



September 11, 2018

City of Happy Valley Planning Commission  
16000 SE Misty Drive  
Happy Valley, OR 97086

**Re: LOCAL FILE NO: CPA-04-18/LDC-04-18/ERP-10-18/VAR-03-18**

Dear Commissioners:

This letter is submitted jointly by Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO). Both HLA and FHCO are non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. FHCO's interests relate to a jurisdiction's obligation to affirmatively further fair housing. Please include these comments in the record for the above-referenced proposed amendment.

As you may know, all amendments to the Comprehensive Plan Map and Zoning map must comply with the Statewide Planning Goals. ORS 197.175(2)(a). When a decision is made affecting the residential land supply, the City must refer to its Housing Needs Analysis (HNA) and Buildable Land Inventory (BLI) to show that an adequate number of needed housing units (both housing type and affordability level) will be supported by the residential land supply after enactment of the proposed change.

Even under the Metropolitan Housing Rule to comply with the housing mix and density standard under OAR 660-007-0030 and -0035, the City has fallen short. The fact the new designation "allows" residential uses, while the current zone "requires" such uses does not mean there are no Goal 10 impacts. As HLA and FHCO have said previously to Happy Valley, why make Goal 10 findings so complicated and go to such lengths to avoid transparency in planning? Why not take a reasonable, fact-based approach and provide an analysis of the zone change against the City's HNA and BLI? Because the zone change will broaden the allowed uses in a currently residential area, the City cannot support its statement that the availability of residential land will remain



unchanged without a fact-based Goal 10 finding, instead of broad, unsupported conclusions that the buildable land inventory will remain the same.

Moreover, as Metro moves towards an urban growth boundary expansion in Clackamas County, it remains unclear how Metro will be able to meet its own equity standards when it allows this death by 1,000 cuts in the most exclusive member city – Happy Valley. See Attached Letter re Eagle Air Estates, particularly Exhibits A and B. These decisions in Happy Valley are exclusionary and drive the fair share of affordable housing, and by proxy housing for protected classes, to other portions of the County.

In this case, it is especially important to demonstrate that the *unintended* effects do not leave the City with less than adequate residential land supplies in the types, locations, and affordability ranges affected. See *Mulford v. Town of Lakeview*, 36 Or LUBA 715, 731 (1999) (rezoning residential land for industrial uses); *Gresham v. Fairview*, 3 Or LUBA 219 (same); see also, *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370, 422 (2002) (subjecting Goal 10 inventories to tree and waterway protection zones of indefinite quantities and locations). Only with a complete analysis showing any gain in needed housing as compared to the BLI can housing advocates and planners understand whether the City is achieving its goals through code amendments.

As such, HLA and FHCO urge the Commission to defer adoption of the proposed amendment until Goal 10 findings include reference to the Buildable Land Inventory. Thank you for your consideration. Please provide written notice of your decision to, FHCO, c/o Louise Dix, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, Suite 1850, Portland, OR 97204. Please feel free to email Louise Dix at [ldix@fhco.org](mailto:ldix@fhco.org).

Thank you for your consideration.

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*Louise Dix*

Louise Dix  
AFFH Specialist  
Fair Housing Council of Oregon

*Jennifer Bragar*

Jennifer Bragar  
President  
Housing Land Advocates

cc: Kevin Young ([kevin.young@state.or.us](mailto:kevin.young@state.or.us))  
Metro Councilors (by e-mail)

City of Happy Valley  
Planning Commission  
16000 SE Misty Drive  
Happy Valley, OR 97086

January 19, 2016

**RE: "EAGLES LOFT ESTATES"  
COMPREHENSIVE PLAN MAP/ZONING MAP AMENDMENT (CPA-14-15/LDC-15-15); 31-LOT SUBDIVISION (SUB-03-15); AND VARIANCE (VAR-08-15)**

Dear Planning Commissioners:

This letter is jointly submitted by the Fair Housing Council of Oregon (FHCO) and Housing Land Advocates (HLA). Both FHCO and HLA are Oregon non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians.

For the reasons set forth below, we request that the proposed comprehensive plan and zoning amendments be denied, together with the subdivision and variance applications that depend on those amendments.

**1. The proposed amendments do not comply with Oregon's Needed Housing Statutes, with Oregon's Statewide Housing Goal (Goal 10) and Planning Goal (Goal 2), or with LCDC's interpretive rules.**

ORS 197.307(6) provides that local governments cannot adopt standards that have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay.

