

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

The City had several projects that utilized CDBG funds to address the goals of the Consolidated Plan, including: Downpayment assistance for several homebuyers to purchase houses constructed by Bend Area Habitat for Humanity; provision of assistance to Central Oregon Veterans Outreach for weekly site visits to homeless camps and provide food, fuel, clothing, sleeping bags and tents; referral for housing and other services through the Thrive program; and, provision of funding for rehabilitation of housing for victims of domestic violence. In all, CDBG funds benefitted 4,556 unduplicated individuals in our community.

Utilizing local funds the City assisted in the completion of 31 units of housing for families at or below 60% of Area Median Income, acquisition of property for construction of single family homes by our local Habitat for Humanity, new construction financing for 108 shelter units that will serve persons experiencing homelessness, and financing for over 100 rental and home ownership units targeted to families at or below 80% Area Median throughout the City of Bend. Additionally, the City supported several fair housing trainings for our Planning Commission, Affordable Housing Advisory Committee, and the Central Oregon Rental Owners Association.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

The City’s program year has become somewhat delayed over the years, so numbers reported in the 2017 CAPER reflect only a portion of the program year accomplishments. Regardless, our accomplishments year to date are considerable. Compared to the projected 100 people to be served with ADA and housing infrastructure improvements, sub-grantees in fact served 4462 people. Within the assisting homeless with shelter and services category, sub-recipients served over 2000 individuals. We believe that the numbers represented in the CAPER are both a reflection of community need as well as a reflection of staff unfamiliar with the HUD reporting system, and expect that the goals and outcomes will be more closely aligned in future years.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete
ADA and Housing Infrastructure Improvements	Affordable Housing Public Housing Homeless Non-Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	4462	4,462.00%

ADA and Housing Infrastructure Improvements	Affordable Housing Public Housing Homeless Non-Homeless Special Needs		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	0	0.00%
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Rental units constructed	Household Housing Unit	200	0	0.00%
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Rental units rehabilitated	Household Housing Unit	25	0	0.00%
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Homeowner Housing Added	Household Housing Unit	50	6	12.00%
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Homeowner Housing Rehabilitated	Household Housing Unit	10	6	60.00%
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Direct Financial Assistance to Homebuyers	Households Assisted	50	9	18.00%

Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Homeless Person Overnight Shelter	Persons Assisted	0	0	
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Housing for Homeless added	Household Housing Unit	0	0	
Affordable Housing Production and Preservation	Affordable Housing Public Housing	CDBG: \$313500	Housing for People with HIV/AIDS added	Household Housing Unit	0	0	
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	2063	
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Rental units rehabilitated	Household Housing Unit	0	0	
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Homeowner Housing Rehabilitated	Household Housing Unit	0	21	
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Homeless Person Overnight Shelter	Persons Assisted	150	115	76.67%
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	50	0	0.00%
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Homelessness Prevention	Persons Assisted	500	0	0.00%
Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Housing for Homeless added	Household Housing Unit	25	0	0.00%

Assist Homeless with Shelter and Services	Homeless	CDBG: \$55000	Other	Other	0	0	
Employment Training and Economic Development	Non-Housing Community Development		Jobs created/retained	Jobs	20	0	0.00%
Employment Training and Economic Development	Non-Housing Community Development		Businesses assisted	Businesses Assisted	5	0	0.00%
Provide Support to Necessary Public Services	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$34000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	1158	115.80%
Provide Support to Necessary Public Services	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$34000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	500	0	0.00%

Provide Support to Necessary Public Services	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$34000	Homeless Person Overnight Shelter	Persons Assisted	0	0	
Provide Support to Necessary Public Services	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$34000	Homelessness Prevention	Persons Assisted	0	0	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The primary goal in City of Bend’s Consolidated Plan is Affordable Housing Production and Preservation, with an emphasis on increasing the amount and availability of affordable rental units. Additional goals include increasing the number of homeless shelter units, infrastructure and ADA improvements, supporting public services, and employment and economic development.

