housing. The tables below (37, 38 and 39) illustrate the number of persons experiencing homelessness by Continuum of Care regions and county. The point-in-time counts show that the range of unsheltered homeless ranges from 82 in Linn County to 1,900 in Lane and Lincoln Counties. This information is used to incorporate non-traditional outreach methods to inform persons experiencing homelessness and connecting them to the right resources for recovery.

Table 37: Affected Continuum of Care Entities

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

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

2.2.7.12 Point-in-Time Count – Type of Shelter

Table 38: Point in Time County – Type of Shelter

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

Source: Oregon Statewide Homelessness Estimates 2021 Report

2.2.7.13 Point-in-Time Count – Impacted by Disaster

Table 39: Point-in-Time Count – Impacted by Disaster

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

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

2.2.7.14 HUD-Assisted Housing Impacted by Disaster

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

Table 40: HUD-Assisted Housing Impacted by Disaster

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

* LIHTC – Low-Income Housing Tax Credit Program

2.3 Infrastructure Unmet Needs

2.3.1 Statewide Infrastructure Loss and Damages

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

2.3.1.1 Roads and Bridges

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

2.3.1.2 Buildings and Equipment

The 2020 Wildfires also had a devastating impact on buildings and equipment in the State—at least 923 nonresidential buildings across seven counties were damaged or destroyed, including fire stations in McKenzie Bridge, White City, and Phoenix. Jackson

County also lost several vehicles, outbuildings, tools, and equipment. Also, in Phoenix, the Southern Oregon Education Service District lost its entire campus.

2.3.1.3 Utilities

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

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

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

In addition to the destruction to existing public water systems, many rural residents, businesses, and local governments were on private septic and well systems. Prior to the wildfires, many communities were contemplating the timing, cost analysis, and need for municipal water and wastewater treatment systems. With the destruction from the wildfires and new Oregon building codes, many residential properties repairs can no longer be grandfathered into allowing for pre-disaster infrastructure replacement. Based on initial estimates from local governments across the impacted areas, there are over \$300 million in post-disaster municipal water and sewerage system needs to comply with current more resilient standards. These costs are not eligible under FEMA PA because the needed infrastructure did not exist prior to the disaster.

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

2.3.1.4 Parks, Recreation, and Other Facilities

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

2.3.1.5 Local Capacity Challenges for Navigating Post-Fire Complexities

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

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

2.3.2 FEMA Programs

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

To access FEMA PA funds, eligible applicants must submit a request for grant funds to the PA primary grant recipient, which in the case of Oregon is the Office of Emergency Management, which evaluates eligibility for PA with FEMA. For DR-4562, FEMA is authorized to reimburse not less than 75% of the eligible costs of specific types of

⁵⁶ Willamette Week, Highway 224 in the Fire-Damaged Clackamas River Corridor Is One Step Closer to Reopening, [Highway 224 in the Fire-Damaged Clackamas River Corridor Is One Step Closer to Reopening \(wweek.com\)](https://www.wweek.com/news/2021/08/12/highway-224-in-the-fire-damaged-clackamas-river-corridor-is-one-step-closer-to-reopening/)

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

disaster response and recovery work undertaken by eligible applicants. FEMA may recommend that the President increase the federal cost share, where warranted. Oregon has requested an increase in the federal share for DR-4562; however, this request was not approved. However, see below, the cost share was later adjusted nationally.

FEMA PA-eligible activities include short-term emergency work and long-term permanent work. Emergency work is divided into two categories: Debris Removal (Category A) and Emergency Protective Measures (Category B). Direct assistance for debris removal is provided if FEMA determines that such work is in the public interest. Permanent work is broken down into five categories: Roads and Bridges (Category C); Water Control Facilities (Category D); Buildings and Equipment (Category E); Utilities (Category F); and Park, Recreational, Railway, Beaches, Piers, Ports, and Harbors (Category G). Permanent work may only be authorized under a major disaster declaration.⁵⁸ Table 41 outlines which counties qualified for which FEMA PA categories under DR-4562. For the purposes of the needs assessment, HUD only considers needs associated with categories C through G (Permanent Work).

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

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

Table 41: DR-4562: FEMA PA-Eligible Counties

County	Cat A	Cat B	Cat C	Cat D	Cat E	Cat F	Cat G
Benton	X						
Clackamas	X	X	X	X	X	X	X
Columbia	X						
Coos	X						
Deschutes	X						
Douglas	X	X	X	X	X	X	X

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

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

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

2.3.3 Hazard Mitigation Grant Program

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

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

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

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

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

The table below indicates the amount of FEMA HMGP funding and need based on the eligible applications received to date, as described above. It includes all projects that are still under review but reflects more funding than what is available through the FEMA HMGP for DR-4562. It is anticipated this number may change once the State and FEMA recalculate the cost share following the changes from H.R. 2471, Consolidated Appropriations Act, 2022, which granted a minimum 90% federal cost share for DR-4562, including for HMGP. The table below reflects a projected 90% federal cost share and 10% non-federal cost share.

2.3.4 FEMA Public Assistance Program

Table 42: FEMA PA Award Amounts by Category

PA Category	No. of Damaged Sites	Sum of Approx. Cost	Sum of Federal Share Cost	Sum of Non-Federal Share Cost
A – Debris Removal	58	\$304,173,430	\$273,756,087	\$30,417,343
B – Emergency Protective Measures	259	\$164,032,248	\$147,629,023	\$16,403,225
C – Roads and Bridges	41	\$2,692,195	\$2,422,976	\$269,220
D – Water Control Facilities	7	\$294,838	\$265,354	\$29,484
E – Buildings and Equipment	137	\$23,319,260	\$20,987,334	\$2,331,926
F – Utilities	46	\$74,875,694	\$67,388,125	\$7,487,569

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

PA Category	No. of Damaged Sites	Sum of Approx. Cost	Sum of Federal Share Cost	Sum of Non-Federal Share Cost
G – Parks, Recreational Facilities, and Other Items	57	\$12,325,071	\$11,092,564	\$1,232,507
Z – Management Costs	99	\$28,049,254	\$25,244,329	\$2,804,925
TOTAL	704	\$609,761,990	\$548,785,791	\$60,976,199

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

2.3.5 Total Cost and Need by PA Category

Table 43: FEMA PA Unmet Need by Category

PA Category	Estimated PA Cost	Match Cost	15% Resiliency	Total Need (Match + Resiliency)
A – Debris Removal	\$304,173,430	\$30,417,343	\$45,626,015	\$76,043,358
B – Emergency Protective Measures	\$164,032,248	\$16,403,225	\$24,604,837	\$41,008,062
C – Roads and Bridges	\$2,692,195	\$269,220	\$403,829	\$673,049
D – Water Control Facilities	\$294,838	\$29,484	\$44,226	\$73,710
E – Buildings and Equipment	\$23,319,260	\$2,331,926	\$3,497,889	\$5,829,815
F – Utilities	\$74,875,694	\$7,487,569	\$11,231,354	\$18,718,923
G – Parks, Recreational Facilities, and Other Items	\$12,325,071	\$1,232,507	\$1,848,761	\$3,081,268
TOTAL	\$581,712,736	\$58,171,274	\$87,256,911	\$145,428,185

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

2.3.6 Approximate Recovery Cost per Agency

Table 44: Unmet Needs by Organization Type

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

Agency	Approximate Cost
Special District Government	\$11,552,201.68
State Government	\$666,888,055.82
TOTAL	\$796,729,235.88

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

2.3.7 Hazard Mitigation Needs per County or Known Project

Table 45: Hazard Mitigation Needs by County

Project	Cost	Funding Source	Unmet Need (10% local match)
Benton County	\$520,400	FEMA	\$52,040
Clackamas County	\$2,485,670	FEMA	\$248,567
Douglas County	\$17,862,938	FEMA	\$1,786,294
Jackson County	\$4,535,838	FEMA	\$453,584
Josephine County	\$1,085,000	FEMA	\$108,500
Lane County	\$37,879,286	FEMA	\$3,787,929
Lincoln County	\$31,143,877	FEMA	\$3,114,388
Marion County	\$200,000	FEMA	\$20,000
Multnomah	\$2,879,355	FEMA	\$287,936
Regional	\$13,575,819	FEMA	\$1,357,582
Umatilla County	\$2,500,000	FEMA	\$250,000
Wasco County	\$331,443	FEMA	\$33,144
Washington County	\$15,854,835	FEMA	\$1,585,484
Clatsop County	\$665,613	FEMA	\$66,561
Coos/Curry County	\$986,357	FEMA	\$98,636
Klamath County	\$217,576	FEMA	\$21,758
TOTAL	\$132,724,006	FEMA	\$13,272,401

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

2.4 Economic Revitalization Unmet Needs

2.4.1 Disaster Damage and Impacts

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

quickly became overwhelmed.⁶¹ There also were significant wildfire flame and smoke damage to agricultural crops and livestock operations.

2.4.1.1 Unemployment

2.4.1.1.1 Unemployment Claims

Prior to onset of Oregon's 2020 Wildfires, the State was already experiencing a significant economic downturn due to the COVID-19 pandemic. In September 2020, the Oregon Office of Economic Analysis found that the State had already lost 14% of existing jobs as a result of the pandemic. While all classes of workers suffered large losses, low-wage workers bore the brunt of the economic impacts from COVID-19.⁶²

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

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

Table 46: Disaster Unemployment Assistance Claims

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

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

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

Table 47: Unemployment Insurance Increase Estimates

Unemployment Insurance Increase Estimates				
	Non-Fire-Impacted Counties		Fire-Impacted Counties	
	Number of Claimants	Number of Claimants	Expected Number of Claimants to Claim the Week (assuming no fire)	Increase in the Number of Claimants Who Claimed a Week, Possibly Due to the Fire
August 30, 2020	174,097	95,052		
September 6, 2020	175,580	100,883	95,862	5,021
September 13, 2020	173,718	98,056	94,845	3,211
September 20, 2020	166,383	92,168	90,840	1,328
September 27, 2020	162,602	89,937	88,776	1,161

Source: Oregon Employment Department.

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

2.4.1.1.2 Dislocated Worker Program

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

2.4.1.1.3 Impacts on Seasonal and Agricultural Workers

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

in orchards, 36% in vineyards, 31% in hemp, 13% in forestry, 15% in dairy/livestock, and 34% in food processing. The survey also found that the median income of survey participants was \$30,000, which is just over half of Jackson County's median household income of \$53,412.^{63, 64} The results from this survey indicate that there was a disproportionate impact on agricultural workers during and after the fires.

2.4.1.2 Agricultural Impacts

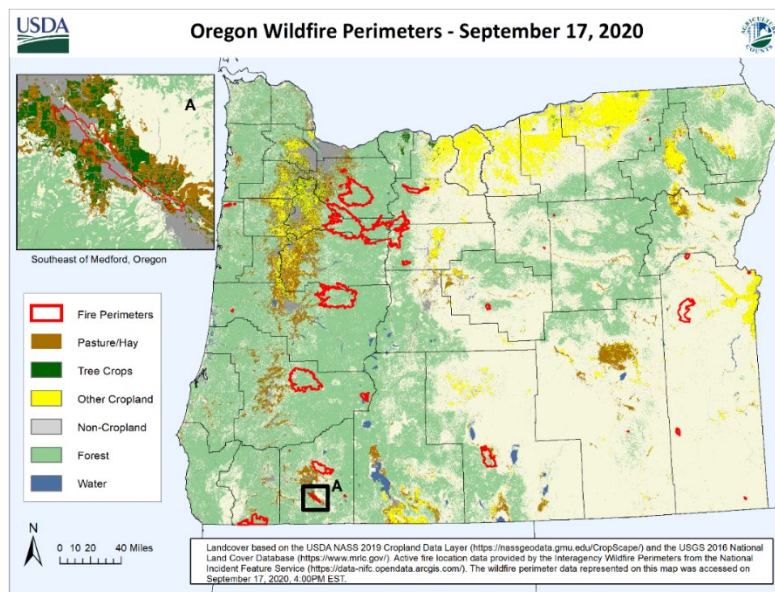
At the time of publication, there was no comprehensive assessment of the value of the loss to the agricultural industry by the Oregon Department of Agriculture from the 2020 Wildfires. However, the 2020 Wildfires did have significant impacts on the agricultural, food, and fiber sectors in Oregon. The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

2.4.1.2.1 Crop Loss

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

A map of the impacts based on USDA crop loss data is included in Figure 9.

Figure 12: Map of Damaged Crops and Burn Scar Areas



⁶³ [U.S. Census Bureau.](#)

⁶⁴ [Alameda Housing Survey, 2021.](#)

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

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

2.4.1.2.2 Livestock

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

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

The Oregon Department of Agriculture reports that livestock also were taken in at local community shelters, along with their farmers/ranchers. This burden was placed on local

⁶⁵ Oregon State University, Oregon Agriculture, Food and Fiber: An Economic Analysis, https://agsci.oregonstate.edu/sites/agscid7/files/main/about/oragecon_report_2021.pdf

governments as FEMA shelters/funding does not cover livestock. Local governments helped provide farmers/ranchers with temporary shelter, as well as food and care of livestock during the wildfires.

2.4.1.3 Small Business Administration (SBA) Commercial Losses

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

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

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

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

2.4.2 Total Business Loans Approved by the SBA

The Small Business Administration provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a homeowner applies for a loan from the SBA the loan undergoes an approval process and upon approval of the loan application an amount is determined

and presented to the applicant. From here the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds.

Table 48: Total Business Loans Approved by SBA

(a) Total Loans, Including Loans Cancelled by Applicants

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

* EIDL – Economic Injury Disaster Loan

(b) Total Loans, Excluding Loans Cancelled by Applicants

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

County	Business Code/Category	Business/EIDL* Loans
TOTAL	All Categories	15

* EIDL – Economic Injury Disaster Loan

2.4.3 SBA Applicant Breakdown

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

Table 49: SBA Loan Breakout by Applicant

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

* EIDL – Economic Injury Disaster Loan

2.4.4 Estimating Business Losses

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

Table 50: Estimated Business Operations Losses

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

2.4.5 Increased Occupation Demands

Data not available based on unemployment claims.

2.5 Mitigation Only Activities

2.5.1 Overview

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural and human-caused threats and hazards in the eight counties most affected by the 2020 Oregon wildfires (DR-4562). The Mitigation Needs Assessment was undertaken to

inform the use of the State's 15% CDBG-DR mitigation set-aside and to help build resilience and mitigation measures into recovery programs and projects.

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

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

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

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

2.5.2 Mitigation Needs Assessment Data and Methodology

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

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

- [Spatial Hazard Events and Losses Database for the United States](#)
- [State Natural Hazards Mitigation Plan \(NHMP\)](#)

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

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

Each 5-year update to Oregon's NHMP must be approved by FEMA in order for the State to receive federal funds to carry out mitigation planning and projects.

Oregon's latest NHMP was approved on September 24, 2020, as a standard plan. It will be updated and re-approved in 2025. The State intends to take action to regain enhanced plan status during the effective life of the current NHMP.

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

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

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

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

Oregon also conducts a risk analysis that involves estimating the damages, injuries, and costs likely to be incurred in a geographic area over a given period. Risk analysis has two measurable components: (1) the magnitude of the harm that may result, defined through vulnerability assessments, and (2) the likelihood or probability of the harm occurring. For the 2020 Oregon NHMP update, the State risk assessment has been reorganized to flow from the discussion of hazards directly into the discussion of vulnerability, and then, for the first time, for the two to culminate in a brief discussion of risk.⁶⁷

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

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

Table 52: Local and State Vulnerability Ranking by County

Notes for Table:

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

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

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

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

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

County	Drought		Earthquake		Volcanic		Landslide		Wildfire		Flood		Windstorm		Winter Storm		Extreme Heat	
	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State
Marion	H	VH	H	VH	L	VH	H	H	M	VH	H	H	L	H	H	H	M	H

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

2.5.2.1 Local Hazards Mitigation Plans

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

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

Table 53 provides links to the most recent county hazards mitigation plans for the eight impacted counties. Each of these local hazards mitigation plans was current at the time of the 2020 Wildfires.

Table 53: Local Hazard Mitigation Plans

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

Most counties include a risk assessment in their Natural Hazards Mitigation Plan to identify disaster types by the level of risk, from high risk to low risk. This assessment is generally based on the frequency and impact of disaster events. In Table 54, you can see the most common categorizations of disaster type by risk level in the MID areas.

Table 54: Oregon Hazards Data Table by Threat Tier

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

Furthermore, counties prioritize the probability of disaster event occurrence and vulnerability of the community to that hazard. Table 55 categorizes all disaster types by their risk rating based on probability and vulnerability by county.

Table 55: Hazard Threat Level, by County

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

2.5.3 Top Risks Impacting the HUD Most Impacted and Distressed Areas

Of the 11 hazard types impacting the State according to the NHMP, nine have been deemed as posing the most significant risk to the MID counties. These include wildfire, flood, earthquake, winter storm, landslide, drought, volcanic, windstorm, and extreme heat. Coastal hazards were excluded from this analysis as the burn scar areas and MID areas have zero or low risk of coastal flooding. Likewise, volcanic hazards were excluded as only Lane, Lincoln, and Marion counties are among the counties deemed vulnerable by the Oregon Department of Geology and Mineral Industries (DOGAMI).

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

Wildfires

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

Fire is an essential part of Oregon's ecosystem but it also can pose a serious threat to life and property, particularly in the State's growing rural communities. Wildfires can be

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

divided into three categories: interface, wildland, and firestorms. Wildland–urban interface (WUI) communities are areas where structures and other human development meet or intermingle with natural vegetative fuels. The increase in residential development in WUI areas has resulted in greater wildfire risk. Fire has historically been a natural wildland element and can sweep through vegetation that is adjacent to a combustible home.

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

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

Table 56: Recent History of Wildfires in Oregon

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

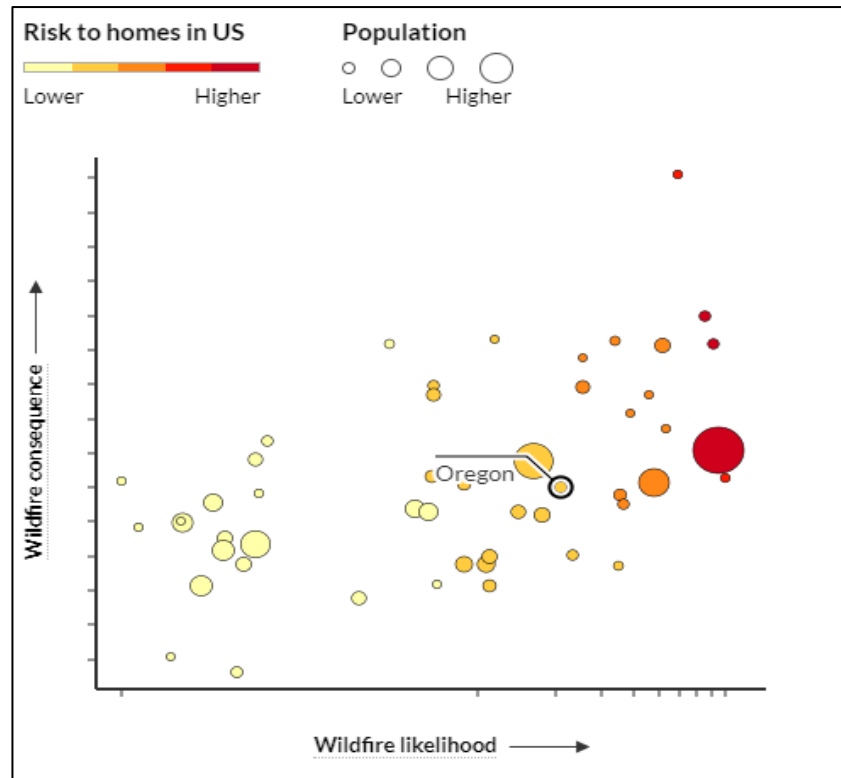
According to the USDA Forest Service, **populated areas in Oregon have, on average, a greater wildfire risk to homes than nearly 70% of other states** (see Figure 10). This presents multiple challenges for the State, including rising insurance costs, increasing State government outlays for recovery, and damages to underlying public infrastructure.⁶⁹

The level of fire activity is strongly correlated to summer climate as the largest fires generally occur during warm and dry summers.

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

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

Figure 16: Oregon's Relative Wildfire Risks to Homes



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

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

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

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

2.5.3.1 **Flooding**

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

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

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

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

Additional floods of record in Oregon occurred in December 1964 and January 1965 during the "Christmas Flood." Damage from these floods totaled more than \$157 million and resulted in 20 deaths. From December 20 through 24, 1964, the most severe rainstorm to occur in central Oregon and one of the most severe west of the Cascades left many areas with two-thirds of their normal annual rainfall in just 5 days. The ensuing

⁷⁰ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RAState.pdf, p. 173

floods destroyed hundreds of homes and businesses, forced the evacuation of thousands of people, destroyed at least 30 bridges, and washed away hundreds of miles of roads and highways.

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

Table 57 provides information on recent flooding events in the MID counties.

Table 57: Recent Flooding Events in the Most Impacted and Distressed Counties

Date	Location	Event
October 2017	Clackamas County	A potent atmospheric river brought strong winds to the north Oregon coast and coast range on October 21, causing heavy rain for some locations along the north Oregon coast and coast range, with Lees Camp receiving upwards of 9 inches. Runoff prompted the earliest significant Wilson River flood on record, as well as flooding on several other rivers in the area.
June 2018	Lane County	In Lane County, an upper-level trough moved across the area from the southwest, generating strong thunderstorms that produced locally heavy rainfall, lightning, hail, and gusty winds. Thunderstorms with heavy rainfall developed over southwest Baker County on June 20, leading to flash flooding and debris flow on the areas left burn scarred by the Rail and Cornet-Windy Ridge fires.
February 2019	Douglas and Lane Counties	DR-4432: Very heavy rain, along with the melting of recent snowfall, caused flooding at several locations in southern Oregon in late February. Deer Creek at Roseburg, the South Fork of the Coquille at Myrtle Point, the North Fork of the Coquille at Myrtle Point, the Coquille River at Coquille, and the Rogue River at Agness all exceeded flood stage. ⁷²

⁷¹ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RAState.pdf, p. 255

⁷² State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RAState.pdf, p. 262

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

2.5.3.2 Earthquakes

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

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

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

Table 58: Frequency, Location, and Magnitude of Seismic Events in Oregon

Date	Location	Magnitude (M)
Approximate Years: 1400 BCE, 1050 BCE, 600 BCE, 400, 750, 900	Offshore, Cascadia Subduction Zone	Probably 8.0–9.0
January 1700	Cascadia Subduction Zone	About 9.0
October 1877	Portland Area, Oregon	5.2
February 1892	Portland Area, Oregon	5.0
December 1941	Portland Area, Oregon	4.5
April 1949	Olympia, Washington	7.1
December 1953	Portland Area, Oregon	4.5
November 1961	Portland Area, Oregon	5.0

⁷³ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RAState.pdf, p. 487

Date	Location	Magnitude (M)
November 1962	Portland Area, Oregon	5.5
December 1963	Portland Area, Oregon	4.5
March 25, 1993	Scotts Mills, Oregon	5.6
February 2001	Nisqually, Washington	6.8 ⁷⁴

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

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

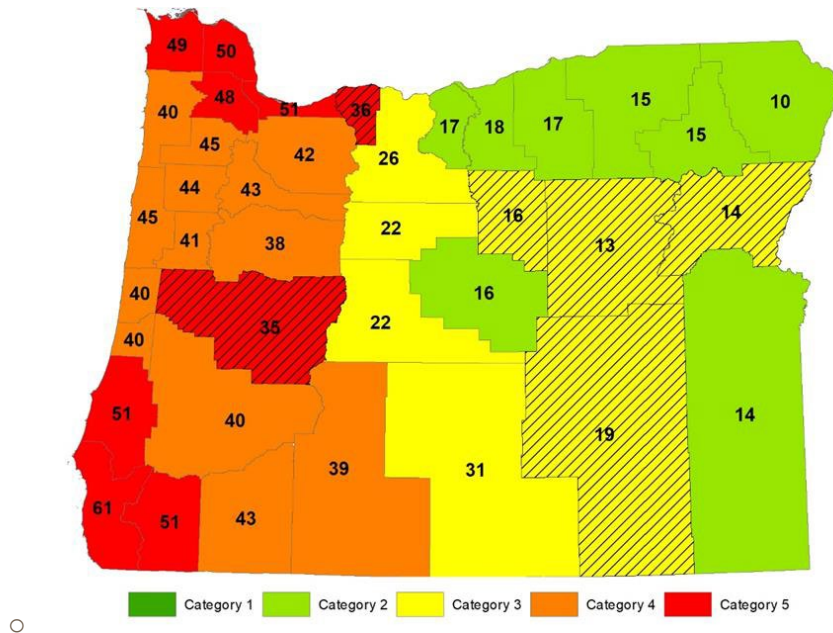
DOGAMI investigators caution that the models contain a high degree of uncertainty and should be used only for general planning purposes. Despite their limitations, the models do provide some approximate estimates of damage⁷⁵.

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

⁷⁴ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASate.pdf, p. 220

⁷⁵ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASate.pdf, p. 223

Figure 14: 2020 Oregon Earthquake Probability Ranking ⁷⁶



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

2.5.3.3 Winter Storms

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

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

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

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

Table 59: Winter Storm Events: 2010 to Present

Date	Location	Description
Nov. 29–30, 2010	Hood River and Wasco Counties	4–5 inches of snow reported in Cascade Locks and Hood River; 0.5 inch of ice in Corbett.
Jan. 12–18, 2012	Hood River and Wasco Counties	4.5 inches of new snow reported in Hood River; I-84 closed due to ice and snow east of Troutdale.
Feb. 6–10, 2014	Hood River County	A strong winter storm system affected the Pacific Northwest, bringing a mixture of arctic air, strong easterly winds, significant snowfall, and freezing rain to several counties in northwestern Oregon.
Feb. 11–14, 2014	Hood River County	2–7 inches of heavy rain fell across many counties in western Oregon, which, combined with warm temperatures, led to snowmelt and rainfall runoff that produced rapid rises on several rivers, including flooding on three rivers in northwestern Oregon.
Mar. 2, 2014	Hood River County, Upper Hood River Valley, and Central Columbia River Gorge	Easterly winds brought cold air from east of the Cascades through the Columbia River Gorge as a moist front pushed in from the Pacific. The combination of a cold air mass and frontal precipitation resulted in approximately 6–8 inches of snow, as well as a quarter of an inch of ice on top of the snow in Hood River and White Salmo, and as much as 0.4–0.5 inch of ice in Parkdale.
Nov. 13, 2014	Hood River County (Western Columbia River Gorge)	Sleet and freezing rain created hazardous commutes for tens of thousands of persons in the western and eastern suburbs of Portland. Snow accumulations were primarily restricted to the Cascade valleys and the central Columbia River Gorge. Spotters reported around 6–8 inches of snow in the Cascade Foothills, followed by 0.25 inch of ice. A combination of heavy snow and ice resulted in slick driving conditions for the western Columbia River Gorge. Areas in the gorge measured a quarter of an inch of ice, whereas other areas had 5–8 inches of snow.
Dec. 6–23, 2015	Statewide Storm Events	DR-4258: Clatsop, Columbia, Multnomah, Clackamas, Washington, Tillamook, Yamhill, Polk, Lincoln, Linn, Lane, Douglas, Coos, and Curry counties were presidentially declared disasters. Several Pacific storm systems moved across the region over the December 12–13 weekend. Each storm system brought several inches of snow to the mountain areas.

Date	Location	Description
Dec. 8, 2016	Hood River County (Western Columbia River Gorge)	A strong frontal system brought strong easterly winds to the North Willamette Valley and a mix of snow, sleet, and freezing rain down to the valley floor. Ice accumulations were higher in the West Hills and near the Columbia River Gorge. ⁷⁷
February 2021	Statewide Storm Events	Significant ice/snow event caused the largest power outage in Oregon history. Over 300,000 were without power, some were without power for up to a week. There was significant property and power line damage from downed trees.

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

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

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

2.5.3.4 Landslides

A landslide is one of the most common and devastating geologic hazards in Oregon. A landslide is a downward movement of earth or rock driven by gravity. Landslides can

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

⁷⁸ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 693

be triggered by natural or human-caused circumstances, such as heavy rains, earthquakes, volcanoes, rapid snow melt, erosion, construction, and other human activity. Average annual repair costs for landslides in Oregon exceed \$10 million, with individual severe winter storm losses often exceeding \$100 million. As population growth continues to push new development into landslide-susceptible terrain, greater losses are likely to occur.

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

The following table describes major landslides in Oregon since 1964.

Table 60: Major Landslides in Oregon Since 1964

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

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

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

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

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

2.5.3.5 Drought

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

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

Table 61: Drought Events in Oregon

Date	Location	Description
1929–1931	Regions 1–3 and 5–7 (1929–1930); Regions 6 and 7 (1930–1931) (Extreme Drought)	In the 1920s and 1930s, these regions were more commonly known as the “Dust Bowl” as they were experiencing a period of prolonged, mostly drier than normal conditions across much of the State and country. Moderate to severe drought affected much of the State.
1939	Statewide	
1977	Northern & Southern Central and Eastern Oregon	Significantly drier than normal year with temperatures near normal.

⁸¹ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 754

⁸² State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 755

Date	Location	Description
1994	Regions 4–8	The Governor's drought declaration covered 11 counties.
2001	Southern and Eastern Oregon	18 counties, including Jefferson, Wheeler, Crook, Deschutes, Klamath, and Lake, were placed under a Governor-declared drought.
2002	Southern and Eastern Oregon	The 18-county declaration remained in effect with the Governor adding five counties, bringing the total to 23 counties.
2003	Southern and Eastern Oregon	Jefferson, Deschutes, and Lake counties' drought declarations expired on June 23, 2003. The Governor issued new drought declarations for Wheeler and Crook counties and extended the Klamath County drought order through December 2003.
2004	Eastern Oregon	Klamath County was placed under a Governor-declared drought; three other counties were declared in neighboring regions.
2005	Regions 5–7	The Governor declared a drought in Wheeler, Crook, Deschutes, Klamath, and Lake counties. All Region 5 counties were declared, as well as two counties in Region 7.
2007	Regions 6–8	The Governor declared a drought in Lake County, along with five other counties in Regions 6 and 7.
2010	Region 6	The Governor declared a drought in Klamath and "contiguous counties."
2012	Region 6	The Governor declared a drought in Lost River Basin only, located within Klamath and Lake counties.
2013	Regions 5–8	The Governor declared a drought in Klamath County, along with four other counties.
2014	Regions 4 and 6–8	The Governor declared a drought in 10 counties, including Crook, Wheeler, Klamath, and Lake counties.
2015	Statewide	All 36 Oregon counties received federal drought declarations, including 25

Date	Location	Description
		counties under the Governor's drought declarations.
2018	Regions 1 and 4-8	Klamath, Lake, and Wheeler counties received the Governor's drought declarations, including eight other counties in five other regions. ⁸³

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

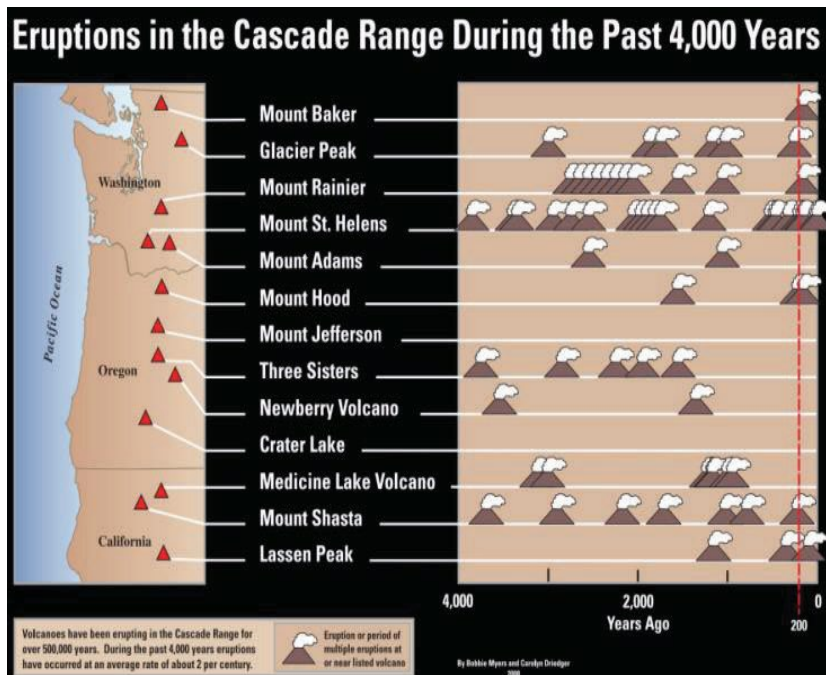
2.5.3.6 Volcanoes

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

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

⁸³ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 1141

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



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

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

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

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

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

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

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

Table 62: Notable Geologic Events Near Mount Hood

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

Date or Age	Event	Deposits
13,000 to 20,000 years ago	Polallie eruptive period	Lava domes, pyroclastic flow and lahar deposits, tephra
20,000 to 25,000 years ago	Maximum of Evans Creek glaciation	Belts of moraines in most valleys
20,000 to 30,000 years ago	Mount Hood dome eruptions	Lava domes, pyroclastic flow and lahar deposits
30,000(?) to 50,000(?) years ago	Mount Hood lava flow eruptions	Andesite lava flows of Cathedral Ridge and Tamanawas Falls

2.5.3.7 Windstorms

In the northwestern region of the United States, windstorms typically involve sustained winds of more than 50 mph, with less frequent events exceeding 80 mph. Windstorms can affect any region of the State but have a higher prevalence along the coastline and coastal headlands. Windstorms are especially dangerous in areas with tree coverage, exposed property, major infrastructure, and aboveground utility lines, where they result in downed trees, power outages, and damage to roofs and outbuildings.⁸⁵

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

The following table outlines recorded windstorm events with notable impacts.

Table 63: Historical Windstorm Events

Date	Location of Impact	Summary	Damage
March 1971	Most of Oregon	Notable damage in Newport	Falling trees damaged power lines, building damage
January 1986	Northern and central Oregon coast	75-mph winds	Damaged trees, buildings, and power lines
January 1987	Oregon coast	Wind gusts to 96 mph at Cape Blanco	Significant erosion to highways and beaches, several injuries
December 1987	Oregon coast / northwestern Oregon	Winds on the coast, 60 mph	Trees uprooted

⁸⁵ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 383

Date	Location of Impact	Summary	Damage
March 1988	Northern and central coast	Wind gusts, 55–75 mph	One death near Ecola State Park, uprooted trees
January 1990	Statewide	100-mph winds in Netarts and Oceanside	One death, damaged buildings, falling trees (FEMA DR-853-OR)
February 1990	Oregon coast	Wind gusts of 53 mph at Netarts	Damage to docks, piers, and boats
January 1991	Most of Oregon	Winds of 63 mph at Netarts, 57 mph at Seaside	75-foot trawler sank northwest of Astoria
November 1991	Oregon coast	Slow-moving storm, 25-foot waves offshore	Buildings and boats damaged, transmission lines down
January 1992	Southwestern Oregon	Wind gusts of 110 mph at Brookings	Widespread damage
January 1993	Oregon coast / northern Oregon	Tillamook wind gusts of 98 mph	Widespread damage, especially Nehalem Valley
December 1995	Statewide	Wind gusts of more than 100 mph; Sea Lion Caves, 119 mph	Four deaths, many injuries; widespread damage (FEMA DR-1107-OR)
November 1997	Western Oregon	Winds of 89 mph at Florence, 80 mph at Netarts and Newport	Severe beach erosion, trees toppled
February 2002	Southwestern Oregon	75–100 mph on the southwestern coast (Douglas, Coos, and Curry counties)	Widespread loss of electricity and damage to public utility infrastructure (FEMA DR-1405-OR)
January 2006	Clatsop, Tillamook, Lincoln, and Lane counties	Two storm events with high winds of 86 mph and 103 mph, respectively	Property damage among all four coastal counties; also impacted five other counties outside of Region 1; total damages of \$300,000 and \$200,000, respectively
February 2006	Clatsop, Tillamook, Lincoln, and Lane counties	Windstorm event with winds measured at 77 mph	Property damage among all four coastal counties; the storm also

Date	Location of Impact	Summary	Damage
			impacted nine other counties outside of Region 1; total damages of \$300,000 and \$275,000

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

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

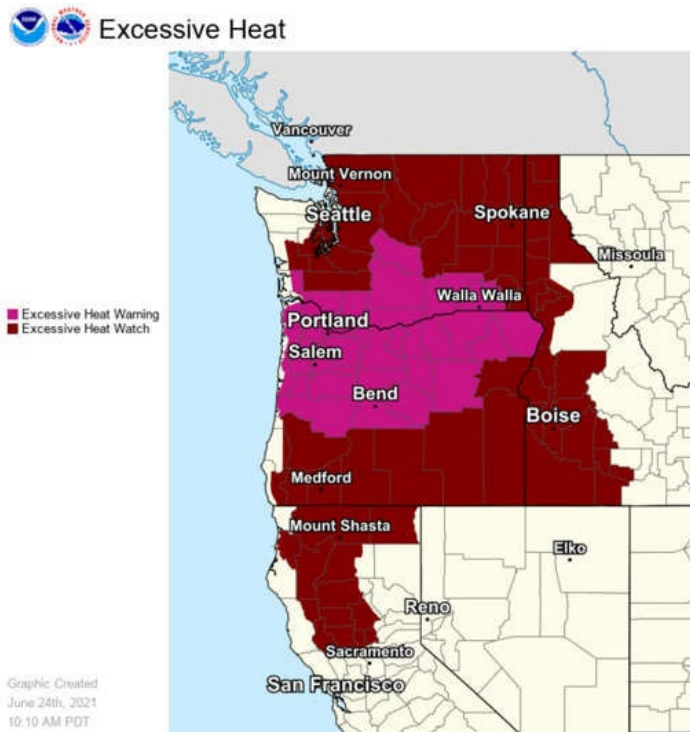
Fallen trees are especially challenging as they can block roads and rails for long periods, which can affect emergency operations. In addition, uprooted or shattered trees can down power and/or utility lines, disrupting local economic and other essential activities. Much of the problem may be attributed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

2.5.3.8 Extreme Heat

Oregon experienced an unprecedented extreme heat event across the State from June 25 through June 30, 2021. A heat dome lodged over the Pacific Northwest brought three consecutive days of temperatures between 106 and 117 degrees Fahrenheit, resulting in the deaths of 83 people due to hyperthermia (elevated body temperature). Ranging in age from 37 to 97, most of the deceased lived alone in homes with no working air conditioning or fans. This lack of air conditioning left many

Oregon residents vulnerable to an extreme heat event. Just 78% of Portland area households have a primary air conditioning unit, 13% less than the national average.⁸⁶

Figure 15: June 2021 Excessive Heat Map



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Climate scientists predict that excessive heat will become a more common occurrence, making for more frequent, more severe, and longer lasting heat events.⁸⁸ Increased extreme heat in urban areas also poses a risk to human health and safety, especially for those living and working in urban heat islands. People living outdoors, in energy-inefficient manufactured homes, or on the upper floors of multifamily housing units may be particularly vulnerable.⁸⁹ While efforts must continue to slow and stop the factors contributing to climate change, Oregon must also develop immediate and

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

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

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

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

long-term strategies to adapt to today's changing climate. These efforts also must be incorporated into emergency and disaster preparedness and mitigation plans. These events will continue to negatively impact Oregon's environment, economy, health, and livelihood.

2.5.3.9 Indispensable Services

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

Tables 64 through 67 indicate the number and value of indispensable service facilities exposed to each of five different hazard types.

Table 64: Wildfire Risk to Indispensable Services

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

Table 65: Landslide Risk to Indispensable Services

County	High		Low		Moderate	
	Services	Value	Services	Value	Services	Value
Clackamas	23	\$113,269,172	644	\$2,495,848,266	158	\$541,461,299
Douglas	47	\$55,717,431	319	\$683,924,573	119	\$247,223,960
Jackson	28	\$66,167,333	332	\$1,253,008,456	115	\$427,714,409
Lane	22	\$56,885,941	536	\$2,360,693,588	121	\$234,927,255
Lincoln	53	\$36,616,276	104	\$135,911,599	36	\$41,291,754
Linn	5	\$3,422,550	312	\$782,580,902	23	\$39,644,250

Marion	9	\$5,903,193	897	\$3,048,718,326	86	\$259,017,444
TOTAL	187	\$337,981,896	3,144	\$10,760,685,710	658	\$1,791,280,371

Table 66: Earthquake Risk to Indispensable Services

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

Table 67: Flood Risk to Indispensable Services

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

2.5.4 Mitigation Needs Assessment Conclusion

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

3. General Requirements

3.1 Citizen Participation

3.1.1 Outreach and Engagement

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

State Agencies

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

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

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

Local Governments and Stakeholders

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

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

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

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

Summary of Feedback

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

Housing

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

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

Mitigation

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

Infrastructure

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

Economic Revitalization

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

Administration/Support Services

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

Eligibility

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

Survey

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

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

The Public Action Plan's Public Comments

In addition to the activities above, OHCS has published this Action Plan at <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx> for a 30-day public comment period. Residents were notified through the following methods:

- Direct email notice to individuals who had signed up for updates on CDBG-DR plan development.

- Email notices to local and tribal governments and nonprofit/community-based organizations that have been active in supporting survivors in disaster recovery, e.g., Long Term Recovery Groups, AARP, disability service advocates, and culturally-specific organizations.
- Press release to all major news outlets state-wide.
- Announcements on agency-managed social media accounts.
- Formal notice on [OHCS's website](#).

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

A summary of residents' comments on this Action Plan, along with OHCS responses, is in an Appendix of this document. For more information, residents can refer to the OHCS Citizen Participation Plan, which can be found at <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx>.

3.1.2 Public Hearings

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

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

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

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

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

- Online webform on the OHCS website

- Email
- Leaving a voicemail through a toll-free number
- Mailing in comments or letters to OHCS mailbox
- Public hearings

3.1.3 Complaints and Appeals

3.1.3.1 Complaints

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

- Formal complaints are written statements of grievance, including email, comments posted on the OHCS website, and handwritten complaints. OHCS shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the OHCS website. OHCS shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. OHCS and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process described above.
- Complaints alleging the violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). OHCS will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx> to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

3.1.3.2 Appeals

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

- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (OHCS or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.

- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. OHCS and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement.

3.2 Public Website

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

These items are made available at <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx>.

Specifically, OHCS will make the following items available: the action plan created using the Disaster Recovery Grant Reporting System (DRGR), including all amendments; each Quarterly Progress Report (as created using the DRGR); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary, including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted on a grantee's website.

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

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

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

3.3 Amendments

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

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

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

3.3.1 Substantial Amendment

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

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

When OHCS pursues the substantial amendment process, the amendment will be posted on the State's CDBG-DR website for a 30-day public comment period, located at <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx>.

The amendment will be posted in adherence with the Americans with Disabilities Act and LEP requirements. OHCS will review and respond to all public comments received and submit the comments and responses to HUD for approval.

