1. **Publicly Supported Housing Analysis**
2. **Analysis**
3. **Publicly Supported Housing Demographics**
4. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

*Public housing and, to a lesser extent, the Housing Choice Voucher Program (HCVs) appear to serve a much more diverse group than Section 8 or Other Multifamily Assisted developments. Other Multifamily developments have 73% white residents and Section 8 residents are 66% white, compared to 49% of HCV residents and 46% of public housing residents. Black residents are most likely to be using public housing, where they make up 30% of residents, or HCVs, where they make up 36% of residents, then they are to use Section 8 or Other Multifamily (where they make up 19% and 14% of residents, respectively). Hispanic residents are most likely to live in public housing, where they make up 15% of residents compared to no more than 8% in any other category (Section 8 coming in second). Asian or Pacific Islander (API) residents are most likely to live in Other Multifamily housing, where they make up 8% of residents. They are proportionally least likely to live in public or Section 8 housing, where they make up 4% of residents compared to 7% of households at or below 50% AMI.*

1. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

 *Portland’s public housing demographics run roughly equal to those of the region, though Portland’s does have a significantly higher proportion of black residents (30% to 23%, respectively), partly reflecting Portland’s roughly doubled concentration of black households as a share of overall population compared to the region (11% of households at or below 50% AMI compared to 5%). Similar dynamics are at play in Section 8 housing, where 19% of Portland residents are black compared to 10% in the region, HCVs, where 36% of Portland residents are black compared to 20% in the region, and Other Multifamily, where 14% of Portland residents are black compared to 7% in the region.*

1. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

*Publicly supported housing residents are disproportionately likely to have disabilities relative to the general population. Less than 25% of Portland’s population is classified as having a disability, but people with disabilities make up 34% of public housing residents, 42% of Section 8 residents, 30% of Other Multifamily residents and 33% of HCV residents. Public housing and HCV residents are disproportionately likely to be black relative to general population demographics. Black households make up 6% of Portland’s population and 11% of households at or below 50% AMI, but make up 30% of public housing residents and 36% of HCV residents.*

1. **Publicly Supported Housing Location and Occupancy**
2. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

*The highest concentrations of Section 8 vouchers – 60% of which go to elders and people with disabilities - are in downtown Portland and in outer East Portland. LIHTC developments are concentrated primarily in downtown and inner North East. There are four small clusters of public housing developments: One, in North West Portland in the general vicinity of McCoy Park, includes the Cecelia, Haven, Woolsey and Trouton Limited Partnerships along with the Tamarack Apartments and houses around 400 households. A second, in the Central City area, includes the Jeffrey, Martha Washington, Williams Plaza, Medallion Apartments and Bud Clark Commons and houses around 350 households. A third, in inner Northeast Portland, includes Dahlke Manor, Eliot Square, Maple Mallory, Humboldt Gardens and Bel Park and houses around 300 households. A fourth, in outer Southeast Portland near Powell Butte, includes Floresta, Powellhurst, Harold Lee Village, Hunters Run, Townhouse Terrace and Demar Downs and houses around 120 households. There are also several Other Multifamily developments around Powell Butte (including the Woodland Heights Retirement Community and the Firgrove Apartments, housing about 90 households). There is a small cluster of Other Multifamily developments in South West Portland near Gabriel Park, including Kehillah Housing, Fanno Creek, the Hopewell Apartments and Tryon Mews, which houses around 70 households. Beyond these clusters, there are multiple public housing and Other Multifamily developments spread throughout the city. There are currently no R/ECAPs within the Portland city limits.*

1. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

*Housing developments which primarily serve elders or people with disabilities are spread throughout the city, though they are far more likely to be in North Portland than in South Portland - 9 out of a total of 13 listed by Home Forward are in North, Northwest or Northeast Portland. Housing developments which primarily serve households with children are spread evenly throughout the city. Such developments include Lexington Court in Southeast Portland, Slavin Court and Stephens Creek Crossing in Southwest Portland, Carlton Court and Dekum Court in Northeast Portland, Cathedral Gardens in Northwest Portland, and the Jeffrey in the Central City area.*

1. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

*There are currently no R/ECAPs within the Portland city limits.*

1. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, then other developments of the same category for the jurisdiction? Describe how these developments differ.