Because of the incredible need for additional affordable housing units in Bend, our focus is often on the primary goal of providing additional units. Due to the business models of our most successful affordable housing developers, CDBG is not always a viable tool for them. (Several of our developers are for-profit businesses, others typically set up private LLCs for each development to ensure that the agencies will survive despite market fluctuation or unforeseen events.) Because of this, CDBG funds locally are used primarily for homeownership activities that meet the affordable housing production and preservation goal. The competition for funding is most acute for public services activities, and these activities generate the most contacts as well. These public services represent the two significantly over-accomplished goals in the matrix above.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	4,375
Black or African American	52
Asian	19
American Indian or American Native	91
Native Hawaiian or Other Pacific Islander	21
Total	4,556
Hispanic	330
Not Hispanic	4,226

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

According to the PR-23 report, the City of Bend assisted 4556 individuals using CDBG funding in 2017 program year. The numbers of minorities, including latino and Hispanic members of our community, are lower than our overall demographic representation. This indicates that our sub-recipients may need to further emphasize their commitment to affirmatively furthering fair housing. It also may be an reflection of the extraordinary escalation in home prices in Bend in recent years, which has contributed to displacement of low-income populations. Because minority populations tend to be lower-income, the displacement may affect minority populations more significantly than others.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	446,038	135,304

Table 3 - Resources Made Available

Narrative

Similar to previous years, with the exception of expensive west side hills properties (multi-million dollar homes) Bend has been fairly successful in ensuring that affordable housing projects and community service dollars are spread evenly throughout the community. During the program year, Bend expended \$508,108.33 for all activities all years. Bend expended \$135,303.65 on 2017 activities according to the PR-02 report.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

City of Bend does not identify target areas. CDBG funds are available for activities throughout City of Bend.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Bend's goal is to leverage \$7 million annually. In 2017, we leveraged \$24 million with our CDBG and the City's own Affordable Housing Fund. Nearly all \$24 million was leveraged from outside of the region.

The City of Bend generates approximately \$1 million annually through a construction excise tax, called the Affordable Housing Fund. Because this fund has been active since 2006, approximately 1/3 of the funding each year is made up from repayment of loans issued in prior years. The average subsidy per unit with our Affordable Housing Fund is \$15,000, meaning the fund must rely upon external resources for homes to be built.

The City of Bend has a goal this biennium of surplussing 7 properties. We have identified and surplussed 3 and have 4 more in the process of being surveyed or otherwise being readied for RFP. Once City Council has decided to surplus a property, staff prepares a request for proposals, which is distributed to affordable housing providers and developers, and responses are scored by the Affordable Housing Advisory Committee (AHAC). The AHAC's recommendations are forwarded to City Council for decision. Affordable Housing Staff recently compiled a list of potential surplus properties which is regularly updated as additional properties are located or decided upon. City surplus properties are sold for the cost of titling plus the cost the City paid for the land—typically far below current market value. Surplus land carries a permanent deed restriction to ensure that the land and eventual homes will be available to those making no more than 80% AMI.

Finally, the City supports an SDC exemption program that currently exempts all City SDCs for affordable housing. This is revenue that is not replaced with other funding. The SDC ordinance became final in December, 2017, and the City has exempted approximately \$430,000 between December, 2017, and June, 2018.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	1,281	0
Number of Non-Homeless households to be provided affordable housing units	12	6
Number of Special-Needs households to be provided affordable housing units	0	0
Total	1,293	6

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	13	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	13	6
Total	26	6

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Discuss how these outcomes will impact future annual action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	5	0

Moderate-income	1	0
Total	6	0

Table 7 – Number of Households Served

Narrative Information

Staff were untrained on the intricacies of the IDIS system so certain goals were significantly overstated. Additionally, as mentioned above, the City’s subrecipient years have become somewhat delayed, so not all data have been reported or entered.

Bend will continue to work to construct and acquire more affordable housing units, in alignment with both our consolidated plan and City Council goals.