A substantial action plan amendment shall require the following:

- The State will revisit the impact and needs assessment when moving funds from one program to another through a substantial amendment.
- A 30-day public comment period will include the following:
 - The State will prominently post the action plan amendment on the OHCS official disaster recovery website at <https://www.oregon.gov/ohcs/housing-assistance/Pages/CDBG.aspx>.
 - The State will afford residents, affected local governments, and other interested parties a reasonable opportunity to review the plan or substantial amendment.
 - The State will identify and consider potential barriers that limit or prohibit equitable participation and will undertake reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with limited English proficiency. This includes the following:
 - The action plan amendment will be translated according to the CDBG-DR Language Access Plan.
 - The action plan amendment will be posted in a way that meets all accessibility requirements.
 - The State will review and respond to all written and oral public comments received. Any updates or changes made to the Action Plan in response to public comments shall be clearly identified in the Action Plan and amendments. The public comments also will be submitted to HUD with the final Action Plan amendment.
- Receipt of approval from HUD.

3.3.2 Non-Substantial Amendment

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

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

3.4 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, OHCS will coordinate across federal, State, and local organizations to meet its commitment to minimize the displacement of

homeowners and tenants due to the delivery of CDBG-DR programs. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure that the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

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

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

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

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

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

3.5 Protection of People and Property

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

3.5.1 Elevation Standards

3.5.1.1 Residential

All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1% annual chance (or 100-year) floodplain, which receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least 2 feet above the 1% annual chance floodplain elevation (base flood elevation). Mixed-use structures with no dwelling units and no residents below 2 feet above base flood elevation must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or a successor standard up to at least 2 feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated 3 feet above the 100-year floodplain.

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

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

from contractors, cost estimating software, and/or examples of comparable costs to elevate in similar markets.

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

3.5.1.2 FEMA PA or HMGP Match

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

“Critical actions” are defined as “any activity for which even a slight chance of flooding would be too great because such flooding might result in loss of life, injury to persons or damage to property.” For example, Critical Actions include hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

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

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

3.5.2 Flood Insurance Requirements

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

additional costs of flood insurance policies to help inform more resilient building codes and practices.

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

Because the 2020 Wildfires were not a flooding event, the following conditions **DO NOT apply**:

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

- The combined household income is greater than 120% of the area median income (AMI) or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

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

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

3.5.3 Construction Standards

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

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

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

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

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

For the rehabilitation of non-substantially damaged residential buildings, OHCS will follow the guidelines to the extent applicable as specified in the [HUD Office of Community Planning and Development \(CPD\) Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program-designed products and appliances.

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

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

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

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

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

3.5.4 Contractors’ Standards

3.5.4.1 Section 3

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

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

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

OHCS will report on Section 3 accomplishments in the DRGR.

3.5.4.2 Minority- and Women-Owned Business Enterprises, Emerging Small Businesses, and Service-Disabled Veteran Business Enterprises

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

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

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

OHCS has published a detailed manual on how the State will carry out these mechanisms in their MWESB/SDVBE Compliance Manual for affordable rental

development programs. The State will adapt this manual for CDBG-DR funded activities carried out through vendors and developers.⁹⁰

3.5.4.3 Culturally Specific Organizations

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

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

3.5.4.4 Contractor Standards

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

Contractor standards and warranty periods will be detailed in the respective policies and procedures documents and will pertain to the scale and type of work being performed, including the controls for ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through a program administered by OHCS included in this

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

Action Plan may be appealed by homeowners and small businesses (if applicable) whose property was repaired by contractors under the State's control.

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

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

3.5.5 Preparedness, Mitigation, and Resilience

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

3.5.5.1 Protect People and Property from Hardship

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

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

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

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

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

3.5.5.3 Support the Adoption and Enforcement of Modern and Resilient Building Codes and the Mitigation of Natural Hazard Risks

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

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

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

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

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

- Urban Growth Boundaries allow cities to plan for growth and prevent urban sprawl, safeguarding farm and forest lands.
- Affordable housing initiatives allow more people to call Oregon their home.

- Economic development analyses help local land use planners set up their towns and cities for long-term success.
- Transportation planning allows towns to grow into newly built roads and pathways without feeling constricted.
- Public facility plans ensure that people will have the utilities they need for modern life.
- Recreation planning allows residents and visitors to enjoy Oregon's beauty.

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

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

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

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

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

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

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

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

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

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

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

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

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

3.5.5.8 Use of the FEMA-Approved Hazard Mitigation Plan

The Oregon DLCDD is the lead agency for developing the State's FEMA-approved Hazard Mitigation Plan. However, the planning process is informed by multiple federal,

State, local, and tribal government agencies, through the development of local hazard mitigation plans, and the [State Interagency Hazard Mitigation Team](#).

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

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

3.5.6 Broadband Infrastructure in Housing

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

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

3.5.7 Cost-Effectiveness

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

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

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

- The property is declared a total loss.

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

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

3.5.8 Duplication of Benefits

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

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

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

4. Grantee Proposed Use of Funds

4.1 Overview

OHCS is the lead agency and responsible entity for administering \$422,286,000 in CDBG-DR funds allocated for disaster recovery. OHCS will implement these programs directly and/or in partnership with subrecipients. These programs include the following:

Housing

- Homeowner Assistance and Reconstruction Program and Accessory Dwelling Unit Pilot Program
- Homeownership Opportunities Program

Multi-Sector

- Planning, Infrastructure, and Economic Revitalization Program

Public Services

- Intermediate Housing Assistance
- Housing and Recovery Services
- Legal Services

Planning and Administration

- Resilience Planning Program
- Administrative Costs

4.2 Program Budget

	Program	Budget	HUD-Identified MID Budget	Percentage of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Homeowner Assistance and Reconstruction Program	\$204,597,567	\$202,551,591	48.5%	\$155 per square foot	Low- and Moderate-Income and Urgent Need	
	Homeownership Opportunities Program	\$119,348,581	\$118,155,095	28.3%	100% of eligible home	Low- and Moderate-Income and Urgent Need	
Infrastructure	Planning, Infrastructure, and Economic Revitalization	\$42,117,170	\$40,117,170	10%	Limited by Allocation	Low- and Moderate-Income and Urgent Need	
Public Services	Intermediate Housing Assistance	\$20,073,231	\$19,872,499	4.8%	Based on household need and affordable rents	Low- and Moderate-Income and Urgent Need	
	Housing and Recovery Services	\$6,017,576	\$5,957,400	1.4%	N/A	Low- and Moderate-Income and Urgent Need	
	Legal Services	\$6,017,575	\$5,957,399	1.4%	N/A	Low- and Moderate-Income and Urgent Need	

	Program	Budget	HUD-Identified MID Budget	Percentage of Allocation	Maximum Award	National Objective	Estimated Outcome
Planning	Resilience Planning Program	\$3,000,000	\$2,970,000	.7%	N/A	N/A	
Administration	Administrative Costs	\$21,114,300	\$20,903,157	5%	N/A	N/A	
Total		\$422,286,000	\$418,063,140	100%			

4.3 Connection to Unmet Needs

As required by the Federal Register, [Vol. 87, No. 23, February 3, 2022, OHCS \(87 FR 6364\)](#), OHCS will allocate at least 80% of the funds to address unmet needs within HUD-identified “most impacted and distressed” (MID) areas. These include Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion counties.

The remaining 20% of the allocation may be used to address unmet needs which are in areas that received a DR-4562 presidentially declared disaster declaration. At this time, the State is limiting the grantee-identified MID areas to Klamath County and anticipates that the majority of the remaining 20% will address unmet needs in the HUD-identified MID areas.

This Action Plan primarily considers and addresses housing and infrastructure unmet recovery and mitigation needs, along with public services and planning that support housing, infrastructure, and economic revitalization unmet needs.

The Federal Register notice also requires that at least 70% of all program funds benefit LMI persons or households. Most of the programs included in the Action Plan include a prioritization for LMI households and individuals; the State anticipates meeting this requirement. The State will closely monitor the impact of State programs and CDBG-DR programs on impacted LMI persons, including vulnerable populations, protected classes, and members of underserved communities. The State also will assess the eligible unmet needs of LMI and non-LMI persons after all federal, State, and insurance proceeds are considered and may determine whether to request a modification of the requirement through a waiver.

4.4 Leveraging Funds

As a component of this Action Plan, OHCS has coordinated across federal, State, and local organizations to gather information about other resources available for recovering from the 2020 Wildfires. This included data collection on FEMA awards, SBA programs, insurance claims, and the significant funding made available by the State of Oregon. The activities identified in this plan were specifically selected as both eligible CDBG-DR activities and filling a gap that other funding sources could not fill. Utilizing CDBG-DR funding for the most significant eligible needs will leverage other funding sources to invest in varied areas of recovery. It is necessary for OHCS to be knowledgeable about other funding programs to maximize the impact of CDBG-DR funding and ensure compliance with duplication of benefits requirements. Through this compliance, there will be an ongoing effort to identify additional federal, State, and local funding sources while also coordinating with partners such as nonprofits, corporations, foundations, and other stakeholders to maximize leveraging opportunities.

OHCS is committed to using CDBG-DR funds to address critical unmet needs that remain following the infusion of funding from other funding sources detailed below. Existing State resources and other funds from the disaster appropriation will be further examined to ensure that all available and viable funding is utilized where it is most needed and will be leveraged appropriately. OHCS will draw on existing relationships with other agencies, as well as create new partnerships and data-sharing agreements to ensure that there is no duplication of benefits and that all viable resources of funding are leveraged.

4.4.1 State Funding

After the 2020 Wildfires, the State legislature moved quickly to pass legislation and provide State funds to assist wildfire-impacted Oregonians. In October 2020, the State Emergency Board approved more than \$390 million for wildfire recovery and emergency shelters,⁹¹ and in July 2021, the Oregon legislature passed House Bill (HB) 5006, which allocated \$486 million to support wildfire recovery.⁹²

⁹¹ Oregon State Legislature, Emergency Board Approves More Than \$390 Million for Wildfire Recovery and Emergency Shelters, <https://www.oregonlegislature.gov/courtney/Documents/E%20Board%2010.23.20%20Press%20Release.pdf>

⁹² House Interim Special Committee on Wildfire Recovery, Funding Distribution (2021), <https://olis.oregonlegislature.gov/liz/202111/Downloads/CommitteeMeetingDocument/250450>

HB 5006 provides funding for various initiatives focused on housing; racial justice; wildfires; water; utilities; education; capital improvements; seismic mitigation and recovery; broadband; policy; and support of local, tribal, and non-State projects.⁹³

4.4.1.1 **State Housing Funding**

Through this funding, the State of Oregon has been increasing its capacity to respond to the needs of impacted residents and communities, with a particular emphasis on vulnerable populations. Some of the key housing initiatives that are being carried out by State agencies are listed in the table below. These agencies collaborate internally and across agencies on a regular basis to ensure that funding is leveraged and administered equitably.

Table 68: Funding Allocated by the Oregon State Legislature for Long-Term Residential Wildfire Recovery in House Bill 5006

Agency	Initiative	Funding
Oregon Department of Environmental Quality	Financial Assistance for Septic System Repair/Replacement	\$15,000,000
Oregon Department of Human Services	Feed and Shelter Wildfire Survivors	\$76,488,018
Oregon Department of Energy	Grant Program to Incentivize Energy-Efficient Rebuilding from the 2020 Wildfires	\$10,831,296
Oregon Housing and Community Services	Wildfire Recovery for Affordable Housing Development, Manufactured Home Replacement, and Flexible Assistance	\$150,163,567
Oregon Department of Consumer and Business Services	Fire Hardening Grants for Wildfire Rebuilds	\$10,678,004

With the \$150 million that OHCS manages from HB 5006, the agency has implemented several disaster recovery programs and will leverage the successes from these State programs into their management of the CDBG-DR activities identified in this Action Plan.

OHCS is currently administering the Wildfire Recovery and Resilience Account (WRRRA) through eight subrecipients across the impacted counties, making \$25 million available for survivor resources, including temporary and permanent housing solutions. WRRRA's primary mission is to provide rapid rehousing for renters and homeowners displaced by DR-4562. The program launched in the fall of 2021 and will provide ongoing rental

⁹³ Oregon State Legislature, House Bill 5006, Emergency Board Work Session Recommendations (2021), <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/CommitteeMeetingDocument/246321>

assistance and other housing supports through June 2023, unless the program is extended.

In addition, the State has invested in land acquisition in order to be well positioned for future housing development, motel conversion projects to increase available housing, bulk purchase of new modular homes, and the coordination of manufactured home replacement. These State programs have initiated the housing recovery efforts, which the CDBG-DR funds will leverage and expand on.

In addition to leveraging the funding from these programs, the programs from the Oregon Department of Energy and the Oregon Department of Consumer and Business Services support state-of-the-art building practices related to energy efficiency and fire hardening. OHCS is committed to resilient construction practices in all activities funded through CDBG-DR. The goal of this resilient reconstruction is not only to protect resources from future disaster damage but to also set the bar for future development in the State of Oregon. By utilizing CDBG-DR funding for model housing development, including by drawing on best practices from other Oregon programs, these funds will leverage increased building quality for future housing developments long after this recovery effort.

The State's 2022 Notice of Funding Availability (NOFA) for housing tax credits and State and federal programs made additional funds available for the development, rehabilitation, and preservation of affordable housing in disaster-impacted communities. All of the funding sources below are limited to multi-family developments that will preserve long-term or permanent affordability (the Manufactured Dwelling Park Preservation [MDPP] program is a hybrid rental/homeownership program). All funding sources other than MDPP are designed to provide affordable housing for renters or first-time homebuyers in a multi-family setting. Because there are no unmet public multi-family housing recovery needs and because of the significant state investment in multi-family housing summarized in the table below, the State has not allocated additional funding from CDBG-DR for multi-family rental developments.

Table 69: OHCS Program Disaster Set-Asides

Program (Pool)	Funding Sources and Amounts
Wildfire Set-Asides Within OHCS Programs <ul style="list-style-type: none"> • Local Innovation Fast Track (LIFT) Rental (\$50 million) • LIFT Homeownership (\$15.35 million) • General Housing Account Program (\$20 million) 	\$85.35 million, OAHTC**
Oregon Affordable Housing Tax Credits (OAHTC) – Wildfire	\$200 million
Disaster Low-Income Housing Tax Credits	\$6.3 million

Permanent Supportive Housing*	\$10 million for preservation, OAHTC**
Affordable Rental Housing Preservation	\$20 million for preservation, OAHTC**
Manufactured Dwelling Park Preservation	\$25 million, OAHTC**

* For housing acquisition cost only. Must be a property included in the statewide Inventory.

** Up to 95% of the permanent loan amount.⁹⁴

As of the time of publication of the initial Action Plan, the Oregon legislature has appropriated \$71.5 million to address the needs of those experiencing or at risk of experiencing homelessness in communities impacted by the 2020 Wildfires. OHCS, in addition to these funds, has made \$3 million in homelessness services assistance funding available to the Oregon Department of Human Services to assist individuals experiencing homelessness who were adversely impacted by the 2020 Wildfires. Additional details are in the table below.

Table 70: State Resources Allocated to Address Homelessness In Wildfire-Impacted Areas

Wildfires – Source of Funding	Amount of Funding	Purpose of Funding
October 2020 Legislative Emergency Board	\$30,000,000	Supports shelter services through the conversion of hotel and motel properties into safe and warm shelter spaces. Provides funding for 500 units in wildfire-affected areas.
	\$10,000,000	Shelter support with funding priorities for wildfire-affected communities.
December 2020 Legislative Emergency Board	\$31,500,000	Shelter, food, and wraparound services to Oregonians impacted by wildfires.
OHCS	\$3,000,000	Assistance and services to individuals experiencing homelessness who were adversely impacted by the 2020 Wildfires.
TOTAL	\$74.5 million	

Due to the significant funding invested through the Oregon legislature and the significant funding the State received from the federal government to help address homelessness shelter and support needs, the State has not budgeted CDBG-DR funding directly for expanding sheltering sites. However, CDBG-DR assistance has been budgeted to provide housing counseling, wraparound services, and temporary rental

⁹⁴ State of Oregon, 2022 NOFA FAQs, <https://www.oregon.gov/ohcs/development/Documents/nofa/2022/FAQ5-2022-NOFAS-03-04.pdf>

assistance for displaced households experiencing homelessness or at risk of experiencing homelessness as a result of the wildfires.

4.4.1.2 State Infrastructure Funding

Through HB 5006 and Emergency Legislative Board approvals, the State appropriated and allocated additional infrastructure funding to help address those unmet needs not covered by FEMA PA or HMGP or other federal funding sources. A summary of those funds is included below.

Table 71: State Resources Allocated to Address Additional Infrastructure Recovery Needs

Wildfires – Source of Funding	Amount of Funding	Purpose of Funding
HB 5006 – State Funding and American Rescue Plan Act	\$108,825,000	Water and Wastewater Infrastructure
	\$20,000,000	HMGP Match
	\$3,266,000	Municipal Wildfire Assistance Program (local planning capacity)
	\$19,874,000	Fire and Public Safety
TOTAL	\$151,965,000	

In addition to these allocations, the State has appropriated more than \$35 million to help local governments with increasing staffing capacity and revenue loss replacement (e.g., loss of revenue due to lost tax revenue).

4.4.1.3 State Economic Revitalization Funding

Through HB 5006, the State legislature appropriated \$10 million for a main street revitalization program, but this is not specifically for wildfire recovery and therefore is not calculated in the sources of funding available for wildfire economic recovery..

4.4.2 **Federal Assistance and Private Insurance**

Additional funding sources that are important to document for the purposes of leveraging disaster recovery funds and ensuring duplication of benefits compliance include FEMA, SBA, and private insurance. Data specific to these sources were provided above in the unmet needs assessments. Summary information is provided here to document OHCS's research as it relates to leveraging available funding sources.

Table 72: FEMA Resources Available for DR-4562 Recovery and Mitigation

FEMA Program	Approved Awards and/or Assistance from FEMA	Total Approved Applications
Individual Assistance (IA)	\$38,774,394	3,251
Public Assistance (PA)	\$457,321,493	Project assessments ongoing
Hazard Mitigation Grant Program (HMGP)	\$97,576,243	Project assessments ongoing

Table 73: SBA Resources Available for DR-4562 Recovery

SBA Loan Type	Loan Amount Issued
Residential Loans Approved	\$19,432,309
Residential Loans Executed and Awarded	\$1,993,800
Business Loans Executed	\$1,993,800

Table 74: Private Insurance for Structural and Personal Property Damages

Private Insurance Type of Coverage	Total Loss Claims (Destroyed home and qualified for policy limit)	Total Paid Losses	Case Incurred Losses (Total anticipated replacement costs)
Residential	2,792	\$1,000,274,510	\$1,089,904,743
80% of Residential (assumed for structural payouts)*	2,792	\$800,219,608	\$871,923,794
Commercial	1,331	\$114,163,353	\$359,578,648

* Due to the nature of the insurance data call and the knowledge that many insurance providers have included personal property claims (including a significant number of cars and vehicles) and losses within their policies, the State is assuming for this Action Plan that 80% of the value of the residential insurance losses and incurred losses are for structural damages. The State will use the 80% figure for its unmet needs assessment. The State will update this figure as it receives additional information on insurance claims and payouts through program intake.

4.4.3 Total Unmet Needs After Leveraging Other Funding

The table below reflects the State's current projected unmet need after subtracting these resources from the calculation of need in the Unmet Needs Assessment and Data and Methodology.

Table 75: Oregon 2020 Wildfires Unmet Needs Calculation

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

4.5 Program Partners

OHCS may engage program partners through formal agreements such as subrecipient agreements and interagency agreements and through informal partnerships. It is critical for OHCS to engage a spectrum of program partners so that programs are more accessible, understandable, and tailored to equitably meet the unmet needs of disaster-impacted residents and communities.

When engaging in formal agreements for the administration or implementation of programs, OHCS will ensure that subrecipients have the capacity and expertise to carry out the program activities included in their scope of work. OHCS will perform a risk assessment of subrecipients and program partners. OHCS may help expand subrecipient capacity and will provide technical assistance and training to subrecipients on program requirements, applicable federal cross-cutting requirements and State overlays, and reporting and performance requirements, and may allocate administrative funding, as appropriate, to do so. All subrecipients will be required to comply with 2 CFR 200.318-327.

The program descriptions include the types of subrecipients or interagency partnerships that may support OHCS in the administration or implementation of specific programs.

4.6 Distribution of Funds

OHCS relied on the information collected through the unmet recovery and mitigation needs assessment, to include qualitative and quantitative data received through the public and stakeholder engagement and consultation carried out prior to program development, including the Governor's Wildfire Economic Recovery Council and the Oregon Disaster Housing Task Force.

Using this information, the State has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities. In addition, each program will help the State meet its pillars, or guiding principles, of recovery:

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

4.6.1 Additional Details in the Program Descriptions

Program descriptions in the Action Plan include a section on the method of distribution for that program. Programs may be administered directly by OHCS through subrecipients, or through a hybrid model where OHCS is the program administrator but assigns specific scopes of work to subrecipients to support OHCS in the administration of the program.

Each program section includes the following information:

- Program description
- How the program promotes equity in recovery and housing for vulnerable populations
- How the program will advance long-term resilience
- Program's national objectives
- Program eligibility
- Program-eligible activities and maximum assistance
- Connection to disaster and unmet needs
- How the program addresses disaster-impacted systems, if applicable
- Program's affordability period, if applicable
- Program's maximum assistance

- Program's definition of "second home," if applicable
- Program's responsible entity
- Program's method of distribution
- Program's competitive application process, if applicable
- Program's estimated beginning and ending dates

The programs established in this Action Plan are not entitlement programs and are subject to available funding.

4.7 Program Income

The State understands that certain activities funded with CDBG-DR funds could result in the generation of program income. OHCS shall develop and adopt specific policies and procedures for each program that generate program income and will specify in those policies whether program income may be retained by local governments, if applicable. Up to 5% of the program income generated by CDBG-DR funds may be used for administrative costs by OHCS, units of local government, or other subrecipients.

Unless otherwise specified, all program income shall be remitted to the State. OHCS shall treat program income as additional CDBG-DR funds subject to the requirements of the Consolidated Notice and shall use it in accordance with the State's CDBG-DR Action Plan.

To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Department of the Treasury are made.

4.8 Resale or Recapture

Resale or recapture requirements will vary by program and may not be applicable to all CDBG-DR programs. If applicable, the resale or recapture requirements are described within each of the program sections below and program guidelines will provide additional details on the terms of resale or recapture and the specific circumstances under which resale or recapture will be used.

OHCS will ensure that affordability restrictions are enforceable and imposed by recorded deed restrictions, covenants, property liens, bylaws, or other similar mechanisms.

5. Program Details

5.1 Housing

5.1.1 Connection to Unmet Needs

As described under the Leveraging Funds section, the State has invested significant resources into addressing unmet wildfire housing recovery needs, including for affordable multi-family housing, renters, and individuals experiencing homelessness. Other federal and private insurance resources have been available to some of Oregon's impacted residents. However, these funds are insufficient to meet the State's housing recovery needs. Following an analysis of relative unmet need across single-family, multifamily, owner, and rental housing, the State has determined that the greatest gaps in housing recovery at the time of the initial Action Plan are in the following areas:

- The reconstruction or replacement of damaged housing with more energy-efficient, disaster-resilient, and physically accessible single-family owner-occupied damaged housing, particularly for those who are LMI, under- or uninsured, and have not been able to complete their recovery.
- The need for affordable housing that is more energy-efficient, disaster-resilient, and physically accessible, which can be built in a manner that overcomes the current constraints on available land, urban growth boundaries, and the risks from natural hazards and the impacts of climate change.
- The need for stable and affordable homeownership opportunities for disaster-impacted LMI renters to help households move into more energy-efficient, disaster-resilient, and physically accessible housing; offset rising rents and property sales prices in the disaster-impacted communities; and increase wealth-building opportunities.
- The need for rental and intermediate housing support while disaster-impacted residents complete their permanent recovery plan.
- The need for targeted housing navigation support, including access to legal services, affirmative and culturally specific outreach and engagement, financial and homebuyer counseling, and accessible program design for advancing equity and racial justice through recovery programs.

It is well documented that housing policies⁹⁵ and disaster recovery⁹⁶ across the United States have often favored and disproportionately assisted white and wealthier American citizens and homeowners. The State of Oregon aims to lead an equitable recovery from the 2020 Wildfires, which will require an intentional examination of systemic policies and practices that, even if they appear to be fair, may marginalize some populations and perpetuate disparities.

Through this process, the State will target CDBG-DR support and assistance to ensure that programs meet the needs of:

- *Federally protected class groups*, which include race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability.
- *Underserved communities*, which HUD defines as populations sharing a particular characteristic, as well as geographic communities, which have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life.
- *Vulnerable populations*, which HUD defines as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

CDBG-DR funds are subject to the Fair Housing Act, which prohibits discrimination because of race, color, national origin, religion, sex (including gender, gender identity, sexual orientation, and sexual harassment), familial status, and disability. Other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to programs and activities for persons with LEP and taking appropriate steps to effectively communicate with individuals with disabilities by providing auxiliary aids and services.

⁹⁵ NPR, A 'Forgotten History' Of How The U.S. Government Segregated America, <https://www.npr.org/2017/05/03/526655831/a-forgotten-history-of-how-the-u-s-government-segregated-america> and ; <https://www.vox.com/22252625/america-racist-housing-rules-how-to-fix>.

⁹⁶ <https://www.nytimes.com/2021/06/07/climate/FEMA-race-climate.html>;
<https://www.facingsouth.org/2018/09/recent-disasters-reveal-racial-discrimination-fema-aid-process>.

5.1.2 Homeowner Assistance and Reconstruction Program

Table 76: Homeowner Assistance and Reconstruction Program Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Homeowner Assistance and Reconstruction Program (TOTAL)	\$204,597,567	\$202,551,591	99%	\$2,045,976	1%
Homeowner Assistance and Reconstruction Program	\$198,551,591	\$196,566,075	99%	\$1,985,516	1%
Accessory Dwelling Unit Pilot Program	\$4,000,000	\$3,960,000	99%	\$40,000	1%

5.1.2.1 Program Description

5.1.2.1.1 Homeowner Assistance and Reconstruction Program

The Homeowner Assistance and Reconstruction Program will provide assistance in the form of grants to eligible homeowners who experienced damage to their homes from the 2020 Wildfires and have remaining recovery needs after accounting for other duplicative benefits received.

The program will fund eligible rehabilitation, reconstruction, acquisition, and replacement costs, including additional costs to comply with federal, State, and local construction standards, such as replacing on-site residential infrastructure, complying with green building standards, and ensuring that homes are accessible for individuals living with disabilities and senior residents. Eligible costs also include elevation, fire hardening, and other program-required costs that will help protect homes from natural hazards faced in the fire-impacted communities.

Participants whose properties are located in an SFHA or a 100-year floodplain, and who receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least 2 feet above the 1% annual chance floodplain elevation (base flood elevation).

Due to challenges surrounding the availability of land and preserved affordable manufactured housing parks in many of the impacted areas, there may be situations where the State needs to rehabilitate damaged manufactured housing parks or engage in new housing or housing development activities. This will help impacted

homeowners who were on leased land return or relocate to homes or parks that are affordable, energy-efficient, and resilient in the face of future disasters. In these cases, the State will work with manufactured housing park owners, developers, manufactured home dealers, and/or builders to incentivize development and supplement the cost of developing housing per program construction standards.

5.1.2.1.2 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

The program is designed to prioritize homeowners who continue to face recovery barriers because they have not had access to the resources, support services, and/or capacity to complete their recovery.

The State will achieve this through the following approaches:

- Implementing a phased approach to applicant processing.** The program is designed to prioritize those individuals and households who have struggled to access the necessary resources to initiate or complete their recovery. By prioritizing LMI households first, the State can ensure that those survivors with the fewest resources are able to initiate their recovery. This approach represents a direct application of OHCS's Targeted Universalism policy. Data show that many of the LMI residents struggling to complete their recovery are Latine, black, indigenous, and people of color. OHCS will leverage data analysis and engagement through OHCS's Equity Lab, culturally-specific organizations, and local engagement to identify barriers that are disproportionately impacting federally protected classes, underserved communities, and vulnerable populations. Drawing from this analysis, OHCS will target resources and recovery strategies to help overcome recovery barriers experienced by different groups. In future phases, subject to funding availability, the State may expand the program to help higher income households address their remaining unmet recovery needs.

Table 77: Application Phases

Application Phases		Phase I	Phase II	Phase III
Household Income	At or below 80% of the AMI	X		
	At or below 120% of the AMI		X	
	Greater than 120% of the AMI			X
Status of Repairs	Incomplete	X	X	X

- **Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations to help bring survivors into the program.** Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with limited English proficiency, members of protected classes, vulnerable populations, and individuals from underserved communities. The State will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The State may engage organizations to help with applicant intake and provide support through the application process so applicants can work with local individuals and organizations. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who are skeptical or fearful of government programs and who have not yet participated in State or federal recovery programs.
- **Providing funding to public service providers who will provide additional support to applicants through housing and financial counseling and legal services.** These programs are described further below. The programs will fund community organizations that provide comprehensive housing navigation, counseling, and legal services to help disaster survivors overcome barriers to accessing recovery resources and sustain affordable housing beyond the life of the CDBG-DR assistance.
- **Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers.** OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community-based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to

support housing recovery as subrecipients through HARP, HOP, IHA, and Housing Recovery Services.

- **Directly managing the construction process on behalf of applicants and/or providing construction advisory services to applicants.** To help safeguard applicants from contractor fraud, price gouging, construction delays, and the time-consuming requirements of managing the housing recovery process, the State will either manage the recovery on behalf of applicants or will provide construction advisory services to applicants as they complete their recovery. When managing the recovery on behalf of applicants, the State may do so either directly or by investing in parks, subrecipients, or local governments through the activities described in On-site and Off-site Improvements for Reconstruction.
- **Review of impediments to fair housing choice.** According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice⁹⁷ and ACS data, people of color disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. Due to this barrier to homeownership, there is a possibility that the Homeowner Assistance and Reconstruction Program could have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs. In order to address this, the State has included significant funding through the Homeownership Opportunity Program to help disaster-impacted renters access affordable homeownership. The program, which is further described below, identifies barriers to homeownership that have been disproportionately experienced by people of color, indigenous, and Latine households and seeks to overcome those barriers through more inclusive and low-barrier policies and procedures.
- **Increase housing available for seniors and individuals living with disabilities.** In addition, according to the Analysis of Impediments, the highest concentrations of seniors and people with disabilities are in Oregon's rural communities. To help increase the amount of accessible housing stock across the state – including in the most impacted and distressed areas that are rural in nature – all HARP reconstruction and replacement projects will be built to accessibility standards that at a minimum meet Oregon Revised Statute 456.510 visitability requirements.
- **Increase affordable housing choice for people of color, indigenous, and Latine survivors who were living in manufactured housing parks.** As identified in the Analysis of Impediments to Fair Housing Choice members of protected classes, including people of color, indigenous, and Latine individuals face barriers to wealth building opportunities through homeownership and face higher rates of denial from lenders for acquiring homes. Many living in the destroyed manufactured housing parks,

⁹⁷ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/conplan/2021-2025%20Action%20Plan/State-of-Oregon-2021-2025-AI.pdf>, page 13.

particularly in Jackson County were there were the greatest number of homes lost, were Latine families who owned their manufactured home, but leased their lot. They worked in agriculture, service jobs and other low-wage professions. As part of the New Housing Production component of this program, it will be critical to restore damaged manufactured housing parks, create opportunities for resident cooperative ownership of parks, and/or acquire and develop new manufactured housing parks that provide affordable and safe housing for wildfire impacted households who were living in manufactured housing parks at the time of the disaster.

5.1.2.1.3 How the Program Promotes Long-Term Resilience

The program will help the State replace damaged or destroyed housing with housing stock that is more energy-efficient, resilient to the hazards in the impacted-communities (including flood, wildfire, earthquake, extreme heat/winter, drought, and other applicable high-risk hazards based on location of the housing), and the projected impacts of climate change. In addition, the replacement housing will be built to accessibility and visitability standards that will allow impacted residents to age in place and increase the housing stock available to individuals living with disabilities.

By building to higher energy efficiency, resilience, and more accommodating construction standards, the State aims to help mitigate future loss of life and property and reduce short- and long-term interruptions caused by future disasters.

Each project will be required to meet resilience performance metrics. Details on how the State will measure, track, and report on resilience performance metrics will be included in program guidelines.

5.1.2.1.4 Accessory Dwelling Unit Pilot Program

Within the Homeowner Assistance and Reconstruction Program, the State will set aside \$4,000,000 for an Accessory Dwelling Unit Pilot Program for applicants eligible under Phase 1 and future phases of the Homeowner Assistance and Reconstruction Program, subject to funding availability.

Accessory dwelling units (ADUs) are independent residential dwelling units located on the same lot as a stand-alone single-family home. ADUs can be additions to existing or reconstructed homes ("internal" or "attached" ADUs) or new stand-alone accessory structures or converted portions of existing stand-alone accessory structures ("detached" ADUs).

Internal, attached, and detached ADUs are a cost-effective way for the State to help impacted residents and communities replenish damaged rental housing stock and will achieve the following:

- Help increase housing affordability for wildfire-impacted and LMI tenants.
- Prioritize income-generating opportunities for LMI homeowners. OHCS's investment in this program, coupled with targeted support provided through Housing and Recovery Services will help individuals who have been unable to benefit from wealth-building opportunities due to historic discrimination and systemic inequalities.
- Create infill housing.
- Reduce the displacement of wildfire survivors.
- Enhance neighborhood resilience.

The award will be structured as a partially forgivable loan:

- The forgivable portion of the loan is tied to the property owner meeting the terms of compliance, which include maintaining the property as affordable to an income-eligible tenant (household at or below 80% AMI, adjusted for household size) for a minimum of 8 years. The forgivable portion of the loan is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded loan.
- The repayable portion of the loan will be a low-interest loan amortized over a period of 20 to 30 years. If the property is sold prior to full repayment, the balance of the repayable portion will be due upon sale.
- The lien, resale, and recapture requirements will be recorded on the property as a deed restriction or covenant.

The ADU pilot program will be offered on a first-come, first-served basis to approved Homeowner Assistance and Reconstruction Program participants who meet the following criteria:

- Ability of the applicant to take on additional debt and/or to complete the project. This includes, but may not be limited to:
 - Approval from first mortgage holders allowing for subordinate debt.
 - Analysis of local zoning and requirements and whether they allow for the development of ADUs for long-term rental and residence.
 - Necessary approvals from all property owners to allow for the program to record additional debt and deed restrictions on the property.
- Demonstrated financial feasibility and commitment to maintain the ADU as an affordable rental property to LMI individuals or households for a minimum of 8 years. The program will publish the definition of affordable rents within program guidelines.
 - Property owners must also agree to provide priority access to wildfire survivors for a period of time that will be defined in program guidelines. The term of wildfire

priority may be subject to the recovery status of the community at the time the property is ready to be occupied.

- Property owners must agree to participate in program-provided counseling on Fair Housing Act laws and affordable small rental property financial management and compliance requirements prior to receiving final approval for ADU assistance.
- Property owners may choose to use rental revenues to hire property managers to help in the management of the property per the program terms.
- Feasibility and cost reasonableness analysis of developing the ADU based on the property site layout. The program may allow for internal, detached, or attached ADUs.

5.1.2.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need (Urgent Need).

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

5.1.2.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, homeowners must meet the following criteria:

- Must have been the owner-occupant of the damaged property at the time of the disaster.
- The damaged property must have been the applicant's primary residence at the time of the disaster.
- The damaged property must have sustained damages as a result of the 2020 Wildfires.
- The damaged property must be an eligible structure as defined in the program guidelines, including, but not limited to, single-family residences, manufactured homes, and pre-fabricated homes.

5.1.2.4 Program-Eligible Activities and Maximum Assistance

Table 78: Homeowner Assistance and Reconstruction Program Eligible Activities

CDBG-DR Eligible Activities	Rehabilitation, reconstruction, elevation, new construction, public facilities, and infrastructure in support of housing development, acquisition, and clearance; HCDA Section 105(a)1, 2, 4, 5, 8, 11, and 14; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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The program provides awards necessary to rehabilitate or replace eligible damaged properties per program standards. Each award will be calculated using consistent program construction, energy efficiency and award calculation standards, which are based on the type of project (ReOregon Managed or Homeowner Managed) and the type of replacement unit (e.g., manufactured home, site-built, or modular homes). The actual maximum assistance that each applicant is eligible to receive will be determined using a consistent award calculation methodology described further below.

For each of the types of projects listed below, the program may also fund activities necessary to address site-specific needs such as demolition and removal of the original structure, accessibility needs (e.g., ramps and lifts), environmental issues, on-site residential infrastructure repairs or replacement (e.g., septic tanks and wells), resilience and mitigation measures, elevation requirements, installation and transportation costs, relocation costs, and municipal ordinances, as needed. Depending on the nature of the activity, the homeowner's project management plan, and the community's development plans, these activities may be carried out by the applicant directly or by the State, local government or a subrecipient on behalf of the applicant. These types of eligible costs may require the program to exceed the program maximum award per applicant.

The necessary and reasonableness of additional assistance will be established using cost estimating software, comparative and market analysis, an analysis of the necessity or value of the improvements, and/or the review of multiple construction bids.

Impacted residents should not plan on receiving the maximum dollar amounts of assistance included in the sections below, as the State anticipates that on average, actual awards will be much lower than the published maximum award amounts.

For ReOregon managed projects, the applicant will not receive direct cash assistance from the program because the program will carry out the housing activities directly, including managing the program contractors.

For all applicants, the State will provide a detailed breakdown of the value of their award.

All awards are subject to a duplication of benefits analysis and applicant awards will be reduced by the amounts that are considered to be duplicative. At this time, the program is not reimbursing applicants for pre-award costs, but the program will consider the amount applicants paid in pre-award costs when assessing duplication of benefits.

Exceptions to these standards and eligible expenses may be required, and the exceptions review and approval processes will be further detailed in program guidelines.

Maximum assistance for owners of manufactured and modular homes (ReOregon Managed Projects): The specific award amount is capped based on the type of unit (e.g., double wide or single wide, size of damaged unit, number of bedrooms, etc.) for which the applicant is eligible, which will be based on the household size or the comparable size of the damaged home. The program guidelines will include the standards related to energy efficiency and quality of the unit. Not all manufactured homeowners will be returning to the site of their damaged units. To accommodate these survivors, exceptions may be made when parks or sites require a specific layout or size of home. When feasible, the State will negotiate bulk orders of homes with pre-approved program floor plans or unit layout specifications. Additional details on eligible units and layouts will be described in program guidelines.

Award Cap: When applicants participate in a ReOregon Managed Project, the program will pay for 100% of the eligible costs, less duplication of benefits. For these projects, the program pays the vendors and dealers directly and the homeowners will not receive payments from the program. When there is a duplication of benefits, homeowners may be required to contribute the DOB toward eligible costs or agree to a scope reduction to offset DOB; the process around DOB will be included in program guidelines and applicant communications.

Maximum assistance for single-family site-built residences (Homeowner Managed Projects):

The specific award each applicant is eligible to receive is based on the remaining costs to rehabilitate the damaged home to program standards and will be subject to a cost reasonableness review using cost estimating software, comparative and market analysis, and/or the review of multiple construction bids. In addition, the award is capped based on a price per square foot.

OHCS will publish comprehensive construction standards, limitations, and eligible rehabilitation, reconstruction, accessibility, and resilience activities within program

guidelines, which will serve as the mechanism for establishing the maximum assistance that an applicant may receive through the program.

Award Cap: Up to \$155 per square foot, based on cost reasonableness analysis described above. This price may change after program launches and the program reviews industry trends at the time of program launch and analysis of actual bids.

Impacted residents should not plan on receiving the maximum dollar amounts of assistance, as actual awards will be based on unmet need and the State anticipates that on average awards will be much lower than the published maximum award amounts.

Exceptions may be made for such reasons as: to accommodate households with members living with disabilities; households living in rural communities where there is limited access to builders and/or when building costs are higher because of travel costs; or to address other circumstances that OHCS determines to be necessary and reasonable for providing equitable access to program assistance.”

Maximum assistance for owners of manufactured homes (Homeowner Managed Projects):

Applicants who have started the process of replacing their damaged manufactured homes are eligible to apply for assistance for the remaining eligible costs under a Homeowner Managed Project, which includes the following activities:

- Purchase a new energy-efficient unit
- Purchase a new non-energy-efficient unit and retrofit the unit to meet program standards*
- Purchase a used unit and retrofit the unit to meet program standards.*
- Repair or retrofit an owned replacement unit that does not meet program standards*

* If funding is needed for retrofits or repairs to non-energy-efficient, used, or non-program-compliant units, the program will review the cost reasonableness of repairing or retrofitting non-energy-efficient or non-program compliant units and may determine it is more cost effective to replace the unit with a program-compliant energy efficient unit. Purchase of used units, retrofits, and repairs to units will require a pre-award inspection to ensure the unit can be reasonably rehabilitated to meet program standards. Restrictions on the age of used units will be outlined in program guidelines.

Award Cap:

- Single-wide: \$100,000
- Double-wide: \$185,000

Impacted residents should not plan on receiving the maximum dollar amounts of assistance, as actual awards will be based on unmet need and the State anticipates that on average awards will be much lower than the published maximum award amounts.

On-Site or Off-Site Improvements for Reconstruction

The State may undertake directly or through local governments or subrecipients new housing development or production for impacted homeowners who do not own the land on which their damaged property was located. When carrying out these activities, the State, local governments or subrecipients may acquire land for development, and carry out necessary infrastructure development or improvements. In these cases, the State will develop detailed construction standards that comply with State and local building codes and program standards around accessibility, energy efficiency, the grade of construction materials and finishes, structural and on-site resilience improvements, the viability of the project, and on-site preparations. Using these construction standards, the State will select park owners, developers, builders, and/or dealers to construct new homes or provide manufactured homes. The State may also contract directly with local governments or subrecipients to carry out these activities.

In some cases, damaged housing cannot be replaced or reconstructed until critical water systems or other neighborhood-based infrastructure improvements are complete. OHCS may provide assistance to local governments or other subrecipients to undertake these necessary improvements. The maximum assistance will be based on procurement, a feasibility analysis, and a cost reasonableness review; the State will work with local governments to leverage additional funding whenever feasible.

5.1.2.5 Connection to Disaster and Unmet Needs

Assistance provided under this program is limited to applicants who experienced verifiable damages from the 2020 Wildfires in the FEMA IA-declared counties. This includes seven HUD-identified MIDs (Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion) and one grantee-identified MID (Klamath).

5.1.2.6 Program's Affordability Period

For HARP:

The program's affordability periods are not required for participants whose homes are rebuilt or replaced on privately owned or leased land. No land restrictions, covenants, or liens will be placed on participating properties unless associated with the ADU pilot program noted above.

Applicants who move into manufactured housing parks that are publicly subsidized or owned by a resident cooperative, nonprofit, public housing authority, or similar ownership structure may be subject to affordability periods and requirements included in the covenants, tenant agreements, and/or bylaws of those parks. The State will work with these park owners and the applicants to ensure that the program applicants understand the affordability requirements prior to moving into the park.