*Several public housing developments of at least 50 units have disproportionately low percentages of black or Hispanic residents compared to overall public housing demographics. Only 3% of Dalhke Manor residents, 4% of Holgate House residents and 4% of Medallion Apartments residents are Hispanic. Only 10% of Bud Clark Commons and Peaceful Villa residents are black. However, this may be explained by low presence of communities of color in these neighborhoods relative to the rest of the city. Holgate House is in Woodstock, where 6% of neighborhood residents are Hispanic. Peaceful Villa is in the Belmont/Hawthorne/Division area, where 1% of neighborhood residents are black. Dahlke Manor, Williams Plaza and Bud Clark Commons are in the Central City area, where 7% of neighborhood residents are Hispanic and 5% are black.*

*Black residents are disproportionately clustered relative to overall public housing demographics and neighborhood demographics in multiple developments of at least 50 units, including Cecilia Limited Partnership and Humboldt Gardens. 60% of Cecilia Limited Partnership residents are black, in a neighborhood (St. John’s) where 8% of residents are black overall. 65% of Humboldt Gardens residents are black, in a neighborhood (the Interstate Corridor area) where 21% of residents are black overall. These statistical outliers could be explained by the specific histories of these neighborhoods – both are historic centers of Portland’s black community which have become significantly more diverse in recent years, while the residents of these buildings have stayed relatively constant.*

 (B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

*Several Section 8 or Other Multifamily housing developments of at least 50 units have disproportionately low percentages of specific communities of color relative to overall Section 8 demographics. For example, only 3% of residents at Westmoreland’s Union Manor are black. However, this may be explained by low representation of communities of color in these neighborhoods generally. Westmoreland’s Union Manor is in the Sellwood/Moreland/Brooklyn area, where only 0.6% of neighborhood residents are black. Neighborhood demographics do not explain underrepresentation of API residents at the Woodland Heights Retirement Co (where 2% of residents are API) around 122nd and Division (where 13% of residents are API), or of Hispanic residents at the Summer Run Apartments (where 0% of residents are Hispanic) in the Lents area (where 12% of residents are Hispanic). However, given that these developments specifically serve elders, these trends may simply reflect the relatively recent growth of the API and Hispanic communities in these neighborhoods.*

*Residents from specific communities of color are disproportionately clustered relative to overall Section 8 and Other Multifamily demographics as well as neighborhood demographics in several developments of at least 50 units. 62% of Alberta Simmons Plaza residents are black in a neighborhood (the Interstate Corridor) where 21% of residents are black. This may be explained by recent demographic changes in the Interstate Corridor (see above). This is less easy to explain in other cases. 76% of M Carter Plaza residents are black, in a neighborhood (the Central City area) where 5% of residents are black. 69%-77% of Kirkland Union Manor residents are API, in a neighborhood (Montavilla) where 11% of residents are API.*

1. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

*Deeper analysis of public housing developments with over 50 units where there is significant divergence between building and neighborhood demographics reveals a common pattern. These projects tend to have disproportionately low populations of API residents relative to the surrounding neighborhood, but the same is often true for white residents. While proportionality varies for Hispanic residents, black residents often make up a disproportionate share of public housing residents relative to their share of the neighborhood population. This trend likely reflects severe racial disparities in the demographics of poverty, as well as significant geographic segregation by race in many neighborhoods of Portland.*

*This trend repeats in deeper analysis of Section 8 housing developments with over 50 units where there is significant divergence between building and neighborhood demographics, but with a significant difference. A considerable number of Section 8 developments have significantly higher concentrations of API residents than the surrounding neighborhood, although a few others have a disproportionately low share of API residents relative to neighborhood demographics. It is worth noting that large Section 8 developments such as the Summer Run Apartments and the Kirkland Union Manor are recorded as having 0% Hispanic residents, despite being in neighborhoods with significant Hispanic populations. The Summer Run Apartments are in the Lents-Foster area, where 12% of residents are Hispanic. The Kirkland Union Manor is in the Montavilla area, where 7% of residents are Hispanic. However, as noted above, both developments primarily serve seniors in areas where Hispanic population growth is relatively recent.*

*Among Other Multifamily developments, the Alberta Simmons Plaza, where 62% of residents are black, is in the Interstate Corridor, a neighborhood where 21% of residents are black. Such demographics are not surprising given the trends noted above. More surprising are the demographics of the Woodland Heights Retirement Co development. 2% of Woodland Heights Retirement Co residents are API. The project is in the 122nd/Division area, where 13% of residents are API. 95% of its residents are white, in a neighborhood where 66% of residents are white. As noted above, since the development primarily serves elders this may reflect the relatively recent growth of the neighborhood’s Asian community.*