Our public services that support people obtaining and maintaining their housing are included in Table 1. These services provide the most robust production numbers for CDBG as explained in Table 1’s narrative. In fact, the City of Bend supports construction of far more affordable properties than those listed on this report with our own funding.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Through partnerships and funding arrangements with local providers, including Central Oregon Veterans Outreach (COVO) and Thrive, the City has been able to assist and evaluate the needs of many of our homeless population, both sheltered and unsheltered. These valuable partnerships provide necessary insight into the needs of this vulnerable community.

The City of Bend provides funding and support to COVO, which offers to unsheltered homeless. This arrangement is in conjunction with the Homeless Leadership Coalition and all the agencies and churches who want to assist this population. COVO took on this mission to cut down the number of social service agencies and churches that were going piecemeal into camps and other locations where the homeless can be found. Homeless individuals complained that the presence of too many individuals and groups trying to provide assistance was bringing too much attention to camp locations, there were conflicting approaches to the delivery of services, and redundant and sometimes unneeded services were being provided. This has been a very successful and beneficial arrangement for the City to effectively address this population.

Homeless individuals have typically lost trust and faith in organized institutions and/or, because of their circumstances (mental health issues or lack of transportation, etc.), homeless individuals cannot access services at times and places where the services may be offered. By taking services to these populations at locations they frequent, and meeting these populations where they are, COVO is able to intercede and intervene in ways that will reduce the burden on and the cost to the City of Bend and other agencies.

Tangible services provided during outreach include water, propane, canned foods (if available), and cold weather gear, most of which has been donated by community members. Other services available through community partnerships include veterinary care, and the Mosaic Mobile Medical Unit which comes along with the crews on outreach, as transportation serves as a barrier to many, especially those camping on the outskirts of city limits. Other services include resource referrals, individuals providing necessities, and empowerment.

COVO utilizes CDBG to cover the costs of the Homeless Outreach Program staff. This staff works directly and daily with homeless individuals, veteran and non-veteran, and provides linkages to local programs and resources.

Thrive Central Oregon (Thrive) provides outreach in public spaces where persons at risk of homelessness or experiencing homelessness most often visit. Bend locations where Thrive meets with individuals include both libraries, Bend Church, and Ariel Glenn Apartments. Thrive offers assistance with housing, employment, public benefits, and other basic needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through partnerships with the Homeless Leadership Coalition, the City works in the coordination of services for this population, including participation in the One Night Homeless Count. In addition the City acts as a clearing house for both information on shelters and referrals to such. The City works most specifically with Bethlehem Inn, the largest single site shelter in Central Oregon, and NeighborImpact, the Continuum of Care coordinating agency, in planning and evaluating needs for shelters. Needless to say, with the current housing crisis, both of these entities have indicated the need for more units. The City has contributed to the renovation of the Bethlehem Inn shelter with our own Affordable Housing Fund.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City actively works with housing and community development providers to help families move out of poverty through the funding and implementation of public service activities, especially those that promote self-sufficiency, and job attainment and retention skills. This also includes those community development activities that assist the homeless and the near homeless to become active members of the community.

The City is funding NeighborImpact's Homesource with CDBG. This program provides housing counseling to protect individuals and families from losing existing home, both for Homeowners and for Renters.

NeighborImpact provides coaching and educational services including home buyer pre-purchase counseling and education; foreclosure counseling and education; reverse mortgage counseling, financial education; home rehabilitation loans; budget and credit counseling; savings programs (IDAs) and related coaching/mentoring; energy conservation education; weatherization grants; and referrals to emergency services to prevent homelessness, most particularly they provide the "on the ground" referrals, and in some cases direct housing (through both their facilities and in partnership with Bethlehem Inn), to individuals leaving incarceration, those exiting Sage View (the local mental health facility), and individuals aging out of foster care (through referrals to Cascade Youth and Family Services transitional housing).

NeighborImpact uses the funding from the City of Bend to help leverage additional resources from the State of Oregon, NeighborWorks America, and private foundations to cover the full cost of operating these programs.