For the ADU Pilot Program:

- **Affordability Period:** Program participants must agree to maintain the property as affordable to an income-eligible tenant (household at or below 80% AMI, adjusted for household size) for a minimum of 8 years. The forgivable portion of the loan is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded loan. The repayable portion of the loan will be a low-interest loan amortized over a period of 20 to 30 years. If the property is sold prior to full repayment, the balance of the repayable portion will be due upon sale. The lien, resale, and recapture requirements will be recorded on the property as a deed restriction or covenant.
- **Affordable Rents:** The State will allow property owners to charge either low or high HOME/CDBG rent limits, adjusted for the number of rooms in the ADU. Whether the property owner may charge low or high rent limits will be determined based on an analysis of the cash flow on the property and the relative income levels in the county in which the property is located. The rent charged should not exceed 30% of an LMI household income.

5.1.2.7 Program's Definition of "Second Home" and Eligibility

Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A second home is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance.

5.1.2.8 Program's Responsible Entity

Administering Entity: The State of Oregon and/or its subrecipients

5.1.2.9 Program's Method of Distribution Description and Overview

The State is the administering entity for the program and will ensure all applicant files are compliant prior to grant execution or award denial. The State may engage subrecipients to support applicants through outreach and engagement, editing and translating program materials for readability, program intake and processing, and/or to provide other related services that facilitate or expedite the application review process.

Homeowners will sign a grant agreement with the State prior to receiving assistance from the program.

The Accessory Dwelling Unit Program may be administered by the State and/or through a subrecipient.

As described in more detail in program policies and procedures, the State will provide assistance to eligible homeowners for unmet needs related to:

- The replacement, reconstruction, rehabilitation, retrofit of the damaged home on the same site as the damaged home, or
- The replacement of the damaged home and homeownership on an alternative site. The details of how this option will be provided to eligible applicants will be detailed in program policies and procedures. It may include providing direct assistance to eligible applicants for them to purchase their replacement home or facilitating the purchase of a ReOregon or otherwise publicly subsidized home.

On-site and Off-site Improvements for Reconstruction for ReOregon subsidized homes

To replace damaged housing in certain locations, the State may need to invest in the development of replacement housing and/or improvements to local infrastructure. To accommodate these situations, the State may provide assistance directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing. The State will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER can pay for infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER, and those costs may be covered under HARP.

5.1.2.10 Program's Competitive Application Overview

The program is not a competitive program; however, there will be program phases. Providing funding beyond Phase 1 is subject to funding availability.

The State may make direct allocations or competitively select subrecipients or local governments to carry out necessary improvements needed to build housing.

5.1.2.11 When such services or activities are needed, the State – or the applicable entity - will competitively procure developers

or vendors needed to carry out program activities. Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

5.1.3 Homeownership Opportunities Program

Table 79: Homeownership Opportunities Program Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Homeownership Opportunities Program	\$119,348,581	\$118,155,095	99%	\$1,193,486	1%

5.1.3.1 Program Description

Due to rising housing rental and homeownership costs, a lack of available housing, and the relative disaster impacts to renters and damages to single-family housing, the State will help replace destroyed housing stock with affordable homeownership opportunities for disaster-impacted first-time homebuyers. The program will develop single-family site-built or pre-fabricated structures—defined as one to four units—for the purposes of selling to eligible disaster-impacted first-time homebuyers. Pre-fabricated (including manufactured) homes may only be placed on owned land or in manufactured housing parks when the landowners or park owners (as applicable) agree to meet all program requirements related to covenants, regulatory agreements and maintaining affordability for the prescribed program periods for the homebuyer and the property.

- The award to the homebuyer will be structured as a fully or partially forgivable, zero-interest loan or grant. The award amount and structure will be calculated based on the applicant’s household income, other reasonably priced resources available to the applicant for home purchase, and projected costs for maintaining the home and housing costs (e.g., property taxes, homeowner and flood insurance, utilities).
- Buyers are not required to qualify for a first mortgage to be eligible for the program.
- If applicable, the repayable portion of the loan will be amortized over a period that makes the payments affordable for the homebuyer. If the property is sold prior to full repayment, the balance of the repayable portion of the loan will be due upon sale.

- If applicable, the forgivable portion of the loan or the grant is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded award.
- The property will be maintained as affordable housing for the duration of a property affordability period, which may be longer than the term of the loan or grant to the homebuyer. The resale requirements associated with the affordability period will be recorded on the property either as a deed restriction, covenant, through bylaws (if placed in an affordability-regulated manufactured housing park), and/or other means. The program also may take a security interest on a manufactured home.

This program includes two levels of subsidy to build housing that is more affordable, energy-efficient, and resilient in the face of future disasters:

- **New Housing Production:** The program will work with developers, manufactured home dealers, and/or builders to incentivize development and supplement the cost of developing housing per program construction standards.
- **Homeownership Assistance:** OHCS will support eligible participants directly by providing additional homeownership assistance, as needed, to make the home affordable.

5.1.3.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

This program will replenish damaged housing stock with more energy-efficient, resilient, accessible, and affordable homeownership opportunities for low and moderate income first-time homebuyers. Affordable homeownership is a critical component of any strategy that seeks to address both housing and economic prosperity, including for members of protected classes who disproportionately experience barriers to accessing economic opportunity. In the disaster-impacted communities with a shortage of housing, a depletion of residents' resources and rising home prices, fixed home payments will help insulate impacted renters and first-time homebuyers from displacement pressures. Homeownership provides an avenue to build wealth and home equity that can support a household's other financial needs.

Across the income spectrum, communities of color have lower homeownership rates than whites due to historical and ongoing discriminatory lending and disparate access to home financing. Common barriers to homeownership include limited access to capital because of low credit scores and/or credit "invisibility."⁹⁸ These barriers disproportionately impact communities of color in Oregon. According to Oregon's

⁹⁸ <https://www.consumerfinance.gov/about-us/blog/who-are-credit-invisible/>

2021 Analysis of Impediments to Fair Housing Choice⁹⁹ and ACS data, people of color disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. In addition, according to the Report on Addressing Barriers to Home Ownership for People of Color in Oregon,¹⁰⁰ people of color and Latine households often face barriers from historical discrimination, lack of access to financing, low or no credit history, cultural differences, education and awareness, and legal status.

This approach represents a direct application of OHCS's Targeted Universalism policy, as OHCS aims to remove barriers that facilitate homeownership opportunities for LMI and Latine, black, indigenous, and people of color. OHCS will invest in partnerships with culturally specific organizations to implement aspects of this program in order to meet this goal.

The program is designed to prioritize homebuyers who face recovery barriers and other unjustified discriminatory barriers to homeownership. The State will achieve this through the following approaches:

- **Review of impediments to fair housing choice.** According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice¹⁰¹ and ACS data, people of color, indigenous, and Latine households disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. This program seeks to overcome unjustified discriminatory effects on racial or ethnic minorities and will expand opportunities for safe, accessible, affordable, energy-efficient housing for disaster-impacted residents, including those individuals and households who have been historically excluded from other housing financing and ownership programs by:
 - Reviewing non-traditional sources of payment and credit history
 - Removing the requirement to qualify for a first mortgage
 - Engaging community-based organizations to support outreach and engagement

⁹⁹ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/conplan/2021-2025%20Action%20Plan/State-of-Oregon-2021-2025-AI.pdf>, page 13.

¹⁰⁰ Joint Task Force Addressing Racial Disparities in Home Ownership, Report on Addressing Barriers to Home Ownership for People of Color in Oregon, December 2019, https://www.oregonlegislature.gov/citizen_engagement/Reports/2019-JARDHO-Addressing%20Barriers%20to%20Home%20Ownership%20for%20People%20of%20Color%20in%20Oregon.pdf

¹⁰¹ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/conplan/2021-2025%20Action%20Plan/State-of-Oregon-2021-2025-AI.pdf>, page 13.

- Providing comprehensive financial and housing counseling through the Housing Recovery Services program and legal support services through the Legal Services Program
- Providing non-predatory, low- to zero-interest flexible loans or grants that are affordable and accessible to low-income households
- **Increase housing available for seniors and individuals living with disabilities.** In addition, according to the Analysis of Impediments, the highest concentrations of seniors and people with disabilities are in Oregon's rural communities. To help increase the amount of accessible housing stock across the state – including in the most impacted and distressed areas that are rural in nature – all HOP new construction projects will be built to accessibility standards that at a minimum meet Oregon Revised Statute 456.510 visitability requirements.
- **Implementing a phased approach to applicant processing.** The program is designed to prioritize those individuals and households who have struggled to access the necessary resources to initiate or complete their recovery. By prioritizing LMI households first, the State can ensure that those survivors with the fewest resources are able to recover. In future phases, subject to funding availability, the State may expand the program to help households with incomes up to 120% of the AMI. However, the State may find it necessary to allow for exceptions to this phasing approach if needed to reduce the possibility of creating concentrated areas of poverty in new or restored housing developments. Assistance under this program is limited to households at or below 120% of the AMI, as defined by HUD or a waiver.

Table 80: Homeownership Opportunities Program Phases

Application Phases		Phase I	Phase II
Household Income	At or below 80% of the AMI	X	
	At or below 120% of the AMI		X

- **Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations.** Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes, vulnerable populations, and individuals from underserved communities. The State will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The State may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support

network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in State or federal recovery programs.

- **Funding public service providers who will provide additional support to applicants through housing and financial counseling and legal services.** These programs are described further below. The programs will fund community organizations that provide comprehensive counseling and legal services to help disaster survivors overcome barriers to accessing recovery resources and sustaining affordable housing beyond the life of CDBG-DR assistance.
- **Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers.** OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, HOP, IHA, and Housing Recovery Services.
- **Directly managing the construction process on behalf of applicants.** To help safeguard applicants from contractor fraud, price gouging, construction delays, and the time-consuming requirements of managing the housing recovery process, the State will either manage the construction process or will provide construction advisory services to applicants as they complete their recovery.

5.1.3.1.2 How the Program Promotes Long-Term Resilience

The program will expand the availability of affordable housing stock that is more energy-efficient and resilient to the hazards in the impacted-communities (including flood, wildfire, earthquake, extreme heat/winter, drought, and other applicable high-risk hazards) and the projected impacts of climate change. In addition, the replacement housing will be built to accessibility and visitability standards that will allow impacted residents to age in place and increase the housing stock available to individuals living with disabilities.

By building to higher energy efficiency, resilience, and more accommodating construction standards, the State aims to help mitigate future loss of life and property and reduce short- and long-term interruptions caused by future disasters.

Each project will be required to meet resilience performance metrics. Details on how the State will measure, track, and report on resilience performance metrics will be included in program guidelines.

5.1.3.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI and up to 120% AMI.

5.1.3.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must have a household income at or below 120% of the AMI. This income limitation is included in the Consolidated Notice from HUD.
- Must have experienced a verified residential loss as a result of the 2020 Wildfires.
- Must be a first-time homebuyer. A first-time homebuyer is an individual who meets any one of the following criteria:
 - An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This may also include a spouse.
 - A single parent who has only owned with a former spouse while married.
 - An individual who is displaced and has only owned with a spouse. A displaced individual is someone whose marital status affects their ability to be properly housed.
- Must agree to the affordability terms, which includes maintaining the property as owner-occupants for a defined period (homebuyer affordability period) and

recording a deed restriction on the property to ensure that the property remains affordable to income-eligible homeowners for a defined period in the event of resale (property affordability period).

- Must meet program underwriting requirements. The underwriting process will review the applicant for such items as the applicant's ability to afford the cost of maintaining a home. It is not a requirement for applicants to qualify for a first mortgage or other credit to access the program.

5.1.3.4 Program-Eligible Activities and Maximum Assistance

Table 81: Homeownership Opportunities Program Eligible Activities

CDBG-DR Eligible Activities	Rehabilitation, reconstruction, elevation, new construction, acquisition, clearance, and homeownership assistance; HCDA Section 105(a)1, 4, 5, 8, 11, 14, 15, and 24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Program guidelines will provide significant details on the eligible activities and award calculation process. The State will perform a cost analysis for each property and applicant, following the methods described below.

New Housing Production

The State will develop detailed construction standards for complying with State and local building codes and meeting program requirements around accessibility, energy efficiency, the grade of construction materials and finishes, structural and on-site resilience improvements, and on-site preparations. Using these construction standards, the State will competitively select park owners, developers, builders, and/or dealers to construct new homes or provide manufactured homes.

The subsidy to the entity building or providing the housing will be issued in the form of a loan, which may be fully or partially forgiven upon meeting award conditions, including completion of the sale of the property to an eligible homebuyer or complying with long-term affordability requirements. The amount of subsidy provided will be based on an analysis of the market and the project, including the current costs of construction and labor, local demand for construction resources, comparable sales in the area, affordability terms, and affordability calculations for the intended homebuyers.

On-Site or Off-Site Improvements for Reconstruction

In some cases, damaged housing cannot be replaced or reconstructed until critical water systems or other neighborhood-based infrastructure improvements are complete. OHCS may provide assistance to local governments or other subrecipients to undertake

these necessary improvements. The maximum assistance will be based on procurement, a feasibility analysis, and a cost reasonableness review; the State will work with local governments to leverage additional funding whenever feasible.

Homeownership Assistance

- The program will pay up to 100% of the cost of purchasing an eligible new home for eligible applicants, which may be based on need, household size, and the cost of a home that meets program standards.
- The award to the homebuyer will be structured as a fully or partially forgivable, zero-interest loan or grant.
- The award amount and structure will be calculated based on the applicant's household income, other reasonably priced resources available to the applicant for home purchase, projected costs for maintaining the home, and housing costs (e.g., property taxes, homeowners insurance).
- Buyers are not required to qualify for a first mortgage to be eligible for the program.
- If applicable, the forgivable portion of the loan is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded loan.
- If applicable, the repayable portion of the loan will be amortized over a period that makes the payments affordable to the homebuyer. The process for determining the amount an applicant must repay will be designed to accommodate different applicant circumstances. This will include procedures for analyzing the following:
 - Sliding scales of percentages of what a household can pay toward housing costs (based on income and/or household composition).
 - Processes for overcoming credit barriers by allowing for alternative sources to establish payment history.
 - The projected long-term housing costs (e.g., pad/lot rent, homeowner insurance, property taxes).
 - The ability for the applicant household to access other reasonably affordable capital, such as a market rate first mortgage loan, which can be applied toward the acquisition of the property. It is not a requirement for applicants to qualify for a first mortgage or chattel loan.
 - The size and composition of the household, which will inform the size, layout, and accessibility components of the home.
 - Other relevant factors that may impact a household's ability to access and/or maintain the home for the period of affordability.

Through this analysis, the State will determine the portion of the loan that will be forgivable over the duration of the affordability period. The State may forgive up to

100% of the loan. Program guidelines will include clear processes for analyzing the amount of the loan that may be forgiven in order to best meet individual household needs, while ensuring consistency and equity in the implementation of the program. Program guidelines will detail any exceptions processes, including for award amounts and loan terms.

5.1.3.5 Connection to Disaster and Unmet Needs

The program is limited to 2020 Wildfires-impacted individuals and households who were renters or who meet the other definition of a first-time homebuyer described above. Through this program, OHCS will help address impacted communities' unmet affordable housing recovery needs and help build long-term financial and disaster resilience for impacted renters and first-time homebuyers.

5.1.3.6 Program's Affordability Period

The Consolidated Notice requires a minimum affordability period for new construction of single-family units for homeownership. The State anticipates investing significant resources in the development of new housing through this program and, in return for this investment, will build long-term affordability requirements into the property. However, the State does not want to place an unreasonable affordability period on homebuyers. Therefore, this program will have two sets of affordability periods, which may be different depending on the amount of program assistance provided to the homebuyer:

- Property Resale Affordability Period
- Homebuyer Affordability Period

5.1.3.6.1 Property Resale Affordability Period

Property resale affordability periods will be managed and enforced by the MH Park owner or site developer and will be for a minimum of 30 years. If other state or federal funding sources require longer affordability periods, then the developer or MH Park owner will be required to comply with the longer of the two affordability periods.

Resale Requirements: The resale requirements will be recorded as a deed restriction or covenant on the property (for prefabricated homes placed in affordability-regulated manufactured housing parks, the resale restrictions will be outlined in the bylaws and/or lease agreements). The restrictions will ensure that if the housing does not continue to be the principal residence of the household for the duration of the property period of affordability, the housing will be made available for subsequent purchase only to a buyer whose household qualifies as an LMI household and will use the property as the household's primary residence.

Within the program guidelines, loan agreement, and deed restriction or covenant, the State will include language which ensures that the price at resale provides the

homebuyer with a fair return on investment and will ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. It also will include the details on how it will make the housing affordable to a low-income homebuyer in the event that the resale price necessary to provide fair return is not affordable to the subsequent buyer.

When a home is placed in an eligible manufactured housing park, the State will work with the park owner(s) and the homebuyer to ensure that the home and/or site is preserved as affordable for the prescribed period of affordability through bylaws, lease agreements, covenants, and/or other means that accommodate different affordable park ownership structures (community land trusts, resident cooperatives, nonprofits, and public housing authorities).

The State may work with local jurisdictions, nonprofits, community land trusts, housing authorities, or resident cooperatives to manage the resale process and/or ensure that the properties remain affordable for the duration of the affordability period.

5.1.3.6.2 Homebuyer Affordability Period

The affordability period on the property may be longer than the term of the loan agreement(s) with the program's participating homebuyer.

For forgivable loans, the homebuyer affordability period is tied to the amount of assistance provided for the home, including the supplement to developers for housing construction and any homeownership assistance provided to the applicant.

Table 83: Homebuyer Affordability Period

Homeownership Assistance Amount (including New Housing Production Subsidy)	Homebuyer Period of Affordability (in years)
Less than \$15,000	5
\$15,000 to \$40,000	10
More than \$40,000	15

Recapture Requirements: The award to the homebuyer will be structured as a receding forgivable loan and is subject to recapture in accordance with the receding percentages documented in the recorded loan. The loan amount due will be reduced on a pro rata basis for the time the homebuyer has owned and occupied the housing measured against the required homebuyer affordability period. For example, if the homebuyer affordability period is 15 years, then 1/15th of the loan will be forgiven after every year of ownership and occupancy of the home as the primary residence by the homebuyer.

5.1.3.7 Program's Definition of "Second Home"

Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A "second home" is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance.

The program will not fund second homes.

5.1.3.8 Program's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

5.1.3.9 Program's Method of Distribution

OHCS will administer the New Housing Production component of the program directly. OHCS will enter into agreements with qualified and eligible subrecipients to administer the homeownership assistance portion of the program in a fiduciary capacity on behalf of OHCS provided that they also meet any additional qualifications and monitoring and administration requirements set forth in the program guidelines. Eligible subrecipients include homeownership centers, community development financial institutions, public housing authorities, and/or other qualified public or private nonprofit organizations.

Homebuyers will execute loan documents with the State or its subrecipient prior to receiving assistance from the program.

On-site and Off-site Improvements for Reconstruction

In some cases in order to replace damaged housing, the State may need to invest in the development of manufactured housing parks and/or improvements to local infrastructure. To accommodate these situations, the State may provide assistance directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing. The State will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER can pay for infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER, and those costs may be covered under HOP.

5.1.3.10 Program’s Competitive Application Review

The program is not a competitive program; however, it is phased per the description above.

The State may make direct allocations or competitively select subrecipients or local governments to carry out necessary public improvements needed to build housing.

When such services or activities are needed, the State will competitively procure developers or vendors needed to carry out program activities.

5.1.3.11 Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first calendar quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all eligible participants have completed closeout, all budgeted funds are expended, or 6 years after execution of the grant agreement with HUD.

5.2 Multi-Sector

5.2.1 **Planning, Infrastructure, and Economic Revitalization Program**

Table 84: Planning, Infrastructure, and Economic Revitalization Program Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Planning, Infrastructure, and Economic Revitalization Program	\$42,117,170	\$41,695,998	99%	\$421,172	1%

5.2.1.1 Program Description

The program will provide direct county allocations for local governments, non-profit organizations, school districts, public housing authorities, and other public or quasi-public entities in the eight most impacted counties to address the unmet infrastructure, planning, and economic revitalization needs that fall within their counties. While budgetary allocations will be made at the county level, counties and organizations within the impacted areas will work together to define the specific projects or programs to be funded. Each infrastructure, economic revitalization, and planning activity must

clearly have a tie to revitalizing disaster impacted communities by directly or indirectly supporting:

- New housing and/or replacement of damaged housing, and/or
- The mitigation of loss of life or property in the face of current and future natural hazards.

Note: in the original draft Action Plan, this program was designed as a competitive infrastructure program. During the public engagement process local governments and organizations shared their concerns around the timing of when funding would be available to meet their communities' needs. They expressed the need to know how much funding would be available for their communities so they could start planning out those projects. Many of the projects need to be completed in order to accommodate housing recovery. Additionally, local organizations and governments shared information around the unmet economic revitalization needs necessary for communities to recover. Based on this feedback, this program was modified to provide direct allocations and to allow for planning, infrastructure, and economic revitalization activities.

5.2.1.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

The State will require applicants to describe how their projects provide the essential public infrastructure necessary for housing and/or will protect life and property, including for members of protected classes, HUD-identified vulnerable populations, and historically underserved communities. While there are no Racially and Ethnically Concentrated Areas of Poverty from the AFFH mapping tools within the fire-impacted areas, the State will work with subrecipients to review their projects to determine if they would have an unjustified discriminatory effect on members of protected classes, HUD-identified vulnerable populations, and historically underserved communities.

Construction projects – including those carried out by subrecipients - will be subject to Section 3. The State will provide technical assistance and training to local organizations to help them achieve Section 3 goals and to the greatest extent feasible, and consistent with existing federal, State, and local laws and regulations, ensure that employment and other economic opportunities be directed to low- and very low-income persons and business concerns that provide opportunities to low- or very low-income persons, particularly those who are recipients of government assistance for housing or residents of the community in which the federal assistance is spent.

5.2.1.1.2 How the Program Promotes Long-Term Resilience

Eligible projects include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Applicants will be required to demonstrate how the projects will be operated and maintained beyond the life of the CDBG-DR grant.

Each project will be required to meet resilience performance metrics. Details on how subrecipients and the State will measure, track, and report on resilience performance metrics will be included in program guidelines.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Applicants will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards, and how that evaluation is incorporated into the design of their project or program.

5.2.1.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation benefits within the HUD- or grantee- identified MID. Each approved application will describe the urgency, type, scale, and location of the disaster-related impact that will be addressed through the project.

5.2.1.3 Program Eligibility

Geographic Eligibility: Eligible entities located in one of the FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: Eligible applicants include, but are not limited to, the following:

- Tribal, State, county, and municipal governments, agencies, districts, and authorities
- Schools (K–12)
- Public housing authorities
- Other public or quasi-public entities
- Nonprofit organizations authorized to carry out CDBG-DR eligible activities, including but not limited to those with a specific public role described in an Oregon revised statute (e.g., soil and water conservation districts)

5.2.1.4 Program-Eligible Activities and Maximum Assistance

Table 85: Disaster Resilience Infrastructure Program Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)1, 2, 4, 5, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 22; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364) and other applicable notices or guides, other applicable waivers or alternative requirements
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This program is designed to allow for a flexible range of eligible activities to help local entities meet the planning, infrastructure, and economic recovery or mitigation needs of their disaster-impacted communities. Each planning, infrastructure, and economic revitalization activity must clearly have a tie to revitalizing disaster impacted communities by directly or indirectly supporting:

- New housing and/or replacement of damaged housing, and/or
- The mitigation of loss of life or property in the face of current and future natural hazards.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Subrecipients will be required to describe the data and/or planning analysis they used in their project prioritization process, including how their projects address the following opportunities, as applicable:

- Support members of protected classes, historically underserved communities, vulnerable populations
- Are designed to mitigate hazard risk, including climate-related natural hazards
- Protect public health
- Conserve lands, waters, and biodiversity
- Address environmental injustice
- Spur economic growth and create jobs

Maximum Project or Program Award: The maximum award is subject to a review of duplication of benefits and cost reasonableness or cost-benefit analysis. No individual project or program award shall exceed the amount of the county allocations within the Method of Distribution section below.

5.2.1.5 Connection to Disaster and Unmet Needs

This program addresses unmet recovery and mitigation planning, infrastructure, and economic revitalization needs in HUD-identified and grantee-identified MIDs, after deducting any duplication of benefits from other federal, State, or private sources.

5.2.1.6 How the Program Will Address Disaster-Related Systems

As described in the Unmet Needs Assessment, there are many planning, infrastructure and economic revitalization needs resulting from the 2020 Wildfires that were not covered by FEMA PA or HMGP, SBA, or other state resources. Many of the infrastructure needs may be due to lack of funding or because of the limitations placed by FEMA on what can be replaced with Public Assistance funds.

These program funds must be used to replace damaged systems or build new systems that will help protect life and property and can withstand future disasters and the impacts of climate change.

5.2.1.7 Program’s Responsible Entity

Administering Entity: Subrecipients.

5.2.1.8 Program’s Method of Distribution

OHCS will make direct county allocations and will engage subrecipients to implement and manage individual projects or programs. OHCS will provide monitoring and broad oversight of subrecipient administered funds. OHCS will review all projects and programs for CDBG-DR compliance and eligibility, ensuring they comply with federal requirements, the Action Plan, and program guidelines.

OHCS calculated allocations to each of the 8 counties based on relative infrastructure, small business, and housing damages, and mitigation needs. The methodology and data used to calculate the allocations are included in the program guidelines. MID County	Percent of Total PIER Program Allocation	PIER Allocation
Clackamas	5.7%	\$ 2,415,826
Douglas	5.7%	\$ 2,399,446
Jackson	32.9%	\$ 13,849,117
Klamath	4.0%	\$ 1,703,097
Lane	18.8%	\$ 7,926,980
Lincoln	6.4%	\$ 2,684,967
Linn	7.4%	\$ 3,110,691
Marion	19.1%	\$ 8,027,045
Total of MIDs	100.0%	\$ 42,117,170

For each county allocation, a regional body will be established with representatives, at a minimum, of the municipal and county governments, the economic development district, and the long-term recovery group. Members of the regional body will select eligible CDBG-DR planning, economic revitalization, and/or infrastructure projects for OHCS approval. OHCS will enter into individual grant agreements with each entity responsible for implementing the approved project or program.

OHCS review will consider whether a) the project is sufficiently and clearly defined and b) meets eligibility standards. This approach will allow local governments and organizations within the eight impacted counties to start budgeting and finalizing the plans for their recovery and mitigation projects immediately.

OHCS will coordinate and consult with State partners, such as OEM, Oregon Department of Transportation (ODOT), Business Oregon, DLCDC, and the Department of Environmental Quality (DEQ), when applicable, to ensure that recovery and mitigation projects are coordinated with other related infrastructure programs.

5.2.1.9 Program's Competitive Application Review

Not applicable.

5.2.1.10 Program's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the third quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

5.2.1.11 How Mitigation Set-Aside Activities will Meet Definition of Mitigation?

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Applicants will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

If projects do not have a clear recovery tie to DR-4562, then applications will have to clearly describe how the proposed activity will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. Each mitigation-only project must: (1) Meet the definition of mitigation activities; (2) address the current and future risks as identified in the grantee's mitigation needs assessment in

the MID areas; (3) be CDBG-eligible activities under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and (4) meet a national objective.

5.2.1.12 How Mitigation Set-Aside Activities will Address Current and Future Risks

The application for each project or program funded through PIER will be required to incorporate information from the state's natural hazards mitigation plan and the applicable local or regional hazard mitigation plans to demonstrate how the project or program will be designed to address current and future risks.

5.3 Public Services

5.3.1 Intermediate Housing Assistance

Table 86: Intermediate Housing Assistance Budget

Program	Budget	Proposed HUD-Identified MID Budget	Proposed Grantee MID Budget
Intermediate Housing Assistance	\$20,073,231	\$19,872,499	\$200,732

5.3.1.1 Program Description

This program provides assistance to eligible residents located in the 2020 Wildfire-impacted counties who lack the necessary resources or support networks to obtain affordable rental housing or need alternative housing until permanent housing solutions are secured.

The State will provide grants to eligible subrecipients to provide:

- Up to 24 months of rental, temporary relocation, and/or other intermediate housing assistance.
- Housing navigation, case management, and support services to disaster-impacted residents.

NOTE: based on public feedback and concerns about having adequate funding to help impacted residents while homes are being rebuilt, the State has increased funding for this program. The additional funding came from the Community Revitalization Planning Program.

5.3.1.2 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

The program provides assistance to those individuals and households who are experiencing homelessness, housing instability, or are at risk of experiencing homelessness due to the lack of affordable intermediate housing options. The program will be designed to ensure that Latine, black, indigenous, and people of color, and other qualifying disaster survivors, who are unstably housed as a result of the disaster can be housed temporarily until they may benefit from a permanent subsidized housing recovery program.

The program is designed to prioritize vulnerable populations through the following approaches:

- **Expanding rental housing choice for low- and moderate-income survivors, including for members of protected classes.** Oregon's 2021 Analysis of Impediments to Fair Housing Choice identified members of protected classes, particularly people with disabilities and people of color experience disparities in rental housing choice. While there is limited housing stock available in the disaster-impacted counties, this program will supplement high rents and will expand housing choice for impacted survivors.
- **Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations to help bring survivors into the program.** Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with limited English proficiency, members of protected classes, vulnerable populations, and individuals from underserved communities. While many of these organizations are already working with survivors, the State seeks to expand engagement efforts to identify and help those survivors who have not received adequate wildfire support to move forward in their recovery.
- **Leveraging supportive housing resources for vulnerable populations by closely partnering and coordinating with a network of local and state housing providers.** OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community based organizations, and other partners

to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, HOP, IHA, and Housing Recovery Services.

5.3.1.2.1 How the Program Promotes Long-Term Resilience

The program helps at-risk disaster survivors have access to stable and affordable housing while they work toward their long-term recovery. This intermediate assistance is critical for helping residents preserve personal savings, retirement, and any other assets needed to meet their permanent recovery plan and long-term financial resilience. These resources also will help protect impacted residents from having to take on additional debt, including high-interest and predatory debt that increases the vulnerability of survivors to current and future disasters and household disruptions.

5.3.1.3 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

5.3.1.4 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- **General Eligibility:** Applicants are not required to participate in HOP or HARP to qualify for IHA. However, the following eligibility criteria apply, based on the household's income:
 - **Households at or below 80% of the AMI** must face housing instability or have been displaced by the 2020 Wildfires in one of the HUD- or grantee-identified MIDs. Applicants whose households are at or below 80% of the AMI may be eligible for assistance if:

- They experienced a direct, verified residential loss from the 2020 Wildfires OR
- Their rents are unaffordable due to the rising rental costs or lack of available affordable rental housing exacerbated by wildfires in the impacted county in which they reside. These applicants are not technically considered “displaced” by the Wildfires, but they do face potential temporary or permanent displacement from the impacted communities if they are unable to afford rents while the State, local governments, and developers replace damaged housing inventory.
- **Households between 80.1% to 120% of the AMI** must have a direct verified residential loss as a result of the 2020 Wildfires and face housing instability and/or are displaced.
- **Temporary relocation assistance for HARP and HOP participants:**
 - Assistance may be provided, including for hotel payments, for households actively participating in the Homeowner Assistance and Relocation Program or Homeownership Opportunities Program who are unable to occupy their home during construction activities.

To ensure the program meets the most urgent needs of low-income residents with verified loss from the disaster, the State may implement a phased or prioritized approach that will be published in program policies and procedures.

5.3.1.5 Program-Eligible Activities and Maximum Assistance

Table 87: Intermediate Housing Assistance Eligible Activities

CDBG-DR Eligible Activities	Interim housing assistance, rental assistance to displaced homeowners, and relocation assistance, HCDA Section 105(a)1, 4, 8, and 15; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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The State will provide grants to eligible subrecipients to provide:

- Up to 24 months of rental, temporary relocation, and/or other intermediate housing assistance.
- Housing navigation, case management, and support services to disaster-impacted residents.

The maximum amount of assistance an applicant may receive is described below. All awards are subject to a duplication of benefits review.

- **Rental Assistance:** On a monthly basis, for up to 24 months of rental payments, per HUD's [Memorandum 23-01](#). The amount calculated on a monthly basis will be the lesser of:
 - The actual cost of rent
 - The amount needed to make housing costs affordable to the household
 - The maximum applicable HOME/CDBG fair market rents based on the household size, and location
- Temporary Relocation Assistance:
 - The program will pay reasonable costs, including hotel payments, based on rate schedules developed by OHCS. Wherever possible, OHCS will attempt to negotiate lower or bulk rates for disaster survivors.
- Other intermediate housing assistance (e.g., utilities, security deposits):
 - Limited to actual costs and a cost reasonableness review from the subrecipient.
 - Refundable security deposits are limited to up to 3 months, subject to State laws listed at https://oregon.public.law/statutes/ors_90.300.
 - Moving costs per the General Services Administration schedule, to be paid up to two times per participant (moving in, moving out).

5.3.1.6 Connection to Disaster and Unmet Needs

The program provides financial and supportive assistance to households displaced by the 2020 Wildfires.

5.3.1.7 Program's Affordability Period

Not applicable.

5.3.1.8 Program's Definition of "Second Home"

Not applicable.

5.3.1.9 Program's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

5.3.1.10 Program's Method of Distribution

The State will administer this program directly or will make grants to subrecipients able to deliver the program to disaster-impacted residents. The State will allocate funds based on estimated unmet needs in the impacted communities, estimates from the subrecipients on the number of participants they can serve, and/or subrecipient capacity. Eligible subrecipients include, but are not necessarily limited to, the following:

- Community action agencies
- Culturally specific and community-based organizations (nonprofits)
- Long-term recovery groups (nonprofits)
- Local governments
- Local public housing authorities
- Other nonprofit, quasi-public, or public organizations

5.3.1.11 Program’s Competitive Application Review

Not applicable.

5.3.1.12 Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout.

5.3.2 **Housing and Recovery Services**

Table 88: Housing and Recovery Services Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Housing and Recovery Services	\$6,017,576	\$5,957,400	99%	\$60,176	1%

5.3.2.1 Program Description

OHCS may administer the Housing and Recovery Services Program directly or by awarding grants to homeownership centers, nonprofit organizations, or other qualified subrecipients to deliver housing and financial counseling and housing navigation services to impacted residents to help in their transition to more permanent housing. Services also may be provided to small rental property owners who provide affordable housing to income-qualified tenants. Services may include homeowner education, renter counseling, homebuyer education, financial literacy, credit rehabilitation, debt management, budgeting, homelessness counseling, avoiding fraud and scams, applying for public and private resources, foreclosure prevention strategies, and relocation counseling, among other services tailored to fit the participants' needs.

5.3.2.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

Disaster-impacted households are facing monumental challenges and are making life-changing decisions related to housing and their household finances. Due to the pressures from FEMA, insufficient insurance, confusing application processes, lack of affordable housing, and other circumstances, many households are forced to make quick decisions, even as they are reeling from the shock and confusion that always accompanies a disaster. These quick and short-term decisions can have long-term consequences, particularly for those impacted residents with access to the fewest resources and Oregon's most vulnerable populations.

Housing counseling and navigation providers will help impacted residents, vulnerable populations, and members of underserved communities expedite their recovery by carrying out the following activities, which are intended to help overcome barriers that restrict access to opportunity:

- Performing outreach and engagement to understand impacted participants' unmet needs, including specific needs faced by Latine, black, indigenous and people of color and individuals living with disabilities, and other individuals and households who continue to struggle to recover.
- Assessing housing needs and financial resources and addressing other concerns about short- and long-term housing.
- Discussing the unique assistance needs and resources available.
- Connecting with State and local recovery resources.
- Communicating with lenders, insurance companies, and government agencies on behalf of applicants, when requested and approved by the applicant.
- Supporting application intake and assisting with the necessary paperwork for recovery programs.
- Reviewing income, expenses, credit, and debt and helping to develop ways to improve a participant's financial situation.
- Creating a personalized action plan.
- Providing other housing navigation services.
- Providing financial counseling services to owners of small rental properties who will rent housing at affordable rates to income-qualified tenants.
- **Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers.** OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly,

frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community-based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, HOP, IHA, and Housing Recovery Services.

5.3.2.1.2 How the Program Promotes Long-Term Resilience

The program helps at-risk disaster survivors have access to stable and affordable housing. This assistance is critical for helping residents plan for current and future housing costs, access recovery programs, complete the required paperwork, and gain the support needed to drive their recovery in a way that makes them more resilient to future disasters and disruptions.

5.3.2.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible applicants with incomes greater than 80% AML.

5.3.2.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must be displaced or facing housing insecurity in one of the HUD- or grantee-identified MIDs.

5.3.2.4 Program-Eligible Activities and Maximum Assistance

Table 89: Housing and Recovery Services Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)8, 15, and 19; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance will be provided to eligible subrecipients in the form of grants to deliver the following types of services:

- Performing outreach and engagement to understand impacted participants' unmet needs.
- Assessing housing needs, financial resources, and addressing other concerns about short- and long-term housing.
- Discussing unique assistance needs and the resources available.
- Connecting with State and local recovery resources.
- Communicating with lenders, insurance companies, and government agencies.
- Supporting application intake and assisting with the necessary paperwork for recovery programs.
- Reviewing income, expenses, credit and debt, and helping to develop ways to improve a participant's financial situation.
- Creating a personalized action plan.
- Providing other housing navigation services.
- Providing financial counseling services to owners of small rental properties who will rent housing at affordable rates to income-qualified tenants.

The maximum amount that can be allocated to the subrecipient will be detailed in program guidelines and will be determined based on such factors as the subrecipient's capacity, location, and/or the communities served by the organization.

5.3.2.5 Connection to Disaster and Unmet Needs

The program provides services to individuals and households living in 2020 Wildfires-impacted communities.

5.3.2.6 Program's Affordability Period

Not applicable.

5.3.2.7 Program's Responsible Entity

Administering Entity: The State of Oregon and/or its subrecipients

5.3.2.8 Program’s Method of Distribution

The State may implement this program directly and/or through subrecipients. While the State intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster impacted areas where services may only be available through the State.

The program policies and public funding announcements will provide information on how qualified subrecipients will receive grants to provide services to eligible residents.

Eligible subrecipients may include homeownership centers, culturally specific or community-based organizations, long-term recovery groups, and/or other nonprofit organizations qualified to provide housing or financial counseling services to applicants.

The State may allocate funds to eligible organizations based on their capacity, location, and/or the communities served by the organization.

5.3.2.9 Program’s Competitive Application Review

Not applicable.

5.3.2.10 Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

5.3.3 Legal Services

Table 90: Legal Services Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Legal Services	\$6,017,575	\$5,957,400	99%	\$60,176	1%

5.3.3.1 Program Description

Through the Legal Services Program, OHCS will provide funding to qualified legal aid and/or legal services providers to deliver the assistance necessary to help impacted residents transition to more permanent housing.

5.3.3.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

In the aftermath of a disaster, legal services are a critical component of comprehensive disaster relief. Legal resources are often unattainable and/or unaffordable to Latine,

black, indigenous, and people of color, HUD-defined vulnerable populations, and LMI households as they work through the challenges of recovery that require legal representation, support, and/or analysis. Failure to resolve these legal issues often results in the denial of recovery resources and/or delays to recovery; these delays and denials disproportionately impact communities of color and individuals with limited English proficiency.

This program will help vulnerable populations overcome many of these challenges and overcome barriers that restrict access to recovery opportunities through the following types of legal services:

- Replacing identification papers.
- Working through insurance claims.
- Clearing property titles and working through heirship and probate.
- Fighting unlawful evictions and foreclosures.
- Combating contractor scams and fraud.
- Assistance with school transfers.
- Obtaining emergency child custody, visitation, support, and other court orders requiring modification as a result of displacement, injury, or job loss.
- Other legal services related to recovery.

5.3.3.1.2 How the Program Promotes Long-Term Resilience

The program helps at-risk disaster survivors secure stable and affordable recovery housing that is more resilient to future disasters. This assistance is critical for helping residents navigate the legal challenges that serve as barriers to recovery and maintain legal access to their recovery housing.

5.3.3.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

5.3.3.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion

- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must be a renter or homeowner actively participating in one of the other CDBG-DR housing programs, including IHA, HOP, HARP, and Housing and Recovery Services, and have a household income at or below 120% AMI.

5.3.3.4 Program-Eligible Activities and Maximum Assistance

Table 91: Legal Services Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a) 8; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), , other applicable waivers or alternative requirements
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Assistance will be provided to eligible subrecipients or OHCS-contracted legal services providers to deliver the following types of assistance:

- Replacing identification papers.
- Working through insurance claims.
- Clearing property titles and working through heirship and probate.
- Fighting unlawful evictions and foreclosures.
- Combating contractor scams and fraud.
- Assistance with school transfers.
- Obtaining emergency child custody, visitation, support, and other court orders requiring modification as a result of displacement, injury, or job loss.
- Other legal services needed for applicants to complete their recovery through one of the other CDBG-DR programs.

5.3.3.5 Connection to Disaster and Unmet Needs

The program provides services to individuals and households impacted by the 2020 Wildfires.

5.3.3.6 Program’s Affordability Period

Not applicable.

5.3.3.7 Program’s Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

5.3.3.8 Program’s Method of Distribution

The State may administer the program directly and/or through subrecipients. While the State intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster impacted areas where services may only be available through the State.

5.3.3.9 Program’s Competitive Application Review

The program policies or public funding announcements will provide information on how qualified providers will receive awards to provide eligible services to eligible applicants.

The State may allocate funds to eligible subrecipients and/or competitively procure service providers.

5.3.3.10 Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first calendar quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

5.4 Planning and Administrative Costs

5.4.1 Resilience Planning Program

Table 92: Resilience Planning Program Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Resilience Planning Program	\$3,000,000	\$2,970,000	99%	\$30,000	1%

5.4.1.1 Program Description

Through the Resilience Planning Program, the State will carry out regional and statewide recovery, resilience and mitigation planning, including, but not limited to, the following:

- Housing development strategies, including developing construction standards, facilitating the development of affordable housing and removing barriers to affordable housing
- Public land use and infrastructure policy and planning
- Public resilience and preparedness policy and planning
- Increasing resilience to the impacts of climate change

- Protecting public health
- Addressing environmental injustice
- Spurring economic growth and creating jobs

5.4.1.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

To receive funding under this program, the State seeks to address historic and systemic barriers, environmental injustice, or other limitations faced by HUD-defined vulnerable populations, underserved communities, individuals and households with LEP, protected classes, and communities of color.

The planning and technical assistance process is intended to be inclusive and reflective of those with lived disaster experience, housing insecurity, and/or economic insecurity. The State will design and implement an inclusive planning process that incorporates feedback and input in a manner that is equitable and representative of the residents living in the impacted areas.

This level and type of inclusive community planning is designed to help recovering communities and the State incorporate the affordable and resilient housing needs of vulnerable populations in long-term recovery and resilience planning.

5.4.1.1.2 How the Program Promotes Long-Term Resilience

Each jurisdiction experienced the 2020 Wildfires differently, with some rural communities facing a lack of public infrastructure and losing more than half of their residential or commercial population, and others facing reconstruction needs in more urban areas. In addition, many communities have existing plans that need to be supplemented or enhanced with additional analysis, while others have a need for new planning to rebuild their communities in a manner that can withstand future disasters.