ORS 197.303(3) provides that, when a need has been shown for housing of particular ranges and rent levels, such needed housing shall be permitted in one or more zoning districts or in zones described by some comprehensive plans as overlay zones with sufficient buildable land to satisfy that need.

The record lacks evidence sufficient to enable the city to determine, among other things, the city's current state of compliance or noncompliance with these statutes, such as the city's housing needs, the relevant buildable lands inventories, how the current designation addresses existing and projected needs, the city's fair share of regional housing needs and supplies, and other information necessary to establish that the proposed amendments will not have the effects proscribed by ORS 197.307(6) and that city will either remain in compliance or not slip further out of compliance as a result of the proposed amendments and variances.

The City's decision does not comply with Goal 10 requirements that land use regulations related to housing must be based on an inventory of buildable lands. Goal 10 requires the city:



“To provide for the housing needs of citizens of the state. Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.”

Goal 10 requires local governments to inventory their buildable land, identify needed housing, and designate and zone enough buildable land to satisfy the identified housing need. *Burk v. Umatilla County*, 20 Or LUBA 54 (1990). See also, *McIntyre-Cooper Co. v. Board of Comm. Washington County*, 2 Or LUBA 126, 129 (1980), *aff'd*, 55 Or App 78, *rev den*, 292 Or 589 (1981). The burden of proving that housing needs are met by the land use regulation rests with the City. *Gann v. City of Portland*, 12 Or LUBA 1, 4 (1984).

When a city with an acknowledged comprehensive plan and implementing ordinances amends its implementing ordinances to downzone or impose other substantial restrictions on lands within its acknowledged Goal 10 land supplies, the city must demonstrate that its actions do not leave it with less than adequate supplies in the types, locations, and affordability ranges affected. *Opus Development v. City of Eugene*, 28 Or LUBA 670 (1995) (*Opus I*); 30 Or LUBA 360, 373 (1996) (*Opus II*), *aff'd* 141 Or App 249, 918 P2d 116 (1996) (*Opus III*); *Volny v. City of Bend*, 37 Or LUBA at 510-11; *Mulford v. Town of Lakeview*, 36 Or LUBA 715, 731 (1999) (rezoning residential land for industrial uses); *Gresham v. Fairview*, 3 Or LUBA 219 (same); *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370, 422 (2002) (subjecting Goal 10 inventories to tree and waterway protection zones of indefinite quantities and locations).

Further, OAR 660-008-0010 provides LCDC's interpretation of Goal 10 Housing specific to Portland Metro and its planning jurisdictions:

“The mix and density of needed housing is determined in the housing needs projection. Sufficient buildable land shall be designated on the comprehensive plan map to satisfy housing needs by type and density range as determined in the housing needs projection. The local buildable lands inventory must document the amount of buildable land in each residential plan designation.”

LCDC's generally-applicable housing interpretive rule defines “housing needs projection” as:

“[a] local determination, justified in the plan, as to the housing types, amounts and densities that will be: (a) Commensurate with the financial capabilities of present and future area residents of all income levels during the planning period; (b) consistent with OAR 660-007-0010 through 660-007-0037 and any other adopted regional housing standards; and (c) consistent with Goal 14 requirements for the efficient provision of public facilities and services, and efficiency of land use.”  
OAR 660-007-0005(5)

OAR 660-007-0005(6) defines "Multiple Family Housing" as "attached housing where each dwelling unit is not located on a separate lot."

OAR 660-007-0005(7) defines "Needed Housing" as follows:

"'Needed Housing' means housing types determined to meet the need shown for housing within an urban growth boundary at particular price ranges and rent levels, including at least the following housing types:

(a) Attached and detached single-family housing and multiple family housing for both owner and renter occupancy; . . .'

Nowhere in the record is there any evidence concerning or reasoned analysis of these statutes, goals, and rules, of Happy Valley or Portland Metro's buildable land inventories, housing needs projections, fair share allocations, housing and coordination policies, or of their application to these proposed amendments and entitlements.