Additionally the City provides guidance and assistance as needed to the Homeless Leadership

Coalition in their continuing efforts to address homeless in all populations.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City works with various agencies on addressing the need to transition individuals and families into permanent supportive housing. Most of this work is done by providing funding to NeighborImpact, Bethlehem Inn, Thrive, and Central Oregon Veterans Outreach. In the last year Bend assisted in providing staffing support to NeighborImpact for their HomeSource Center, which refers people to both NeighborImpact's own family shelter, but also works with those individuals to transition to permanent housing.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Bend works closely with our Regional Housing Authority, Housing Works, to address their needs. Over the past year, Housing Works has been attempting to secure outside financing for the “gap” to construct Phoenix Crossing, a City surplus lot awarded to Housing Works. The City provided an award of \$200,000 in Affordable Housing Funds to Phoenix Crossing in 2017, but because of how the state funds 9% tax credits, Phoenix Crossing has not yet secured gap financing enough to proceed. (Instead, the development securing tax credit financing was owned by a separate for-profit group on another City surplus lot, called “Canal Commons.”) Housing Works did not apply for CDBG funding in 2017. A member of the Housing Works staff sits on the City’s Affordable Housing Advisory Committee and our Citizen Transportation Advisory Committee.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

It is the dream of many families who currently rent to purchase a home of their own. The City of Bend has helped Housing Works with their HomeQuest Homeownership program, which is aimed at assisting those families with the dream of homeownership to purchase a good quality, affordable home near where they work, where their children go to school, and in the neighborhood of their choice in Central Oregon. By working closely with homebuilders, lenders, and various community partners, HomeQuest works with the family to make this dream a reality.

To assist people in preparing for homeownership, Housing Works has developed Tutor Homes in our communities. These homes are owned by Housing Works and leased to households of lower income that are determined to become homeowners. Tutor Home applicants are generally drawn from its Housing Choice Voucher or PATHWorks participants, residents in Housing Works' affordable housing communities, or community residents earning less than 80% of the AMI.

Actions taken to provide assistance to troubled PHAs

There are no troubled PHAs in Central Oregon.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Bend is highly proactive in actions taken to remove or ameliorate the negative effects of public policies that serve as barriers. Our City Council has prioritized affordable housing as one of 5 council goals this biennium and has requested that the Affordable Housing Advisory Committee (AHAC) continue to provide any and all suggestions to reduce housing barriers to the Council.

Within the past year, the City of Bend has enacted a variety of tools. City Council expanded an SDC exemption ordinance to 100% of all City SDCs for affordable housing that is below 80% AMI and willing to undertake a deed restriction. (In Bend, Parks & Rec is a separate taxing entity.) Council and the AHAC have reduced open space requirements when developments are near parks, considered allowing fourplexes outright in RS zones, and increased allowable lot coverage for multi-family housing. During the 2017 program year the City has worked towards aligning our Comprehensive plan and zoning maps, creating new urban renewal areas, incentivizing area planning, sourcing infrastructure financing that will allow us to service our new UGB expansion areas, applying for a legislative expansion of our UGB (HB 4079), hiring a parking manager, and revising our density bonus for clarity.

The City granted a low-income property tax exemption to Azimuth 315, a tax-credit and City funded project located in NorthWest Crossing, an award-winning (and affluent) community in the desirable northwest part of Bend.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Generally, the obstacles to meeting underserved needs are the lack of funding and the lack of information regarding available resources. Individual City departments actively monitor and pursue funding opportunities for a broad range of project areas, including housing and community development. During the Program Year, the City directed CDBG dollars where they are most needed by targeting funds to projects and activities that meet the priority needs identified in the Consolidated Plan. In addition, the City expanded and refined the means by which those whose needs are underserved are informed about the financial and informational resources available to them in the community through liaison with NeighborImpact, Housing Works, Saving Grace, Bethlehem Inn, Thrive, and COVO.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

No lead based paint abatement projects were undertaken in the last years. The vast majority of

Bend's housing (over 75%) has been constructed since 1980. Bend is an anomaly in that its older housing is the most desirable in the City, most of which is on the 'trendy' west side. As such these units are very well maintained and very few units are occupied by low income individuals. The City consulted with Deschutes County Health Services to ensure they have not identified additional households with children residing in homes with lead-based paint in need of remediation.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City actively works with housing and community development providers to help families move out of poverty through the funding and implementation of public service activities, especially those that promote self-sufficiency, and job attainment and retention skills. This also includes those community development activities that assist the homeless and the near homeless to become active members of the community. Most particularly in this program year the City has provided assistance to NeighborImpact for housing counseling and their "Ready to Rent" Program, and to Thrive for resources and referral.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Bend hired two permanent staff in to affordable housing positions within program year 2017, greatly increasing our institutional capacity and furthering structural goals. Focus by these staff has been on documenting and improving business practices and creating better internal communication systems across departments.