This program is designed to promote sound, sustainable long-term recovery resilience and planning that accounts for the unique hazards, opportunities, housing stock, economic revitalization, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities.

The State will identify the following opportunities, as applicable, within each of their plans:

- Increasing resilience to the impacts of climate change.
- Protecting public health.
- Conserving lands, waters, and biodiversity.
- Addressing environmental injustice.
- Spurring economic growth and creating jobs.

5.4.1.1.3 How will Program Address Current and Future Risks/Mitigation Needs Assessment

Each plan created under this program will account for or include considerations of current and future risks and mitigation needs.

5.4.1.2 Program’s National Objective(s)

Planning activities are presumed to meet a national objective under the requirements at 24 CFR570.208(d)(4).

5.4.1.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

Eligible Applicants: Eligible applicants may include, but are not limited to:

- State agencies

5.4.1.4 Program-Eligible Activities and Maximum Assistance

Table 93: Resilience Planning Program Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)8, 9, 12, 16, and 21, administration costs, applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance may be used for regional and statewide recovery, resilience and mitigation planning, including, but not limited to, the following:

- Housing development strategies, including developing construction standards, facilitating the development of affordable housing and removing barriers to affordable housing
- Public land use and infrastructure policy and planning
- Public resilience and preparedness policy and planning
- Increasing resilience to the impacts of climate change
- Protecting public health
- Addressing environmental injustice
- Spurring economic growth and creating jobs

5.4.1.5 Connection to Disaster and Unmet Needs

This program is limited to planning activities that cover the communities that were impacted by the 2020 Wildfires.

5.4.1.6 Program’s Responsible Entity

Administering Entity: The State of Oregon

5.4.1.7 Program’s Method of Distribution

The program will be implemented by the State, in close coordination with local, state, and regional entities.

5.4.1.8 Program’s Competitive Application Review

Not applicable.

5.4.1.9 Program’s Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the third quarter of 2023, after HUD has approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

5.4.2 Administrative Costs

Table 94: Administrative Costs Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Administrative Costs	\$21,114,300	\$20,903,157	99%	\$211,143	1%

5.4.2.1 Program Description

The costs necessary for the general administration of the CDBG-DR grant include, but are not limited to, the State and subrecipient's staff time administering programs; compliance and monitoring of the State's subrecipients, vendors, and other recipients of funding; and other costs specified as eligible administrative expenses in 24 CFR 570.206.

Up to 5% of the overall grant and any program income may be used for administration of the grant, inclusive of administrative costs incurred by OHCS and its subrecipients.

5.4.2.2 Program Eligibility

Table 95: Administrative Costs Eligible Activity

CDBG-DR Eligible Activities	Program administrative costs, defined at 24 CFR 570.205 and 570.206, and any applicable waivers or alternative requirements
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Eligible Recipients: State and eligible subrecipients carrying out CDBG-DR programs

6. Appendix

6.1 Certifications

- The grantee certifies that it has in effect and is following a residential antidisplacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- The grantee certifies its compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms, if required by Part 87.
- The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be administered with funds under this notice are consistent with its Action Plan.
- The grantee certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Act, as amended, and its implementing regulations at 49 CFR Part 24, except where waivers or alternative requirements are provided for in this notice.
- The grantee certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.
- The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

- Each State receiving a direct award under this notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.
- The grantee certifies that it is complying with each of the following criteria:
 - Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the MID areas for which there is a presidentially declared disaster in 2020 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed in order to give the maximum feasible priority to activities that will benefit LMI families.
 - The aggregate use of CDBG-DR funds shall principally benefit LMI families in a manner that ensures that at least 70% of the grant amount is expended for activities that benefit such persons.
 - The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds by assessing any amount against properties owned and occupied by LMI persons, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title, or (b) for the purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- The grantee certifies that it will conduct and carry out the grant in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
- The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require units of general local government that receive grant funds to certify that they have adopted and are enforcing:
 - A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations, and

- A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- Each State receiving a direct award under this notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.
- The grantee will not use grant funds for any activity in an area identified as floodprone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as an SFHA (or 100-year floodplain) in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR Part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K, and R.

- The grantee certifies that it will comply with the environmental requirements at 24 CFR Part 58.
- The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

6.2 Waivers

6.2.1 Use of Standardized Area Median Income

Public Law 117–43 authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of any statute or regulation in connection with HUD’s obligation or use by the recipient of these funds. Pursuant to the Housing and Community Development Act, 42 U.S. Code 5302(a)(20), the State of Oregon requests a Secretarial waiver of regulations under PL 117-43 to set the minimum Area Median Income (AMI) requirements at Clackamas County’s annual AMI – adjusted yearly – for those communities impacted by DR-4562 with AMI limits below that of the Clackamas limits, including when used to calculate 80 and 120 percent of the AMI. The State believes it is consistent with the overall purposes of Title I of the HCDA in seeking this waiver.

This waiver is consistent with similar HUD waivers provided to the US Virgin Islands and the State of Texas, following their respective 2017 disasters, as provided in the Omni Notice, 85 FR 60821. The notice can be found [here](#) and the specific waivers are found on these pages:

- **III. Public Law 115–31, 115–56, 115–123, 115–254, and 116–20 Waivers and Alternative Requirements** *Use of Standardized Area Median Income (State of Texas Only)* – Page 60824
- **VI. Public Law 115–56, 115–123, and 116–20 Waivers and Alternative Requirements** *Use of Standardized Area Medium Income (U.S. Virgin Islands Only)* – Page 60826

Per the applicable federal register notices, AMI is generally - though not explicitly - defined using the county as the area of interest and serves as eligibility criteria (80 percent or 120 percent of the AMI, depending on the eligible activity) for programs that provide homeowner assistance, affordable rental assistance, homeownership assistance, and buyout or incentives. To meet the low-and moderate-income expenditure requirements of the CDBG-DR grant, 70 percent of grant funds must be spent on activities that provide a benefit to persons at or below 80 percent of AMI. However, the range of LMI across the impacted counties is quite large, from a low of \$57,450 in Douglas and Klamath counties to a high of \$85,200 in Clackamas County. Of the 8 most impacted and distressed counties that experienced impacts to homes, 7 counties have AMI limits below that of Clackamas’ limit. The table below compares the

county limits of the HUD and Grantee-identified most impacted and distressed counties' low- and moderate-income (LMI) limits – or 80% of AMI – compared to that of Clackamas County LMI limit.

Difference between 2022 Clackamas County 80% AMI Limit and Other FEMA IA Impacted Counties' 2022 CDBG 80% AMI Limits

	Percentage Difference between Clackamas and Other IA County 80% AMI Limits								
		1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Clackamas		59,650	68,200	76,700	85,200	92,050	98,850	105,650	112,500
		Dollar Difference Between Clackamas and Other IA County CDBG 80% AMI Limits							
Douglas	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Jackson	-28%	(16,850)	(19,300)	(21,700)	(24,100)	(26,050)	(27,950)	(29,850)	(31,800)
Klamath	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Lane	-25%	(15,050)	(17,200)	(19,350)	(21,500)	(23,250)	(24,950)	(26,650)	(28,400)
Lincoln	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Linn	-29%	(17,550)	(20,100)	(22,600)	(25,100)	(27,100)	(29,100)	(31,100)	(33,150)
Marion	-26%	(15,350)	(17,600)	(19,750)	(21,950)	(23,700)	(25,450)	(27,200)	(29,000)

Source: HUD CDBG LMI Limits

As a point of reference, the table below compares the counties with the statewide AMI limit:

Difference between 2022 Statewide 80% AMI Limit and 2022 CDBG 80% AMI Limits Across DR-4562 FEMA IA Impacted Counties

	Percentage Difference between State and County 80% AMI Limits								
		1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Oregon Statewide Limit		50,850	58,150	65,400	72,650	78,500	84,300	90,100	95,950
		Dollar Difference Between State and the County CDBG 80% AMI Limits							
Clackamas	17%	8,800	10,050	11,300	12,550	13,550	14,550	15,550	16,550
Douglas	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Jackson	-16%	(8,050)	(9,250)	(10,400)	(11,550)	(12,500)	(13,400)	(14,300)	(15,250)
Klamath	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Lane	-12%	(6,250)	(7,150)	(8,050)	(8,950)	(9,700)	(10,400)	(11,100)	(11,850)
Lincoln	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Linn	-17%	(8,750)	(10,050)	(11,300)	(12,550)	(13,550)	(14,550)	(15,550)	(16,600)

Marion	-13%	(6,550)	(7,550)	(8,450)	(9,400)	(10,150)	(10,900)	(11,650)	(12,450)
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Source: HUD CDBG LMI Limits for county, HUD Income User for Statewide

The AMI varies significantly between counties, but the cost to rebuild or reconstruct a new home does not vary on the order of magnitude as shown in income limits across the impacted counties, if at all.

- **Manufactured Homes:** More than half of the damaged homes in DR-4562 were manufactured homes. Manufactured homes provided affordable homeownership options for lower income households pre-disaster, but these same households do not have the resources to replace damaged manufactured homes in today's market, particularly since many of the homes destroyed were older manufactured homes that were drastically underinsured. Nonetheless, the costs of manufactured homes are consistently increasing across Oregon. Based on data gathered in October 2021 during the unmet needs assessment, it was estimated that it will cost on average \$77,000 to replace destroyed single wide and \$144,000 to replace double wide manufactured homes – **regardless of where residents live in Oregon because all of Oregon is included in the Western Region for manufactured home sales.** This information was aggregated by reviewing the real costs 15 fire survivors were paying for manufactured homes through the State's Manufactured Home Replacement Program. This average cost did not include site prep or the costs to replace damaged septic systems and wells. Since that analysis was performed, the Manufactured Home Replacement Program team performed additional analysis and found that MH costs continue to increase. This analysis is supported by the Federal Reserve Bank of St. Louis, which shows that as of December 2021, the average sales price of new manufactured homes in the US Western Region was \$76,900 for a single wide and \$170,600 for a doublewide.¹⁰² These costs are up from the December 2020 averages of \$64,500 and \$115,000, respectively. Based on feedback during the Action Plan public hearings from survivors who have purchased manufactured homes since February 2022, these costs have risen even further. The rising costs of manufactured homes – while still more affordable than stick-built homes – are felt consistently across the disaster impacted communities and are substantiated and summarized in the table below.

Average Sales Price of New Manufactured Homes in the Western Region					
	Single Wide	Percent Increase (Decrease)	Double Wide	Percent Increase	Data Source

¹⁰² Federal Reserve of St. Louis Economic Data, Average Sales Price of New Manufactured Homes by Region and Size of Home, December 2021,

<https://fred.stlouisfed.org/release/tables?rid=471&eid=1194074#snid=1194087>

December 2019	\$52,100	-	\$107,600	-	US Census Bureau
December 2020	\$64,500	23.8%	\$115,000	6.9%	Federal Reserve of St. Louis
August 2021	\$79,000	22.5%	\$143,000	24.3%	US Census Bureau
October 2021	\$77,000	(2.5%)	\$144,000	0.7%	OHCS Manufactured Home Replacement Loan Program : Wildfire Recovery Sample
December 2021	\$76,900	0%	\$170,600	18.5%	Federal Reserve of St. Louis
March 2022	\$88,073	14.5%	\$172,647	1.2%	Oregon Manufactured Housing Association (OMHA)
Total Increase from Dec 2019 to Mar 2022		69.0%		60.5%	

- **Site-built Homes:** As of quarter 1 2022, according to the RS Means Location Oregon cost indices and weighted factors, which represents relative construction costs across regions and states, the counties with the lowest LMI limits (Douglas, Klamath, and Lincoln) have factors of 101.9 (Douglas - based on Eugene factor), 100.4 (Klamath - based on Klamath Falls factor), and 103.1 (Lincoln - based on Salem factor). Some additional data points on the RS Means Location factors highlight the need to standardize income limits across the impacted areas:
 - o The area with the highest LMI limit (Clackamas) has a factor of 102.7 (based on Portland factor).
 - o The Portland (Clackamas) factor is lower than the Salem (Marion) factor, meaning it is more expensive to build in Marion than it is in Clackamas. However, Marion's LMI income limits are 26% lower than those in Clackamas. It is also important to note that just over 60 single family homes were destroyed in Clackamas County, while over 600 single-family homes were destroyed in Marion County.
 - o The other two counties with significant single-family housing losses (Jackson [610] and Lane [505]) have RS Means Location Factors of 100.9 (Medford) and 101.9 (Eugene), respectively, or 1.8% and 0.8% lower than the Portland (Clackamas) factor. However, the income limits in Jackson and Lane Counties are 28% and 25% lower than the Clackamas income limits.
 - o For a 1,600 square foot home at standard grade built in RS Means, this translates into construction costs ranging from \$229,700 in Klamath to \$239,000 in Salem, with the other regions coming in around \$230,000. **This 4% range in estimated construction costs is much smaller than the 25-33% difference between Clackamas and the other county 80% AMI income limits in the most impacted and distressed counties.**

Like many other parts of the country, Oregon faces challenges related to construction, supply chain disruptions, and increased labor and material costs. Construction costs have increased since the September 2020 wildfires, forcing many lower income property owners to postpone rebuilding. The construction industry, one of the fastest-growing sectors of the state economy is facing a labor shortage. Contractors report they continue to have a difficult time hiring skilled worker positions and expect it to remain difficult for the next year. This shortage has been amplified by the COVID-19 fueled recovery spending that led to a construction boom and recovery efforts across the country. This has resulted in an average two-year timeline for completing a single-family stick-built home.

If the State uses the AMI income limits for each county, the recovery programs could disproportionately impact the eligibility of Latine persons and households to participate in CDBG-DR housing programs. While the State is still collecting demographic information on survivors, local governments, community organizations and the Oregon Department of Human Services have reported there were a disproportionate number of Latine survivors in destroyed manufactured housing parks, particularly in Jackson County where the greatest number of homes were damaged or destroyed. Based on sample surveys, many of these survivors worked in agriculture, service jobs and other low-wage professions, which could put their households just above the respective 80% or 120% of AMI limits, but do not provide enough income to replace destroyed manufactured homes in today's market. As described in the Analysis of Impediments to Fair Housing Choice, Latine households face additional barriers in accessing homeownership programs and credit, which can be addressed through CDBG-DR if applicants income-qualify for housing programs. By using the higher Clackamas limit, it will be less likely there will be a disproportionate impact of eligibility on recovering Latine survivors.

Prior to the COVID-19 pandemic and 2020 Wildfires, the State experienced significant increases in housing costs and a severe housing shortage. The statewide median home value rose by 40% (around \$100,000) between 2010 and 2018. Similarly, the median rent also increased by nearly \$300 (just above 40%) during the same period.¹⁰³ The most current vacancy data available for the State indicates a 4% rental vacancy rate and a sales vacancy rate around 1.3%. Oregon lacked sufficient housing to meet the demand for relocation or temporary housing generated by the disasters, which has increased the cost of living in the disaster impacted counties from rising rents and costs to replace or repair damaged housing.

The State represents that granting this waiver will allow it to more effectively serve the residents that are financially burdened and who need CDBG-DR assistance to be able to recover under the current conditions. OHCS is actively designing their recovery

¹⁰³ State of Oregon, 2021–2025 Consolidated Plan, <https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx>, p.119

programs. While this waiver request is critical for helping lower- and moderate-income households across the impacted areas who are struggling to recover, the State will prioritize very low and extremely low-income vulnerable populations through program outreach, intake, and the additional supports provided through CDBG-DR and state-funded housing counseling, legal services, permanent supportive services, and the intake processes through the CDBG-DR homeowner and renter programs. Additional information on these strategies is outlined in the program sections of the Action Plan and will be further detailed in program guidelines.

Prompt approval of this waiver will help provide certainty and guidance to impacted residents and communities who continue to undertake recovery efforts.

6.2.2 Assistance for Privately-Owned Utilities

While 24 CFR Part 570.201 (I) allows for using CDBG funds to assist privately-owned activities, in [Section III.G.3 of the Consolidated Notice](#) HUD has prohibited the use of CDBG-DR funds to assist a privately-owned utility for any purpose.

In *Basically CDBG for States*, April 2021, Chapter 6, **HUD defines a private utility:**

- A privately-owned utility may be defined as a publicly-regulated service provided through the use of physical distribution lines to private properties and that is owned and operated by a non-public entity.
- Utilities include, but are not necessarily limited to, natural gas, electricity, telephone, water, sewer, and cable television services.

After consulting with HUD, providing assistance to a non-profit or cooperatively owned utility can be done through subrecipient agreements, where the State would treat them similarly to local governments or other public or quasi-public entities. This applies to non-profit and cooperatively owned electric, water, and sewer utility providers, including when those providers service a wide area and when the utilities are limited to residents of non-profit or cooperatively owned manufactured housing parks.

Therefore, this waiver focuses on providing assistance to *for-profit* privately-owned utilities.

6.2.2.1 Rehabilitation of damaged affordable manufactured housing parks

6.2.2.1.1 Context

Many manufactured housing parks were damaged in DR-4562. Manufactured homeowners living in parks often fall within the category of “owner” because they own their home, but they are considered tenants of the park because they rent the lot or pad. OHCS seeks to invest in manufactured housing parks when at least 51% of the lots will be rented at affordable rates to households at or below 80% of the area median income, per program guidelines. This may include parks owned by private, for-profit entities. The water, sewer and electrical systems of the manufactured housing parks

were commonly destroyed by the fires. For these parks to return and for them to maintain affordable rents for their former and new tenants, many need assistance with rehabilitating those systems.

6.2.2.1.2 Waiver Request

The State is requesting HUD waive the prohibition to assist privately-owned utilities in [Section III.G.3 of the Consolidated Notice](#) for for-profit affordable manufactured housing parks when at least 51% of the residents are at or below 80% of the AMI and are charged affordable rents, provided the park meets the following conditions:

- The park owner(s) must agree to tenant income and rent affordability restrictions as required by Consolidated Notice requirements and per program processes of recording and enforcing those requirements. At a minimum, the affordability period will be in compliance with HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(e).
- The State will underwrite the project financials and determine whether the park owner(s) can reasonably finance all or a portion of the infrastructure improvements that would be considered “privately-owned utilities.” The State will ensure that CDBG-DR assistance will not result in an unreasonable return on investment for the park owner(s).
- Only if the owner(s) cannot fund these improvements with other reasonable sources will the state pay for costs that may be considered “privately-owned utilities.”

6.2.3 Extension of Rental Assistance

OHCS requested a waiver from HUD to allow for the provision of rental and other eligible intermediate housing assistance for up to 36 months. Through [Memorandum 23-01](#), HUD approved a waiver for the provision of rental assistance (e.g. rent, security deposits, and utility deposits) and utility payments for up to 24 months. Existing CDBG regulations allow these payments to cover rent and utilities for a short period of time as a public service activity under 42 U.S.C. 5305(a)(8), but these payments cannot extend for so long that they no longer qualify as an eligible public service activity. As described in the Leveraging Funds section of the Action Plan, the State is investing over \$300 million of state funding into the redevelopment or new development of affordable multi- and single-family housing in the impacted counties. This housing will come online in the next 2-4 years, but during this time, residents residing in the impacted communities face unaffordable rents.

Following the 2020 Wildfires and Straight-line Winds, many Oregon residents were forced to abandon their residences and may be unable to return when damages to the units have made them uninhabitable. These households are considered to be “displaced” by the disaster are eligible for up to 42 months of rental assistance, per the waiver in the Consolidated Notice.

However, there are additional low-and-moderate income households who have been indirectly impacted by the destruction of housing and could be forced to move from the impacted communities due to the lack of affordable rental housing options in the impacted counties. Of the 4,326 homes impacted by the 2020 wildfires, all but 54 of them were completely destroyed. According to the FEMA IA data, 41% of the impacted residents with verified losses were renters, and so the State can reasonably assume that around 40% of the damaged and destroyed units were rental properties. The total loss of this housing has placed additional demands on areas that were already facing an affordable housing crisis before the wildfires. As such, as demonstrated in the table below, rents have considerably increased in the impacted counties from 2020 to 2022.

County	2020-2022 FMR Percent Change				
	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	18.79%	17.30%	16.05%	13.63%	10.59%
Douglas	9.44%	7.48%	7.36%	5.68%	-0.44%
Jackson	13.17%	14.65%	14.57%	12.76%	11.69%
Klamath	7.07%	6.94%	7.04%	7.83%	16.60%
Lane	7.76%	7.28%	6.63%	5.01%	7.89%
Lincoln	11.08%	8.00%	8.89%	6.58%	6.73%
Linn	12.07%	3.97%	3.83%	1.41%	1.92%
Marion	19.32%	15.90%	13.09%	11.36%	10.30%

Source: [2022 and 2020 HUD Fair Market Rents \(40% Percentile Rents\)](#)¹⁰⁴

This waiver and alternative requirement will provide the State with additional time to stabilize persons or households in permanent housing and is consistent with the goal of preventing homelessness of residents in impacted areas. The damages from the wildfires diminished the opportunities for homeless, at-risk persons, and LMI households living in impacted communities to independently establish affordable housing. The goal of this waiver and alternative requirement is to prevent homelessness and provide

¹⁰⁴ 2022 and 2020 HUD FMR (40th Percentile Rents), https://www.huduser.gov/portal/datasets/fmr.html#2022_query

additional time to stabilize persons or households in permanent housing while the State works to replace the housing stock lost from the wildfires.

Reference of comparative rents by county, from 2020 to 2022:

2020 HUD FMR (40%)					
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	\$1,192	\$1,289	\$1,495	\$2,157	\$2,625
Douglas	\$699	\$815	\$1,073	\$1,548	\$1,824
Jackson	\$729	\$792	\$1,043	\$1,505	\$1,831
Klamath	\$566	\$648	\$852	\$1,201	\$1,331
Lane	\$773	\$893	\$1,176	\$1,696	\$1,989
Lincoln	\$659	\$812	\$1,012	\$1,460	\$1,767
Linn	\$721	\$832	\$1,096	\$1,562	\$1,824
Marion	\$709	\$761	\$1,001	\$1,444	\$1,757

2022 HUD FMR (40%)					
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	\$1,416	\$1,512	\$1,735	\$2,451	\$2,903
Douglas	\$765	\$876	\$1,152	\$1,636	\$1,816
Jackson	\$825	\$908	\$1,195	\$1,697	\$2,045
Klamath	\$606	\$693	\$912	\$1,295	\$1,552
Lane	\$833	\$958	\$1,254	\$1,781	\$2,146
Lincoln	\$732	\$877	\$1,102	\$1,556	\$1,886

Linn	\$808	\$865	\$1,138	\$1,584	\$1,859
Marion	\$846	\$882	\$1,132	\$1,608	\$1,938

6.2.4 Request for exception from DOL on the interpretation of the applicability of the Davis-Bacon and Related Acts, Section 3, and Section 504 to Ongoing or Pre-Award Non-Residential and Non-Commercial Construction Work

DBRA is made applicable to the Community Development Block Grant program by Section 110 of the Housing and Community Development Act of 1974 (HCDA), now codified at 42 USC 5310. Also, under the regulations of the U.S. Department of Labor (DOL) at 29 CFR §1.6(g), where federal assistance is not approved prior to contract award (or the beginning of construction if there is no contract award), Davis-Bacon wage rates apply retroactively to the beginning of construction and must be incorporated retroactively in the contract specifications.

OHCS requests HUD to ask DOL to allow an alternative interpretation of DBRA for work previously completed and work currently in progress which OHCS would like to fund with OHCS's 2020 CDBG-DR grant. There is precedent for granting this request and it is particularly helpful when CDBG-DR funds are used to match FEMA PA projects or help supplement unmet infrastructure projects that must be completed early in the recovery to enable additional housing and community recovery that can be funded by CDBG-DR programs. The Sandy grantees from 2011-2012 and the 2015-2019 CDBG-DR grant recipients had special permission from DOL on the applicability date of DBRA to CDBG-DR funded projects. In addition, this provision reduces recovery delays and administrative costs for impacted communities, as it removes the need to add costly and time-consuming administrative layers to completed or ongoing projects. The potential for requesting this alternative interpretation is also outlined in HUD-FEMA's joint [Implementation Guidance for Use of Community Development Block Grant Disaster Recovery Funds as Non-Federal Cost Share for the Public Assistance Program](#) (page 40).

Specifically, OHCS is requesting that DBRA prevailing wage requirements not be applied retroactively to construction funded in whole or in part with 2020 CDBG-DR funds for:

- Construction work completed prior to the OHCS and HUD CDBG-DR agreement when CDBG-DR grant funds reimburse already incurred project costs.
- Construction work in progress when that work starts prior to the OHCS and HUD CDBG-DR agreement.

The State seeks a similar alternative requirement and interpretation from HUD for the applicability of compliance with Section 3 and Section 504 under these circumstances.

6.2.5 Section 104(d) One-for-One Replacement of Lower Income Dwelling Units

OHCS is adopting the waiver provided through Section IV.F.1 of the Consolidated Notice. For the purpose of complying with this alternative requirement, OHCS is defining a property as “not suitable for rehabilitation” if any of these conditions apply:

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

6.3 Summary and Response to Public Comments

6.3.1 Summary of Public Comments

The following provides a summary of the key themes that were raised in the May public hearing sessions with the various impacted communities.

1. **Supportive Affordable Housing Solutions for both Homeowners and Renters.** Stakeholders highlighted the lack of affordable housing for impacted residents to move into. The fire has placed significant strain on communities that were already suffering from high costs of housing.
2. **Assistance for home damage repair and efforts to make resilient structures.** Residents inquired about the use of funding to cover repair and reconstruction work that is currently in progress or has already been completed using personal funds.
3. **Development of resilient infrastructure.** Stakeholders mentioned the importance of infrastructure and how poorly maintained sewage and utility infrastructure has hampered lots of rebuilding efforts due to the high costs of replacing the infrastructure.
4. **Business Assistance.** Stakeholders noted that many businesses could not fully recover from the fire as insurance was insufficient to complete reconstruction of buildings. Rising prices and general inflation have also created challenges for long-standing businesses that are vital to certain communities.
5. **Funding Timeline.** Attendees questioned when the various programs funded by the CDBG-DR Action Plan will be available.
6. **Low-to-Moderate Income.** Attendees asked whether assistance would be available for impacted residents above the LMI thresholds.
7. **Assistance for residents impacted by additional fires.** Attendees that were impacted by fires after the 2020 Labor Day disaster (namely the 2021 Bootleg Fire) requested to know if CDBG-DR funding could be used to cover their recovery efforts/repairs.

The input received during the above referenced briefings and meetings has informed OHCS's recovery plan, including decisions related to funding allocations and program design. OHCS will continue to affirmatively outreach to all tribes and vulnerable populations for future public meetings and consultations.

6.3.2 Public Comments and Responses

This section features all public comments received via the various collection forms (public hearings, written letters, e-mail, web form, and voicemail). They have been separated into various categories based on their content.

6.3.2.1 Eligibility

The following comments contain inquiries regarding eligibility and requirements of the CDBG-DR grant.

1. **Public Comment:** Do these programs have nothing at all for folks who have already rebuilt, even if we spent money out of savings to rebuild a home.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement savings or otherwise suffered a demonstrated financial hardship to complete their housing recovery. If this is allowed, the State may establish benefit caps for how much eligible applicants may be reimbursed for eligible replacement or reconstruction activities.

2. **Public Comment:** I assume most of the suggestions given are for the Alameda fire but just wanted to ask if anyone has suggested anything for the South Obenchain fire recovery disaster: FM-5367-OR. As my family lost their home there, we did not have insurance, the community did quite a lot for us through access and Adaire homes but there is still so much that needs to be done regarding the damage that is still done to our fence and land / we had to pay for a replacement septic also which is about \$7000 and need a new fence as well as agriculture fire clearing from all of the black berry bushes that are invasive and grow wild in the area and along our ditch that is out on the highway. There were trees cut down and just left there posing other fire hazards to us during the rebuild. It would be nice if funds could go to the efforts of firebrandcollective.org so this can be done.

OHCS Response: The 2020 South Obenchain fire is included in the 2020 declared disaster (DR-4562) and residents who were impacted by that wildfire are eligible to apply for ReOregon assistance. ReOregon it is not limited to the Alameda fire but includes all fires and straight-line winds included in FEMA's 2020 DR-4562 disaster declaration. The ReOregon funds are focused on rebuilding damaged homes and increasing housing opportunities for impacted renters. Because these are federal funds,

there are limitations on eligible uses. Unfortunately, fences are not an eligible use of these funds. However, there may be an opportunity to support the removal of hazardous standing trees that pose a future fire or other risk.

- Public Comment:** Currently, residents and businesses in Detroit suffer loss of electricity several times a year to inclement weather bringing down powerlines. And will be a great asset to the area. Their plan will require their consumers to pay for running their power hook-ups from the service line to their residence at a cost of \$9K per customer. This cost will present a huge hurdle to many Detroit residents, myself included. Fortunately, residents who lost their homes in the Beachie Creek and Lionshead wildfires in Sept. 2020 will receive grants from FEMA to cover the cost of this service. Unfortunately, residents whose home did not burn will not qualify for assistance. As a resident whose home did survive, I, like many others, do not qualify for FEMA help. The problem for us is, even though our home survived, we are facing and in many cases struggling to cover huge costs to repair our buildings. My home required a completely new roof, replacement of windows and repairs to the interior caused by leaks from the roof failure. In addition, I am going to have to replace my storage shed. At this point, I am also having to deal with my insurance carrier that is not being extremely, or minimally for that matter, helpful in paying for my repair costs. I am not wondering how I will cover what insurance will not cover. To now have to try and come up with these additional numbers for power hook-up could be the proverbial straw that breaks the camel's back that will make me have to give up my home. I understand that CPI will probably offer a monthly payment plan, but as I am now on a fixed income, I am already doing creative budgeting. In short, even though many others like me did not lose our homes, we are still facing significant costs to fix our damaged homes and this projected additional.

OHCS Response: Assisting homeowners with the private cost of completing the utility undergrounding project is very possibly an eligible expense under the mitigation portion of the program, should local governments and organizations choose to make this a priority. This program was termed DRIP in the draft Action Plan. To provide more local control over how these dollars are allocated, it has been revised in the final Action Plan as the Planning, Infrastructure, and Economic Revitalization Program (PIER). Your home does not have to have been destroyed to qualify for assistance.

- Public Comment (Summary):** Insurance paid off 1.5 years ago at cost estimate at that time, but prices have escalated like crazy, and will eat up all of our savings. Can this program help with completing the home?

OHCS Response: The Homeowner Assistance and Reconstruction Program (HARP) will provide assistance to help cover unmet recovery needs, which includes construction not yet complete and will account for changes in the market since the wildfires.

5. **Public Comment:** The first thing all of us who lost our homes need to know is if we will qualify for the HARP funds followed by when we will be able to receive funds. I was not able to understand the income limits to qualify for HARP. Is income defined as AGI or Taxable income or some other line on an IRS income tax form? I could not find this information anywhere on the website. There is also no information on when phase 2 and 3 will be implemented if we don't qualify for phase 1.

OHCS Response: The estimated launch of the Homeowner Assistance and Reconstruction Program (HARP) is in the first quarter of 2023 (January-March) for Phase I applicants. At this time, there is no set amount of time Phase I will be open before Phases 2 and 3 open for application. As impacted residents reply to the survey and submit their applications, the State will know more about survivors' needs and will be able to communicate more about the timing of when each phase will open for application intake. HUD gives the state options for how income is calculated provided the State consistently follows one methodology for their CDBG-DR programs, but the program will likely calculate income based on the applicant household's adjusted gross income.

6. **Public Comment:** I'm deeply concerned about Manufactured Home parks that have highly integris owners/PMs being considered for help from this grant. Some parks have been in the family for many generations and plan to continue to keep that legacy going. These parks are or have plans to do costly wildfire mitigation and I'm hoping they aren't being set up to fail. These are parks who are truly concerned for their residents and have intentions to continue to treat their residents in a fair and caring way. I know that some parks are considered to be a danger re: selling the park out from under the residents, but many of the parks destroyed in the fires are looking out for the folks who live in their parks. I implore you to consider helping parks who have shown good faith efforts.

OHCS Response: Restoring and protecting damaged manufactured home parks is a critical part of Oregon's housing recovery. The ReOregon homeowner and homeownership programs include funding to help rebuild and develop manufactured home parks when (and if) those parks commit to preserving affordable rents on the majority of lots for low- and moderate-income residents.

7. **Public Comment:** Would the 501c3 be eligible under infrastructure to help with rebuild? \$165K short of rebuild cost. This is an important piece of the community that is important.

OHCS Response: Repairing or reconstructing damaged non-profit facilities that are open to the public are eligible under the Planning, Infrastructure, and Economic Revitalization program. Please work closely with your local jurisdiction and Lane County to share information on your unmet recovery needs.

8. **Public Comment:** I am requesting the plan from hcs for the housing, along with information on who would qualify.

OHCS Response: Section 5 of the Action Plan has a high-level overview of the programs with a description of who is eligible under “Program Eligibility.” The final plan is available at re.oregon.gov. OHCS is developing the full program plans and guidelines that will be posted on the OHCS website when they are complete.

9. **Public Comment:** What assistance is there for those of us who lost everything in the Bootleg Fire? FEMA never showed up, Oregon has hardly helped, Klamath County has not offered much. Our situation is the same as those whose homes burned in the 2020 fires, but we are getting almost none of the help. We can't even deduct our losses as a Casualty Loss since the Bootleg apparently was not declared a federal disaster. Something is very unfair here.

OHCS Response: The assistance from the federal government for disaster recovery is limited to the 2020 Wildfires and does not include the 2021 Bootleg Fire. We understand that the individual survivors are no different and ideally would be treated the same. OHCS staff is working with other State partners to identify some additional state resources to help Bootleg Fire survivors. Please keep reaching out to your local government, Klamath & Lake Community Action Services, and your area's long term recovery group to receive updates on when funding for the Bootleg Fire will be available.

10. **Public Comment:** That's great that 2020 fire survivors will get assistance. But what about us that had the same catastrophe happen to us in the 2021 Bootleg Fire? We lost everything we had built over 50 years, including our 1971 log cabin and our beautiful 1980's passive solar home. What kind of assistance is there for us?

OHCS Response: The assistance from the federal government for disaster recovery is limited to the 2020 Wildfires and does not include the 2021 Bootleg Fire. We understand that the individual survivors are no different and ideally would be treated the same. OHCS staff is working with other State partners to identify some additional state resources to help Bootleg Fire survivors. Please keep reaching out to your local government, Klamath & Lake Community Action Services, and your area's long term recovery group to receive updates on when funding for the Bootleg Fire will be available.

11. **Public Comment:** Hello ... we lost our entire livelihood in the Beachie creek wildfire. We have received no help from FEMA or SB. We had no choice but to move from our property. Desperate to rebuild after numerous appeals with SBA. How do we get to be part of this funding?

OHCS Response: The Beachie Creek Wildfire is included in the most impacted and distressed areas of the 2020 Wildfires. This means that survivors from that fire are

included in the ReOregon housing programs if they meet the eligibility requirements, which are intended to be less stringent than FEMA or SBA.

12. **Public Comment:** We were lucky to apply to a program where we had the opportunity to purchase a home with a special credit with Rogue Credit Union. And we were able to qualify, but they asked us for all the FEMA and insurance funds, and now we don't have anything. And we need assistance with the mortgage payments. I'm currently working in a restaurant, but the job is unstable because of COVID. I am the father of young children and I would love to be able to get assistance.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement or savings.

13. **Public Comment:** Why are families that have a higher income being excluded from the program? It's very important to consider this, because many families lost their homes, but didn't lose their jobs, and we kept working for our families. And at consequence of having a stable job, we can't qualify for these programs. That's unfair. I can imagine that all of us who work are always looking for better pay. So then what happens? Just because we get paid enough, we don't qualify. We were affected just the same. I bought a house because I didn't have any other option. It wasn't even the home that I wanted, it was all that was available. I understand that there are phases, and that there are families with greater need. But is there no help for us, just because my husband, daughter, and I have an income? You think I'm doing well? I know many families have worked 5, 10 years, I don't know how much they have in savings. And then Access and other organizations ask you for your savings/checking account and they see you have savings and they think you don't need assistance. You don't know how long it has taken to save that. As Latinos, we all work, we all want to own something, even if it's small. And just because of that, it's hard to qualify to these programs. I think that's unfair. That because some families have just a little more than others. I personally owed money for my trailer home and lost it just as everyone else. This is something all programs should consider. Helping all those who lost a home, and not disqualify based on income. [IN RESPONSE TO ALEX'S COMMENT]: I understand that it's a rule, but it's unfair and makes me wonder, should I stop working so I can qualify? I don't think I'm the only person in this room with a higher income, and not even by a lot. I am just a little higher than the level necessary to qualify, the thresholds are too low. I hope that future programs, or in this program where the rules are not final, which is why we're here, income thresholds are increased so more families can qualify.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement or savings. Similarly, households with higher incomes will be eligible for funding in later phases. In addition, we are asking HUD for a waiver to adopt the income thresholds for the State of Oregon which are higher.

14. **Public Comment:** I agree [regarding income thresholds]. For example, let's say this year we made 80K, but we don't have that money, it's been spent. We don't know if we will make the same income this year. But because that was our income, we are left out of the program. But we also lost everything, we lost our homes, we lost our possessions. We don't have money like everyone else. But we are left out just because we make a little more than other families. We work year to year, and then this fire happens and we lost everything. We also have needs even if we make more than other families. Being left out the program is illogical.

OHCS Response: We are asking HUD for a waiver to adopt the income thresholds for the State of Oregon which are higher than county thresholds. In addition, households with higher incomes may be eligible when later phases of the programs open up.

15. **Public Comment:** So to rebuild, it has to be in the burn scar? Or can people who purchase land outside those areas qualify?

OHCS Response: Survivors being served under the HARP (Homeowner Assistance and Reconstruction Program) of HOP (Homeownership Opportunities Program) would not have to build or place their new home, or live in the burn scar.

16. **Public Comment:** I had a landscaping/lawn mowing business. We are a 7-member household. Like [previous commentor's name] said, Access has many requirements. We received \$35K for our trailer home. And we have \$20K to give. We took our information to Access and they requested our income information. I took all the information and now they're saying that I'm above the threshold. We make \$67K for a 7-member household. I barely pass the threshold, but I'm out. And I don't get to keep that money [\$67K], I have to buy equipment, pay for gas, and the money runs out. Yet they say I don't qualify. Another question, I tried to qualify for FEMA's loan. I took all my documents. I pay taxes, I pay for insurance, and they told me I did not qualify because I did not have a social security number. I made a claim on my mobile home on my child's name, but because he's a minor they did not approve my loan. I had to buy the tools and everything.

OHCS Response: In response to the comments about the need to support impacted businesses, the State has modified the infrastructure program under the newly named Planning, Infrastructure, and Economic Revitalization Program. Under this program, local

governments and organizations may apply to the State to run small business programs, if that is a priority recovery need for their communities. Please continue to reach out to SOREDI in Jackson County to understand what resources may be available to businesses. The maximum 2022 income limit for a 7-person household in Jackson County for Phase 1 will be at least \$75,000.

17. **Public Comment:** I would like to know if I qualify for HARP. What form of income is used to qualify people for HARP? Is it AGI or Taxable income on IRS income tax returns or some other kind of income? When will the application phases 1,2 and 3 take place? When will funds be distributed?

OHCS Response: The estimated launch of the Homeowner Assistance and Reconstruction Program (HARP) is in the first quarter of 2023 (January-March) for Phase 1 applicants. At this time, there is no set amount of time Phase 1 will be open before Phases 2 and 3 open for application. As impacted residents reply to the survey and submit their applications, the State will know more about survivors' needs and will be able to communicate more about the timing of when each phase will open for application intake. HUD gives the state options for how income is calculated, but the program will likely calculate income based on the applicant household's adjusted gross income. There will be more specific information on the income qualification process when the program guidelines are released.

18. **Public Comment (Summary):** 70% must be spent on LMI households. The LMI threshold is very low. The threshold is lower in Lincoln than in Clackamas, that is very unfair.

OHCS Response: The intent of the requirement is to make sure that the disaster-impacted households with the fewest resources are prioritized. OHCS are preparing a waiver request to HUD that would allow us to use the statewide figures for calculating LMI incomes that would provide us significantly more flexibility.

19. **Public Comment (Summary):** Let's use the \$100M with flexibility, focus on the counties with lower income thresholds.

OHCS Response: If HUD does not grant the State the flexibility to use a statewide LMI figure, OHCS would certainly consider prioritizing survivors as suggested: those that would meet the LMI threshold in another county but not their own.

20. **Public Comment:** Buenas tardes, yo y mi familia fuimos afectados por el incendio de septiembre de 2020 al grado de perder todo, hasta hace 6 meses que pudimos tener un nuevo hogar que requiere de varias cosas por arreglar, so todas las personas afectadas pueden calificar para ayuda o solo algunas? Me gustaría saber cuál es el seguimiento para saber si mi familia califica para obtener ayuda, gracias.

Transl.: Good afternoon, me and my family were affected by the fire of September 2020 to the point of losing everything, until 6 months ago when we were able to have a new home that requires several things to fix, so all the affected people can qualify for help or just a few? I would like to know what the follow-up is to see if my family qualifies for help, thank you.

OHCS Response: There will be programs available for homeowners (Homeowner Assistance and Reconstruction Program) and renters (Homeownership Opportunities Program and Intermediate Housing Assistance) to help with unmet recovery needs. HARP and HOP will be phased based on a household's income (lower income households are prioritized) and based on recovery status. The programs that are offered under the Action Plan can assist with repairs or improvements to new homes that are necessary to "complete" recovery.

21. **Public Comment:** I lived in [redacted] Medford, Oregon and was impacted by the fires. I lost everything. I used to pay \$450 per month for my mobile home. I want to know how I can receive help for my home. I haven't received any support, not from FEMA. I'm still struggling with bills. The bank made us a loan, and I'm hoping I can be supported with paying a portion of my loan. Not the whole loan, just a part so my debt burden decreases.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement savings or otherwise suffered a demonstrated financial hardship to complete their housing recovery. If this is allowed, the State may establish benefit caps for how much eligible applicants may be reimbursed for eligible replacement or reconstruction activities.

22. **Public Comment:** Mira mi pregunta es yo compré junto con otra familia donde vivimos pero le hace falta cosas por restaurar estoy hablando con una asociación llamada caridades catolicas mi pregunta no soy la única dueña mas aparte tuve q pedir prestado con familiares.pero pedí ayuda a caridades catolicas o mejor me espero al OHCS porque quiero mi propio espacio.

Transl.: Look my question is I bought together with another family where we live but I still have recovery needs. I am talking to an association called Catholic Charities. My question is that I am not the only owner but apart from that I had to borrow from relatives, but I asked for help from Catholic Charities or I better wait for the OHCS because I want my own space.

OHCS Response: Please continue to work with Catholic Charities and other organizations that can provide you with supportive case management or resources now. The programs funded through ReOregon will likely be available for application in early 2023 and OHCS' ReOregon program staff will be able to work with you at that

time. The programs in the ReOregon plan will be able to help low- and moderate-income survivors complete repairs to homes they owned at the time of the disaster. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes. Another ReOregon program is the Homeownership Opportunities Program (HOP), which will help impacted residents who are low- to moderate-income survivors who were renters become homeowners.