1. **Disparities in Access to Opportunity**
2. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

*Significant concentrations of Section 8 vouchers, HCVs, LIHTC developments and public housing developments, including developments which primarily serve elders and people with disabilities, are in the Central City area. The Central City area has some of Portland’s highest Neighborhood Opportunity Scores, which indicates a high number of job opportunities reachable in 30 minutes without a car. Several concentrations of publicly supported housing, particularly LIHTC developments and including a significant amount of housing which primarily serves households with children, elders and people with disabilities, is in high-Opportunity Score sections of North East Portland. The cluster of Other Multifamily developments near Gabriel Park is in a high-Opportunity Score area as well.*

*However, not all publicly supported housing has equal opportunity access. The clusters of public housing, Section 8 and Other Multifamily developments in the vicinities of McCoy Park and Powell Butte sit in low-opportunity score areas. These developments include several which primarily serve households with children (including Cecilia Limited Partnership, Haven Limited Partnership, Woolsey Limited Partnership, Trouton Limited Partnership, Townhouse Terrace, Scott Crest Plaza and Floresta) or people with disabilities (including Floresta, Demar Downs, Hunter’s Run and Townhouse Terrace). HCVs, whose users are highly concentrated in outer East Portland, may often be in areas with low opportunity scores as well.*

1. **Additional Information**
2. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

*Much of our data comes from Home Forward, Multnomah County’s housing authority, whose data on publicly supported housing demographics are more detailed and more up to date than HUD data for certain metrics. Home Forward serves all of Multnomah County, but since much of its housing is within or closely bordering the Portland city limits we consider its data a mostly accurate measure of Portland demographics.*

*It is important to recognize the role of racial discrimination and segregation in shaping Portland’s demographics. The original Oregon Constitution forbade black visitors from remaining in the state after nightfall, and the region has a long history of white supremacist violence. The most infamous chapter of this history occurred during the 1920s, when Portland had one of the nation’s largest and most politically powerful KKK branches. Decades of discrimination, segregation and redlining steered white residents into areas such as Southwest and Southeast Portland, while black residents were forcibly steered into Northwest and inner Northeast Portland. Chronic disinvestment from the city kept historically black neighborhoods in relative poverty for decades. Around the turn of the century, accelerating development and gentrification began creating new demographic trends. Many historically black neighborhoods near the Central City area have become increasingly diverse – meaning, in this case, that they have growing numbers of newer white residents – while communities of color have increasingly moved or been economically displaced outwards towards areas of East Portland which were unincorporated until the 1990s. API and Hispanic communities in East Portland have seen sizable growth over the past few decades. Because of its relatively recent incorporation, East Portland is relatively underserved in terms of infrastructure, transit and public investment relative to areas closer to the Central City. These demographic trends create serious concerns regarding equitable access to opportunity.*

1. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

*Home Forward has implemented multiple programs to focus public housing support on communities with the most need. These include tenant-based voucher set-aside policies designed to help residents find housing close to supportive services and a new Local Project-Based Voucher Program which centers people with disabilities, people with extremely low incomes and backgrounds which create barriers to finding housing. Home Forward’s innovative Moving to Work Plan, updated annually with HUD authorization since 1998, helps create opportunities for residents by offering incentives, training and support services for heads of households who are working or seeking work.*

*In response to a severe undersupply of affordable housing, the Portland City Council declared a Housing State of Emergency in 2015. Portland subsequently passed its first ever Housing Bond, and the Portland Housing Bureau currently has about 2,400 new affordable rental units on track to be available by the end of 2021. The Portland Housing Bureau has numerous programs which help communities with the most need find housing. Publicly supported housing in the Interstate Corridor Urban Renewal Area, which has a history of displacement of historic communities including protected classes, now follows a Preference Policy which prioritizes current and former community residents for city-supported housing. Numerous homeownership programs exist to help low-income community members buy their own homes. The Portland Housing Bureau works with culturally specific community partners to ensure that these programs, which include the federal Mortgage Credit Certificate and the city-funded Down Payment Assistance Loan, are accessible for communities of color.*

1. **Contributing Factorsof Publicly Supported Housing Location and Occupancy**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