The City offers technical assistance to agencies implementing projects with CDBG funds and any other funding sources. The City aggressively recruits individuals and agencies who are interested in developing both housing and services in Bend. This may include incorporating specific language from federal regulations into grant contracts, encouraging strategic plan development, providing staff training assistance, and implementing a City Risk Assessment and Monitoring Plan. The Risk Assessment and Monitoring Plan outlines procedures the City will use to determine an organization's capacity to undertake a CDBG funded project. Project monitoring requirements for both City staff and the organization monitored are clearly outlined within this Plan. The results of the risk assessment will assist the organization in identifying ways to improve its capacity, efficiency, and service area analysis (markets), and to improve project performance. Many of the actions identified serve to improve Bend's institutional structure by enhancing coordination with housing developers and service providers in the community, thereby improving the capacity of the City and collaborating organizations to meet the communities needs. The City has worked diligently with Central Oregon Veterans Outreach since their inception in 2005 to move them from just an outreach organization to a viable service agency that provides referral, counseling, outreach and housing.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City recognizes the importance of coordination among the City and the community's housing and social service providers in meeting the community's priority needs. Many of the actions taken by the City coordinate with local housing and social service providers in the identification, documentation and mitigation of community needs. This results in a more streamlined and effective service delivery system. The City Affordable Housing Manager serves as a point of contact and to coordinate the City's role in addressing housing and community development needs. An Affordable Housing Advisory Committee reviews all CDBG applications, all Affordable Housing Fee applications, all Systems Development Charge Exemption applications and all Requests for Proposals for surplus City property. This committee is a textbook example of combining private and public sector experts to create a cohesive coordinating process. The committee has designated membership representing these interests, with one position appointed by the local Builders (Central Oregon Builders Association), one position from the local realty community (Central Oregon Association of Realtors), one position representing local business (Bend Chamber of Commerce), one position from a local lending institution, one position from a provider of affordable housing, one position from a tenant of affordable housing and three at large positions. This provides valuable expertise to City staff and the City Council and will serve to enhance the coordination of service delivery in the broader community.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City of Bend employs a variety of actions to overcome impediments identified in the Analysis of Impediments to fair housing choice, including providing education, outreach, and referral both directly and through partners.

Housing discrimination complaints can be filed with HUD's Office of Fair Housing and Equal opportunity (FHEO), the Housing and Civil Enforcement Section of the United States Department of Justice, Oregon Bureau of Labor and Industries (BOLI), the Fair Housing Council of Oregon (FHCO) and through private legal action. For households that make below federal poverty guidelines the Central Oregon Regional Office of Legal Aid Services of Oregon (LASO) is available to address discrimination violations within the City of Bend.

This year LASO assisted in multiple tenancy termination cases where fair housing defenses were raised. Many tenants requested reasonable accommodations regarding a physical or mental disabilities. LASO also defended a termination where a domestic violence survivor asserted Oregon's fair housing protections under ORS 90.499.

In 2017, BOLI provided assistance in one disability discrimination case from Bend. The disability discrimination claim settled privately after BOLI intervention.

FHCO fielded 25 calls from Bend with fair housing inquiries in 2017. A caller that presented rental terms and conditions that discriminated against his or her disability protections received further assistance from FHCO.