23. **Public Comment:** Me gustaría saber más información sobre cómo poder obtener vivienda propia y que programas hay para más ayudas en caso de tener su propia casa ,Que poder hacer en caso de que ocurría otro incendio como el que vivimos en 9/8/2020 . Primero Dios y ya no ocurran más en un futuro pero es bueno estar informado para saber más información Gracias.

Transl.: *I would like to know more information about how to apply for homeowner assistance and what programs there are for more help in case you have your own home, What to do in the event of another fire like the one we experienced on 8/9/2020. First God and they don't happen anymore in the future but it's good to be informed to know more information. Thank you.*

OHCS Response: The programs in the ReOregon plan will be able to help low- and moderate-income survivors complete repairs to homes they owned at the time of the disaster. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes. Another ReOregon program is the Homeownership Opportunities Program (HOP), which will help impacted residents who are low- to moderate-income survivors who were renters become homeowners. For information on what to do in the event of another fire, please visit <https://wildfire.oregon.gov/prepare> where there are resources in Spanish and English on how to prepare for a wildfire. The State of Oregon has invested in an improved state-wide emergency alert system.

24. **Public Comment:** I agree [regarding income thresholds]. For example, let's say this year we made 80K, but we don't have that money, it's been spent. We don't know if we will make the same income this year. But because that was our income, we are left out of the program. But we also lost everything, we lost our homes, we lost our possessions. We don't have money like everyone else. But we are left out just because we make a little more than other families. We work year to year, and then this fire happens and we lost everything. We also have needs even if we make more than other families. Being left out the program is illogical.

OHCS Response: OHCS is asking HUD for a waiver to adopt the statewide income thresholds for Oregon, which are higher than county thresholds. In addition, households with higher incomes may be eligible when later phases of the programs open up.

6.3.2.2 Programming

The following comments contain inquiries regarding the logistics, functionality, and purpose of the various programs established by this Public Action Plan.

25. **Public Comment:** I would like the allocated money to go to affordable housing and families to be able to own their own homes.

OHCS Response: One of the ReOregon programs is the Homeownership Opportunities Program, which will support survivors who are low to moderate income purchase a new home. OHCS will focus on new home construction within or as close to the fire areas as possible.

26. **Public Comment:** Due to increases in the costs of building materials and labor, many businesses have not been able to recover or reopen. Insurance has been inadequate in many cases. We urge you to consider allocating funds to business recovery.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization program in the Action Plan. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs.

27. **Public Comment (Summary):** My business thought we were fully insured but were only ½ insured. It cost \$3M short to rebuild. Biz would employ locals and attract visitors. Very few programs are available to help. In the meantime, I had to find a job, pay the bills and rebuild. The extreme generosity to folks who are receiving free housing versus no help for others is not fair. Use modular housing rather than manufactured housing, whenever possible. Clusters of manufactured homes can cluster poverty and exacerbate poverty.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization program in the Action Plan. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs.

28. **Public Comment:** I own a small business in Ashland, Oregon that has seriously had a financial impact on my business. Business fell off by 50% due to the alameda fire. I would encourage your agency to consider how vital the businesses are to keep services flowing to the residents. Our store has gone out of

its way to accommodate fire victims by giving huge discounts, giving away free furniture and items and making deliveries free of charge. Please help keep our businesses open so we can have a flourishing community.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization program in the Action Plan. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs.

29. **Public Comment:** I would like the funds to be distributed towards fire survivors as well as easy access to resources.

OHCS Response: The ReOregon housing programs are limited to disaster survivors. The State is working to streamline the programs to make them as easy to access as possible, but they are federal funds, and the State must follow the federal rules that come with these funds.

30. **Public Comment:** I would like the allocated money to go into supporting us in becoming homeowners and rebuilding our home. [I] also [would prefer] to be relocated back to talent [rather than] being moved around to Medford in FEMA. I would like my kids to live back in Talent so they can be back in community.

OHCS Response: One of the ReOregon programs is the Homeownership Opportunities Program, which will support survivors who are low to moderate income purchase a new home. OHCS will focus on new home construction within or as close to the fire areas as possible.

31. **Public Comment:** In the days immediately following the 2020 Alameda fires, the Rogue Action Center wasted no time in setting up donation and aid stations to help meet the basic needs of fire survivors. These aid stations evolved into a central relief center at the Shoppes at Exit 24 in Phoenix which operated for a year after the fire. Following the closure of the Shoppes Relief Center in August 2021, our team has continued to maintain and build relationships with hundreds of fire survivors through continued resource navigation support and supplies distribution events. Before the Alameda fires struck, the amount of low-income housing in Ashland, Talent, and Phoenix was insufficient. Since the Alameda fire and since losing over 2,500 homes, the issue of low-income housing has grown exponentially. Through our housing navigation work, the lack of housing options for Talent Fire Survivors, particularly for those in need of affordable housing, is clear. Many of the families we are working with were living in older, manufactured home parks prior to the fires and have been unable to find housing options that fall within their budget since. We have heard time and time again from survivors that they will be unable to remain in their home communities

if they are unable to find affordable housing options. Additionally, the disproportionate impacts from the fire on renters, low-income people, latina/o/x community members, non-English speakers, elders and people living with disabilities has been devastating. Unfortunately, these impacts have only grown more severe throughout the recovery process as many people living at the intersection of these identities have been unable to access the resources, they need to make a full recovery. Coping with trauma from the disaster, medical complications, language access, technology access and literacy levels have all served as barriers for many survivors in receiving the help they need. We understand that carving a path to recovery that includes housing options for low and very low-income families will require significant investments and deliberate choices on the part of our elected officials. We support the proposed Disaster Recovery Plan which would allocate critical funding for affordable housing development. The proposed plan also includes a robust public participation goal throughout the plan's implementation process. We believe centering the voices of fire survivors throughout is fundamental to the rebuilding efforts. Additionally, we urge OHCS to continue to identify and reduce the barriers to participation that survivors may be facing (language, discomfort interacting with government officials, trauma, etc).

OHCS Response: The State looks forward to work with you to receive feedback from you on how ReOregon programs are meeting our affordable housing, resilience, equity, and racial justice goals.

32. **Public Comment:** I would like the money to be allocated towards a community picnic to reconnect our community. As well as create[ing] affordable meals.

OHCS Response: A community park or recreational area may be eligible under the newly revised Planning, Infrastructure, and Economic Revitalization Program. Please share your recommendations with your local jurisdiction.

33. **Public Comment:** I believe this money should be allocated towards manufacturing affordable housing for fire survivors. The rebuilding of our community needs to be accessible to low income and elderly families whom were affected at a higher rate. Basic living is a human right and should not have so many hoops to jump through after you lost your home just to be safe with a roof over your head.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the State will help low- and moderate-income survivors, including seniors, replace damaged manufactured homes.

34. **Public Comment:** I would like the money to go to manufactured housing for fire survivors, and for small business start-ups with first and last month's rent.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the State will help survivors replace damaged manufactured homes. Based on significant public feedback, the State has amended the infrastructure program and renamed it Planning, Infrastructure, and Economic Revitalization (PIER) program so local communities and non-profits may offer business assistance when needed in their communities. Please reach out to your local government or economic development district to express your business recovery needs.

35. **Public Comment:** I would like the money allocated to go to fair housing and support in house rebuilding and support in helping with bills they can't catch up and save at the same time making it very challenging in rebuilding.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the State will help survivors replace, repair or rebuild damaged homes, depending on their unmet recovery needs.

36. **Public Comment:** Use the funds allocated for affordable housing for fire survivors.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the State will help survivors replace, repair or rebuild damaged homes, based on their unmet recovery needs. Another ReOregon program is the Homeownership Opportunities Program, which aims to support impacted residents who are low to moderate income renters to become homeowners.

37. **Public Comment:** Wildfire recovery also applies to the hundreds of businesses impacted by the fires. Economic recovery starts there. Unfortunately, this plan in its current form does not provide any direct assistance to help the business community. As proposed by SOREDI previously, we are strongly advocating a balanced approach with a small 5% carve out of funds for direct business assistance. We are appreciative of the \$8 million set aside for economic planning, but the businesses themselves cannot be an afterthought! This is not to diminish the dire need for housing recovery at all. However, without accessible communities for our LMI populations most impacted by the wildfires that provide vital business services and job opportunities to create thriving, communities - those small rural communities - Phoenix, Talent, and parts of Jackson County may simply go away and become bedroom communities or worse, ghost towns. Businesses are key. Please find a balanced approach that includes direct business assistance now, equitable to that also being set aside for economic planning purposes.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization in the Action Plan and to reach out if you have questions about what types of activities are eligible.

38. Public Comment: There has been very little assistance for business. SOREDI has done what we can with support from USEDPA, our own money, support from our members, Oregon Community Foundation and local rotary clubs. We are in the process of making grants to over 50 businesses for almost \$200K, but in those applications there's a need for \$500k more. Our proposal to OHCS is to dedicate 5% of the funds in/for Jackson County to economic revitalization and business support. Housing recovery is critical, but without community and downtown infrastructure and a strong business base, the recovery is not complete and there will be missing essential services. Please provide the local governments and SOREDI the opportunity to address the unique needs of their communities.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small support business activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization in the Action Plan and to reach out if you have questions about what types of activities are eligible.

39. Public Comment: We believe that we may have potential to fall under some of your recovery action plans requirements. We would like consideration for the rebuild of facilities provided to community members including members from other neighboring counties. These would include a grocery store, laundry and shower facility, restrooms, ice machine area, shops/barns and potentially an office. All were lost during the beach Creek wildfire. We also would request funding for the rebuilding of septic and water lines as well as our electrical that was ruined in the wildfire. We are also exploring the possibility of developing a convention center/chapel that could be of use to the local community for events and training purposes. In addition, we are exploring the possibility of developing full time residential RV sites to supply the local need for housing due to the wildfire. We would need some intervention with the county to allow us to develop this housing need on timber conservation property for full time residents, as we currently are only permitted seasonal recreational camping. We look forward to the progress that this Grant will make in our area and the rebuilding of this part of Oregon. We hope to be a part of the funding provided as we are in tremendous need of it. My home sits on 397 acres and we believe there is a lot of potential use to assist with this Grant. We currently service 550 members and their guests and family, providing a much-needed resource to the community for recreation activities and support of the local economy.

OHCS Response: For the economic and community recovery projects, OHCS encourages you to work closely with your local jurisdiction and county to share information about your unmet recovery needs. While the State understands that RVs are an important source of permanent housing for many of our impacted residents and communities, the U.S. Department of Housing and Urban Development (HUD) places

limitations on how these funds may be used. It is the State's understanding that providing funding for RVs and RV parks are not eligible uses of these disaster recovery HUD funds.

40. **Public Comment:** [OHCS should] use closed campgrounds for homeless there setup for electrical garbage, and bathrooms. They're closed [for] 7 months of the year.

OHCS Response: Campgrounds provided an important source of intermediate housing for those displaced and without housing due to the 2020 Wildfires. The state is committed to providing resilient and affordable housing for individuals and households experiencing homelessness from the Wildfires. Your comment will go on record and may be considered by local and state agencies who are focused on temporary and intermediate strategies for helping individuals and households whose homelessness experience was worsened by the wildfires, but pre-dated or was not caused by the wildfires.

41. **Public Comment:** I was one of the many affected by fires and my input in one of the many for funding I feel should be helping families that bought a home with not the best condition to provide a roof over family to help with renovation because it's been hard and it's very expensive when you are providing for a big family. some of the homes are very old and need a lot of fixing so my suggestion is help those that have bought home with renovation needs and help those that have not gotten a permanent home into one thank you in advance for hearing my input.

OHCS Response: One of the goals of ReOregon is to help impacted survivors move into safer, more resilient and energy efficient homes that meet the needs of their households. Depending upon the type of repairs or additional work needed, the types of homeowners you describe may well be eligible for assistance to "complete" their housing recovery.

42. **Public Comment:** I am a Holiday Farm Wildfire survivor. I am also a 6th generation Oregonian, whose mother sold the 1870 family farm my grandfather wanted me to have because of EFU 30 zoning, she said. The County says it keeps that Land Use Law to "Keep Oregon, Oregon." Even though it means that only corporate farmers can farm and only the people from out of state can afford to live here. Because we Oregon Natives were raised to pursue quality of life, not money, by fighting for clean air, clean water, and were independent thinkers and believed in collaborative "Barn-raising" and getting along with our neighbors. All I am asking is to "Keep Oregon, Oregon" by dedicating some funds to buy land in the woods for soul-healing privacy and money to build stick houses with- like the Upper McKenzie River was, until the fire. Thank you for your time, and your openness to all comments.

OHCS Response: As part of HARP and HOP, the State seeks to partner with local governments, community land trusts, community-based organizations, non-profit organizations, and landowners to acquire and develop land for housing that will remain affordable for residents living in the disaster-impacted communities.

43. **Public Comment:** We support the priority for home ownership for low- and moderate-income households. There are ways that we could partner with this program.

OHCS Response: The ReOregon housing programs recognize and include non-profit organizations and developers as important partners in the development of homeownership opportunities and rebuilding damaged homes. We will coordinate with you and other non-profit partners to leverage resources and local expertise and build from existing recovery efforts wherever possible.

44. **Public Comment:** What I wish to address is the lives of a small group of survivors of the Holiday farm wildfire and hopefully through this certain 'quick fix' it may benefit as a guideline in helping others. The small group I speak of are currently renting a FEMA trailer located at the Basketball Academy in Rainbow, Ore. The majority of these people are on a fixed income. The FEMA units are available for sale to individuals living in them and are priced according to that income. Scuttlebutt has it that Homes for Good has purchased property in the vicinity to use as low-cost housing. My recommended plan of action would be to help in purchasing the unit (possible guaranteed loan?); helping cut red tape in locating/relocating units. (Lazy Days trailer park?) [local].

OHCS Response: OHCS is working with survivors currently--through local community action agencies and others--to provide assistance with state funds to purchase FEMA trailers where that is a desired option. We are also working directly with Homes for Good to assist with the possible acquisition of the Basketball Academy site.

45. **Public Comment:** Does the number [referring to income] provided by HUD take into account inflation?

OHCS Response: Income limits are updated every year by the Federal Department of Housing and Urban Development (HUD). HUD gives the state options for how income is calculated, but the program will likely calculate income based on the applicant household's adjusted gross income.

46. **Public Comment:** I had a complete and total loss in the 242 Fire in Chiloquin, Oregon on September 7th, 2020. I am going to keep this for length sake to some main bullet points, however, would like to state I am open to further communication where I can go into greater detail. I lived on a six-acre property with three other individuals where we had our own community per se. In total we lost a 2 bedroom, 2 bath manufactured home, 11 outbuildings including a shop, pump house, shower/bathhouse, tack shed, sheds, and various animal shelters,

an MCI bus, a dodge truck, a tractor, and then, of course, all of our personal belongings including thousands of dollars in tools of all kinds. Everything we worked our entire lives for! The property also had an old campground that we had spent the last six years clearing dead trees and making defensible spaces to reopen. We had just finished the clean-up and were in the final stages to resume operations. We also had plans to put up a couple of small cabins that we planned to Airbnb. That entire plan and investment is now a long-lost dream as our land is desecrated. To say the process has been a slow and agonizing one would be an understatement. In fact the clean-up process was very slow and the property wasn't cleared for rebuild until the end of December 2021. To which we have been in a hotel void of proper amenities such as kitchens. We have dogs and cats to which our cats cannot be housed with us at this hotel and we have spent a fortune driving back and forth to our property where we have kept our cats sheltered on our property, and have asked many times for help with some kind of temporary housing at home. All of those requests have been denied without explanation. That brings me to the gross misuse of funds, at least in the eyes of every fire survivor. We are deeply grateful for the sheltering in these hotels, however, the only one it benefits in the long term is the owners of the hotels. If the allocated funds would go more directly to fire survivors themselves in getting them back to pre-disaster it would be much more beneficial. At least get back on their property while they build. Spend less by allocating funds to go directly to survivors instead of hotels. Our group has been housed for almost two years and we have three rooms costing in the hundreds of thousands, which in the end does nothing for us. We were handed ODHS as our Disaster case managers and things really started to degrade when [names withheld] with ODHS got involved. They weren't willing to help beyond the scope of the hotel and in fact kept threatening to evict us before our property was even cleaned by FEMA. Appallingly, we received a 48-hour eviction on November 4th, 2021 without cause. There is so much more to go into beyond the scope of this one letter. Everything points to this rash decision being made in retaliation to my self-advocacy and my involvement with the Governor's advocacy. We have been in the dark since November 2021 and finally have our appeal on June 1st, 2022, which I feel we are most likely going to lose as I'm solely up against Oregon's Assistant Attorney General Ellen Mendoza, as well as other attorneys. We still have a really long road ahead and the stress induced by all of this is more than we can bear. DHS is not equipped to handle the special needs of Wildfire Victims. They lack tact, compassion, grace, understanding, and kindness, subsequently, rendering them unfit to help us. We just want to be treated with dignity. We deserve Transparency. We deserve due process. They have violated their own Rights & Responsibilities and don't even hold up to their own standards. One such instance is when we were recently connected with Catholic Charities. I was informed that they had made multiple inquiries about 242 fire victims and were repeatedly told by DHS no one needed their assistance without our

knowledge ultimately denying us resources. There are many more I am willing to point out in further communication.

OHCS Response: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Your experience--along with many others as you point out--has been very frustrating. Paying for hotels is not a very efficient use of funds, but ODHS has had limited options. The housing funding under ReOregon is weighted very heavily towards permanent housing solutions.

47. **Public Comment:** [I] would like to allocated money to go to condition shelters as the climate evolves with the seasons, like 7 shelters for fire survivors and houseless.

OHCS Response: Shelters provide important temporary housing after a disaster for survivors. The State continues to fund shelters in and around the impacted areas while we work toward helping disaster survivors transition to safer, more permanent housing solutions. The State also continues to invest in shelter operations through community action agencies and continuums of care to help support those individuals who were experiencing homelessness before the disasters and continue to face housing challenges. The Action Plan includes an infrastructure and mitigation program (PIER). Local governments will be deciding on the use of those funds. If they choose to, they could spend some of that money on shelters that could serve as both immediate/emergency shelters for disaster survivors and cooling/warming shelters when needed.

48. **Public Comment:** I would like the allocated money to go to fair housing of fire survivors for rebuild.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the State will help survivors replace, repair or rebuild damaged homes, depending on their unmet recovery needs. The State understands that many survivors face systemic and discriminatory barriers to accessing recovery resources and has designed the programs to reduce those barriers and help as many residents as possible return to safer, more energy efficient homes. If you believe your rights may have been violated, OHCS encourages you to submit a complaint. You can file a complaint online in English or Spanish by visiting https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint. You can speak with an FHEO intake specialist by calling 1-800-669-9777 or 1-800-877-8339.

49. **Public Comment (Summary):** Please talk to FEMA regarding the high rent prices and high utility bills. You know about all of this, you have the funds, please hurry.

Do you want us to get in debt? Help us. There are so many funds coming in, but nothing is getting done.

OHCS Response: Thank you for your comment. The State of Oregon has been advocating vigorously with FEMA to make sure that rent in the direct housing mission is adjusted to what survivors can afford. In addition, assistance to pay for rent and/or utilities is available through ACCESS.

50. **Public Comment (Summary):** What I want like many of you, is a home. I am willing to pay for that home, we are used to paying. I work in a restaurant, we are all hard workers. I've worked hard and now I'm the manager. That's why we're here, we came here to work. What do we want? A home. I don't want it for free. Just assist me so this is feasible (paraphrasing). Yesterday, I did not qualify for a loan. The home was \$350K. If out of those \$422m, you could only give me \$100k, I'll pay the rest \$250K, and you can forget about me then. And I assure you, if you were to give \$100k, to all who are present, they would be able to purchase their home and pay for their mortgage. [FEMA] wants to give us those trailer homes for which we would pay a monthly payment of \$800 for life, plus insurance and other things. That's so much money. Help us to acquire our own land, I don't even ask you for half, just a little so that I can qualify for the loan. I want assistance, not just words. We need quick solutions. I only have 3 months left [in his current housing situation].

OHCS Response: The HOP program will do exactly what you are requesting: provide assistance to fire survivors to purchase a new home. In relation to the FEMA direct housing mission, the State is requesting an extension of the mission. The State has also made assistance to survivors through ACCESS to assist with purchase of one of those trailers, if that is their preferred option. (The cost to pay off those loans is not "for life." They are in fact, forgivable.) OHCS is working to establish new affordable rental housing as quickly as possible, and several projects have already been funded to move forward. Unfortunately, the development of those projects takes quite a period of time, and begins with land acquisition, which has been extremely challenging in the wake of the Alameda Fire.

51. **Public Comment (Summary):** One of the things I read in your presentation was "equity". Okay, equity is for those are not on the same level. But like you've heard, most of us work. We work the whole year. We are not used to asking for help, until the fires happened. So it's really hard for it to be "equity" and not "equality". If you want to reframe this, it should be about equality. Because all of us lost our homes, we did not lose our jobs, we lost our homes. Some lost their small business. And we've kept working. Some of us got in debt, because we had to. We had to purchase a home again. We've used our savings, and depleted all our money. So I do think, we are all still struggling. For example, none of us qualified for the Habitat for Humanity programs. No one qualifies. It's ridiculous, you would have to not work to qualify. My children do not want to

move from their school district. It's hard, because land in Talent is so expensive, even more so is Ashland. We want to stay here. My question for you is, would we have to complete forms for you too? What are the requirements so that we can begin?

OHCS Response: Thank you for your comment. Yes, participants in the ReOregon program will undoubtedly have to fill out more paperwork. There's no way around that. However, we will be able to pay local organizations to help you with the paperwork and to track down any missing documentation needed. We will provide notice when it is time to apply through multiple channels, including mass media, Spanish language radio, local governments, organizations assisting survivors (e.g., the Jackson County Community LTRG and ACCESS), and culturally specific organizations (e.g., Unete).

52. Public Comment: I was here last week for the same presentation. And you were thinking to use the income thresholds for the Clackamas County because they're higher. Are you still thinking about doing that, or will it be county-specific?

OHCS Response: Through this Action Plan, OHCS has requested the use of statewide income limits. We expect that we may be more likely to receive approval from HUD if we request to use the statewide levels, which are higher than the Jackson County figures, but not as high as Clackamas County.

53. Public Comment: As a fire survivor of the Alameda fire in Jackson County, I THANK YOU for the great work you are doing to help channel these HUD funds into rebuilding affordable housing. What a blessing! I lost my manufactured home, along with 68 other households in the Bear Creek Mobile Home Park where I was the manager. I literally pulled seniors out of their homes. We were lucky no one died in our park. My family had good insurance, so we are okay. For 21 months I have worked for Zone Captains, a fire recovery non-profit, advocating for renters and manufactured homeowners in the 22 mobile parks in Jackson County that burned after the fire. Sadly, I have learned that the low-income folks and seniors are still struggling, many living in RVs and hotels still, almost 2 years later. My suggestions: 1. Low-income & senior renters need truly affordable apartment inventory to move into. Many are living in hotels and RVs. According to the JCCLTRG Needs Assessment data, this population could only afford rentals at an average of \$600/month before the fire. That inventory does not exist anymore. The average rent cost in Jackson County is now \$1500/month. And we know developers can't build affordable housing due to current market trends and supply costs. So, we need the HUD subsidies to give developers incentives to keep new apartment rents low. 2. Low-income & senior manufactured homeowners need help rebuilding. Many lived in a mobile home that was insured for an average of just \$20,000, whereas the new home will cost \$100-\$200,000. The OHCS forgivable loan program and WRRRA grant program are available to help them rebuild, yay!!! But...many are unaware and are being barred from the very parks they lived in before, which leads me to my next 2

points. 3. Low-income & seniors need a BIG MEDIA CAMPAIGN in both English/Spanish. How will fire victims know about the current OHCS housing programs in addition to the HUD resources that will be coming? So far all of the media has been on Facebook. With Zone Captains I saw so many seniors & low-income and Latinx people are out of the loop and have no idea about the current, much less future, resources. They prefer face-to-face interaction, print media, or radio/TV. Radio, TV, and print media are needed to reach the fire victims who are low-tech, and are simply unaware of their options. 4. Low income & seniors need advocacy to get back into their old mobile parks. The mobile home park owners have made the rules stricter since the fire, which means the very seniors who lived there before can't afford to go back! Typically park owners require 3X the space rent in monthly income, which now prices out many seniors on a fixed income. These are folks who have an average of \$1000/month social security, which does not increase. They could afford the mobile home park 10 years ago, but can't afford it now due to the increased space rent and 3x rule. There is a need for state intervention to make sure these people can return to their old homes. THANK YOU again for your time and attention.

OHCS Response: 1. While it takes time to rebuild affordable housing developments, the State has provided significant funding for the redevelopment and new development of multi-family housing in Jackson County. This has come in the form of both new, dedicated funding and by prioritizing existing resources for use in wildfire-impacted communities. There are over 500 units of funded affordable rental housing projects in some stage of development in Jackson County, including a recently approved AGE PLUS project that will serve seniors, specifically. 2. The WRRRA funds are available now and ReOregon programs will provide additional assistance to help manufactured homeowners who were underinsured. 3. Thank you for this recommendation. OHCS will certainly make use of a wide range of tools to make survivors aware of the ReOregon programs, including radio, TV, and print media. 4. Your comments about the practices of park owners are distressing. There is likely little that OHCS can do to alter park owner practices, particularly in what is a "seller's market." However, the ReOregon program has funding to pay for the establishment of new, occupant-owned "coop" parks. And any assistance to existing private parks would require commitments to make at least half of the spaces available to low- or moderate- income residents.

54. Public Comment: Thank you for this opportunity to provide comments on CDBG Wildfire Grants: One important factor to any rebuilding program needs to be achieving financial stability for those who are impacted. Many of those who were burned out were not only devastated physically, but also financially. They had little if any savings and nowhere to turn. As the only community based nonprofit credit counseling agency in the region, I believe that part of this funding should be directed to providing for credit counseling for those who were impacted, so that they can not only physically rebuild their lives, but also rebuild

them financially. Financial stability is the foundation upon which all else is built. Financially stable families build and create financially stable neighborhoods and communities. Funding of credit counseling and financial education needs to be a key part of this rebuilding process. I am happy to discuss this in greater detail, but I believe this needs to be an important part of any rebuilding program.

OHCS Response: The State agrees with your recommendation and has budgeted \$6 million for Housing Recovery Services, which includes financial and housing counseling for individuals and households who are facing financial challenges post-recovery. Local organizations - including community based nonprofit credit counseling agencies - will be critical partners and subrecipients who will help the State deliver these services. The State will provide funding to expand the capacity of eligible subrecipients who provide these services.

55. **Public Comment:** It would be helpful to not only have that assistance to get a home or rebuild but also that assistance of getting property of some sort to place a home. Before the fires my family and I were in a mobile home manufactured home, and we were looking into purchasing and now I have so many more barriers on my credit and limited funds from hotels and figuring out a place to stay food gas care repairs due to having to travel. It all trickles down from there. It has been a nightmare trying to get my family back on track i can only imagine what others been through. I know that for me as a 28-year-old mom of two and being so close to finally having my own home to make memories with my kids and family then it gets ripped away is devastating frustrating and heartbreaking.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program and the Homeownership Opportunities Program, the State is working with local partners to acquire land that will serve as manufactured or modular home parks that will remain affordable to residents for 50+ years. Those programs can also help eligible applicants replace their destroyed homes, including manufactured homes. In the current Action Plan, the State is not providing funding to help individual survivors acquire land for single-family reconstruction or replacement.

56. **Public Comment:** I work for an Economic Development Agency in Jackson County and my role is the Disaster Recovery & Resiliency Liaison. I have been reaching out to fire affected businesses for over a year doing needs assessments and listening to the challenges that the business community is facing. Our Executive Director has submitted a proposal to get a carve out of these funds to assist in economic recovery. The business community in Jackson County that were affected desperately need resources to bring their communities back. We do not want these communities to turn into bedroom communities with no economic footprint. Thank you for your time and consideration on this matter....

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program

to allow for economic revitalization and small business activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization program in the Action Plan and to reach out if you have questions about what types of activities are eligible. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs, as this program will allocate funding to each county so that they can work with local partners and prioritize the projects that would be funded.

57. Public Comment: Consumers Power, Inc. (CPI) requests that \$2 million of the Community Development Block Grant – Disaster Recovery (CDBG-DR) funds designated for mitigating future disasters be used to offset CPI's costs to provide such mitigation in the Santiam Canyon area impacted by the 2020 Labor Day wildfires within CPI's service area. In the months following the 2020 Labor Day wildfires that swept through the Santiam Canyon, CPI applied for and received approval from the Federal Emergency Management Agency (FEMA) for eight hazard mitigation projects totaling \$30,900,000. These projects will convert most of CPI's existing overhead electric distribution system in the affected areas to underground. FEMA and Oregon Office of Emergency Management have determined undergrounding power lines as the most effective method for mitigating disasters. CPI is required to provide 25% of the funds needed for these projects. Significantly, approximately 200 homes in the mitigation project areas of the Santiam Canyon served by CPI largely escaped damage and will continue to receive electric service via overhead lines. In order to maximize the considerable mitigation efforts underway, these overhead services also need to be converted to underground, but FEMA has ruled that these proposed service conversions are not eligible for funding under the Public Assistance program. CPI's request above will provide the funds needed to convert the remaining overhead services to underground, resulting in the elimination of all overhead power facilities in the underground conversion areas. Many of the mitigation projects are under construction and the proposed funds could be applied immediately.

OHCS Response: What you have described may be eligible for CDBG-DR assistance under the Planning, Infrastructure, and Economic Revitalization Program. A portion of funding under this program will be allocated to each impacted county. Please work closely with local jurisdictions and Marion County to share information on your unmet recovery and mitigation needs. There are certain limitations from HUD on providing assistance for privately-owned utilities - which includes utilities owned by private non-profit organizations or other non-public entities - but the undergrounding of utilities from the system through the residential property to the home could be eligible as a mitigation and rehabilitation activity under CDBG-DR.

58. **Public Comment (Summary):** I lost my apartment and a storage unit in Phoenix. We need to make investments to ensure water availability to control and manage fires in the future. I would like to encourage OHCS to partner with Habitat for Humanity so people could put some sweat equity into new homes. Assistance to fire survivors to help start new businesses would be very useful.

OHCS Response: The State has provided significant funding and has worked with Jackson County and municipalities within Jackson County to fix many of the water challenges faced during the wildfires to help prevent similar challenges experienced in 2020. The State plans on partnering with non-profit organizations like Habitat for Humanity to develop homeownership opportunities for impacted renters. In response to the overwhelming comments about the need to support impacted businesses and communities, the State has modified the infrastructure program under the newly named Planning, Infrastructure, and Economic Revitalization Program. Under this program, local governments and organizations may apply to the State to run small business programs, if that is a priority recovery need for their communities. Please continue to reach out to SOREDI in Jackson County to understand what resources may be available to businesses.

59. **Public Comment:** Our family owns a senior manufactured housing community of 164 homes since 1987. Almost all of them were destroyed by the Alameda fire. The stories of how folks were impacted was heartbreaking, but we are starting to rebuild and bring homes back. Please consider including funding for rebuilding the clubhouse, it really was the center of the community.

OHCS Response: Restoring and protecting damaged manufactured home parks is a critical part of Oregon's housing recovery. The ReOregon homeowner and homeownership programs include funding to help rebuild and develop manufactured home parks when those parks commit to preserving affordable rents on the majority of spaces for low- and moderate-income residents. Assistance will also be provided to impacted homeowners who wish to return or relocate to a manufactured home park. As we move further into program development, we will be sure to reach out with opportunities for coordination and to notify you of any funding opportunities that may be available to support eligible manufactured home park owners.

60. **Public Comment:** Access wants folks to go into real-estate market to buy homes, but that isn't accessible to low-income folks. Why can't they buy land and build homes or make mobile homes ready for the survivors.

OHCS Response: One of the ReOregon programs is the Homeownership Opportunities Program, which will support survivors who are low to moderate income purchase a new home. The Homeowner Assistance Reconstruction Program will help low to moderate income homeowners whose homes were destroyed in the fires rebuild or replace those homes. OHCS will focus new home construction within or as close to the fire areas as possible. This includes scenarios where local non-profits, community land trusts, housing

authorities, and/or local governments acquire land and keep the land rent low for homeowners.

61. Public Comment (Summary): What about those of us living in FEMA trailers? FEMA has said that they will take them.

OHCS Response: The State of Oregon will apply for another 6-month extension of the FEMA direct housing mission. Whenever the direct housing mission does end, ReOregon will be ready to assist those survivors still living in the FEMA units with their housing needs.

62. Public Comment: It sounds very beneficial for low income Fire victims but not so great for a person like me. I'm a disabled veteran with an income higher for any real help. The Disability money is supposed to help me get my health needs and quality of life taken care of. Unfortunately the payment is just enough for most of my bills but leaves nothing extra to buy back 38 years worth of property. So basically I used my Veterans benefits to purchase a house with very little in it. All my Diploma's, birth certificates, schools transcripts, marriage license...cost a fortune but I have no funds or ways of rebuilding my life back. Quality of life is a zero.

OHCS Response: The requirement that 70% of the Community Development Block Grant Disaster Recovery (CDBG-DR) funding is spent on activities that benefit low- and moderate-income households is a standard HUD requirement and is included in the federal register that issued the rules for these funds for Oregon. These funds are for unmet recovery needs. Through its phased approach, the State plans on providing assistance to higher income households in Phases 2 and 3. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery.

63. Public Comment: Mi familia se compone de 5 personas no emos podido comprar casa porque carecemos de crédito no tenemos mal crédito pero tampoco lo emos echo y en algunas otras cosas no calificamos por que estamos arriba de los límites de bajos ingresos es una frustración que vivimos día a día por el echo de no poder encontrar nuestro nuevo hogar todos los días tengo que llevar a mi hijo media hora de distancia ala escuela son 2 horas día a día en vueltas en carro porque no quisimos aserle otro cambio a nuestro hijo después de lo que abiamos.pasado no era bueno meterlo a otra escuela porque todos estamos arrastrando mucha ansiedad y frustración por todo esto ..pedimos que nos ayuden a empezar a reconstruir nuestro hogar no que nos regalen si no que nos ayuden con ese dinero para empezar a construir nosotros toda la comunidad somos gente trabajadora que nada más necesitamos el comienzo para seguir adelante con nuestro propio esfuerzo me gustaría que se

compraran un grande terreno y ahí poner nuestras casas y nosotros pagarlas con el tiempo por favor no pedimos regalado solo un pequeño empujón...muchas gracias por todo su esfuerzo se lo agradecemos mucho ...

Transl: My family is made up of 5 people we have not been able to buy a house because we lack credit we do not have bad credit but we have not done it either and in some other things we do not qualify because we are above the low income limits it is a frustration that we live day by day Due to the fact of not being able to find our new home, every day I have to take my son half an hour away to school, it is 2 hours every day in car rides because we did not want to make another change for our son after what happened to us it was not good to send him to another school because we are all experiencing a lot of anxiety and frustration for all this ... we ask you to help us start rebuilding our home not to give us a gift but to help us with money to start building the whole community we are hard-working people who just need the beginning to move forward with our own effort I would like them to buy a large piece of land and where we can put our houses and pay them over time please do not ask for a gift just a little push ... thank you very much for all your effort we appreciate it very much ...

OHCS Response: The programs in the ReOregon plan will provide housing assistance options. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. Another ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate income renters become homeowners. This program is designed to also help first time homebuyers who may not be able to access traditional forms of credit like first mortgage loans due to situations like a lack of credit.

64. **Public Comment:** Would be great to have financing or other financial help to get into a manufactured home and/ or help to get into a commercial zoned location to start a small repair shop hopefully with live in space above or behind shop. It would be a guitar and antique furniture repair location. Might need to hire part time help and train. Thank you for this opportunity.

OHCS Response: One ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate income renters become homeowners. In the meantime, the state awarded funds to community action agencies and LTRGs through the Wildfire Recovery and Resilience Account (WRRRA). They may be able to provide some assistance with gap funding for eligible manufactured homeowners who lost their homes in the wildfires and need to replace them. Please reach out to your local community action agency for more details on that funding. Additionally, in response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization program in the Action Plan. Please also

continue to work closely with your local jurisdiction and county to share information about your region's unmet business needs.

65. **Public Comment:** There needs to be more affordable housing options available. And help with things like furniture and household items for the new home we will be moving into. And most importantly an emergency broadcast system for residents to be notified that actually work of any fires near our homes or town.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. Another ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate income renters become homeowners. Federal rules do not allow ReOregon funds to be used to buy furniture and household items, but funding for those needs may be available through your local long term recovery group or community action agency. The State of Oregon has invested in a much-improved state-wide emergency alert system. To sign up for alerts, text your zip code to 888777 or sign up for your county alerts (for example, in Jackson County, visit: <https://jacksoncountyor.org/emergency/resources/citizen-alert>). OHCS encourages you to reach out to your local government to understand what plans they have in place for when there are disasters and how to receive alerts.

66. **Public Comment:** We needed housing solutions a year ago! The people can no longer wait another year or another 2-3 years for OHCS to finalize and implement these housing programs. We need the funding to flow into the community and not lost in the bureaucratic processes. People have been living in unstable housing conditions for almost two years causing more anxiety, stress, and poverty. Last week I heard from a handful of families that don't know if they will be in their homes a month for now, that they keep looking for affordable housing, but everything is exhausted, or folks do not meet the qualifications. Make a certain percentage of the homeownership programs funding immediately available to cover purchase and replacement costs for families ASAP. Make funding move faster and more directly. Community moves in different ways; this funding needs to be flexible and adaptable to fit the many needs of our diverse community. This will break down any barriers and OHCS can learn from this. The first phase should prioritize the disproportionately impacted like seniors and disabled on fixed income, Latinx and indigenous folks, mix-status. Provide wrap around support throughout the program process. Economic development--restoration of micro enterprises, small businesses. Funding to support community structures such as community centers in mobile home parks. OHCS needs to develop PopED, workshops, and trainings around these home ownership programs for all folks to understand the process and the long-term commitment. The proposal states that OHCS will be working with local cities, CBOs, DCMs—is the state going to fund and train staff that will be working in the

fire affected areas to successfully implement the programs? We know that local know the communities, but bilingual/bicultural leaders and CBOs are stretch thin and since the fire disproportionately impacted Latinx and the Spanish speaking community then we need more capacity to ensure that our community gets access and support.

OHCS Response: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. The state has increased the proposed funding allocation to the Intermediate Housing Assistance through CDBG-DR (\$3M) and has proposed \$6M for Housing Recovery Services that will help provide wraparound services. In the meantime, the state has awarded funds to community action agencies and LTRGs through the Wildfire Recovery and Resilience Account (WRRRA). They may be able to provide some assistance with those funds to help bridge the gap until ReOregon programs are available. ReOregon plans on funding and partnering closely with community action agencies, long-term recovery groups, culturally specific organizations, and community-based organizations to provide significant application support for survivors throughout applicant engagement and intake. The intent is to provide a trusted local program partner and to address inequities in recovery. Through funding agreements or partnerships, the State will provide significant program technical assistance and capacity to local organizations and will solicit feedback from those local organizations on how the State can break down program barriers for seniors, individuals living with disabilities, Latine households, and other members of federally protected classes. In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business activities and more flexibility for local governments to use these funds. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization (PIER) in the Action Plan and to reach out if you have questions about what types of activities are eligible. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization and community center needs.

67. **Public Comment:** After reading this report I have identified key recommendations needed for the CDBG-DR action plan. Support micro enterprises/businesses lost in the fire. Support community rebuilding in Cities were they were displaced from. Financially support survivors that already purchased a home. The application process must be as clear and concise as possible. Seniors

and people with disabilities need to receive additional financial assistance. How will we make sure that they have accessible/affordable housing when they often live on fixed income? OHCS action plan should also include funding financial literacy programs for Alameda survivors. Programs like the IDA + new additions. Support multi-generation households that are now needing their own separate living.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business activities and more flexibility for local governments to use these funds. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization Program in the Action Plan and to reach out if you have questions about what types of activities are eligible. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization and community rebuilding needs. The programs in the ReOregon plan will provide housing assistance options. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. Right now, the program prioritizes survivors who have not yet been able to complete their recovery. The State will strive to make the program as low barrier and streamlined as possible, within the constraints of the federal rules. One of the ways in which the State will do this is by funding and partnering closely with community action agencies, long-term recovery groups, culturally specific organizations, and community-based organizations to provide significant application support for survivors throughout applicant engagement and intake. The intent is to provide a trusted local program partner and to address inequities in recovery. Through these partnerships, the State will provide significant program technical assistance and capacity to local organizations and will solicit feedback from those local organizations on how the State can break down program barriers for seniors, individuals living with disabilities, Latine households, and other members of federally protected classes. All new or substantially reconstructed housing funded through ReOregon will be designed to meet certain accessibility standards so the State can increase the amount of accessible housing stock in the impacted areas and to accommodate the needs of seniors and individuals living with disabilities. The Action Plan includes over \$6 million for housing recovery services, which includes financial literacy and housing counseling. Another ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate-income first-time homebuyers become homeowners.

68. **Public Comment (Summary):** Did dip into savings and bought an older manufactured home. Interested to upgrade and improve home to make it more fire hardened.

OHCS Response: The programs that are offered under the Action Plan can assist with repairs or improvements to new homes that are necessary to "complete" recovery, such as fire hardening.

69. **Public Comment (Summary):** Improved communications are greatly needed. Landlines are not available, and cell service is very poor. Will likely face more disasters.

OHCS Response: The "Planning, Infrastructure, and Economic Revitalization" program, allocates \$42 million for local governments, schools, non-profits and other public or quasi-public organizations to work together to prioritize their recovery needs and invest in infrastructure and mitigation projects.

70. **Public Comment:** The house I was renting burned in the Alameda Fire and I am lucky to have recently moved back into the rebuild (Jan 2022); however, the rent is \$450/month higher than before the fire due to rebuilding costs and the house having been underinsured. I saved money during the time I was displaced by renting a tiny cottage with no closet, kitchen, or laundry and I'm using that money for rent now but worry about when it runs out (end of the year approximately.) I would like the plan to include rental assistance for people whose rents have substantially increased due to the fire. Mine increased over 50%. I am on the waitlist for Jackson County Housing Authority help but the wait list is around four years which is too long. Also, even though I am housed renter, will I be given information about and access to the HOP program? I love returning to my home, the one that burned, and don't know if I can afford to buy a house, even with assistance but I noticed that most offers of assistance go to those who aren't yet housed. This makes sense, for sure, but in my circumstance, if I can't continue to afford my rent, I may be displaced again, all because of the fire. Thank you for formulating an action plan - and for your consideration.

OHCS Response: We understand that rent costs have been a significant challenge. There will be programs available for renters (Homeownership Opportunities Program and Intermediate Housing Assistance) to help with unmet recovery needs. The Homeownership Opportunities Program will be phased based on a household's income (lower income households are prioritized) and based on recovery status. These programs will be available in early 2023. Your local community action agency or LTRG may have some intermediate rental assistance to help you while you wait for other programs to become available.

71. **Public Comment (Summary):** Many survivors have worked hard and sacrificed to rebuild quickly. The way this program is designed penalizes those who have worked hard to recover.