Such analysis and evidentiary support is essential. In one of its earliest affordable housing opinions, *Kneebone v. Ashland*, 3 LCDC 131 (1979), the LCDC remanded a City of Ashland ordinance downzoning needed residential lands because the city's record failed to demonstrate that the downzoning would not reduce Ashland's supply of lands for needed housing in violation of the statewide housing goal. In its opinion, LCDC reminded Oregon's local governments that

"Planning decisions must meet the standards set by the goals. Insofar as compliance depends upon specific, ascertainable fact, compliance must be shown by substantial evidence in the record. Insofar as compliance depends upon value judgments and policy, compliance must be shown by a coherent and defensible statement of reasons relating the policies stated or implied in the goals to the policies of the planning jurisdiction." 3 LCDC at 124

LCDC's Metro Housing Rule, at OAR 660-008-0060, provides as follows:

"(2) For plan and land use regulation amendments which are subject to OAR 660, Division 18 [Post-Acknowledgment Plan and Zoning Amendments, or PAPAs], the local jurisdiction shall either:

(a) Demonstrate through findings that the mix and density standards in this Division are met by the amendment; or

(b) Make a commitment through the findings associated with the amendment that the jurisdiction will comply with provisions of this Division for mix or density through subsequent plan amendments."

The city has not made, and almost certainly cannot make, either the demonstration called for in subsection (a) or the commitment called for in subsection (b), both of which would require a

showing of surpluses in supplies over projected needs, supported by the kind of reasoned analysis and evidentiary support that LCDC required in *Kneebone*. Given the current shortage of buildable, available, affordable lands planned and zoned for multi-family housing in Happy Valley, its sub-region, and Portland Metro as a whole, FHCO and HLA do not believe that the requisite demonstrations can be made at this time or in the foreseeable future.

**2. The proposed amendments do not comply with the intergovernmental coordination requirements of LCDC's statewide Goals 2 (Land Use Planning) and 10 (Housing) because the city failed to coordinate its actions with all other affected governmental units.**

There is no evidence in the record of this proceeding that the Oregon Department of Land Conservation and Development, Portland Metro, as regional coordinator, or other nearby jurisdictions such as Gresham, Portland, Clackamas County, and Oregon City, have agreed to increase their share of comparably planned, zoned, serviced, and located land or that Happy Valley has made any efforts to coordinate with them concerning their ability and willingness to accommodate the reallocation of housing need effected by the proposed amendments. See *Creswell Court v. City of Creswell*, 35 Or LUBA 234 (1998); *1,000 Friends of Oregon v. North Plains*, 27 Or LUBA 371, *aff'd* 130 Or App 406, 991 P2d 1130 (1994).

**3. The proposed amendments and variances are inconsistent with the City of Happy Valley's Comprehensive Plan.**

Applicable Happy Valley Comprehensive Plan Policies that are not addressed adequately or at all to date include the following:

**Policy 8:** To assume proportionate responsibility for development within the City of Happy Valley consistent with projected population for the City.

**Policy 42:** To increase the supply of housing to allow for population growth and to provide for the housing needs of a variety of citizens of Happy Valley.

**Policy 43:** To develop housing in areas that reinforce and facilitate orderly and compatible community development.

**Policy 44:** To provide a variety of lot sizes, a diversity of housing types including single family attached (townhouses) duplexes, senior housing and multiple family and range of prices to attract a variety of household sizes and incomes to Happy Valley.

**Policy 45:** The City shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels that are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.

**Policy 46:** The City shall provide a range of housing that includes land use districts that allow senior housing, assisted living and a range of multi-family housing products. This

range improves housing choice for the elderly, young professionals, single households, families with children, and other household types.

Before the city can approve the amendments and the related subdivision and variance entitlements, you must be able to find that the applicant has proven by a preponderance of the evidence that all of the above policies have been satisfied. HLA simply does not believe this is possible given the current state of affordable housing need and supply in Happy Valley, its sub-region of Portland Metro, and Portland Metro as a whole.

**4. The proposed amendments and variances are inconsistent with Metro's Functional Plan.**

The applicant has not demonstrated compliance with Title I of the Metro Urban Growth Management Functional Plan, which requires each city to maintain or increase its housing capacity. FHCO and HLA do not believe that the applicant can meet this requirement because the requested zone change would reduce the city's housing capacity with respect to scarce needed housing types, densities, location, and affordability ranges.

**5. The proposed amendments risk violation of federal fair housing requirements.**

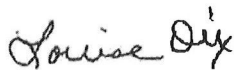
HLA believes that any action by the City that results in a reduction in housing diversity and affordability could violate the city's obligation to affirmatively further fair housing under the Federal fair Housing Act, 42 U.S.C. §§ 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), 1437C-1(d)(16).