An online survey was made available to Bend residents regarding fair housing in January and February of 2018. Over 500 Bend residents participated in the survey. Of the survey participants, 52% indicated they would change their living situation if they could afford to do so. A portion of the participants, totaling 134, believed they experienced housing discrimination in the past 5 years. Of those that reported experiencing housing discrimination, 78 disclosed they were in a protected class. Source of income was the most reported form of discrimination reported, with 31 participants. Other protected classes participants identified as the basis for the discrimination faced included age, sex, gender, sexual orientation, family status, race, ethnicity, and national origin. Almost half of the participants that reported experiencing discrimination did not take any action to address it.

The City of Bend did its last Analysis of Impediments to Fair Housing, which was submitted to HUD after approval of City Council, in October, 2012. The City is currently finalizing its third Analysis of Impediments. Proactive prevention policies, community engagement and education are the best steps to thwart discrimination and affirmatively further fair housing. Solution based actions will be far more effective than responses after discriminatory actions. While policies about discrimination exist under the City of Bend's Code, Chapter 5.25, inaction results in greater racial, ethnic and income disparities. The City of Bend should be prepared to address these disparities and meet its requirement to affirmatively further fair housing.

The following impediments and actions were addressed in the 2012 Analysis of Impediments and will be addressed in the 2018 Analysis of Impediments:

Employment / Unemployment:

The lack of employment limits one's financial capacity and ability to obtain housing. The Bend-Redmond MSA unemployment rate as of June of 2018 was 3.8%, a steady increase from years past with large percentage growth in mining, logging, and construction. According to the February 2017 Landscape Report Bend 2030, prepared by ECONorthwest, "Median incomes for renters have increased 4.8% since 2012, while rents have increased 36% in that time." Although employment opportunities have risen, housing costs outpace wages. Housing costs limit fair housing options.

Action: The City of Bend includes Affordable Housing within the Economic Development Department. The Affordable Housing staff closely monitors economic trends and facilitates policies, resources and services for more housing options. The Economic Development Department provides many public meetings and community engagement opportunities within the Bend economic Development Advisory Board, the Urban Renewal Advisory Board, and the Affordable Housing Advisory Committee. Because of continuing policies recommended by the Affordable Housing Advisory Committee over 1000 deed restricted units exist for households of 4 persons making an amount less than \$56,000.00 annually. The City of Bend's 2017-2019 Council Goals and Objectives include increasing affordable housing options.

Wage Inequality:

Demographic data documents that women earn less than men across all industries, classes and

professions in Bend. Unequal pay for equal work creates a barrier in a protected class's ability to afford all items (including housing) in a manner that is the same as others in the community; thus unequal pay creates a barrier to fair housing. This phenomenon is not limited to the City of Bend, it is a nationwide issue.

Action: The City supports State and Federal actions, policies, and laws developed to create equality in the work place and lessen the gender wage gap.

Concentrations of Poverty:

A thorough review of racial segregation or integration requires census tract data on racial, ethnic, and economic data. The City of Bend should plan on reviewing the Census data in 2020 for concentrations of poverty, further segregation trends, and where integration is lacking.

When affordable housing is available in multiple neighborhoods of a community, then protected classes under the Fair Housing Act have greater housing options with access to opportunities, including healthy environments, strong schools, and employment. Most recent census data indicates that concentrations of poverty align with the HWY 97 and HWY 20 corridors. Children under 18 were estimated to be a significant portion of the population below poverty level within these tracts.

Action I: In partnership with FHCO and LASO Bend will provide affordable housing education and seminars to real estate professionals, informing them of the full range of available housing options for individuals with a restricted income. Bend's Community Development Department, Planning Commission and Affordable Housing Advisory Committee recently participated in fair housing training. Training topics included: historical discriminatory practices; inequitable consequences of discriminatory practices; federal and Oregon protected classes; disparate impact; and indicators of barriers to equitable housing.

Concentrations of Minority Populations:

The percentages of Hispanic or Latino populations in Bend's central census tracts indicate possible concentrations. These are areas where the Hispanic and Latino population are 50% greater than the proportion of the population citywide (one and a half times 8%). These numbers may reflect segregation circumstances if discrimination continues without housing market intervention in these core areas of Bend.