OHCS Response: Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery.

72. **Public Comment:** What about those of us living in FEMA trailers? FEMA has said that they will take them. Please speak to FEMA regarding the high rent prices and high utility bills. You know about all of this, you have the funds, please hurry. Do you want us to get in debt? Help us. There are so many funds coming in, but nothing is getting done.

OHCS Response: The State of Oregon will apply for another 6-month extension of the FEMA direct housing mission. The State has also worked with FEMA to create a more flexible process to request reductions in rent. Whenever the direct housing mission does end, ReOregon will be ready to assist those survivors still living in the FEMA units with their housing needs.

73. **Public Comment:** As an Executive Officer of a local financial institution in Southern Oregon we have seen many businesses in addition to individuals impacted by the fires. As you are aware it destroyed many businesses in Phoenix and Talent in Southern Oregon. There must be inclusion of business and accessibility considerations if we are to build back "better". A thriving business community provides accessible services to individuals while also bolstering and growing the local economy. A strong, resilient economy requires a vibrant business community. The request is to set aside 5% of approved funds allocated to Southern Oregon for Economic Revitalization Programs, specific to the Almeda and Obenchain fire recovery, to be administered in the form of loans or grants to small businesses to help revive the local economy. Southern Oregon Regional Economic Development, Inc. (SORED) is well poised to administer the funds as the region's economic development district. As the regional economic development agency for the area, SORED is responsible for implementation of the region's Comprehensive Economic Development Strategy (CEDS). SORED has managed RLF programs since 1994 and deployed over \$7M in COVID-19 grant funds between 2020-2021. Please consider supporting local businesses with this recovery plan in addition to individuals impacted. Supporting businesses is critical to helping our communities rebuild and thrive. Thank you!

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities. OHCS encourages you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization in the Action Plan and to reach out if you have questions about what types of activities are eligible.

74. **Public Comment:** I would like funding to improve roads possibly with sidewalks on main roads. I think when you're past the beginning tier of helping the low income

with housing, that there should be consideration for homeowners who were under insured who had to finance rebuilding their home after it was destroyed which left them with a much higher debt then before the fire. I don't feel that people who began recovery sooner than later should be penalized for their proactively. I don't feel that someone who used their life savings and security savings to rebuild should be without assistance restoring them to where they were prior to the fires.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement savings or otherwise suffered a demonstrated financial hardship to complete their housing recovery. If this is allowed, the State may establish benefit caps for how much eligible applicants may be reimbursed for eligible replacement or reconstruction activities. Repairing damaged roads and sidewalks are eligible federal expenses. Please work with your local jurisdiction to notify them of your area's roadway and sidewalk needs and to understand if there are planned restoration activities planned for your area.

75. **Public Comment:** One of the needs that hasn't yet been addressed, and I hope can be included in this plan is that we saw what happens when mobile home parks have one exit, and from what I'm seeing is that they're all being rebuilt with a single exit, as though we haven't learned anything. I want to see a concentrated effort made to ensure that all mobile home parks in Oregon are required to have a second exit. Our home and neighborhood burned to the ground on September 8, 2020. We were living in Bear Creek mobile home park in Ashland. The day of the fire, our road out was inaccessible to many. It was pure luck that we didn't have more casualties. Please use some of this funding to ensure that there are at least 2 escape routes in every park.

OHCS Response: The State will partner with local governments, developers, and park owners to incorporate design and park layout requirements that increase the safety of residents in the face of future disasters. Your recommendation will be included in those design concepts and will be required wherever practicable. Your comment and concern has also been shared with local development review officials that may be able to require access improvements as/when parks are rebuilt.

76. **Public Comment (Summary):** Where does the requirement to spend 70% of money to benefit LMI households come from? Why is the standard so low? Why can they tell us how to spend the money?

OHCS Response: The requirement to spend 70% of funds on LMI households comes from the federal government. In the fall of 2021, Congress appropriated funding for disaster recovery and mitigation to pass through the US Department of Housing and Urban

Development, Community Development Block Grant Disaster Recovery (CDBG-DR). The requirement to spend 70% of the total grant on activities that benefit low- and moderate-income households is a standard HUD requirement and is included in the federal register notice that issued the rules for these funds for Oregon. These funds are for unmet recovery needs. The intent of the requirement is to make sure that the disaster-impacted households with the fewest resources are prioritized. OHCS are preparing a waiver request to HUD that would allow us to use the statewide figures for calculating LMI incomes that would provide us significantly more flexibility. In addition, through its phased approach, the State plans on providing assistance to higher income households.

77. Public Comment (Summary): We lost multiple buildings and animals to the fire. We meet regularly with many other fire survivors, and I want to share concerns. Because of challenges with insurance and under-insurance, many people did have to dip into savings and/or use insurance to pay off mortgages. If there is not assistance to help rebuild, many survivors are at risk of becoming homeless. Survivors in precarious situations are continuing to suffer health impacts, even to the point of shortening their lives. Facing a massive spike in construction costs. Do not delay funding just to meet the 70% requirement. Move forward quickly. Organizational infrastructure does need to be reinforced; the Santiam Integration Team has been very supportive and need new resources to continue. We are not better prepared for disaster now than we were in 2020. Do not have better communications plans or have public education and engagement to prepare for a range of possible future disasters. Need more emergency response capability for wildland fires and other disasters.

OHCS Response: The State is working to launch and open programs as quickly as possible and will know more about the timing of when each of the Homeowner Assistance and Reconstruction Program will open in the coming months. The phased approach is necessary for several reasons. In addition to making sure that low- and moderate-income households receive some additional attention, until we gather more information, we cannot establish with confidence what the level of benefit will be for higher income survivors. As stated at the public hearing, OHCS will certainly consider adding a reimbursement program if sufficient funds are available. Low- and moderate-income households that faced a particular hardship in recovery, such as spending a large proportion of their retirement savings, would likely be prioritized. The other programs, including the Housing Recovery Services and Planning, Infrastructure, and Economic Revitalization programs can help local recovery organizations continue operations and survivor supports and can help local governments recover and prepare for future disaster events. The State also has the ability to provide capacity enhancement funding to groups like the "SIT" through our administrative allocation.

78. Public Comment: Al revisar los programas que están ofreciendo están bien, pero en mi caso ahorita estamos viviendo en la traila de Fema , mis hijos y yo , cómo

madre soltera de 4 hijos, ya estoy en proceso de construir una casa, el programa que ofrecen no me ayudarían a pagar lo que ya está construido , y mientras se llena la aplicación y me hacen la casa puede que ya esté terminada , tenemos hasta septiembre para vivir aquí yo necesito un hogar para mis hijos Mucha gente al igual que yo no podemos esperar , necesitamos a ayuda si la necesitamos todos necesitamos un poco de ayuda , no les pido que paguen por toda mi casa . Mi sugerencia es que me ayudarán con un poco de reembolso por la construcción de la casa y así yo poder dar el entre de mi préstamo y así bajar mis pagos cada mes , ya que va a estar difícil para mi dar un pago de más de 1500 dólares ,Ahora estoy trabajando y ahorrando lo más que pueda para lograr que mis pagos mensuales sean más bajos ,es mi sujerencia que ayuden a las personas que en realidad necesitan que comprueben que están en proceso de comprar o construir casa , es mi comentario y espero que mi familia y yo califiquemos para que me ayuden en la construcción de nuestra casa , necesitamos comprar todo nuevamente no tenemos nada, gracias

Transl.: When reviewing the programs they are offering they are fine, but in my case right now we are living in a FEMA trailer, my children and I, as a single mother of 4 children, I am already in the process of building a house. The program you offer does not help pay for what is already built, and during the time that the application is filled out, the house may already be finished. We have until September to live here and I need a home for my children. Many people just like me cannot wait, we need help; many of us just need a little help, I'm not asking you to pay for my whole house. My suggestion is that they help me with a little reimbursement for the construction of the house so that I can give the interim of my loan and thus lower my payments each month, since it will be difficult for me to make a payment of more than 1500 dollars. Now I am working and saving as much as I can to make my monthly payments lower, it is my suggestion that you help people who really need to prove that they are in the process of buying or building a house, it is my comment and I hope that my family and I qualify to help me build our house. We need to buy everything again we have nothing, thank you.

OHCS Response: The State will request that FEMA extend the direct housing mission beyond September to give survivors more time to recover. In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who have already started or completed their repairs.

79. **Public Comment:** I lost everything in the Two Four Two Fire on Sept. 7th. 2020. I have been treated poorly by DHS staff and made to feel like a homeless transient. We have 6 acres that housed 3 separate households and have been housed at Shilo Inn since that date. Since the beginning we asked for 3 or 4 small

trailers to live in back at our property while FEMA and several other agencies planned cleanup which would allow us to start rebuild. Long story short, the State has given The Shilo Inn over 80K per room to date, (that's 320K for 4 rooms for just us to date, (when for 10 to 15K ,total of 50 to 60 K could have put us back home). That's just one issue. EVERYONE But the victims have made out well on the backs of us victims. DHS has victimized us more than even the fire. There is much much more input I would like to give, but the news of these meetings just aren't getting out to the public, I know of several other fire victims treated even worse than us that would love to have a voice. They don't know who to reach out to and DHS etc sure isnt giving them good resources. So to sum it up, fire victims have not been given a damn thing from Emergency Mgmt funds but some overpriced Motel rooms and put into programs that have NOTHING to do with taking us home to our own land. We have gone through hell and then more hell simply because they wouldn't get a couple of cheap trailers for us to borrow and put on our property while rebuilding. So \$50 to \$60K could have been spent over 18 months ago versus \$320K paid to Shilo Inn for same time period. Plus, the State could have had the trailers back to resell to recover some of what they spent. HOW ABOUT GOVERNEMENT IN THE FUTURE JUST GIVE VICTIMS ONE TIME PAYMENTS and they can't get their own temp housing? MAYBE \$10 to 20K each and be done with it, not for the salaries of dozens and dozens of Government appointed positions to dole it out and Hotel chains. I could go on and on but way too much to address in this message.

OHCS Response: There are many lessons to be learned from survivors and there are certainly opportunities for improving the experience of survivors now and in future disasters. Your comment will be shared with Department of Human Services (DHS). Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes. This program will be available in the beginning of 2023, and we understand you may have more immediate housing support needs. Please reach out to ACCESS and/or a Disaster Case Manager, as they may have resources available to you immediately.

80. **Public Comment:** Mi comentario solo es que por favor se nos allude a las personas que necesitamos por que yo soy una persona que perdí mi hogar y no se me alludo ni por fema ni por ningun medio. No tengo hogar y me entristece el aver perdido mi casita en Phoenix Or. gracias.

Transl.: *My only comment is that we please help the people we need because I am a person who lost my home and I was not helped by fema or by any means. I am homeless and sad to have lost my little house in Phoenix Or. Thank you.*

OHCS Response: OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild

damaged homes they owned at the time of the disaster. Another ReOregon program is the Homeownership Opportunities Program (HOP), which will help impacted residents who are low- to moderate-income renters become homeowners. These programs will open for application in the beginning of 2023, which we know is a long time from now, so we encourage you to reach out to ACCESS and your disaster case manager, as they may have resources available to you immediately to help you return to your community.

81. **Public Comment:** Mis comentarios son que yo perdí mi casa todos mis muebles todos mis recuerdos de mis hijos fue una cosa muy triste que nos paso teníamos aseguransa pero eso no cubrió todas nuestras pertenencias tenemos que estar poniendo de nuestra bolsa para poder recuperarnos todos nuestros ahorros ahí senos están yendo con tanto sacrificio me gustaría que si nos pudieran ayudar con poquito para poder sobrevivir porque la verdad está muy mucho muy caro todo y cómo les digo que sólo nosotros las que pasamos todo eso sabemos el sufrimientos que estamos pasando

Transl.: My comments are that I lost my house, all my furniture, all my memories of my children, it was a very sad thing that happened to us. We had insurance, but that did not cover all our belongings. We had to pay out of pocket to recover all our savings, there they are going with so much sacrifice I would like that if they could help us with a little to be able to survive because the truth is everything is very, very expensive and how can I tell you that only we who went through all that know the suffering we are going through.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to use their retirement or savings.

82. **Public Comment:** It would be nice to use some of the funds for renters relief, I am paying 300.00 more a month for rent, I lived at Lazy Days mobile home park, I was living in a 2020 manufactured home and paying only 750.00 a month, now I'm having to work full time hours and I am disabled. Please consider use that are struggling with this situation.

OHCS Response: The ReOregon Homeownership Opportunities Program (HOP), which will help impacted residents who are low to moderate income renters become homeowners. The Intermediate Housing Assistance (IHA) program will be able to help eligible renters who are facing housing instability. For IHA, OHCS has requested a waiver to allow for up to 36 months of rental assistance. These programs will be available at the beginning of 2023, but we know you may have more immediate housing support

needs. Please reach out to ACCESS and/or a Disaster Case Manager, as they may have resources available to you immediately.

83. Public Comment: I truly feel that rent money should be needed to give more than 8 months of assistance. It's been over a year and we are still struggling to get on top of living expenses with the high rent cost when we weren't paying that much before loosening everything. People don't get it....EVERYTHING and they think you just bounce back in just a short time.

OHCS Response: The ReOregon Homeownership Opportunities Program (HOP), which will help impacted residents who are low to moderate income renters become homeowners. The Intermediate Housing Assistance (IHA) program can also help eligible renters who are facing housing instability. For IHA, OHCS has requested a waiver to allow for up to 36 months of rental assistance. These programs will be available at the beginning of 2023, but we know you may have more immediate housing support needs. Please reach out to ACCESS and/or a Disaster Case Manager, as they may have resources available to you immediately.

84. Public Comment (Summary): We lost our home in Mountain View Estates. We are still struggling with FEMA and hope that the legal assistance could be used to help survivors who are still fighting to get the benefits they are entitled to from FEMA. The programs should also pay particular attention to helping people that are on fixed incomes.

OHCS Response: If you are facing challenges with your appeals process with FEMA, you can find help via Rogue Valley Rebuilds, which has compiled a list of legal assistance providers on its website at <https://jacksoncountyor.org/recovery/legal-help-for-fire-survivors>. You can also contact the Wildfire Disaster Relief Hotline: 844-944-2428. Individuals with fixed incomes do face additional long term challenges. Where possible, OHCS would like to take this fact into account. For instance, if/when OHCS can establish that there are sufficient funds available to create a reimbursement program, it may make sense to prioritize seniors who are more likely to be living on fixed incomes.

85. Public Comment: What about those of us living in FEMA trailers? FEMA has said that they will take them.

OHCS Response: The state will apply for another six-month extension of the FEMA direct housing mission. If the program were to end in September, which we do not anticipate, Oregon Housing and Community Services, in partnership with local Community Action Agencies, will be prepared to assist survivors with existing state funds. Although the direct housing mission is likely to be extended again, perhaps several times, by the time the direct housing mission is likely to end, ReOregon will be ready to assist those survivors still living in the FEMA units with their housing needs through the Intermediate Housing Assistance program.

86. **Public Comment:** What about those of us living in FEMA trailers? FEMA has said that they will take them. Please speak to FEMA regarding the high rent prices and high utility bills. You know about all of this, you have the funds, please hurry. Do you want us to get in debt? Help us. There are so many funds coming in, but nothing is getting done.

OHCS Response: The state will apply for another six-month extension of the FEMA direct housing mission. The state has also worked with FEMA to create a more flexible process to request reductions in rent. The state will apply for another six-month extension of the FEMA direct housing mission. If the program were to end in September, which we do not anticipate, Oregon Housing and Community Services, in partnership with local Community Action Agencies, will be prepared to assist survivors with existing state funds. Although the direct housing mission is likely to be extended again, perhaps several times, by the time the direct housing mission is likely to end, ReOregon will be ready to assist those survivors still living in the FEMA units with their housing needs through the Intermediate Housing Assistance program.

87. **Public Comment (Summary):** In order to have healthy, solid communities, infrastructure investments in things like roads and utility undergrounding are very important.

OHCS Response: Thank you for taking the time to comment and for your recommendation. Through the Planning, Infrastructure, and Economic Revitalization Program (PIER, named DRIP in the draft Action Plan) program, the plan dedicates over \$40 million that will be available to local governments to address unmet infrastructure, mitigation, and economic revitalization needs, provided they are Community Development Block Grant-Disaster Recovery-eligible activities. There are limitations on providing assistance to privately owned utilities, but the state is working with the U.S. Department of Housing and Urban Development on being allowed flexibility on this prohibition.

88. **Public Comment:** I was living at Royal Oaks Mobile Manor [redacted information] when the Alameda fire took my home and cat. I am a senior/disabled/low fixed income (less than 11,000 annually) woman who is now living in a subsidized apartment that is not sustainable for my needs. While I am thankful for this apt, I pray every day to have the opportunity to go back to the park I was living at the time of the fire, however I have no way of doing so. My income is too low to move into any park at this point. My circumstances and income have changed since I purchased my mobile home in 2013. "Royal Oaks" It is not being rebuilt and has been purchased by HAJC. I've applied for housing assistance through ACCESS and any programs that I know of to try to rebuild what I lost in the same Phoenix/Medford area, however, haven't been able to get any real answers. Any help would be greatly appreciated. I'm aware there's many people still displaced, waiting for a miracle.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help low- and moderate-income survivors replace, repair or rebuild damaged homes or manufactured homes they owned at the time of the disaster. The program and the Housing Recovery Services program include support services to help survivors move into a park or home that meets their specific needs. These programs will open for application in the beginning of 2023, which we know is a long time from now, so we encourage you to continue to talk with ACCESS and your disaster case manager, as they may be able to help you identify vacant manufactured housing park spaces, as well as see if you qualify for existing programs that can help with a manufactured home replacement. Please also be sure to share with ACCESS that your preference would be to return to Royal Oaks Mobile Manor when they rebuild so that they can notify you when additional information about the status of the project is available.

89. **Public Comment:** We need available space for low-income people to live in their motorcoach or travel trailers. The cost of everything is astronomical and it's scary not knowing what, where or how we're going to make it. I was born and raised in this area and I really don't want to leave but it looks like I might have to. This is my hometown and I want to stay here. Thank you.

OHCS Response: Per HUD rules, CDBG-DR funds can't be used to buy motorcoaches or travel trailers, but you may be eligible under the Homeownership Opportunities Program (HOP) as a first-time homebuyer. The Homeownership Opportunities Program helps impacted residents who are low to moderate income renters become homeowners. We understand that you would like to stay in your hometown, which is why OHCS will focus new home construction within or as close to the fire areas as possible. This includes scenarios where local non-profits, community land trusts, housing authorities, and/or local governments acquire land and keep the land rent low for homeowners.

90. **Public Comment:** The Jackson County Community Long Term Recovery Group provides the following for consideration in the CDBG-DR Action Plan: (1) Commitment by OHCS to on-the-ground technical assistance supporting application submissions for fire survivors modeled after the Multi-Agency Resource Center efforts that supported FEMA Individual Assistance applications. A large portion of our survivors struggle with limited technology access or literacy and will need support submitting their applications for the HARP and HOP programs outlined. Providing capacity for local partners to support this effort is the best way to leverage trusted relationships to increase equitable access to these crucial resources. Without this concerted effort, inequities will persist. Funding to contract with professional developers who can find and secure land deals that can be banked for Community Land Trusts or other affordable/attainable development projects. Land availability is and has been a consistent challenge in developing the housing stock necessary to recover our community from the 2020 Labor Day Fires. Without a cache of funds to support

this effort, we run the risk of money to build houses and nowhere to build them. Investing in workforce—The plan as outlined is admirable and will require a construction workforce that is not currently available. Developing partnerships with local trade schools will be vital to increasing the workforce to support the programs outlined in the plan. We have already seen a number of cases involving contractor fraud, rolling delays, and escalating costs. What mechanisms is OHCS preparing to address these? Additional considerations should be made for the folks who lost their homes in the fires and are now the same people we are relying on to rebuild the community. We are encouraged by this initial draft and look forward to the good work to come. Thanks for your efforts to make sure our most vulnerable survivors are able to recover and repair their lives.

OHCS Response: ReOregon plans on funding and partnering closely with community action agencies, long-term recovery groups, culturally-specific organizations, and community based organizations to support applicant engagement and intake. The intent is just as you described - to provide a trusted local program partner and to address inequities in recovery. One of the proposed programs, Housing Recovery Services, will focus on providing technical assistance and resources to help fire survivors successfully access resources necessary to obtain stable, permanent and affordable housing. Through funding agreements or partnerships, the State will provide significant program technical assistance and capacity to local organizations and will solicit feedback from those local organizations on how the State can break down program barriers. OHCS has made land acquisition a priority in the allocation of HB 5006 funding and is currently using existing resources to acquire land for future projects whenever possible. Both the Homeowner Assistance & Reconstruction Program and the Homeownership Opportunities Program will be designed in a way that streamlines the rebuilding process, addresses escalating costs, leverages efficiencies and economies of scale, and minimizes the opportunity for contractor fraud.

91. **Public Comment:** The community of Glide Oregon was devastated by the Archie creek fire. Because Glide is an unincorporated town, it lacks many of the traditional resources to connect fire survivors and impacted business to help. This opportunity may need to consider increased funding allocated to local nonprofit Long-Term Recovery Groups to connect impacted community members to these benefits. Nonprofits are at risk of running out of caseworker funding prior to this program being enacted. Interim funding will ensure the relationship and communication between fire survivors and LTRG's is sustained while this program is being developed so the money can find its way to the intended recipients quicker. It is estimated that this program will be in effect nearly 4-5 years after the devastating 2020 wildfires. Many people are trying to move forward now. Withholding benefits to community members who may be completed with construction by the time this program is funded, may encourage many to keep waiting. It may be beneficial to take early application for future reimbursement

to encourage a continuation of rebuilding, knowing that they have the same chance of help as if they would wait.

OHCS Response: In response to the overwhelming comments about the need to support various projects across the impacted areas, including unincorporated areas such as Glide, the State has modified the infrastructure program (termed DRIP in the draft Action Plan) under the newly named Planning, Infrastructure, and Economic Revitalization Program (PIER). Under this program, local governments and organizations, like Glide Revitalization, may apply for projects and administrative support based on priority recovery needs for their communities. In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who have already started or completed their repairs. These funds were allocated to Oregon from the U.S. Department of Housing and Urban Development (HUD). The State does not have the funds yet. We will submit our plan to HUD on how the funds will be spent at the beginning of June and plan to open the program for application in the beginning of 2023, provided HUD approves our Action Plan in a timely manner. Opening up applications more or less immediately would not lead to faster awards. ReOregon funds will only pay for work done after a damage assessment is completed. We are currently building internal staff and systems capacity, as well as undertaking program design as quickly as possible, but at this time are not at a stage where we can open applications before programs are fully designed and intake systems are in place.

6.3.2.3 Miscellaneous Comments

The following comments contain inquiries, requests, and suggestions made about the action plan, ongoing disaster efforts, and related disasters in the state.

92. **Public Comment (Summary):** I lost my mobile home but have been able to live with my daughter. I have fixed income but used to be able to supplement my income with a small business from my home doing sewing and alterations. I could really use a grant to get back into business.

OHCS Response: In response to the overwhelming comments about the need to support impacted businesses and communities, the State has modified the infrastructure program under the newly named Planning, Infrastructure, and Economic Revitalization Program. Under this program, local governments and organizations may apply to the State to run small business programs, if that is a priority recovery need for their communities. Please continue to reach out to SOREDI in Jackson County to understand what resources may be available to businesses.

93. **Public Comment:** By time these funds will actually be available to help anyone, it will be 2 years since the wildfire destroyed lives and devastated neighborhoods and communities. In those two years, this government assistance could have made a meaningful impact on people who really needed the help to get back

on their feet - low/mod income families and those with unmet needs because of insurance shortfalls. It's good that you are planning for future disasters and assistance for larger, longer term public infrastructure investments, but for maximum benefit, these funds really needed to be here on the ground sooner. Touting the millions of dollars in disaster recovery that is coming to Oregon only adds insult to the injury if these funds won't be accessible to those who have already begun recovering from the disaster. Direct assistance funds for unmet needs need to be available to survivors on a reimbursable basis as well as to those who need assistance moving forward. In those two years as we sacrificed and struggled to rebuild and recover, those funds could have made a significant difference.

OHCS Response: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021, and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery.

94. Public Comment: I am a person who is also a COVID survivor. I've been in two hospitals, and the doctors would tell me, "how are you so strong?, you don't even need oxygen". I told them I was strong because of God, they would laugh. After that, I was getting my house ready for remodeling. Once I had recovered, I painted it. And then one of my co-workers told me, "Jesus, the fire is coming". It's not that I didn't believe him, but I said to myself "where is the fire?" and kept working. The prior week, I had traveled to California, and my documents were still in my travel bag and that was the only thing within reach. I took my keys and my car, and only the documents in that bag. I was in an office where I was asked to write a list of all the things that I lost, and I was so nervous, there was so much I could write. I know if we were all asked to write a list of what we had [and was lost], it would be too long. I am a handyman. I like doing plumbing, electricity, and paint work. If this program also facilitated a way in which we could work together, if we could identify plumbers, electricians [within our community]. I know construction may be different because of permits and building codes. And one more thing, if we could be informed of an office where we could obtain all this information in a written format, it would be very helpful.

OHCS Response: The State has not set up local offices yet, but ACCESS, your Disaster Case Manager, or your local long term recovery group can help you document your losses and all the work you've done so far. Your suggestion about helping survivors share information about contractors is a good one. Generally, the State cannot recommend

private businesses, but we could explore ways to support local non-governmental partners provide that information through the Recovery Services program.

95. Public Comment: I would like to bring attention to the issue of contractor fraud, during the recovery here in southern Oregon due to the Almeda fire, the contractor fraud has been rampant and overlooked by mostly everyone. The need has made victims and nonprofit organizations as well as the funding bodies of these organizations ignore the issue or even consider it due to the sense of urgency this recovery has. Roughly about 51 % to 60 % of fire affected victims here are Hispanics and they lack the language skills to advocate for themselves, they are voicing this concern, they have had contractors giving them job estimates of up to \$95k for roof replacements when they just need a leak fixed, \$90k to dig a well or \$14k to transport a mobile home from less than 10 miles away. This systemic abuse is rampant due to the fact that contractors know the necessity and the availability of funds or open blank checks they can get from organizations that serve these communities. There should be a cross check system, a bid system and a price limit for contractors that are interested in helping the community rebuild, this abuse only takes away from the funds allocated to help families go back to normal and it only marginalizes them even further by exploiting them, their situation and the very much needed funds that are getting extracted by a few that plan on using this situation to their own benefit. Please consider this serious issue when writing the rules for the allocation and distribution of funds and how they would have to be used, the affected communities need to benefit the most, not the private sector.

OHCS Response: Unfortunately, it is a common pattern in disaster recovery. OHCS will work closely with survivors to avoid these types of situations and ReOregon has money to advise survivors on how to select and manage contractors. In addition, OHCS would welcome the opportunity to partner with local organizations to raise awareness of these issues among survivors who may still be at an early stage of recovery. It is important for property owners to file complaints with the Oregon Construction Contractors Board in instances of contractor fraud or abuse. Additional information can be found at <https://www.oregon.gov/ccb/complaints/Pages/file-complaint.aspx>. The board website also has information on what property owners can do to avoid construction and disaster scams - <https://www.oregon.gov/ccb/homeowner/Pages/reliablecontractor.aspx>. This website includes guides to hiring a contractor and some red flags to look out for potential disaster scams.

96. Public Comment (Summary): Can you give us the exact LMI # for a five-person household?

OHCS Response: HUD has not published the 2022 income limits yet, but the income limit for a five-person household in Lane County for 2021 is \$61,550.

97. **Public Comment (Summary):** Had insurance gaps. There are people taking advantage of shelter mission generosity.

OHCS Response: The ReOregon housing programs are designed to help fill insurance gaps that are keeping survivors from returning to safe homes.

98. **Public Comment:** We are still struggling single mom with four kids need help financially haven't found a stable home for an affordable price.

OHCS Response: There will be programs available for homeowners (Homeowner Assistance and Reconstruction Program) and renters (Homeownership Opportunities Program and Intermediate Housing Assistance) to help with unmet recovery needs. HARP and HOP will be phased based on a household's income (lower income households are prioritized) and recovery status. The programs that are offered under the Action Plan can assist with repairs or improvements to new homes that are necessary to "complete" recovery.

99. **Public Comment (Summary):** It is very important to provide help, also, with the costs of reconnecting new homes to utilities such as water and electricity and new septic systems. There are many people who need help right away. What kind of assistance is available for them?

OHCS Response: The ReOregon housing programs will likely include the costs of the underlying infrastructure needed to rebuild damaged or destroyed homes. These funds were allocated to Oregon from the U.S. Department of Housing and Urban Development (HUD). The state does not have the funds yet. We will submit our plan to HUD on how the funds will be spent at the beginning of June and plan to open the programs to applications in the beginning of 2023. We understand this process takes too long.

100. **Public Comment (Summary):** Forgiveness over time is similar to Habitat to Humanity. Would like to partner. Have a lot of educational information that can help first-time homeowners be successful. The ReStore can also help individuals with their reconstruction.

OHCS Response: The ReOregon housing programs recognize and include non-profit organizations and developers as important partners in the development of homeownership opportunities and rebuilding damaged homes. We will coordinate with you and other non-profit partners to leverage resources and local expertise and build from existing recovery efforts wherever possible.

101. **Public Comment (Summary):** Lost my home and now living in FEMA direct housing. Some FEMA direct housing recipients are interested in help purchasing those units and siting them. Hope to start building this fall. Insurance will not be enough to cover the cost of construction.

OHCS Response: There will be programs available for homeowners (Homeowner Assistance and Reconstruction Program) and renters (Homeownership Opportunities Program and Intermediate Housing Assistance) to help with unmet recovery needs. HARP and HOP will be phased based on a household's income (lower income households are prioritized) and based on recovery status. The programs that are offered under the Action Plan can assist with repairs or improvements to new homes that are necessary to "complete" recovery. For participants currently in FEMA's direct housing mission, the state awarded funds to community action agencies through the Wildfire Recovery and Resilience Account (WRRRA). They may be able to provide some assistance with funding to help purchase and site FEMA units. Please reach out to your local community action agency for more details on that funding. Additionally, in response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business support activities.

102. **Public Comment:** Not sure how all this works but we are still greatly impacted by the wildfires devastation. Our only source of income and recreation abruptly stopped after that terrifying experience and we still have tons of clean up. We make our living from logging operations. Even tho[ugh] logging demands went to their highest there was no need for security for the logging equipment because all the forest gates were shut down which is what we've done for 5 years prior to the wildfires. We've been locked out of our local national forest areas which is our only playground for us and our dogs. This whole area was considered a recreational area so our main opportunity to make money from the tourist seasons has been ripped out from under us and with no end in sight. We were barely making it beforehand but now we are homeless with no options on the horizon. It's been a nightmare from which we cannot wake.

OHCS Response: Based on significant feedback from the public and local governments and organizations, the State has expanded the infrastructure program to the newly named Planning, Infrastructure, and Economic Revitalization Program. This program will allow local governments, organizations, economic districts, and other public or quasi-public organizations to submit recovery and mitigation projects or programs to the State for approval, including programs for economic revitalization. Economic revitalization programs will be designed and managed at the local level.

103. **Public Comment (Summary):** I lost a home in the fire but am really concerned about my office building. We are unable to afford commercial insurance because of the fire. I am concerned with continued fire that insurance will become completely unaffordable for businesses in Southern Oregon.

OHCS Response: OHCS encourages you to share your insurance experience with the Insurance Commissioner and reach out to Oregon Department of Consumer and Business Services and file a complaint at <https://www.oregon.gov/dcbs/consumer/Pages/consumer.aspx>.

104. **Public Comment (Summary):** I did not receive almost any warning and had to leave everything behind, lost my double wide. I have a neighbor who was disabled and died in the fire and that was very traumatic. I've been told that there was not enough water to fight the fire because it was being sent to Ahslan. I've been told I don't qualify for Habitat for Humanity because my income of \$1200/month isn't high enough.

OHCS Response: The State has provided significant funding and has worked with Jackson County and municipalities within Jackson County to fix many of the water challenges faced during the wildfires to help prevent similar challenges experienced in 2020. Additionally, under ReOregon there will be programs available for homeowners - Homeowner Assistance and Reconstruction Program (HARP) and renters - Homeownership Opportunities Program (HOP), as well as an Intermediate Housing Assistance program to help with unmet recovery needs. HARP and HOP will be phased based on a household's income (lower income households are prioritized) and based on recovery status. The programs that are offered under the Action Plan can assist with repairs or improvements to new homes that are necessary to "complete" recovery.

105. **Public Comment (Summary):** I would just want to say one last thing, before this ends. We also lost everything, but like my dad said. I lost what I built for 28 years, in just one minute. Those were his words. And after all this, sadness overtook him, he got sick, and passed away. But those were his words, "I lost what I built for 28 years, in just one minute".

OHCS Response: Thank you for attending the public hearing and providing a public comment. We will strive to make sure that all of the homes built with this program are able to withstand a fire in the future.

106. **Public Comment:** The fact that you are not considering the repeal of SB 100 is evidence that you are not serious about solving this problem. There is so much fake farmland in this county that is artificially undevelopable. These government-imposed restrictions on development do nothing but make the limited supply of developable land more expensive. This drives up costs and makes housing affordability more of a pipe dream. The cure for housing affordability is increased supply. By restricting the supply, you are making the problem worse.

OHCS Response: Please reach out to your local and state elected officials to share your concerns. OHCS does not control land use decisions.

107. **Public Comment:** I was impacted by the Alameda fire, 20 days later my house got destroyed and my husband died of COVID-19. I recently moved from Medford, Oregon because I don't have any family down there. I really need to talk to somebody and get help getting back down there and getting myself a place down there.

OHCS Response: [We attempted to call the commenter back, but the number was no longer in service.] Disaster case managers (DCMs) can help survivors access a range of assistance, from wellness counseling to financial help. They are your best point of contact for a variety of programs to help with recovery. If you aren't currently connected to a DCM, to have one assigned to you, or if you aren't sure who your DCM is, call the DCM hotline: 833-669-0554.

108. **Public Comment:** Caller is unsure if she needs to attend a meeting in Gates, OR to sign up for Homeowner Recovery. Please call her back.

OHCS Response: [Caller was responded to.] OHCS will provide regular email updates and will also make phone calls, if preferred, when there are critical announcements, such as the opening of applications processes for new programs.

109. **Public Comment (Summary):** How will you serve renters, with a lack of land availability, in Lincoln County?

OHCS Response: OHCS is using state funds to acquire land as soon as possible. The HOP program also includes funding to acquire land for new homeowners.

110. **Public Comment (Summary):** We have the opportunity to purchase FEMA trailers, but there is no land to put them on. Rents are extremely high. Land use rules limit land division and limit the ability to establish new rental housing. Please look into that possibility.

OHCS Response: The Planning funding provided under the Action Plan could be utilized by the county to consider land use changes, to provide greater flexibility for land division. These types of decisions, however, must be made by local elected officials.

111. **Public Comment:** Allowing forestry, loggers to do thinning of dead trees, underbrush, keeping old logging roads opened, new ones built to help prevent these fires is needed 100%. You stopped this, now lives, wildlife, homes, are destroyed because of your negligence. Allowing some kid to run things who looks at pictures and decides livelihood is crazy dangerous, costly. Chetco River fire as one example two- three years ago. Fire was spotted, reported, they (forestry) was told hold off see how it does. Someone should of yanked Brown down to Brookings, took her to it and left her. Not allowing anyone to go in and fight it, no helicopters, nothing for two hrs- how did that work. Almost lost the town. The smoke from California's fires was here, this added, up down coast. California Paradise fire neglect from PGE never ever maintaining equipment. A breeze blows they shut power off to people! Smart. No one runs anything right, to allow these Forrest fires is pure neglect, but no one is accountable. Loggers have been around forever, they know trees, how to prevent fires- . What happened to the spoiled brats who shot fireworks into forestland??? Let me guess. Nothing could replace the trees, homes. Paradise burned, lives lost, no

town- why? Can't think of a government agency with any brains. Born Oregonian, still in Oregon- not like it used to be. Bunch crooks is all there is.

OHCS Response: Forestry management and wildland fire-fighting approaches are not areas over which OHCS has any authority. The PIER program does make funds available, if local governments were to prioritize such activities, for thinning or other fuels reduction programs.

112. **Public Comment:** Hola soy [name redacted] no puedo asistir la reunion por mi condicion no puedo estar mucho tiempo Sentara ni parade por mi cintura tengo que estar acostada oh reposando en el silliness yo tengo muchas preguntas yo no miro la ayuda para los propietarios de las viviendas segun que nos iban ayudar no miro nada los colchones que me puso fema son usados me lastiman mi cintura tube que buscar otros por mi cintura que segun access me iban ayudar traime unos colchones nuevos y nada por eso yo digo lo que es fema no contesta las llamadas pero si quieren que cada mes les demos informacion de buscar viviendas en donde si no hay nada y todo esta muy caro si nos iban ayudar que sea de corazon no hagan promesas y nos estresan mucho y por ejemplo yo no estoy trabajando por mi condition que tengo y nadie me quiere ayudar para nada access me habla cada semana karla diciendome que si estoy trabajando ella sabe perfectamente que no puedo trabajar no entiendo porq me hablan y me preguntan yo estoy batallando mucho economicamente en todo no tengo ingreso para nada nadie me ayuda y para septiembre se van a llevar las viviendas fema donde nos vamos a meter oh nos van a echar a la calle seria algo cruel para todos nosotros si nos iban ayudar ayudenlos porfavor necesitamos viviendas para vivir bien porfavor y gracias"

Transl.: "Hello I am [name redacted] I can't attend the meeting because of my condition I can't sit or stand for a long time because of my waist I have to be lying down or resting in the chair I have many questions I don't look at the help for homeowners according to what they were going to help us I don't look at anything the mattresses that fema put me. The mattresses that fema gave me are used and they hurt my waist and I had to look for new mattresses because of my waist and nothing that's why I say that fema doesn't answer the phone calls but if they want us to give them information every month to look for housing where there is nothing and everything is very expensive if they are going to help us it should be from their heart they should not make promises and they stress us out a lot and for example I am not working because of my condition that I have and nobody wants to help me because of that. For example, I am not working because of my condition that I have and nobody wants to help me at all access talks to me every week telling me that if I am working she knows perfectly well that I cannot work I do not understand why they talk to me and ask me I am struggling a lot financially in everything I have no income for anything nobody helps me and for September they are going to take the viviendas fema where we are going

to get or they are going to throw us out on the street it would be cruel for all of us if they are going to help us please help them we need bibiendas to eat well please and thanks.

OHCS Response: Disaster case managers (DCMs) and Housing Navigators are available in each of the counties most impacted by the 2020 Labor Day Fires. DCMs can help survivors access a range of assistance, from wellness counseling to financial help. They are your best point of contact for a variety of programs to help with recovery. If you aren't currently connected to a DCM, to have one assigned to you, or if you aren't sure who your DCM is, call the DCM hotline: 833-669-0554. Housing Navigators are your best point of contact for housing recovery issues specifically, including help with finding a new rental or accessing financial assistance to help rebuild or replace your home.

113. **Public Comment:** "Creo que ubo personas alas que se les hayudo demasiado pero tambien hubimos personas alas que solo se nos hayudo con lo mas minimo."

Transl.: "I think there were people who were helped a lot, but there were also people who were helped with just the bare minimum."

OHCS Response: ReOregon will be working with and hiring local, community-based organizations to assist survivors access the programs and resources. We know that the way that the programs are implemented is very important and we will work very hard to ensure that survivors are encouraged and supported through application processes.

114. **Public Comment:** My home, personal property and 3 vehicles were a total loss in echo mountain fires. We Only escaped with the clothes we were wearing. We were insured and did rebuild. However, we have had to use credit cards to replace items that were lost where the insurance wasn't enough to cover, like our fences, gates, our shed, lawn mowers, tools and many other items. This has had a big impact on us financially. We are finding it difficult to get back to normal. Some sort of a grant would mean a lot.

OHCS Response: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. The ReOregon programs are focused on housing recovery. Your local long term recovery group may have funding to assist with other recovery needs. The LTRG can be accessed through a Disaster Case Manager. DCMs can help survivors access a range of assistance, from wellness counseling to financial help. They are your best point of contact for a variety of programs to help with recovery.

115. **Public Comment (Summary):** How many wildfires are addressed by the \$422 million. If you don't accept applications until 2023, many more will have rebuilt. Why can you not begin taking applications more or less immediately?

OHCS Response: The programs in the Action Plan are currently limited to those wildfires and straight-line winds that occurred on/around Labor Day 2020 in Clackamas, Douglas, Jackson, Klamath, Lane, Lincoln, Linn, and Marion counties. These funds were allocated to Oregon from the U.S. Department of Housing and Urban Development (HUD). The State does not have the funds yet. We will submit our plan to HUD on how the funds will be spent at the beginning of June and plan to open the program for application in the beginning of 2023. Opening up applications more or less immediately would not lead to faster awards. ReOregon funds will only pay for work done after a damage assessment is completed. Given that we are not in a position to actually process applications (due to both capacity and not having fully fleshed out program designs) nor complete damage assessments, we believe there is not a lot of value in opening applications now. In addition, we would risk wasting survivors' time and making the process more frustrating by trying to write applications prior to program manuals. We are focusing, instead, on building capacity through hiring and procurement and program design. As stated at the public hearing, OHCS will certainly consider adding a reimbursement program if sufficient funds are available.

116. **Public Comment (Summary):** Why can't applications be accepted earlier? How long is the affordability requirement for new affordable rental housing development? Program will be too little, too late.

OHCS Response: These funds were allocated to Oregon from the U.S. Department of Housing and Urban Development (HUD). The State does not have the funds yet. We will submit our plan to HUD on how the funds will be spent at the beginning of June and plan to open the program for application in the beginning of 2023. Opening up applications more or less immediately would not lead to faster awards. ReOregon funds will only pay for work done after a damage assessment is completed. Given that we are not in a position to actually process applications (due to both capacity and not having fully fleshed out program designs) nor complete damage assessments, we believe there is not a lot of value in opening applications now. In addition, we would risk wasting survivors' time and making the process more frustrating by trying to write applications prior to program manuals. We are focusing, instead, on building capacity through hiring and procurement and program design. As stated at the public hearing, OHCS will certainly consider adding a reimbursement program if sufficient funds are available. One of the ReOregon programs is the Homeownership Opportunities Program (HOP), which aims to support impacted residents who are low to moderate income in their path to homeownership. In exchange for assistance under HOP, applicants may receive a portion of their award as a loan that will be forgiven over 15 years, if they remain in the home. There will be a long-term affordability covenant recorded on the property, so the home remains affordable to lower income households after the HOP participant sells the property. The length of the requirement depends on the amount of loan forgiveness, but in many/most cases we expect that it will be 50 years. We understand that the program is coming into effect years after the disaster

and, even though it is hundreds of millions of dollars, will not be able to address every need.

117. **Public Comment:** Infrastructure needs are immediate, need to be expedited with first phase of program. Sewer capacity expansion is needed for Mill City and Gates and is required to bring housing back. Sand filter alternatives are very expensive. Need is approximately \$3M for sewer expansion. Also have an area with needs for booster pump for fire flow to portion of city. Need is approximately \$2.7 million.