* Admissions and occupancy policies and procedures, including preferences in publicly supported housing

*Overly strict screening criteria may create housing barriers for otherwise qualified applicants whose backgrounds include unfavorable rental, criminal or financial histories caused by extenuating circumstances. Such barriers disproportionately impact applicants of color. In designing screening criteria for affordable developments created by the ongoing Housing Bond, the Portland Housing Bureau is working with community partners to ensure our practices remove barriers, advance racial equity, and reflect local and national best practices.*

* Community opposition

*New affordable housing construction faces significant opposition from certain neighborhood groups which oppose rapid development and seek to preserve the historic character of single-family residential neighborhoods. Such opposition often slows down affordable housing development, making it difficult to meet stated targets on deadline. Portland’s Bureau of Planning and Sustainability is working on a major set of zoning code changes, including the Residential Infill Project and the Better Housing by Design code amendments, which seek to incentivize small-scale affordable housing development while preserving neighborhood character. Both Multnomah County and the City of Portland offer tax incentives for property owners who construct Accessory Dwelling Units on their properties, creating further opportunities for small-scale affordable housing development.*

* Displacement of residents due to economic pressures

*Economic displacement is one of Portland’s most urgent issues. The city was named the fastest-gentrifying in the US in a 2015 analysis by Governing magazine. A 2013 study carried out by Dr. Lisa Bates for the Bureau of Planning and Sustainability found that large areas of inner Northeast Portland are experiencing rapid gentrification, and that communities in much of Outer East Portland and parts of North West Portland are highly vulnerable to displacement. These communities already have significant concentrations of publicly supported housing. However, these remain insufficient to keep up with existing and anticipated need.*

* Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

*Compared to most states, Oregon has relatively strong laws protecting survivors of domestic violence, sexual assault and stalking from housing discrimination. However, enforcement of these laws is difficult. This form of discrimination may often occur for seemingly legal actions – for example, rejecting an applicant based on a past criminal conviction or series of noise complaints which the agent does not realize were related to the applicant resisting domestic violence. Additionally, survivors may not be aware of their rights or feel comfortable discussing past traumas with strangers. The City of Portland is working to establish screening criteria for city-supported housing which removes these barriers through better informing applicants of their rights and through routinely considering extenuating circumstances if an applicant fails to qualify for housing based on past criminal, rental or credit history.*

* Impediments to mobility

*As discussed above, significant clusters of publicly supported housing in Northwest and Southeast Portland, including housing developments which specifically serve elders or families with children, are in areas with low transit access relative to other parts of the city. Lack of transit access creates severe mobility impediments for low-income individuals and families, who are less likely to drive. These impediments are especially acute for families and elders, who often depend on public transportation.*

* Lack of access to opportunity due to high housing costs

*Affordability issues create serious barriers for low or moderate-income community members seeking housing. Local analyses indicate that annual rent increases in Portland metro area have routinely been among the highest in the US for several years running. Over half of renter households in Portland are housing cost-burdened, and the Portland Housing Bureau’s 2016 State of Housing Report found zero neighborhoods over the entire city in which the average two-bedroom rental unit is affordable for the average single mother, black household, or Latino or Native American household. Demographic trends show these communities are increasingly moving outside the Portland city limits.*

* Lack of meaningful language access

*While both Home Forward and the Portland Housing Bureau work in tandem with translation services and culturally-specific community partners to reduce housing barriers for non-English speakers, language barriers remain an equity issue. ESL community members who do not receive outreach and support in their native language are less likely to be aware of housing support services, have more difficulty taking advantage of these services once they find out about them, and face higher barriers to finding employment even when they have stable housing.*

* Lack of local or regional cooperation

*The City of Portland engages in highly productive cooperative efforts with regional partners including neighboring cities and county, Metro, state and federal government agencies. This report is one such example. However, cooperation is not perfect. Different jurisdictions have taken divergent paths in recent years with regards to new publicly supported housing funding and renters’ rights legislation. A perceived lack of regional coordination led a broad coalition of culturally specific groups to issue a collective letter to the Portland city government last year demanding better coordination with regional partners on renters’ rights policies.*

* Lack of private investment in specific neighborhoods

*Large areas of East Portland suffer from a history of chronic public and private disinvestment, partly related to their relatively recent incorporation. Neighborhood Opportunity scores east of I-205 are dramatically lower than those west of it. Similar “opportunity deserts” remain present in certain areas closer to inner Southeast Portland, including the Lents and Brentwood-Darlington neighborhoods, and certain parts of Northwest Portland, particularly the St. John’s neighborhood.*