Additionally, middle school demographics indicate increases in the Hispanic populations for almost all the City of Bend census tracts, except for the Southern HWY 97 corridor. However, those demographic increases also indicate minority population are growing more quickly in central areas compared to West Bend, the more affluent area, and North Bend. Encouraging greater housing choice options for Hispanic populations in census tracts west of the Deschutes River and in the northern communities of Bend may be necessary to prevent further segregation to census tracts in the core of Bend.

Action I: Building upon the actions above, the city of Bend can continue to monitor data and collect data to understand the direction of poverty and minority concentrations within Bend.

Action II: Encourage and support the testing of sale and rental properties, to discern whether housing discriminatory practices are occurring, and if so to address them at an early stage. This is problematic with the limited inventory of housing available for both sale and rent in the community. However, FHCO will attempt to do such testing.

Transportation:

Although not a direct barrier to housing, the ability to access fair and equitable transportation has the potential to impact access to groceries, employment, medical care, and many other necessities. Housing in areas that do not have equitable transportation cannot be an option for vulnerable populations and have a discriminatory affect.

Action I: The City invested in a commitment to improving accessibility through Bend. The City has an Accessibility Manager. The City also provides a biannual ADA Transition Plan for Curb Ramps in the Public Rights-of-Way, the most recent draft for 2017-2019 is available on the City's website.

Action II: The City of Bend can ensure that communities with greater housing choices have access to public transportation systems and affordable commuting options.

Housing Affordability:

Data suggested that the populations that most need affordable housing are those in various protected classes, including disability, familial status, age, and race. Overall, the costs to own and rent a home have been increasing as a portion of income. Thus, affordability remains an impediment to fair housing in the City of Bend. These collective factors make it important to continue to ensure an adequate supply of homes that are affordable to all segments of the Bend population are available.

Action I: Bend continues to support programs that preserve and rehabilitate housing for low-income residents; provide financial and administrative support through administration of the City's Community Development Block Grant (CDBG) and the Affordable Housing Fee.

Action II: The City continues to identify, obtain, and leverage funding sources for the development of new housing for low-income residents.

Action III: Through CDBG, the Affordable Housing Fund, and other grant programs, the City continues to support partners in acquiring property for the development of housing affordable to low-income households.

Action IV: The City continues active involvement in development of affordable housing for low-income households through coordination with housing providers and advocacy groups and other implementation strategies associated with this goal.

Action V: The City implemented an exemption for all Systems Development Charges for Affordable Housing, reducing the cost of each unit by approximately \$20,000.

Available Supply of Residential Land:

The City of Bend expanded its Urban Growth Boundary in 2016. Infrastructure capacity will be the largest barrier to increasing the supply of residential land in Bend.

Action I: The City will continue to maintain the supply of land in each zoning district consistent with the General Plan and Supporting Documents.

Action II: Through zoning actions the City will encourage a mix of housing types and densities within proposed large residential or mixed use developments.

Action III: Through zoning actions the City will continue strategies to allow for infill and redevelopment at increased densities, with a focus on opportunity areas identified by the City through implementation strategies associated with this policy.

Action IV: Zoning and Development Code actions will continue to minimize or prohibit development of single-family detached units in multi-family or mixed use zones.

Loans in In High Minority Areas:

HMDA data indicates that lending activity is generally lower in areas with higher minority populations, including new loans, home improvement loans and refinance loans. The lower level of lending activity could be due to a number of factors, including fewer single family homes available, less of a need for loans, and fewer loans needed per dwelling unit in higher density multi-family zones. Conversely, the lower level of lending activity could be the result of discrimination and segregation. Although differing levels of lending activity are not extreme, the fact that a discrepancy exists warrants additional review, analysis, and potential action, as direct discrimination and segregation would be the most egregious acts and impediments to fair housing.

Action: Continue to monitor lending activity throughout the City to identify areas that are receiving a disproportionately lower level of investment.

Discrimination Complaints:

Although no federal complaints or actions were filed, data from the fair housing survey indicates source of income discrimination as the greatest fair housing violation within Bend. Nearly half of those surveyed indicated they did not take action to address the discrimination experienced.