OHCS Response: Based on significant feedback received from local governments and organizations, the State has revised its infrastructure program under the newly named "Planning, Infrastructure, and Economic Revitalization program," which provides allocations by fire for local governments, schools, non-profits and other public or quasi-public organizations to work together to prioritize their recovery needs and submit projects to the State for approval. This change in program method of distribution is designed to allow local governments and organizations to finalize the plans for their recovery or mitigation projects now.

118. **Public Comment (Summary):** I lost a lot of timberland that I was relying on for future and current income. I'm wondering how many people lost businesses and investments that were impacted. And these losses are not addressed by the programs proposed.

OHCS Response: Based on significant feedback from the public and local governments and organizations, the State has expanded the infrastructure program to the newly named Planning, Infrastructure, and Economic Revitalization Program. This program will allow local governments, organizations, economic districts, and other public or quasi-public organizations to submit recovery and mitigation projects or programs to the State for approval, including programs for economic revitalization. Economic revitalization programs will be designed and managed at the local level. Please work closely with local jurisdictions and Marion County to share information on your unmet recovery and mitigation needs. To learn more about impacts on businesses as a whole in Marion County, you may want to request the "Economic Impact and Opportunity Analysis" report prepared for Marion County by ECONorthwest.

119. **Public Comment:** I have 4 kids, one of them has a disability. I am also a small business owner and I want small business owners to be considered in this plan. My husband thinks that the recovery of our home should be the priority, but I disagree, I believe the recovery of our business is the priority. In order to provide for my family, I need for my business to recover. I am not asking for charity, I've always worked for my family. I need help, and I need it now. I decided to come here, because my 4-year old son was asking me for his bedroom and a t-rex blanket, and I told him he would have them, but then I realized I didn't know how I could provide them, when I didn't have the means. I had already

decided not to participate in a public hearing like this one, because I am psychologically, physically, and mentally tired of talking, listening, but not seeing any changes or help. I need to know if we're going to actually receive help. And as a homeowner, I would love to receive help, because we are first time owners, and we have put all of our energy and money into buying our home. I would want a significant reimbursement, so that I can continue with my home recovery. I submitted an application to a recovery program by Jackson County where supposedly I could receive help if I reconstructed in a fire-resilient manner. I was told I would receive help, and I was very excited because I wanted to use the funds for insulation, but then they told me I did not qualify because I did not reconstruct in the "fire scar" which was the park. I am proud to own my land, but I cannot receive help, because I won't return to the park where I was only an owner of the unit but not the land? I think this is unfair. Also, don't forget about those with disabilities and the elderly. We need to be considerate and help each other as a community. I'm glad to see you all here. I hope we can all participate and express what is hurting us and our needs. You may think, "well, they already bought a home". But you don't know how much it's costing us, you don't know if our kids had to go without food, you don't know if our kid needs therapy, but we couldn't provide it. You don't know. I pay all my bills, I've paid all my permits. It's really hard, I'm very tired. I can't imagine how others are faring. These are my suggestions. Also, when would this program begin?

OHCS Response: The estimated launch of the Homeowner Assistance and Reconstruction Program (HARP) is in the first quarter of 2023 (January-March) for Phase I applicants. At this time, there is no set amount of time Phase I will be open before Phases 2 and 3 open for application. As impacted residents reply to the survey and submit their applications, the State will know more about survivors' needs and will be able to communicate more about the timing of when each phase will open for application intake. In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business activities. We encourage you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization in the Action Plan and to reach out if you have questions about what types of activities are eligible. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs. In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement savings or otherwise suffered a demonstrated financial hardship to complete their housing recovery.

120. **Public Comment:** I know many of you. I was born and raised in South Oregon, specifically in the communities that were lost by the fires. I took some time to

remember my childhood, and I remember all the love, all the mutual support, and the culture that surrounded me. The environment provided by these communities made feel safe, loved, and supported by my neighbors. You helped me grow into the woman that I am today. It hurts to realize, that this sacred place does not exist anymore because of the fires. My community has been marginalized once again. My dad lost his home and business to the fire, until this day he is still fighting with FEMA to receive a loan. These communities were full of businesses as Beatriz mentioned. This plan needs to help those businesses. The testimonies I've heard from my Latin community express a variety of different needs. The families who bought their homes are expressing that they don't have any savings anymore, because we all know that once you buy a home all bills are much more. Then, this plan should also support the families who have purchased a home, because we know that the need is great. It is also imperative that you don't forget the elderly and the ones with disabilities, like Beatriz said. Many of the elders in these communities had plans to retire here. Now, they can't retire. So, we need to have funds to help these communities. So that the elders have a community where they can happily retire, surrounded by the love with which I grew. Open communication and transparency are key for efficient recovery. Please consider making this process as accessible as possible, where the recovery actions are led by the voices and needs of the survivors and where bureaucracy has no place.

OHCS Response: In response to the feedback from local communities and organizations, the State has amended its Disaster Resilience and Infrastructure program to allow for economic revitalization and small business activities. We encourage you to read the revised description of the newly named Planning, Infrastructure, and Economic Revitalization in the Action Plan and to reach out if you have questions about what types of activities are eligible. Please also continue to work closely with your local jurisdiction and county to share information about your region's unmet economic revitalization needs. OHCS will review our ability to provide some reimbursement to survivors who have recovered once we have enough information to determine what amount of reimbursement is possible.

121. **Public Comment (Summary):** I was affected by the fires. I was living Phoenix, I had a mobile home. For my mobile home, FEMA gave me \$35K. With that my challenge started. I had help from the school, from my job, a family member made me a loan, and I was able to buy a town home that needs remodeling. I have two young children, we have lived in 6 different places [since the fire]. I have come here to learn how you can help us. I agree that the focus should be on equality. We were all affected, economically and psychologically. I built my home and acquired my possessions for 14 years with my work. Everything was destroyed. I wonder then, how it is you can help me. We are all in need. We have bought our [new homes] with so much effort. If you knew how hard it was to buy my home, I didn't travel, I didn't shop, my children went without food

sometimes. They asked me for a computer, for a phone, I could not give it to them. My trailer home [home before fires] had all the amenities, it had hot water, everything. I had a storage room because I'm a couponer. I had soaps, rice, pasta, food, everything... and everything was destroyed. My husband is a carpenter, he lost all his work equipment. I am here to see what is the help available for my family. How long will it take? It's been two years already. What are we going to receive? Have you forgotten about us? I've seen the need of everyone here. But I fought for what I achieved, dollar for dollar. Whatever FEMA gave me, what the school gave me, I used everything, but I still face need. I bought a small new home, I did not waste the funds I received. I had to buy a home, because my children suffered so much, and I suffered with them. Please we need help for everyone, because everyone was affected.

OHCS Response: We recognize that these programs are coming long after the disaster and many people have been through many hardships while they are waiting for this help. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Regarding reimbursement, we are taking all your comments into account, we know there's a need for reimbursement. If there is sufficient funding, reimbursement will be considered in latter phases. The final Action Plan will also give local governments the flexibility to help small businesses that were impacted as well.

122. **Public Comment:** Mis comentarios son que yo perdí mi casa todos mis muebles todos mis recuerdos de mis hijos fue una cosa muy triste que nos paso teníamos aseguransa pero eso no cubrió todas nuestras pertenencias tenemos que estar poniendo de nuestra bolsa para poder recuperarnos todos nuestros ahorros ahí senos están yendo con tanto sacrificio me gustaría que si nos pudieran ayudar con poquito para poder sobrevivir porque la verdad está muy mucho muy caro todo y cómo les digo que sólo nosotros las que pasamos todo eso sabemos el sufrimientos que estamos pasando.

Transl.: "My comments are that I lost my house, all my furniture, all my memories of my children, it was a very sad thing that happened to us, we had insurance, but that did not cover all our belongings, we have to be putting out of our pocket to recover all our savings, there they are going with so much sacrifice I would like that if they could help us with a little to be able to survive because the truth is everything is very, very expensive and how can I tell you that only we who went through all that know the suffering we are going through".

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement or

savings to rebuild their homes. The programs in the ReOregon plan will be able to help low- and moderate-income survivors complete repairs to homes they owned at the time of disaster. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes. You did not have to be helped by FEMA to qualify for HARP. This program will be available in the beginning of 2023, and we understand you may have more immediate housing support needs.

123. Public Comment: Most of my comments were raised during the public hearing at the McKenzie River Community School. I would like to emphasize a couple of points. Providing as much flexibility of use of the funds within each program will allow it to have the most impact. This includes allowing folks who have begun rebuilds to be reimbursed. The funding amounts for the HOP program should be increased as there is a need for housing development in our community that cannot be accomplished through HARP. The allocation for infrastructure should be much higher. When you consider the amount split between the impacted communities, there is very little to go around to meet that very vital need.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who have already started or completed their repairs. Homeowners and renters were impacted differently across the State. As the program launches programs and collects additional information on renter and homeowner survivors, the State will adjust program budgets - and may increase the HOP allocation - to meet remaining unmet needs. In response to the overwhelming comments about the need to support communities, OHCS has modified the infrastructure program (called the Disaster Resilience Infrastructure Program in the draft Action Plan) to the newly named Planning, Infrastructure, and Economic Revitalization (PIER) Program, which provides additional support and flexibility to impacted communities. OHCS also allocated an additional \$2 million to the program. Under this program, local governments and organizations may apply for projects based on priority recovery needs for their communities.

124. Public Comment: I feel a nonprofit would be better equipped to allocate funds as DHS has proven inadequate with no transparency. Funds should go directly to Fire Victim Survivors and the rebuilding of their homes not spent on purchasing hotels for the state. Fire victims feel like they're not being heard. They are capable of advocating for themselves and just want to rebuild what they have lost. I think we would all love to see an audit of these funds!

OHCS Response: The majority of the housing programs funded by ReOregon will be administered by Oregon Housing and Community Services, in partnership with non-profit organizations like community action agencies, long-term recovery groups, culturally specific organizations, and community-based organizations to provide

application support for survivors. There are no current plans to fund hotels with ReOregon funds. As these are federal funds, they will be audited at least annually. The federal government will also audit Oregon's programs at least annually.

125. Public Comment: I was discouraged to find that only 15% was going to be used in prevention. I lived 5 doors down from a fire hydrant. I felt safe because of that. It wasn't used during the fire and may not have had water. I had 5 minutes to leave and lost everything but my dog, car and tablet. It seems that there wasn't enough water available. That Ashland had to bring water to Phoenix and Talent. It's likely there will be another fire. And I don't feel reassured that there will be enough water when that happens. Several people at the town meeting raised this concern and it just wasn't addressed. Campfires need to be stopped during fire season. And there should be no fireworks in July. Let's have fireworks New Year's Eve and save lives and property. There should be more grants for homeowners to use to fireproof homes. One person added a metal roof. There are some grants available and more could be provided. The evacuation routes are not clear. Lots of money was spent dividing Ashland into zones. Know your zone? How does that help? At the coast there are tsunami evacuation signs. These need to be placed all down 99. Hwy 5 was closed leaving Ashland. That seems like a logical exit. A comprehensive map which shows exit routes from Medford, Phoenix, talent, Ashland, Jacksonville, etc. would be useful. The only direction I got was. Go north. If more emphasis were placed on prevention, there would not be such a great need for housing next time. Affordable housing is also very important. The greed that erupted after the fire was astonishing. If I wanted to buy the home I lost in the fire, it would cost 4 x what I paid for it 6 years prior. Price gouging needs to be illegal. Many, many people were living just fine before the fire. Their home was paid for and maybe they needed to pay only a reasonable space rent. After the fire, the prices of homes skyrocketed. Some mobile home parks wouldn't allow small homes to be placed in their park. In some mobile parks the prices on the exact same home have risen in two months from 199k. To 215k. To 225k.

OHCS Response: The federal funds require that the State invest at least 15% of the total \$422 million in mitigation and prevention activities. However, the State plans on significantly exceeding that requirement, by rebuilding more resiliently wherever possible, whether it's through housing or public infrastructure. The housing programs include plans to rebuild homes in a way that makes them more resilient to future fires, earthquakes, flooding, and other hazards that different communities in Oregon face. The State changed the infrastructure program (termed DRIP in the draft Action Plan) under the newly named Planning, Infrastructure, and Economic Revitalization Program (PIER). Under this program, local governments and organizations may apply for projects based on priority recovery needs for their communities such as improved communications, emergency response, utility services, evacuation signage and other mitigation projects. We encourage you to read the revised

description of the PIER program in the Action Plan. Many local governments have made significant improvements to disaster response systems, so we also encourage you to reach out to your local government to understand what plans they have in place for future disasters. However, the State of Oregon has invested in a much-improved state-wide emergency alert system. To sign up for alerts, text your zip code to 888777 or sign up for your county alerts (for example, in Jackson County, visit: <https://jacksoncountyor.org/emergency/resources/citizen-alert>). For information on what to do in the event of another fire, please visit <https://wildfire.oregon.gov/prepare> where there are many resources on how to prepare for a wildfire. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. Another ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate income renters become homeowners. Both of these programs consider the current costs to rebuild or replace damaged homes and the State is working to develop preserved manufactured home parks to increase the number of affordable homes and lots in the disaster-impacted areas.

126. Public Comment: Mi sugerencia es, que fuera posible ayudarnos equitativamente, y de la manera más dinámica que se pueda, así los ahorros, ayudas que tenemos guardados podríamos juntar esa ayuda y poder encontrar un lugar estable.

Transl.: "My suggestion is that it be possible to help us equitably, and in the most dynamic way possible, so that the savings, aid that we have saved, we could gather that help and be able to find a stable place."

OHCS Response: OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Through the Homeowner Assistance and Reconstruction Program (HARP), the State will help survivors replace, repair or rebuild damaged homes they owned at the time of the disaster. Another ReOregon program is the Homeownership Opportunities Program, which will help impacted residents who are low to moderate income renters become homeowners. One of the goals of all ReOregon programs is to put equity at the forefront of all of recovery efforts and to help impacted survivors move into safer, more resilient and energy efficient homes that meet the needs of their households.

127. Public Comment: Burned out of rental need a mental or wood cover over RV living in permanently.

OHCS Response: Please work with your local long-term recovery group, disaster case manager or community action agency, as they may have existing resources available

to help you. Unfortunately, funding these type of repairs are not eligible under CDBG-DR funding.

128. Public Comment (Summary): Have to be able to help folks who have completed or will complete between now and 2023. Do you have to apply for legal services? Or can we make that access more available, more easily/quickly. It is an urgent need. If the programs are on a reimbursement basis, need to fund the cash flow. We have seen many different, confusing, arbitrary, processes. Need to work hard on implementation—and local organizations can provide input.

OHCS Response: Once the state has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. Legal aid services are available immediately. Low-income survivors can access legal assistance immediately/currently via the Wildfire Disaster Relief Hotline: 844-944-2428. OHCS wants to make services as easily available as possible, but in many cases will have to, at a minimum, take some steps to verify income-eligibility (if the survivor is not already enrolled in one of the other ReOregon programs). You are correct that—for some survivors, depending on circumstances—ReOregon may need to assist with the cash flow of construction or other payments. In many program areas, the ReOregon program is designed to pay for and provide construction services directly to avoid having the survivors in the payment loop at all. You are also absolutely correct that an effective implementation effort that is clear and easily navigable is absolutely critical to program success. OHCS staff look forward to partnering with Long Term Recovery Groups and others to benefit from your experience working with fire survivors as programs are designed.

129. Public Comment (Summary): Excited about new homeownership and the potential for community land trust. Need to do a lot of planning up-front; currently very tricky to work with ADUs and tiny homes. Timing has been off with rebuild. Many LMI have completed, and their quality of life has been severely impacted by taking on additional debt or dipping into savings. Be careful with DOB calculation, may have had other required expenses (e.g., paying off a mortgage).

OHCS Response: The state will work with local jurisdictions to understand the flexibilities and parameters of building ADUs in communities with differing applicable state and local zoning requirements. Related to the timing of recovery, the federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and the U.S. Department of Housing and Urban Development (HUD) released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who either have not started or have not yet completed their recovery. Once the state has a better

understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. The Stafford Act and HUD have certain requirements that must be met for ensuring there are no duplication of benefits with these federal dollars. The state will not add additional requirements for the Homeowner Assistance and Reconstruction Program beyond those that are required by the federal government.

130. Public Comment (Summary): I am a member of the community of White City. Our community was deeply impacted and has suffered very much. Despite all of this, we have continued working and rebuilt. We want to be acknowledged and valued by the government. Recovery has been extremely difficult. We've lost everything and have been left with psychological trauma. Many of us need mental health assistance. My request is that the \$422m funds that you mentioned are used correctly and that they go to those who needed the most. I hope we get to qualify for those funds.

OHCS Response: Through the Homeowner Assistance and Reconstruction Program, the state will help survivors replace, repair, or rebuild damaged homes, based on their unmet recovery needs. Another ReOregon program is the Homeownership Opportunities Program, which aims to support impacted residents who are low- to moderate-income renters in their path to homeownership. The ReOregon program does not include funding for mental health or wellness services. There are, of course, limited funds and many important and worthy activities that are not funded.

131. Public Comment (Summary): For those of us living in FEMA trailers, I've lost my job, and I have to pay for the utilities every month, more than \$200. I don't think it's fair and I'm tired. The manager told me they will be taken away in September if we don't buy them, so what will happen to those of us who are not working, will we be homeless? We have kids with disabilities, I am not the only one in this situation.

OHCS Response: The state will apply for another six-month extension of the FEMA direct housing mission. If the program were to end in September, which we do not anticipate, Oregon Housing and Community Services, in partnership with local Community Action Agencies, will be prepared to assist survivors with existing state funds. Although the direct housing mission is likely to be extended again, perhaps several times, by the time the direct housing mission is likely to end, ReOregon will be ready to assist those survivors still living in the FEMA units with their housing needs through the Intermediate Housing Assistance program.

132. Public Comment: I am a beachie creek wildfire survivor staying at the shallow inn in Salem Oregon funding through ODHS emergency management. There is about 6 wildfire survivors staying here and funding ends June 30th 2022. Some of us have nowhere to go. We need housing.

OHCS Response: The state is committed to continuing to keep wildfire survivors who need shelter, in shelter. Although, because of contract arrangements, some fire survivors may need to move locations on June 30, the state's shelter mission is not ending at that time. Your message has been provided to ODHS staff to follow up with you.

133. **Public Comment:** Page 18 graph 9 it says no manufactured homes in Klamath County were lost. That's not true my place was a manufactured home and was totally destroyed in the 242 fire this misinformation has caused major problems.

OHCS Response: The information included in the Action Plan reflects the best available data from FEMA, OEM, and local organizations on properties that were destroyed in 2020, which includes 242. However, we know that this dataset excludes impacted residents, and we will continue to update the unmet needs assessment as we collect more information. Your comment is very helpful and we will collect additional information through a program survey in the coming months.

6.3.2.4 Additional Comments Received Outside of Public Comment Period

The following comments contain comments received outside the official public comment period.

134. **Public Comment (Summary):** I was impacted by the fires. I had to purchase a home, but am currently renting the lot plus the mortgage payments. I need some assistance with loan reimbursement. I also experience difficulty paying my bills after the fire. I was a longtime client of DISH but they refused to work with me. They sent me to collections for a \$200 debt.

OHCS Response: In the first draft of the Action Plan, the State is focusing on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In future Action Plan amendments, if there is sufficient funding, we will consider offering reimbursement payments to survivors who had to dip into their retirement or savings. You may want to check with your local community action agency to see if there are existing resources to help you with lot rent.

135. **Public Comment (Summary):** Students' lives were severely disrupted. Providing scholarships for impacted students who were just finishing up high school would be very helpful.

OHCS Response: Training and education programs are not currently an activity in this Action Plan. However, if local governments were to choose to prioritize those kinds of expenses, they could explore doing so under the dollars that they will control under the Public Infrastructure and Economic Revitalization program.

136. **Public Comment:** Pues yo estoy en espera para poder agarrar hotra casa móvil en el Area donde Vivíamos. Pero es muy alto los precios....

Transl.: Well, I'm waiting to get another mobile home in the area where we lived. But the prices are very high...

OHCS Response: Yes, prices on all forms of housing are increasing rapidly. The "HARP" and "HOP" programs will not have award limits that prevent us from helping survivors that qualify purchase new homes at these higher prices. In the meantime, the state awarded funds to community action agencies through the Wildfire Recovery and Resilience Account (WRRRA). They may be able to provide some assistance with funding to help purchase manufactured homes. Please reach out to your local community action agency for more details on that funding.

137. **Public Comment (Summary):** Folks who did the right thing and rebuilt need help. We dipped into savings and are facing numerous cost increases going forward: particularly, increased water rates and property taxes.

OHCS Response: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery.

138. **Public Comment:** The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and HUD released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the State has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery.

OHCS Response: We have heard a lot of comments about this kind of situation. Under the ReOregon program we could assist survivors with legal services in this kind of situation--and would seek to avoid it entirely through careful, bulk procurement. For survivors struggling with these issues today, they should reach out to their local housing navigation services through their Disaster Case Manager.

139. **Public Comment (Summary):** Is there a formal strategy for the intersection of the CDBG-DR and WRRRA? Is there a different purpose/end goal for each program, and if so, what is the rationale for aligning program requirements?

OHCS Response: The state-funded Wildfire Recovery and Resilience Account (WRRRA) is providing important intermediate housing assistance to many wildfire survivors through community action agencies and long-term recovery groups. Through the CDBG-DR funded Intermediate Housing Assistance and Housing Recovery Services programs, the State intends to leverage existing WRRRA systems, partnerships, and processes to try and streamline the survivor experience wherever possible. In addition, OHCS has been making adjustments to WRRRA this year in order to better align the level of benefit with what we anticipate being available under ReOregon to reduce any disparity between assistance received from the two programs. The Intermediate Housing Assistance program is intended to provide intermediate housing financial support to impacted survivors who are displaced or facing housing instability. The Housing Recovery Services is intended to provide additional housing counseling and support services to impacted residents as they work toward their recovery. These programs and services may be carried out by the same organizations as WRRRA subrecipients in some cases, but the State will also engage additional community-based organizations and subrecipients to help.

140. **Public Comment (Summary):** Could legal assistance help with survivors who are fighting rate increases by local utility companies?

OHCS Response: While fighting rate increases is not expressly included, if there is an appeals or complaint process from the utility company, then legal services can help you navigate those processes. Legal support services include the following types of activities: Replacing identification papers, working through insurance claims, clearing property titles and working through heirship and probate, fighting unlawful evictions and foreclosures, combating contractor scams and fraud, assistance with school transfers, obtaining emergency child custody, visitation, support, and other court orders requiring modification as a result of displacement, injury, or job loss and other legal services related to recovery through one of the other CDBG-DR programs.

141. **Public Comment (Summary):** Could mitigation assistance help with evacuation planning? The evacuation from Otis was a mess. An evacuation/warning siren would be very helpful, too.

OHCS Response: Yes, the activities you describe would be eligible as a Planning activity or under the program that is now called Planning, Infrastructure, and Economic Revitalization Program. Please work with your local governments to express your concerns and share your recommendations related to the communications and evacuation planning needs for your community.

142. **Public Comment (Summary):** People who do the repair work or construction themselves should be eligible to be paid for that work.

OHCS Response: OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery and rebuilding. Once the State has a better

understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. While homeowners are not prohibited from doing work on their own, to be reimbursed, you will have to meet local building requirements and if your property is in the floodplain, it will have to be elevated at least 2 feet above base flood elevation, in order to qualify for potential future funding.

143. **Public Comment (Summary):** Lots of survivors are struggling with manufactured home purchases. The dealers are taking advantage of buyers and changing delivery schedules without keeping customers informed.

OHCS Response: We have heard a lot of comments about this kind of situation. Under the ReOregon program we could assist survivors with legal services in this kind of situation--and would seek to avoid it entirely through careful, bulk procurement. For survivors struggling with these issues today, they should reach out to their local housing navigation services through their disaster case manager.

6.3.2.5 Local Government and Organization Letters

The section below features responses that OHCS provided to letters received from local governments and community organizations in regard to the CDBG-DR Action Plan.

Lane County Board of Commissioners Comment Letter:



LANE COUNTY BOARD OF COMMISSIONERS

Joe Berney
Jay Bozievich
Heather Buch
Pat Farr
Laurie Trieger

May 25, 2022

Andrea Bell
Oregon Housing and Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem OR 97301-1266

Dear Executive Director Bell,

During our regularly scheduled Board of County Commissioners meeting of May 24, 2022, the Commissioners affirmed the submittal of formal comments to the Action Plan Draft that OHCS is required to submit to the US Department of Housing and Urban Development prior to being able to draw down a significant federal investment to assist in the local recovery efforts from the Labor Day fires of 2020.

Lane County has been tracking these funds since they were first appropriated by Congress in September, 2021, and was able to meet with HUD staff in Washington DC in April of this year during our annual advocacy trip to our nation's capital.

We want to acknowledge the OHCS recovery staff for the quality of the contextual information and data presented with the draft CDBG-DR Action Plan. It was helpful to see a consolidated accounting of the demographics across counties, detailed risks from natural hazards, and unmet needs assessments. We perhaps draw some differing conclusions from the information presented, but the thoroughness is to be commended.

COMMENT #1: Each Fire Impacted County has unique circumstances and unique resources when it comes to recovery efforts and current status. Rather than addressing these realities, the DRAFT Action Plan suggests a centralized role whereby OHCS will control the available resources and deliver services.

At the highest level of analysis, we agree that housing is priority for recovery - that is certainly the case for the McKenzie River Valley. However, it is urgently important to recognize that the challenges and opportunities facing each fire-affected community are different and therefore require different types of investment.

This is abundantly clear in the various categories of information presented in the Unmet Needs Analysis. Here in Lane County and in other rural areas that have relatively dispersed housing, there is a greater proportion of funds required for infrastructure such as septic systems, roads, and communications. Yet we noted that the Proposed Use of Funds section essentially lays out a singular approach for all of the fire-affected communities from DR-4562 no matter their incorporated versus unincorporated context. Further, it is evident that local capacity varies across fire affected communities and may well be determinative of how much of the total funds are allocated to each community. For these reasons, we urge OHCS to amend the Draft Action Plan to:

- Include initial allocations of the \$422,286,000 in CDBG-DR funds to each of the community-recovery efforts and that each of the specific budget line items within the Grantee Proposed Use of Funds section include details on how to flexibly use those funds should local context prove to be barriers. OHCS should create a funding formula with clear and measurable goals for a fair distribution of CDBG-DR resources. Establishing these goals early on and measuring resource distribution over time will build confidence within and among the fire-affected communities and enable OHCS to support greater equity.

COMMENT #2: From an equity perspective, the Action Plan must recognize the significant yet varying levels of current recovery, and why some property owners have been able to make investments while others have not.

We were pleased to note that OHCS is supportive of providing resources for those households who have already begun rebuilding like the Homeowner Assistance and Reconstruction Program. Pg 147 notes "If participants have executed contracts at the time of application but have not yet completed their repairs, reconstruction, or replacement and are unable to complete their recovery, the State may provide direct gap assistance."

We want to ensure resources are available to assist low- and moderate-income households with rebuilding their homes. In some cases, low-income households may have completed reconstruction of their home by the time CDBG-DR funds and programs become available. In the process these families may have overextended themselves, depleted savings, or burdened themselves with costly loans, only to see their neighbors leverage the grants or low-interest loans available from this program. We want to avoid the potential for inequities to be created as a result of the CDBG-DR implementation timeline.

For these reasons, we urge OHCS to amend the Draft Action Plan to:

- Allow low-income households who have completed construction before CDBG-DR funds become available remain eligible for CDBG-DR funds and programs.
- We recognize, however, that there may be a policy of the Federal Department of Housing and Urban Development (HUD) stipulating that even low- and moderate-income households who have completed their rebuild are not eligible for assistance under CDBG-DR. If this is the case, we propose OHCS allocate some portion of the \$100,000,000 in state wildfire recovery housing funds to help reimburse low- and moderate-income households who have completed construction prior to the availability of CDBG-DR funds.

COMMENT #3: We note that nearly one quarter of the funding available will be dedicated to establishing new home ownership via the proposed Homeowner Opportunity Program. While we applaud that goal, Congressional intent was to provide overall recovery from these disasters. Home ownership will come from overall economic viability being restored to these communities and that demands a more comprehensive investment in infrastructure.

As previously indicated, we do recognize that housing is a high priority across each of the fire impacted counties. However, our experience with recovery to date has lead us to understand that housing alone will not produce community recovery. For our upriver residents the need for improved internet and communications infrastructure became evident immediately and was exacerbated by the COVID-19 pandemic.

Moreover, County roads and State highways have had an inordinate amount of wear and tear from salvage logging operations and heavy equipment movements. While it is the case that some of the fire impacted counties have already received General Fund or ARPA investments from the

Legislature for infrastructure, these projects were approved prior to the inflationary and workforce issues that exist today and in some cases the counties remain without the actual funding due to the timelines and procedures for actually delivering these dollars to counties.

Related to our first comment, the needs of each unique fire recovery area will require greater or lesser degrees of infrastructure investment as a proportion of all funds allocated to each.

For these reasons, we urge OHCS to amend the Draft Action Plan to:

- Increase the proportion of funds that can be used for infrastructure from 10% to 30% within each of the Most Impacted and Distressed (MID) Areas based on the specific unmet needs locally. Further, CDBG-DR funds are unique in that they can be used as match for other federal funds that require local match. Increasing the percentage of CDBG-DR available for infrastructure would not only provide more flexibility to fund infrastructure repairs, but it would provide these communities with greater access to other federal infrastructure grants.

As a related aside, Page 148 says, "Pre-fabricated (including manufactured) homes may only be placed in manufactured housing parks that are owned by a nonprofit, community land trust, public housing authority, or resident cooperative and have a regulatory agreement in place to maintain affordability." To avoid any potential for confusion during implementation, we recommend that OCHS clarify that pre-fabricated homes can be sited in a variety of locations, and that if prefabricated homes are placed in manufactured home parks, they must be owned by an entity that can maintain long term affordability.

COMMENT #4: Staff capacity is a vital resource at every stage of developing and administering the programs proposed within the Action Plan. Lane County has already expended significant reserve funds to provide critical services in support of wildfire recovery and as a result is experiencing budgetary shortfalls that are unsustainable.

In an effort to support survivors in the McKenzie area who are rebuilding, Lane County Land Management Division (LMD) has not charged permit fees for those residents who are rebuilding after the fire. This has resulted in a loss of revenue of \$2,000,000 a year, and has caused Lane County to expend reserves. As of May, 2022, we have seen approximately 45% of destroyed buildings permitted for replacement, so we expect additional lost revenue due to waived permit fees over the next several years.

By requiring safe construction and requiring homes be constructed outside of known hazard zones, building and land use permits provide the most fundamental layer of hazard mitigation. The Legislature recognized this need in 2021 and provide limited resources for fire impacted counties' building departments. Those resources were exhausted within the first year of the 21-23 biennium.

For these reasons, we urge OHCS to amend the Draft Action Plan to:

- Allow CDBG-DR funds be available to cover the cost of permit fees and to reimburse Lane County for associated lost revenues.
- Provide that some portion of the 49 new State positions at OHCS be dedicated to supporting permitting and inspection efforts in fire impacted counties.

COMMENT #5: While we applaud OHCS for the consultations it did with its peer State Agencies, we do not find that OHCS undertook efforts to capitalize on the recovery work of these agencies, and failed to consult with a key potential partner; the Oregon Department of Transportation. Similarly, we find there was little consultation with the Federal Emergency Management Agency.

During the 2021 Legislature, the Assembly created wildfire specific Committee's in both the House and the Senate. These Committees worked to allocate significant resources memorialized within HB 5006 to assist with recovery needs in each of the fire impacted counties. That measure provided that certain agencies would create grant programs to stand up clean air centers, evolve fire resiliency efforts during rebuilding, and improve overall energy efficiency frameworks for replacement homes.

Long Term Recovery Groups are the organizational model that FEMA recommends to facilitate private donations to wildfire survivors. With FEMA demobilizing, the LTRG fills this crucial role connecting private donors with fire-affected families who continue to need assistance with recovery. Unfortunately, FEMA does not propose a clear method for funding the operations of these crucial non-profit organizations.

For these reasons, we urge OHCS to amend the Draft Action Plan to:

- Propose to augment existing grant programs administered by DHS, DCBS, and Department of Energy such that these existing programs can extend their impact beyond the limited appropriations they currently have available to them.
- Ensure a consultation with ODOT is formalized, and a partnership established with that agency to identify key transportation needs, even if those needs are not necessarily funded through the Action Plan.
- Ensure that LTRGs should be able to apply for funds and help distribute CDBG-DR resources as outlined in this Action Plan.

The Action Plan is open for public comment until June 1, 2022, after which it will be submitted to HUD for approval. We anticipate the formal approval process could take many months and it will take additional time before any CDBG-DR funds are expended. In the interest of reducing wait time, we request OHCS begin work on outreach programs now, if that's allowable.

Thank you for the opportunity to provide these comments. We look forward to continuing to work with you and your team in meeting the needs of our fire-affected communities.

Sincerely,



Pat Farr, Chair
Lane County Board of Commissioners

OHCS Response:

Response to Comment #1: In response to the overwhelming comments about the need to support various categories of communities, including both incorporated and unincorporated areas, the state has modified the infrastructure program (termed DRIP in the draft Action Plan) under the newly named Planning, Infrastructure, and Economic Revitalization Program (PIER). Under this program, local governments and organizations may designate priority infrastructure, mitigation and economic revitalization projects. OHCS would only review projects/programs to verify that they are clearly defined and are eligible activities. We encourage you to read the revised description of the PIER program in the Action Plan.

Response to Comment #2: The federal disaster recovery funding process in the United States is complicated, often delayed, and insufficient to meet all recovery needs. Congress did not appropriate supplemental disaster recovery assistance for Oregon until September 30, 2021 and the U.S. Department of Housing and Urban Development released the rules for these funds in February 2022. OHCS is working as fast as possible to meet all the federal requirements and prioritize assistance for impacted survivors who have not started or have not yet completed their recovery. Once the state has a better understanding of all our survivors' remaining recovery needs and if there is enough money, the program may be able to provide some reimbursement for those who completed their recovery. In doing so, we would almost certainly prioritize lower-income households.

Response to Comment #3: Regarding the level of investment in homeownership, please be aware that (1) there is an expectation and requirement from HUD that the state spend a proportional amount on recovery for displaced renters as for homeowners. OHCS believes that this homeownership program is a method to do so that is much more compatible with local wishes, land use and overall character of many of the impacted areas than funding the development of affordable rental housing; and (2) some infrastructure investments, though not all of those described in this comment, are eligible expenditures under the Homeownership Opportunities Program.

Response to Comment #4: Your efforts to support survivors are commendable. While CDBG-DR funds cannot be used to fund lost revenues, the state will work closely with Lane County to identify eligible ways to help offset additional costs and capacity needs to help your residents and communities recover. Such activities may be eligible through the final version of the Action Plan under the housing programs, the Planning, Infrastructure, and Economic Revitalization program, or the administrative funds.

Response to Comment #5: Regarding consultation with FEMA: Under the State Recovery Function framework, Office of Emergency Management provides the primary point of liaison between state agencies and FEMA, and OEM has been consulted extensively. In addition, the OHCS team has had multiple informal discussions with FEMA staff and made several data requests to FEMA directly, the results of which are cited in

the unmet needs analysis, in particular. In response to your specific recommendations, the Housing Recovery Services and Intermediate Housing Assistance are designed to augment and replace programs administered by Department of Human Services. Where the ReOregon programs do fund home hardening and energy efficiency investments, OHCS will continue to involve and consult with DCBS and Department of Energy regarding how ReOregon program design can be informed by their experiences and complement those programs. The value of OHCS convening discussions around transportation needs may be limited—especially given that the final version of the Action Plan gives discretion over how to spend the infrastructure funds to the local governments. Finally, the Action Plan does explicitly recognize that many programs could best be managed or carried out by “on the ground” community-based organizations such as Long-Term Recovery Groups.

CASA of Oregon Comment Letter:



June 1, 2022

To: ReOregon/OHCS

Re: CASA of Oregon comments on CDBG-DR Action Plan Draft

CASA wishes to salute the work that OHCS and the State of Oregon have committed to addressing the wildfire disasters of 2020. We have been impressed with the department's efforts to date and in particular its efforts in leading with equity.

OHCS's commitment to recovery through the framework of targeted universalism is commendable. It is impressive that you are prioritizing no citizenship or residency requirements, focusing on homeownership, and funding co-op or alternative ownership models for manufactured home parks

Latinx households in Southern Oregon are disproportionately represented in housing losses and will benefit from targeted strategies. These include application support, language translation and interpretation support, legal services, providing access to housing that meets the needs of multi-generational households and other services that will be provided by local trusted community organizations in a culturally appropriate manner.

While the plan addresses many housing needs, we also recognize that additional supports are needed. The multiple layers of trauma induced by the Almeda fire along with the trauma of being an oppressed population means that the housing work needs to be done in conjunction with other community building activity. People did not just lose their houses in Southern Oregon. They lost their community of supports.

So while this plan focuses on housing recovery, a community will not recovery with housing alone. We believe supports to build community centers, cultural centers, Head Start and other facilities will be necessary for a full recovery.

As part of the engagement strategy, OHCS needs to ensure that it is accomplished in a cultural specific manner. CASA has contracted with Coalición Fortaleza and Salazar Architect to begin engagement related to the two projects it is developing. We hope that OHCS will continue engaging in a manner that reflects the commitments made in this plan. And that this engagement is community led.

We would also like the department to consider a locally-based "implementation team" that can be tasked with accountability for the plan's implementation. There will be a lot of moving parts once the plan is approved and the funds start to flow. The community will need expertise on the ground to help with the house buying/building/placement process. Grant application processes and approvals will need to be set up and implemented. Construction experts to manage projects and interact with survivors will be needed. All this needs to be done in a culturally-sensitive manner.

COMMUNITY AND SHELTER ASSISTANCE CORP
20508 SW Roy Rogers Rd, Suite 155, Sherwood, OR 97140 | 503.537.0319
CASAOFOREGON.ORG

We are also concerned with how different housing types will be evaluated. There are currently a number of innovative types being utilized and considered including 3-D, light gauge steel, modular and more traditional manufactured units. How will the department consider what housing types will be acceptable? Will there be some sort of engagement process with the community so they have input? Who will the experts be in evaluating these different housing types?

Economic Revitalization

We are concerned the Action Plan does not address informal business activity, especially Latino communities affected by the Alameda Fire. We know for a fact that many daycare providers, landscapers and others lost their businesses when they lost their homes. While this plan does not address how those losses can be compensated for, we believe that it would be worthwhile to understand those impacts and when rebuilding, and make sure that housing design is considered to potentially address those losses.

Please feel free to contact me if you have questions.

Sincerely,



Peter Hainley
Executive Director

OHCS Response:

One of the goals of all ReOregon programs is to put equity at the forefront of all of recovery efforts and we plan to do this by continuing to support and engage with local partners and impacted community members.

In response to the overwhelming comments about the need to support economic revitalization, OHCS has modified the infrastructure program (called the Disaster Resilience Infrastructure Program in the draft Action Plan) to the newly named Planning, Infrastructure, and Economic Revitalization (PIER) Program, which provides additional support and flexibility to impacted communities. OHCS also allocated an additional \$2 million to the program. Under this program, local governments and community-based organizations will be expected to work together to prioritize projects for funding, which can include support for small business recovery, community, and cultural centers, Head Start facilities and other projects that help a community fully recover. If you haven't already done so, we encourage you to also share these recommendations with the local jurisdiction.

OHCS intends to continue engaging partners and the community in policy/program design and welcomes feedback on things such as innovative and resilient housing types, particularly for manufactured housing parks that are being redeveloped.

Housing Oregon Comment Letter:



June 1, 2022

*Sheila Stiley, Board
chair – NW Coastal
Housing*

*Kymerly Horner –
Vice-chair - Portland
Community
Reinvestment Inc.*

*Rachael Duke,
Secretary -
Community Partners
for Affordable
Housing*

*Trell Anderson,
Treasurer –NW
Housing Alternatives*

*David Brandt,
Housing Works*

*Wakan Alferes
Homes for Good*

*Ernesto Fonseca -
Hacienda CDC*

*Maria Elena Guerra -
Farmworker Housing
Development Corp*

*Nkenge Harmon
Johnson – Urban
League of Portland*

*Kristy Rodriguez –
Housing Authority of
Malheur & Harney
Counties*

Recovery and Resiliency
Oregon Housing and Community Services
725 Summer St NE, Suite B
Salem, OR 97301

RE: Housing Oregon comments for draft RE Oregon Disaster
Recovery Action Plan

Thank you for the continued hard work OHCS has dedicated to addressing the wildfire disaster of 2020 that severely damaged or destroyed more than 4,300 housing units in Oregon resulting in nearly \$1.9 billion in housing, infrastructure, economic revitalization, and mitigation recovery needs. Please accept these comments from Housing Oregon members gathered over the past month from members of our Rural Policy Council.

Housing Oregon is a membership-based statewide association of seventy affordable housing nonprofits and affiliate allies committed to serving and supporting low-income Oregonians across the housing needs spectrum – from homeless to homeowner.

We appreciate OHCS' approach to the recovery through the frame of targeted universalism prioritizing no citizenship or residency requirements, focusing on homeownership, and funding co-op or alternative ownership models for manufactured home parks.

The draft action plan is accurate noting this “wildfire disaster was primarily a housing disaster,” recognizing the loss of housing compounded an already limited housing supply, tight rental market, a homelessness rate higher than the national average, and disproportionate impact on households of color, especially Latinx communities in the Medford area.

P.O. Box 8427, Portland, OR 97207

We hope these HUD CDBG-DR funds will be prioritized for more permanent housing as a more efficient and effective way to solve survivor housing needs. This is especially true for low-to-moderate income residents with few options for temporary affordable housing and need immediate shelter that could be expanded in the future as space needs increase.

Common themes we heard from our members

We appreciate OHCS' robust community engagement over the past two years since the wildfires. We urge a continued commitment to making community engagement accessible throughout implementation of these funds, especially making documents and meetings accessible for undocumented residents and language accessibility, especially for the predominantly Latino affected communities in the Alameda Fire area.

One common theme from our members was concern regarding the overly bureaucratic nature of accessing CBDG funds in general. Several organizational representatives indicated they would avoid utilizing these wildfire funds unless absolutely necessary. To ensure access to these funds we encourage OHCS to provide training and technical assistance for community-based nonprofits on the application process.

In addition, several people expressed support for any coordinated effort OHCS can provide helping nonprofit affordable housing developers navigate barriers with zoning and code issues with local jurisdictions.

Insurance

The report acknowledges the role of private insurance in wildfire recovery efforts. One of our member organizations, Rural Community Assistance Corporation (RCAC), is actively involved in recovery efforts in Paradise, CA. Their efforts may help inform how the State, local jurisdictions and housing developers can work more effectively with the insurance industry.