The Fair Housing Act (the Act) declares that it is "the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States." It does so by prohibiting discrimination in the sale, rental, and financing of dwellings, and in other real estate-related transactions because of race, color, religion, sex, familial status, national origin, or disability. In addition, the Fair Housing Act requires that HUD administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies of the Act.

Courts have examined the legislative history of the Fair Housing Act and related statutes. They have found that the purpose of the affirmatively furthering fair housing mandate is to ensure that recipients of Federal housing and urban development funds do more than simply not discriminate: recipients also must address segregation and related barriers for groups with characteristics protected by the Act, including segregation and related barriers in racially or ethnically concentrated areas of poverty. In the 1972 Supreme Court case, *Traffigante v. Metropolitan Life Insurance Company*, 409 U.S. 205, 211 (1972), the Court quoted the Act's co-sponsor, Senator Walter F. Mondale, in noting that the Fair Housing Act was enacted by Congress to replace the racially or ethnically concentrated areas that were once called "ghettos" with "truly integrated and balanced living patterns." In 2015, in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 576 U.S. \_\_\_\_ (2015), the Supreme Court again acknowledged the Fair Housing Act's continuing role in moving the Nation toward a more integrated society, holding that disparate impacts on protected classes, whether intended or not, can result in violations of the Act.

High concentrations of wealth appear to be a proxy for exclusionary zoning practices in Happy Valley. As reported on June 23, 2015, in the Oregonian, Happy Valley is the "richest town" in Oregon. See Exhibit A attached here. This raises concerns about the city's ability to comply with the Act. The Clackamas County Consolidated Plan ("Con Plan" available at [http://www.clackamas.us/communitydevelopment/documents/conplan\\_final.pdf](http://www.clackamas.us/communitydevelopment/documents/conplan_final.pdf) - pages referred to below are attached as Exhibit B) shows that Happy Valley's population growth between 2000-2010 was 208%, and in 2010, 76% of the population was white. See Con. Plan p. 26 and 31. Poverty has increased in the County by 10.4% between 2000 and 2010 and nearly half of female householders with young children under 5 (a protected class) lived in poverty. *Id.* at 53. Notwithstanding this crisis, Happy Valley's housing supply consists almost exclusively of single family units. *Id.* at 55. Downzoning the subject property will continue the trend of ignoring the need for affordable housing in areas of opportunity, such as Happy Valley.

Thank you for your consideration. Please provide written notice of your decision, to FHCO and HLA, c/o Louise Dix, at 1221 SW Yamhill Street, Portland, OR 97205.



Louise Dix  
Fair Housing Council of Oregon



Jennifer Bragar, President  
Housing Land Advocates



## 'Richest town in Oregon' may surprise you



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on June 23, 2015 at 10:41 AM, updated June 23, 2015 at 12:15 PM

The website 24/7 Wall St. recently pored through Census data to come up with a list of the richest towns in each state. For their list, the site's editors stuck to only incorporated towns with 25,000 or fewer residents. (Sorry, Lake Oswego and West Linn.)

Even so, **the town at the top** [\[http://247wallst.com/special-report/2015/06/17/the-richest-town-in-each-state/9/\]](http://247wallst.com/special-report/2015/06/17/the-richest-town-in-each-state/9/) will likely surprise a lot of people. Happy Valley has more often been in the news for its unprecedented over-development just before the Great Recession, and subsequent real estate collapse. Images of empty subdivisions are rooted in many Oregonians' minds when it comes to Happy Valley.

But 24/7 Wall St. found Happy Valley's median income of \$92,773 to be tops in Oregon. **At the other end of the spectrum: Prineville** [\[http://247wallst.com/special-report/2015/06/05/the-poorest-town-in-each-state/9/\]](http://247wallst.com/special-report/2015/06/05/the-poorest-town-in-each-state/9/), long one of the areas with the highest unemployment in the state, and a median income of \$29,959.

The gap between richest small town and poorest small town puts Oregon about in the middle of the pack nationally, the website said.