The agencies that did address fair housing complaints or claims, FHCO, BOLI, and LASO, indicate the most significant number of incidents in Bend were related to disability.

Oregon's fair housing protections for survivors of domestic and sexual violence under ORS 90.449 were also raised for a Bend resident in a residential eviction action. These protections may be less known to the community and a key reason awareness and education should be maintained at a minimum.

Action: The City of Bend can increase community awareness of fair housing protections and resources.

NIMBYism

The Planning Commission and City Council deal with “not in-my-back-yard” (NIMBY) arguments on occasion, relating to everything from the location of bike trails to group homes for persons with mental disabilities or for persons experiencing homelessness. There is evidence of resistance to the integration of diverse types of housing into existing neighborhoods and areas in Bend, including homeless shelters and the siting of state run residential housing units. The difficulties that organizations and developers encounter when trying to site special needs housing facilities definitely has an impact on fair housing choice. A siting battle (or even the potential of a long and protracted battle) can influence the selection of a site and can even determine whether or not a housing project ever gets off the ground.

Action I: Continue to provide community resources that inform the public about the variety of housing opportunities to educate and expand the awareness of the issues that citizens face, and support local providers to initiate a community-wide program to help reduce public opposition to group living facilities.

Action II: Provide information on and support for enforcement of fair housing laws to help deter future efforts to block group homes, publicly assisted housing and other locally unwanted land uses.

Homeless Shelters:

Data from the one night homeless count indicate that a significant number of individuals and families go homeless each night. The lack of emergency services where an individual or family can secure temporary shelter is a barrier. The data indicates that is an inadequate supply of beds to meet the need.

Action I: Support programs that provide homeless shelters, transitional housing, and services to homeless individuals and families. Provide financial and administrative support through administration of the City’s Community Development Block Grant (CDBG) and the Affordable Housing Fee. The City of Bend’s investments resulted in additional beds at the homeless shelter, Bethlehem Inn.

Action II: Assist in identifying, obtaining and leveraging funding sources for the development of new emergency shelters and transitional housing for homeless families.

Action III: Assist in acquiring property for the development of emergency shelters and transitional housing for homeless individuals and families, using funds from the Affordable Housing Fund and other sources.

Action IV: Encourage the development of emergency shelters and transitional housing for homeless families and individuals through coordination with housing providers and advocacy groups and other implementation strategies associated with this goal.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Staff attempts to monitor all projects by means of project site visits and through project reports provided by the organizations whose projects are funded by the City's CDBG funds. Specifically, the City's Affordable Housing Manager and Coordinator programmatically review the records of all sub-recipients. This review includes analysis of goals, objectives, client files where appropriate, accuracy of reports and supporting documentation. Any deficiencies noted are reported to the organization in writing. The organization must remedy the deficiencies and provide documentation of the remedy to the Affordable Housing Manager and Coordinator in a timely manner. The City's Finance Department also reviews and monitors sub-recipients' fiscal compliance with applicable guidelines and regulations.

The City obtains and retains information on the number and categories of households served by HUD-assisted projects within its jurisdiction for inclusion in its annual performance report.

In order to monitor its own performance in meeting the goals and objectives outlined in the Consolidated Plan, the City regularly reviews the Plan and assesses the City's progress toward meeting these goals and objectives in the annual plan. The annual plan includes an extensive community process to allocate the CDBG funds awarded by the Federal government. In addition, in order to ensure the City's compliance with all CDBG program requirements, City staff will apply the same analysis to the City's use of funds and operation of the CDBG program as it does to the analysis of subrecipient files, including review of project files and records, assessment of compliance with federal requirements, and documentation of the City's performance in meeting program regulations.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Similar to the process of the Consolidated Plan and Annual Action Plan, public comment is encouraged for the CAPER, which is placed on line for public to review and assess. In addition a copy is sent to the Affordable Housing Advisory Committee and City Council for input.

No comments were received on the 2017 CAPER from any sources.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes have been necessary in the last several years. The goals of Bend's Consolidated Plan appear to be valid even in the hyper-charged housing market that is Bend.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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