RCAC is working with a team of insurance industry leaders in risk modeling, actuarial analysis and reinsurance to find the community wide mitigation strategies/projects that afford the most safety for residents and acceptable risk reduction levels to keep insurance rates affordable. Part of the effort is working with the Insurance Institute for Business and Home Safety on a Wildfire Prepared Home Standard for wildfire affected Wildland Urban Interface (WUI) communities in California. The Town of Paradise, CA is adopting the IBHS standards into their building codes to include construction materials, defensible space and property maintenance requirements.

Manufactured Housing Units and Parks

Funding for co-op or alternative ownership models for manufactured home parks is identified as a priority in the Action Plan. Moving older Manufactured Housing Units (MHUs) to a new site, as the Action Plan infers, is not easy and is too expensive for most low-to-moderate income owners as well as the unit likely couldn't stand the stress of the move.

With the high demand for alternative affordable housing for low-income and very-low-income residents, priority should be made for installing newer MHUs built to higher standards, and which do not necessarily depreciate over time as older ones do.

Housing - Resiliency and Mitigation

Several members have noted concern about CDBG restrictions on housing construction standards limiting alternative construction typologies such as 3-D printed buildings. There are several developers proposing 3-D printed housing developments in rural Oregon, including in communities affected by the Alameda Fire. It is unclear whether there would be restrictions against utilizing CDBG funds for such building technology. While research is not conclusive, 3-D printed buildings have shown to be more fire resilient than traditional wood construction types.

While the Action Plan refers to requirements for MHUs to be built to minimum HUD standards, what about minimum standards for mitigation in other Wildland-Urban Interface communities? If not already considered, SB 762, passed in 2021, directs the Forestry Department to map WUI areas where building codes may require hardening construction standards. If not in this report, OHCS should consider if and how the work of that committee may affect wildfire recovery efforts and increased construction costs.

In addition, SB 1536, passed in 2022 in response to weather heat extremes in the summer of 2021, establishes a right to cooling and State funds for the disbursement of cooling equipment – heat pumps – through the Energy Trust of Oregon. If not in the report, OHCS should consider how to align wildfire recovery efforts to maximize utilization of the ETO funds for cooling equipment in new housing developments.

Section 3.5.5.3 notes the Building Codes Division has launched a Fire Hardening Grant Program. A member asked how much funding has been disbursed for this program? They pointed out that FEMA Mitigation funding can also be used for this purpose, in case OHCS was not aware of that.

Last, several members noticed there was no reference to the Firewise Program led by the Oregon Forestry Division. This is a great resource that should be incorporated into any project development manuals ensuring renovated or new housing developments comply with existing Firewise best practices.

Land Acquisition – House Bill 5006

Section 4.4.4.1 notes the state has invested in land acquisition for future housing development, bulk purchase of new modular homes, coordination of manufactured home replacement, and motel conversions for housing homeless families.

While land acquisition efforts by the State were noted several times in the report, it is unclear if the HUD CDBG funds can be used to supplement State funds for land acquisition. Assistance with land acquisition is a growing priority amongst our members who struggle to compete with for profit developers with liquid assets who can move more quickly than nonprofits with more complex capital stacks.

Infrastructure

Section 4.4.4.2 notes the state has allocated \$108.8 million for Water and Wastewater Infrastructure from State and ARPA funds. Members asked if any of this funding is eligible for Manufactured Housing Parks (MHP) infrastructure to help rebuild them in wildfire affected communities?

Section 5.1.2.4 addresses program-eligible activities including infrastructure in support of housing development and refers to assistance for owners of manufactured homes. Members asked if this would include on-site infrastructure improvements at MHPs or does it only refer to individual manufactured homeowner sites?

Our ask is to ensure CDBG funds can be used for collective infrastructure improvements at MHPs.

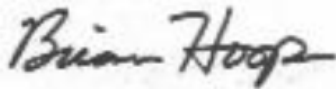
Economic Revitalization

We are concerned the Action Plan does not address informal business activity for those affected by the fire, especially Latino communities affected by the Alameda Fire. As noted in the report, CASA of Oregon and the NOWIA Unete Center for Farm Worker Advocacy found 44% of families affected by the fire relied on seasonal work as their primary source of income. 88% of families impacted were connected to agriculture work within the past 7 years.

Many of those with informal business activity losses for household income – i.e., lost tools for landscaping or construction, equipment for in-house childcare services - are likely unable to utilize private insurance or SBA loans. Can CDBG funds be used to assist them? If families in need are unable to access these HUD funds, perhaps Oregon should consider seeking legislative approval for relief funds for agricultural and other low-income workers affected by the fires similar to those allocated in response to the COVID pandemic.

Please feel free to contact me if you have questions at 503-475-6056 or brian@housingoregon.org.

Sincerely,



Brian Hoop
Executive Director
Housing Oregon

OHCS Response:

OHCS is absolutely committed to continued robust community engagement and will continue to make particular efforts to reach the households who may have been excluded from previous recovery efforts due to residency, citizenship, or language barriers. OHCS certainly expects to provide training and technical assistance to community-based nonprofits on the application process. Such organizations are a key element of the delivery model as conceived.

Thank you for the suggestion regarding assistance for nonprofit housing developers with code and zoning issues. That would be an eligible expense in several areas of the Action Plan. OHCS will also follow up with you regarding the connection with RCAC and IBHS standards.

Regarding MHUs, OHCS does intend to purchase new, higher quality units, and is exploring the use of modular construction as well. OHCS is also interested in a variety of construction approaches and will be exploring those to the maximum extent allowable under HUD rules. All housing constructed under the ReOregon program will be built to as strong a fire resistance standard as practicable. OHCS is certainly aware of the recent legislation you mention and will be coordinating with internal and external partners such as ODF, DCLD and Energy Trust of Oregon to ensure implementation of ReOregon programs both leverages other streams of funding and is informed by the most current thinking about responsible development in the wildland urban interface. Questions

about the State fire hardening program should be directed to the Building Code Division < bcd.firehardening@dcbs.oregon.gov > .

Land acquisition is something the Housing Opportunities Program (HOP) could provide funding for to development partners. The ARPA funding for water and wastewater improvements were dedicated to specified individual projects, primarily at the level of treatment and distribution. The full listing of these allocations is available at (see pages 26 to 29):

<https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB5006>.

The Action Plan does provide for funding for MHP infrastructure, but that funding would be limited to those parks with a binding commitment to maintaining affordability.

One of the primary changes to the Action Plan made in response to numerous public comments is to include economic revitalization as an eligible activity. It is included under the new program called PIER, the funding for which will be allocated by a locally driven decision-making process.

Habitat for Humanity of Oregon Comment Letter:



We build strength, stability, self-reliance and shelter.

May 31, 2022

Recovery and Resiliency
Oregon Housing and Community Services
725 Summer St NE, Suite B
Salem, OR 97301

Dear Recovery and Resiliency Team,

First, thank you for Oregon Housing and Community Service's excellent work in successfully applying for \$422 million in CDBG-DR funds to help Oregon communities achieve long-term wildfire recovery. It is clear that hundreds of hours of collaboration, hard work and careful thought have gone into crafting the action plan draft. Our network of Oregon Habitat for Humanity affiliates has truly appreciated the opportunity to participate in the local engagement meetings. That takes significant time and coordination, too, and all of the feedback we've heard has been extremely positive.

It's exciting to see the disaster recovery plan align with the following guiding principles:

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

All of us at Habitat for Humanity of Oregon are thrilled to see the emphasis on helping members of underserved communities to achieve first-time homeownership. It's exciting to see the federal investment of capacity building resources leveraged to promote intergenerational wealth-building opportunities.

Habitat for Humanity has been responding to disasters nationwide for over 40 years. Especially since Hurricane Katrina, the organization has effectively organized and implemented multiple large-scale recovery efforts to address the affordable housing challenges that face low-income families after a major disaster. The following recommendations include both suggestions gleaned from conversations with colleagues from other states and questions raised during the review of Oregon's CDBG-DR Action Plan Draft:

Give nonprofits and residents the ability to access funding.

Habitat affiliates have received DR-CDBG funding directly for construction projects and indirectly by working with residents who have received homeowner (down payment) assistance. Habitat has been able to effectively leverage the funding through both of these avenues, separately and combined. It is critical that nonprofits and residents can access the funding, giving more flexibility to affected residents seeking replacement housing. The caps set for construction projects and homeowner assistance will determine which avenue the affiliate chooses to help families, and in cases where a family has lost their home and belongings, Habitat recommends a higher total benefit cap that would allow the affiliate to access the funding for both construction and homeowner assistance. When residents do access the funding for homeowner assistance, the application process and required documentation must be taken into consideration because in many cases, most of their belongings have been destroyed, so exceptions and accommodations should be allowed. Habitat encourages flexibility for assistance that is accessible by homeowners directly, and that nonprofits like Habitat can also access the funding to support their construction efforts in rebuilding communities.

Include nonprofit, licensed homebuilders as eligible Contractors for the Homeowner Assistance and Reconstruction Program (HARP) and the Homeownership Opportunities Program (HOP).

Habitat for Humanity affiliates serving wildfire impacted communities should be considered as a delivery mechanism for these programs and/or considered a qualified contractor. Using the Habitat model the CDBG-DR funds will go farther because of volunteer labor, technical expertise, and strong relationships with local residents, subcontractors, suppliers and community organizations providing relief and recovery for disaster survivors. Additionally, because Habitat offers homeowner services, our local organizations can serve as both the contractor and case manager – providing support throughout the rebuilding process.

Streamline and ease the burden of environmental review requirements.

Every project supported with CDBG-DR funds requires environmental clearance. This can be cumbersome for sub-grantees especially if they have to work with multiple firms doing assessments. Therefore, Habitat recommends that States take over this responsibility and hire an engineering firm to complete the environment reviews for every CDBG-DR project. By overseeing all reviews, the State will ease the burden and confusion of multiple entities doing the reviews, and the process will be streamlined and run more smoothly.

Provide a precise definition of directly and indirectly affected people.

It is important to clearly define what circumstances qualify a resident to be directly or indirectly impacted by a disaster. Both declarations are eligible for funding, but in particular, indirect impact has been poorly outlined and is too narrow. Indirectly impacted residents include those persons who experienced adverse economic impacts from a disaster. In the past, this definition has been too specific with the inclusion of qualifications that are often difficult to document, and limit the number of marginalized people that Habitat can assist. A clearer, more flexible definition of what indirectly impacted residents means should be provided to guide sub-grantees, including exactly what type of documentation is required in each case.

Shift the Property Resale Affordability Period for More than \$100,000 to Match Standard Lending Practices.

Especially for new home construction, the per home assistance will typically exceed \$100,000. It's important that OHCS aligns the Property Resale Affordability Period with standard mortgage lending practices. The most common approaches include the following:

- Have the term match or fall within the first mortgage term (e.g. 25 years).
- Include a 99-year renewable affordability period (permanent affordability).

For a 50-year affordability period, the state would likely need to release its lien in order for a subsequent, income-eligible homebuyer to qualify for a conforming mortgage. Then, at the time of sale, the state would need to offer the new homebuyer some financial assistance, such as proportional down payment assistance, to issue a new lien for the remaining affordability period. This cumbersome process could have the unintended consequence of making it extremely challenging for homeowners to sell under any circumstances.

Contemplate larger townhomes and condo developments when creating design standards.

With so many homes needed in wildfire impacted communities, we ask the state to consider design standards that make denser homeownership developments inviting for residents, such as community garden spaces.

Thank you again for the opportunity to comment on the exciting work before us!



Shannon M. Vilhauer, Executive Director

OHCS Response: The ReOregon housing programs recognize and include non-profit developers as eligible partners in the development of homeownership opportunities and rebuilding damaged homes. OHCS will coordinate with you and other nonprofit partners to leverage resources and local expertise and build from existing recovery efforts wherever possible.

OHCS staff recognized that environmental review can be a burden and will be handling those reviews internally. Your detailed suggestions regarding program delivery, impacted persons definition, resale affordability period and design standards are all very useful as the agency begins turning to program development and are very much appreciated. OHCS staff look forward to further future discussions with you on these items.

Rogue Climate Comment Letter:



www.RogueClimate.org || PO Box 1980, Phoenix, OR 97535 || 541-301-9204

June 1, 2022

Comments on Community Development Block Grant Disaster Recovery Funds for ReOregon Program

Dear Oregon Housing and Community Services,

Thank you for the opportunity to provide comments on the OHCS Action Plan and the funding for ReOregon programs. Rogue Climate is a climate justice organization with offices in Phoenix and Coos Bay, Oregon with a mission to empower Southern Oregon and South Coast communities most impacted by climate change, including low-income, rural, youth, seniors, and communities of color, to win climate justice by organizing for clean energy, sustainable jobs, and a healthy environment.

We are supportive of continuing to invest in wildfire impacted communities, the environment, and structures from wildfire risk to better align with the urgency of the climate crisis, as well as, increase Oregon communities' ability to recover from the impacts of wildfires.

The devastating 2020 Labor Day fires hit Southern Oregon communities hard, especially low-income families, and our Latinx and Indigenous neighbors. Since the fires, Rogue Climate and other organizations in the Rogue Valley have supported hundreds of fire survivors to meet their most basic needs, like food, water, and a place to stay, as well as, assisted with resource navigation. Almost two years later these communities are still struggling to find affordable and adequate housing. Though we cannot change the past, we can better prepare and support recovery and stability for those who call Oregon their home.

Rogue Climate strongly encourages the Community Development Block Grant Disaster Recovery Funds to invest in affordable and adequate housing in a meaningful way by taking into account accessibility of the funding, home improvements, and community resilience. These comments were generated through 20 months of working alongside fire survivors in their recoveries.

Housing

- Ensure affordable housing projects prioritize multigenerational living, access to lawns and outdoors, and ownership of the structure.
- Extend assistance services for low-income fire impacted households such as increasing SNAP benefits and rental and home ownership assistance.
- Continue the Disaster Case Management program.
- Ensure mobile home replacements and upgrade programs for existing structures if repairs and improvements are not enough to fire harden the home.
 - An issue has been the number of structures that are too expensive to insure or are simply uninsurable because of age or other factors. Our communities deserve adequate and safe housing. For example, mobile home replacements and upgrade programs will be really useful for folks who decided to purchase FEMA trailers that will bear wear and tear due to expected extreme weather conditions.
- Develop buy-out programs for fire survivors who purchased inadequate housing to live in (moldy, dilapidated structures, dangerous electric, etc). This is a relatively common issue as many households were desperate for a structure they could afford that now may disqualify them from receiving additional assistance but also depleted their savings.
- Floodplain buy-out programs; some housing that burned is in flood plain or other zoning that prohibits rebuilding. Offering these households the opportunity to be bought out of that property may remediate this issue.
- Support local CBOs and non-profits to form resident-owned communities, cooperative housing models, or other alternative permanent housing solutions. Support may come in the form of loans to CBOs for the initial land and structure purchase, technical assistance for planning or for establishing property management contracts, or other.
- Provide no- or low-interest loans for house down payments, manufactured homes, property purchases, and resiliency upgrades. Forgivable or partial repayment options may be best to return elderly and disabled households to housing; based on preliminary results from the Jackson County Community Long Term Recovery Group Needs Assessment (415 households), only 1% of spanish-speaking households and 4% of english-speaking households took an SBA loan from FEMA. Reasons given for not pursuing an SBA loan were fear of inability to repay, and uncertainty of the terms.

Energy efficiency and other home improvements

- Ensure funding for rebuilding 100% electric, to reduce energy cost burden and health impacts.
- Increase funds for ODOE's energy efficiency incentives for households rebuilding.
- Funding for on-site energy production (solar electricity, solar water heater, wind) and storage to be resilient during disasters.
- Funding for passive heating and cooling rebuilding, retrofits, or external structures.
- There is a great need for fire hardening homes for both homeowners and renters. Funds should work to extend these programs and their workforce capacity.
 - Rogue Climate partners with Clear Result to conduct home energy audits. Many of these homes need fire hardening work and weatherization, yet local assistance programs for these improvements have a waiting list of 3 years in some cases. Our communities need these improvements to have a safe home to withstand weather conditions and disasters. It cannot wait 3 years.
- Shade structures and fire resilience additions to manufactured homes are both desired and needed such as funds for metal carports, metal mobile home shade covers, re-roofing for mobile homes.
- Statewide, sponsored residential fire hardening & defensible space programs. Cash payments to households who can check off completing measurable fire-hardening activities.
- Programs to cover a back-up energy system for manufactured home parks if they have an affordable-lot program.

Accessibility to services and to funding:

Please consider these program design elements to remediate issues to accessing funds that fire survivors have already faced for current programs.

- Allow multiple applications from the same fire-affected address if one household at the time of the fire can demonstrate they are separate households currently. Examples of situations where this is necessary:
 - The adults have divorced or separated since the fire

- A larger family has moved to two living spaces because of limits on how many family members can fit in one space
- Family size has changed (birth, death, marriage, etc)
- Reimbursement programs can be very difficult for households to afford. Please consider program designs that allow households to access funds to pay for large expenses directly through the program without having to pay out of pocket before receiving reimbursement. (Reimbursement options are good to keep as an option for households that have already made upgrades etc.)
- While many households are working with case managers to complete applications, they should not need to. When possible, include a program manager phone number for English and Spanish support to answer questions pre-application. Many community members are challenged in the recovery process by written and computer literacy, and providing phone assistance makes these programs more accessible to community members who are elderly, ESL, Spanish-speaking, low-literate, low-tech and more.
- If no local office is available, consider partnering with one or two CBOs to allow in-person drop in for people to pick up paper applications, drop off paper applications, and ask questions.
- Providing free on-site consultation or advice for significant structural changes would increase program uptake (perhaps through contractors, Energy Trust of Oregon, CBOs, Long-Term Recovery Groups, or COADs). Many qualifying individuals are running low on executive function after so many life-changing events and managing recovery.
- Offering paid stipends to households who have completed an application to recruit more applicants and assist them through the process as a community member may increase adoption rates of programs.

Other considerations for community resilience

- Funding for CBOs to organize and build resilience hubs in fire impacted communities.
- Funding for microgrids, community renewable projects, battery storage to increase energy resilience during disaster.

We have seen so clearly in the aftermath of the Almeda fire, that the ability to recover from a catastrophic fire is drastically dependent on income level, home ownership, and access to

insurance and federal support, and that renters, low income community members, and those who cant access federal support have a much more challenging path to recovery.

Thank you for your consideration.

Sincerely,



Alessandra de la Torre
Advocacy & Programs Director

OHCS Response:

- 1.** The Homeowner Assistance and Reconstruction Program (HARP) and Homeownership Opportunities Program (HOP) are designed to accommodate multi-generational living. By investing over half of the CDBG-DR grant into these programs and through various state-funded recovery programs, OHCS has prioritized homeownership as part of recovery wherever possible.
- 2.** The Intermediate Housing Assistance extends rental assistance. There are no current plans for extending SNAP benefits with CDBG-DR assistance, as there are often other funding sources available to help address those needs for qualified individuals.
- 3.** The State will fund disaster case management through multiple programs, including the housing recovery services program.
- 4.** HARP and HOP include plans to make damaged homes and new homes more resilient to future disasters and to help cover the additional costs of recovery when insurance, FEMA and other sources aren't enough.
- 5.** If homeowners replaced their damaged manufactured homes that do not meet the program requirements, HARP may be able to help them improve/repair those homes or replace them with higher quality homes. In addition, through the existing Wildfire Recovery and Resilience Account (WRRRA), the state has provided funding to local community action agencies to support manufactured home upgrades and replacements for eligible survivors.
- 6.** Through the newly renamed Planning, Infrastructure, and Economic Revitalization (PIER) program, local governments and community-based organizations may decide to prioritize residential buyouts that will provide mitigation benefits for their communities. We encourage you to share your recommendations with your local jurisdictions.

- 7.** Through HARP and HOP, the State plans on working with non-profit and cooperative organizations to develop manufactured housing parks that will remain affordable to residents.
- 8.** HOP is intended to provide low-barrier homeownership assistance for first-time homebuyers. These loans will take into account the household's income and will structure the loans to make housing costs affordable to program participants.
- 9.** HOP and HARP include comprehensive energy efficiency requirements, which are more strict than those required by HUD.
- 10.** The State will leverage ODOE's energy efficiency programs and will ensure there are no duplication of effort with that program. While CDBG-DR funds are not going to ODOE to expand their program, the CDBG-DR programs' energy efficiency components are modeled after ODOE's program, and so, in effect, ODOE's program's goals and efforts will be expanded through HOP and HARP.
- 11.** Through the newly renamed Planning, Infrastructure, and Economic Revitalization (PIER) program, local governments may decide to prioritize resilient energy production strategies. We encourage you to share your recommendations with your local jurisdictions.
- 12.** We will incorporate passive heating and cooling standards in reconstruction, new construction and retrofits for repaired homes to the extent practicable.
- 13.** We will incorporate fire hardening measures into reconstruction, new construction, and repairs of damaged homes. These measures are being designed in line with the fire hardening program being administered by DCBS.
- 14.** The State is evaluating the estimated costs to rebuild and will consider whether carports, replacing manufactured home roofs, and other shade covers are eligible.
- 15.** HARP and HOP will include fire hardening measures as a part of the program.
- 16.** HARP and HOP will provide assistance to eligible manufactured housing parks who agree to program requirements, including affordability requirements. For each project, the program will review the risks to the site and if a back-up energy system is warranted, those may be eligible program or project costs.
- 17.** The State will design HARP and HOP wherever possible to accommodate a wide spectrum of property ownership, household makeup, and how residents have been displaced by the disaster.
- 18.** HARP and HOP are designed to minimize applicants' burden of coming out of pocket for repairs by managing the construction on behalf of homeowners (HARP) or homebuyers (HOP).

19. The State will design its programs to have multiple ways to submit applications and will take into account that not all survivors have access to internet or computers and others may prefer or need to talk to someone on the phone.
20. The State intends to partner with local organizations to help make the application process easier for survivors.
21. The State will partner with local organizations and will procure vendors to add capacity and take some of the burden off impacted residents as they work through their recovery.
22. CDBG-DR funds cannot be used to provide stipends for individuals to complete applications. However, the State will engage in significant local and targeted outreach – including to those households who are displaced from where they were living at the time of the disaster - and will provide multiple options for households to submit applications. Through these efforts, the State will try to remove barriers to programs and encourage participation.
23. Through the newly renamed Planning, Infrastructure, and Economic Revitalization (PIER) program, local governments and community-based organizations may decide to prioritize community centers and resilience hubs. We encourage you to share your recommendations with your local jurisdictions.
24. Through the newly renamed Planning, Infrastructure, and Economic Revitalization (PIER) program, local governments and community-based organizations may decide to prioritize energy projects. We encourage you to share your recommendations with your local jurisdictions.

Firebrand Resiliency Collective Comment Letter:

Hello ReOregon Team,

I want to first appreciate all of the amazing work you have all put into this Draft Action Plan, and the effort the OHCS team has undertaken to create a series of programs and outcomes that meet the localized needs of communities affected in the 2020 Labor Day fires. The plan as put forth is ambitious, innovative, and seeks to redress historical inequities in a way not seen before. As I have been present at many forums and discussions over the last two years that led up to this point, I just want to express my gratitude as a community member for the inclusive process and congratulate you all on the herculean effort to date. I understand the plan is one that can be amended at any time. To that point, what I present here is a list of specific bulleted thoughts and a few questions, and should be thought of as a continuation of the ongoing discussion rather than as comprehensive feedback on the whole.

I would suggest deciding on and prioritizing publication of eligibility requirements and timelines for these programs as soon as possible, so that survivors can make decisions quickly about whether to rebuild on their own, or make use of CDBG-DR assistance funds.

I wholeheartedly support the measures to extend the DHS Housing program, as well as an extension of the Disaster Case Manager program. As we learned in Paradise, the DCM rolls there are still full three years later. CDBG funding in this regard should do more to promote the DCM program, including tier 1 and tier 2 cases, so that residents can make full use of the program and the resource navigation to maximize funding already allocated outside of the CDBG-DR scope. Many people still simply do not know about the DCMP or how it can benefit them and provide a coordinated recovery track.

With the understanding that the Action Plan must be able to fit the needs of a statewide recovery, it is worth looking at a more localized rebuild environment to target funds where they can do the most good in regards to neighborhoods still struggling to rebuild with homeownership representing above 80% AMI. A tool such as [Firebrand Resiliency Collective's Loss and Recovery Dashboard](#) could assist with that localized, neighborhood-level research, and we stand ready to assist.

Jackson County, city leaders of Talent and Phoenix, and SOREDI have proposed 5% of the funds (\$21m) be set aside for direct economic recovery to help bring commercial properties back online. Such a goal supports the symbiotic relationship between an overly impacted workforce and the imperiled main streets of these communities. Both housing and commercial opportunities should be thought of as infrastructure. I believe OHCS should take a closer look at how to innovate in this space, and I support the jurisdictions and SOREDI in their request with the caveat that experts, rather than jurisdictions, should be brought in to ensure maximized efficiency of this funding to both microenterprises and brick and mortar businesses affected in the fire.

I understand there is no reimbursement built into this plan, but I believe this could be reconsidered at a future date once 80% AMI projects have been serviced. The science tells us that fire-hardening homes and establishing defensible space are the two biggest indicators of a home's survivability. In weighing reimbursements, OHCS could make reimbursement funds available only for LMI households who have rebuilt to fire-hardened standards and taken steps to create defensible space with their community. This would stretch the existing fire-hardening grants farther than the \$10m allocated statewide. In addition, when possible OHCS-funded housing developments should adopt the recommendations and practices of the Fire Adapted Communities Network, and promote Firewise Communities whenever possible to further bolster mitigation and preparedness efforts.

MH parks are the quickest way to affordable housing, and familiar to those in our valley. I applaud the intention in the plan for the state to purchase existing manufactured housing parks and turn them into resident-owned communities whenever possible. I believe this approach will promote the equity and social innovation that many of us have hoped for in the rebuild. At the same time, in our work with survivors we have often heard that many former residents of parks wish only to return to what they had before, and as quickly as possible. The ills of the manufactured industry are well known. Homeownership—included the ground the houses sit on—is the overarching goal. Yet, a

number of the parks that were wiped out in the Alameda fire have been owned and managed by local families, which in some cases represent generational relationships. These small, locally-owned and operated parks are the least likely to have weathered the storm, compared with national and in a few cases multinational-owned parks, and have been among the slowest to rebuild. Making infrastructure improvements to parks that can meet certain criteria (for example: local ownership, adherence to affordability metrics, preference for returning residents) and leveraging these parks to support priority goals of the CDBG-DR plan through deed restrictions is a possibility that could be looked into in a future amendment. Community Land Trusts in place of traditional parks are an admirable goal, and I believe an option B should be on the table when discussing purchase with park owners to help residents get home as quickly as possible.

Questions:

If the intent is for the state to contract directly with homebuilders, how does the plan intend to address a lack of local contractor capacity, and the lack of affordable housing developers?

Do staff plan to pipeline CDBG-DR funding into shovel-ready projects, and if so, how will they decide which projects will be successful? I am eager to learn more, and will likely have many more questions once the plan is submitted to HUD.

Thank you for your time and passionate focus on these vital programs.

Best,

Tucker

Tucker Teutsch III

Executive Director—Firebrand Resiliency Collective

FirebrandCollective.org

OHCS Response:

1. This is an excellent recommendation for helping survivors plan over the coming months. OHCS is working toward publishing specifics around eligibility and timelines as soon as possible.
2. The housing and public service programs are currently designed to fund a variety of housing support services, including the disaster case managers and Department of Human Services housing programs.
3. The Action Plan includes funding for planning, which could be used to carry out some of that research. Also, as programs open up for survey and application, the state will have more localized data on where impacted survivors are in their recovery and the challenges they face. For the next six years (the term of the CDBG-DR grant), the state will work with local partners and through community engagement to understand current needs of communities and neighborhoods. OHCS will amend the Action Plan to

meet those needs, if and when we have a better understanding of how they differ across the state.

4. In response to the amount of feedback on the need to help small businesses and microenterprises in impacted areas, the state has modified the infrastructure program (termed DRIP in the draft Action Plan) under the newly named Planning, Infrastructure, and Economic Revitalization Program (PIER). Under this program, local governments and organizations may apply to the state programs based on the priority recovery need for their communities, including economic recovery. Now that this funding is available for this purpose, we encourage you to share your feedback with SOREDI and your local jurisdictions. As part of its review of all proposed projects and programs, the state is required by HUD to review the capacity of subrecipients to carry out eligible activities.

5. The state has amended the housing programs to include privately owned manufactured housing parks when they agree to program requirements, including affordability requirements. OHCS understands that some of these requirements may be difficult for many private owners to agree to and is developing guidelines that consider the challenges of the park owners, but the agency prioritizes the need to preserve affordable rents and housing for impacted communities. There may be certain limitations on what can be funded (e.g., privately owned utilities on site), but the state is working with the U.S. Department of Housing and Urban Development to seek waivers as necessary.

6. Local contractor and affordable housing developer availability are not issues that we directly addressed in the Action Plan. There are funds (in PIER, administrative costs, and perhaps the housing programs themselves) that could be used creatively to address this issue if promising strategies are identified. OHCS would welcome discussions about what such strategies might be.

7. Because the infrastructure program was amended to give more control to local organizations, it will be up to the locals to decide if the shovel-readiness of a project should be considered when selecting CDBG-DR projects. However, OHCS will review all projects for certain eligibility requirements, which include making sure all funding sources are committed, that the project is feasible, and that there is funding available to maintain the project.

8. OHCS is happy to have additional discussions with you around any of the programs.

6.4 Data Sources/Methodologies

6.4.1 Housing Unmet Needs Calculation

6.4.1.1 HUD Unmet Needs Calculation Methodology

For its unmet housing needs calculation, HUD considers major low, major high, and severe damage categories for both owner and renter households, which are defined in the Federal Register Notice for calculating unmet recovery needs. For owner-occupied properties, this means anyone with real property damages above \$8,000 or \$3,500 in personal property damages. For renter-occupied properties, the threshold includes anyone with more than \$2,000 in personal property damages. There are additional details below on the damage categories by owner-occupied and renter- (tenant) occupied households. Generally, FEMA categorizes manufactured homeowners who owned their unit as owners, even when their unit is placed on leased land.

Owner-Occupied Households

Real or Personal Property Damage Categories

- Minor Low:
 - Less than \$3,000 in FEMA-inspected real property damage or less than \$2,500 in FEMA-inspected personal property verified loss
- Minor High:
 - \$3,000 to \$7,999 in FEMA-inspected real property damage or \$2,500 to \$3,499 in FEMA-inspected personal property verified loss
- Major Low:
 - \$8,000 to \$14,999 in FEMA-inspected real property damage or \$3,500 to \$4,999 in FEMA-inspected personal property verified loss
- Major High:
 - \$15,000 to \$28,800 in FEMA-inspected real property damage or \$5,000 to \$9,000 in FEMA-inspected personal property verified loss
- Severe:
 - Greater than \$28,800 in FEMA-inspected real property verified loss or determined destroyed or greater than \$9,000 in FEMA-inspected personal property verified loss or determined destroyed

Renter-Occupied Households

Personal Property

- Minor Low:
 - Less than \$1,000 in FEMA-inspected personal property verified loss
- Minor High:
 - \$1,000 to \$1,999 in FEMA-inspected personal property verified loss

- Major Low:
 - \$2,000 to \$3,499 in FEMA-inspected personal property verified loss
- Major High:
 - \$3,500 to \$7,500 in FEMA-inspected personal property verified loss
- Severe:
 - Greater than \$7,500 in FEMA-inspected personal property verified loss

While the FEMA IA data are incomplete in presenting the true level of impact to owners and renters, it is the best available dataset available to the State that distinguishes between impacted owners and renters. The table below demonstrates the relative percentages of owners and renters who:

- Applied to FEMA IA (total registrants).
- Had a FEMA verified loss (FVL) greater than \$0 (total FVL over \$0).
- Experienced major to severe levels of FEMA verified loss (total major to severe).

The data analysis in this table also includes the average FEMA verified loss for owners and renters (average FVL in \$).

Table 96: Average FEMA Verified Loss for Owners and Renters

FEMA Individual Assistance	Owner	Owner %	Renter	Renter %	Unidentified	Total
Total Registrations	6,958	29%	17,055	71%	25	24,038
Total FVL Over \$0	1,835	47%	2,089	53%	0	3,924
Total Major to Severe	1,427	47%	1,605	53%	0	3,032
Average FVL \$	\$46,255	N/A	\$5,847	N/A	N/A	N/A

Data from FEMA FIDA 40449 4562, February 17, 2022.

6.4.1.1.1 FEMA/SBA Multiplier

OHCS has calculated the ratio and derived what is called an SBA multiplier, using a subset of FEMA IA applicants with the following:

- Major and severe HUD-defined damages of FEMA verified loss
- SBA verified loss and FEMA real property verified loss

The use of an SBA multiplier is the methodology that HUD has used for projecting a more accurate estimated need, as the SBA inspection conceivably covers the cost of

bringing the home back to pre-disaster condition, while FEMA inspections are based on the amount needed for a homeowner to make the home safe, sanitary, or functional. The following table shows the number of households that registered with both FEMA IA and the SBA and calculates the SBA multiplier.

Table 97: Ratio of SBA to FEMA Verified Loss for SBA Multiplier

Damage Category	No. of Owner Registrations (both FEMA and the SBA)	Total SBA Verified Loss	Total Real Property FEMA Verified Loss	Ratio of SBA to FEMA Verified Loss = SBA Multiplier (SBA FVL/FEMA Real Property FVL)
Severe	168	\$25,028,153	\$14,817,592	1.69
Major High and Low	22	\$1,046,927	\$430,701	2.43
TOTAL	190	\$26,075,080	\$15,248,293	1.71

When this multiplier is applied across FEMA IA owner-occupied registrants with major to severe FEMA verified losses, there would be an estimated \$143,105,403 in owner-occupied losses, as laid out in the table below.

Table 98: Average Owner Loss with SBA Multiplier

FEMA IA Damage Category	Ratio of SBA to FEMA Verified Loss (SBA Multiplier)	Total Owner Count with FEMA Verified Loss	Total Owner FEMA Verified Loss	Estimated Total Owner Loss with SBA Multiplier	Average Owner Loss with SBA Multiplier
Severe	1.69	1,147	\$81,740,816	\$138,141,978	\$120,437
Major High and Low	2.43	280	\$2,042,562	\$4,963,425	\$17,727
TOTAL	1.71	1,427	\$83,783,378	\$143,105,403	N/A

Because FEMA does not assess real property damages for rental properties, to project the rental housing replacement need, OHCS uses the average owner loss with SBA multiplier and projects that onto the renter FEMA IA population, as demonstrated in the table below.

Table 99: Estimated Rental Loss with SBA Multiplier

FEMA IA Damage Category	Total Renter Count with FEMA Verified Loss	Average Owner Loss with SBA Multiplier	Estimated Total Renter Loss with SBA Multiplier
Severe	745	\$120,437	\$89,726,045
Major High and Low	860	\$17,727	\$15,244,806
TOTAL	1,605	N/A	\$104,970,851

Using the SBA-FEMA methodology with FEMA IA data, the owner and renter housing loss is detailed in the table below. However, the State knows that this assessment undervalues the actual costs to recover from the residential damages caused during the 2020 Wildfires and therefore additional analysis is performed in the next section.

Table 100: Sum of Owner and Renter Loss using SBA Multiplier

FEMA IA Damage Category	Total Registrant Count	Estimated Loss with SBA Multiplier	Percentage of Total
Owner – Major to Severe	1,427	\$143,105,403	58%
Renter – Major to Severe	1,605	\$104,970,851	42%
TOTAL	3,032	\$248,076,254	100%

6.4.1.2 Alternative Methodology: Estimated Costs to Replace Damaged and Destroyed Housing

According to OEM and local damage assessments, the actual number of residential units that were damaged or destroyed in the 2020 Wildfires is 4,326, or nearly 30% more than the 3,032 valid FEMA registrants with major to severe damages; therefore, the FEMA IA data registrant totals do not reflect the actual number of residential units that were damaged or destroyed. In addition, based on OHCS research, the SBA-estimated loss does not reflect the current costs to reconstruct or replace damaged or destroyed housing—including affordable housing or building back more resiliently—in the HUD MIDs and Klamath County.

Because of the limits of the FEMA and SBA data, OHCS performed additional analysis to calculate a more accurate projection of the costs to rebuild or replace major damaged or destroyed housing. The housing damage analysis performed by OEM and local governments does not include a distinction between owner-occupied and renter-occupied units but includes a breakdown based on structure type. The analysis below includes an average estimate of cost based on average costs across different structure and reconstruction types.

Table 101: Sources for Average Cost to Rebuild Resiliently

Source	Average Unit Cost
SBA Average Verified Loss	\$210,222
Affordable Multifamily Cost per Unit	\$314,347
Manufactured Home Cost per Unit in Investor-Owned Parks with Site Improvements	\$139,117

Source	Average Unit Cost
Modular Cost per Unit in Affordable Parks (including land and infrastructure)	\$331,817
Manufactured Home Cost per Unit in Affordable Parks (including land and infrastructure)	\$305,000
November 2021 Zillow Estimate/New Construction	\$252,494
November 2021 Zillow Estimate/New Construction Septic/Well Repairs	\$302,494
Average of Averages of Estimated Unit Cost to Rebuild	\$265,070
Add 15% Resilience	\$39,761
Average of Averages of Unit Cost to Rebuild Resiliently	\$304,831

6.4.1.2.1 SBA Average Verified Loss

This value was calculated using the average current value of verified loss for homeowners who were approved for an SBA loan as a result of the 2020 Wildfires.

After disasters, the SBA provides subsidized low-interest disaster loans to homeowners and renters. These loans can be used to repair or replace real estate and personal property impacted by the wildfires.

The SBA's loss verification is used to estimate and validate the cost of restoring disaster-damaged property to its pre-disaster condition. In the past, loss verifiers conducted damage assessments solely through on-site inspections. However, in 2017, the SBA implemented the desktop loss verification process. This process uses a two-step approach, an initial desktop loss verification and a post-desktop review. The initial desktop loss verification is used to estimate the cost of repairs. This is evaluated through telephonic interviews and third-party information sources (tax assessor's websites, Google Earth, and Zillow). After an initial desktop loss is calculated, a post-desktop review is conducted. For loans less than \$25,000, loss verifiers rely on a FEMA on-site inspection report. In the event that this was not conducted, the SBA conducts its own on-site inspection. For loans exceeding \$25,000, an SBA-conducted on-site inspection is required.

6.4.1.2.2 Affordable Multifamily Cost per Unit

The calculation for affordable multifamily cost per unit was provided by the Housing Authority of Jackson County (one of the eight impacted counties). These estimates come from four construction projects that the housing authority had completed in the past 4 years. Two of these projects occurred after the time of the disaster. Both multifamily housing projects started after the 2020 Wildfires saw increased per unit costs

of 5% and 19%, respectively. Hard construction costs increased by 22% in 2021. These project costs include land acquisition, construction, and soft costs per unit post-wildfire. Increased costs from the projects were attributed primarily to increases in land, labor, and construction material costs.

6.4.1.2.3 Manufactured Homes in Investor-Owned Manufactured Housing Parks with Site Improvements

The average cost of a manufactured home (MH) in an investor-owned manufactured housing park, including site improvements, is calculated from OHCS's Manufactured Home Replacement Program. The estimates provided are the average of single-wide and double-wide unit costs, plus site improvements. These costs do not include elevation costs. MH park owners who are bringing in new manufactured homes and homeowners involved in replacements note that increases in replacement MH costs, lack of inventory, timeline delays, and challenges in rebuilding park infrastructure have accounted for the lack of affordability and availability for impacted MH residents.

6.4.1.2.4 Manufactured and Modular Home Costs per Unit in Affordable Parks

The manufactured and modular home costs per unit in affordable parks are based on OHCS-funded projects that purchase and rebuild manufactured housing parks, provide prefabricated units, and preserve the parks as affordable. Based on current cap rates and market conditions, the development cost per space is estimated at between \$300,000 and \$350,000 (depending on the unit type), and includes land, infrastructure, capital improvements, and unit acquisition and installation.

6.4.1.2.5 November 2021 Zillow Estimate (New Construction)

The November 2021 Zillow estimates are a seasonally adjusted measure of typical home values across a given region and housing type. The Zillow estimates provide median home values at the county level. For this dataset, OHCS used the Zillow estimate and assumed that two-thirds of the actual home value is for the residential structure itself. With this data, OHCS then calculated a weighted average of home values in the impacted counties. Thus, taking 66% of the median home value from Zillow's \$382,567 average across the eight counties gives us a weighted home value of \$252,494.

This number also was validated through data that OHCS received from multiple homebuilders, who estimated the cost to build new single-family housing (3-bedroom/2-bath) in Oregon to range from \$220,000 to \$250,000. This did not include the cost of land acquisition or residential infrastructure.

6.4.1.2.6 November 2021 Zillow Cost Estimate with Septic/Well Repairs (New Construction)

This November 2021 Zillow cost estimate follows the same methodology as above but includes additional septic and well repairs. The Oregon DEQ estimates these additional

costs to be around \$50,000 per residential unit. OHCS estimates that more than 1,100 damaged properties will need this type of repair. One additional component that most of the above datasets specifically excluded was site work—infrastructure in support of housing, landscaping, and other costs outside of the construction of the housing unit itself. Much of the impacted structures are located in rural areas without access to public utilities. As such, it is important for OHCS to include these home infrastructure-related costs for the installation of wells, septic, resilient landscaping, hardscaping for driveways, sidewalks, and other site improvements.

6.4.1.2.7 Resilient Construction Estimates

OHCS anticipated that all new reconstructed properties will integrate resilient building design and materials. Based on the HUD Federal Register Notice, the State anticipates at least a 15% cost increase from standards-based construction to resilient and mitigating construction.

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6.5 Important Definitions and Terms

Federally Used Acronyms

AMI: Area Median Income

CBDO: Community-Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant – Disaster Recovery

CFR: Code of Federal Regulations

DRGR: Disaster Recovery Grant Reporting System

DUA: Disaster Unemployment Assistance

FEMA: Federal Emergency Management Agency

HCDA: Housing and Community Development Act of 1974, as amended

HMGP: (FEMA) Hazard Mitigation Grant Program. This program provides funding to State, local, tribal, and territorial governments so that they can rebuild in a manner that reduces or mitigates future disaster losses in their communities.

IA: (FEMA) Individual Assistance

LEP: Limited English Proficiency

LIHTC: Low-Income Housing Tax Credit

LMI: Low-to-Moderate Income

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance. This program provides supplemental grants to State, tribal, territorial, and local governments, as well as certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies.

RE: Responsible Entity

RFP: Request for Proposal

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

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

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

Vulnerable Populations: HUD defines “vulnerable populations” as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

Oregon-Specific Acronyms

DEQ: Oregon Department of Environmental Quality

DLCD: Oregon Department of Land Conservation and Development

DOGAMI: Oregon Department of Geology and Mineral Industries

DR-4562: Oregon Wildfires and Straight-line Winds (incident period September 7, 2020 – November 3, 2020)

ETART: Erosion Threat Assessment and Reduction Team

HSC: Housing Stability Council

ODHS: Oregon Department of Human Services

OED: Oregon Employment Department

OEM: Oregon Office of Emergency Management

OHCS: Oregon Housing and Community Services

NHMP: Natural Hazards Mitigation Plan

RHNA: Regional Housing Needs Assessment