* Lack of public investment in specific neighborhoods, including services and amenities

*Large areas of East Portland suffer from a history of chronic public and private disinvestment, partly related to their relatively recent incorporation. Neighborhood Opportunity scores east of I-205 are dramatically lower than those west of it. Similar “opportunity deserts” remain present in certain areas closer to inner Southeast Portland, including the Lents and Brentwood-Darlington neighborhoods, and certain parts of Northwest Portland, particularly the St. John’s neighborhood.*

* Land use and zoning laws

*Portland has large areas that are zoned primarily for single-family housing, including several neighborhoods in inner Southeast Portland with National Historic District status. Restrictions on large developments in single-family areas limit options for siting and placement of new publicly supported housing developments. The Bureau of Planning and Sustainability is currently working on zoning code changes designed to help mitigate some of these barriers by incentivizing small-scale affordable housing development, including the Residential Infill Project and the Better Housing by Design code amendments. Limits on building height in the Central City area create further barriers to new affordable housing construction, an issue that is currently the topic of intense community debate between residents seeking increased development and residents seeking to conserve views and historic neighborhood character.*

* Loss of Affordable Housing

*Thanks to funds created after the declaration of Portland’s Housing State of Emergency and the passage of the Portland Housing Bond, the Portland Housing Bureau’s affordable housing portfolio is projected to expand by about 2,400 units by 2021. However, the city’s supply of “naturally occurring” affordable housing (NOAH) – unregulated low-cost housing unconnected to public housing subsidies or portfolios – is rapidly shrinking. A recent report from Drs. Lisa Bates and Seyoung Sung on behalf of the Southwest Corridor Equity and Housing Advisory Group estimated that over 68,000 NOAH units have been sold in the Portland metro area since 2006, with over 20% of these sales occurring since 2015. Many have already been converted into higher-cost housing, reducing housing opportunities for low-income renters.*

* Occupancy codes and restrictions

*Large sections of Portland are zoned primarily for single-family residences, making housing supply relatively inelastic in relation to growing demand. The Bureau of Planning and Sustainability is currently working on zoning code changes designed to help mitigate issue by incentivizing small-scale affordable housing development in single-family or small multifamily residential zones, including the Residential Infill Project and the Better Housing by Design code amendments.*

* Quality of affordable housing information programs

*Both Home Forward and the City of Portland partner with culturally and linguistically specific community groups to spread information about affordable housing programs to the most at-risk communities. However, language barriers and funding limits complicate efforts to spread information as widely and effectively as is needed. A far more pressing issue is that affordable housing programs cannot keep up even with the current level of qualified applicants – wait lists for publicly supported housing of all varieties continue to grow throughout Portland, prompting the City Council to declare a Housing State of Emergency in 2015 to unlock more funding for publicly supported housing.*

* Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

*In developing siting selection policies for the Portland Housing Bond, the Portland Housing Bureau worked with stakeholders and community partners to decide between two options: Intentionally site Bond-funded developments in areas where land is most cheap - enabling the city to construct more affordable units overall, but also deepening geographic income segregation - or intentionally site developments in low-affordability areas where land is most expensive – meaning the Bond funds would create fewer new units overall, but that these units would be located primarily in high-opportunity areas where affordable housing is in the shortest supply. After extensive community consultation, the Bond Oversight Committee approved a policy framework prioritizing locations with little to no existing affordable housing resources, high risk of gentrification and displacement, and nearby access to community services and amenities.*

* Source of income discrimination

*Source of income discrimination is illegal in the State of Oregon. However, it remains one of the most commonly broken Fair Housing laws. This creates a barrier to housing access for applicants who depend on Section 8 or HCVs. The City of Portland partners with groups such as the Community Alliance of Tenants, Legal Aid Services of Oregon and the Fair Housing Council of Oregon to educate renters about their rights and help prevent housing discrimination.*

* Other

*As discussed above, Portland’s history of racial violence, segregation and redlining – along with its accelerating dynamic of gentrification and economic displacement – has created serious issues with racial and ethnic geographic segregation. Systemic racism continues to deepen geographic segregation in ways that create major barriers to housing access and opportunity for low-SES communities of color and low-SES immigrant communities.*