-- The Oregonian/Oregonlive.com

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# **2012-2016 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT**

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**CLACKAMAS COUNTY  
COMMUNITY DEVELOPMENT DIVISION**

Health, Housing  
& Human Services   
**CLACKAMAS COUNTY**

**April 2012**

**EXHIBIT B**

A few examples illustrate the rich history of the County and its cities. Canby, in its early days, boasted an abundant crop of wild strawberries. Early settlers grew apples to ship to gold miners in California. Canby remains a rich agricultural area today. Speculation in real estate in the late 1800s in Gladstone, followed by an auditorium seating 3,000 people in 1895 brought people from all around for "concerts, ball games and sermons by evangelists such as John Phillip Sousa, Billy Sunday and William Jennings Bryant."<sup>2</sup>

Oregon City is the oldest city, as mentioned above, and is located at the end of the Oregon Trail. Before that settlement though, the area had been a focal point for fishing and trade among Native Americans. Early fur traders were gradually replaced by more permanent settlers, including missionaries in the 1830s and steamboat transportation in the 1850s which fostered transportation of agricultural and timber products spurred by the needs of the gold rush in California. Population and industry in the County continued to grow and diversify. Wilsonville is a relatively new city in the County and is home to several modern corporate headquarters.

## POPULATION

### Population Growth

Table 1: Clackamas County Population 1990-2010\*

Location	1990	2000	2010	Change 2000-2010
Oregon	2,842,321	3,421,399	3,831,074	12%
Clackamas County	278,850	338,391	375,992	11%
Barlow	118	140	135	-4%
Canby	8,990	12,790	15,829	24%
Damascus			10,539	n/a
Estacada	2,016	2,371	2,695	14%
Gladstone	10,152	11,438	11,497	1%
Happy Valley	1,519	4,519	13,903	208%
Johnson City	586	634	566	-11%
Lake Oswego**		35,278	36,619	4%
Milwaukie	18,670	20,490	20,291	-1%
Mollala	3,637	5,647	8,108	44%
Oregon City	14,698	25,754	31,859	24%
Rivergrove**		324	289	-11%
Sandy	4,154	5,385	9,570	78%
West Linn	16,389	22,261	25,109	13%
Wilsonville**		13,991	19,509	39%

\*Portland and Tualatin not included, although portions lie in the County.

\*\*Data provided for entire city, although part outside Clackamas County.

Source: U.S. Census; Portland State University, Population Research Center

Clackamas County population grew by 11% between 2000 and 2010, according to the census, which was about half the rate of growth as that a decade earlier (21% change from 1990 to 2000). These rates are similar to those in Oregon State for the same periods. The change in individual cities is much more varied. Some cities shown in Table 1 had not been incorporated in 1990 and Damascus was not incorporated until after the 2000 census.

In addition to the cities shown in the Table 1, small portions of Tualatin and Portland lie in Clackamas County, but are not considered separately in this document. Several areas in the County

are recognized under the Hamlets and Villages program, which is a grassroots, citizen-driven program developed by the County. The hamlets are Beaver Creek, Molalla Prairie, Mulino and Stafford and the single village is the Villages at Mt. Hood. Clackamas County is a mixture of urban and rural. Agriculture is

<sup>2</sup> {www.oregon.com}

**Table 6: Race 2010**

Location	Race*						Total Population
	White	Black/ African Am.	AK Native/ Am. Indian	Asian	Other	Multiple	
Oregon	84%	2%	1%	4%	6%	4%	3,831,074
Clackamas County	88%	1%	1%	4%	3%	3%	375,992
Barlow	81%	1%	1%	0%	14%	4%	135
Canby	81%	1%	1%	1%	13%	3%	15,829
Damascus	91%	1%	1%	3%	1%	3%	10,539
Estacada	92%	1%	1%	1%	3%	2%	2,695
Gladstone	89%	1%	1%	2%	4%	4%	11,497
Happy Valley	76%	1%	<1%	17%	1%	4%	13,903
Johnson City	84%	<1%	1%	2%	7%	5%	566
Lake Oswego	89%	1%	<1%	6%	1%	3%	36,619
Milwaukie	89%	1%	1%	2%	3%	4%	20,291
Mollala	87%	1%	1%	1%	8%	3%	8,108
Oregon City	91%	1%	1%	2%	3%	3%	31,859
Rivergrove	94%	0%	0%	3%	<1%	2%	289
Sandy	90%	<1%	1%	1%	4%	3%	9,570
West Linn	91%	1%	<1%	4%	1%	3%	25,109
Wilsonville	85%	2%	1%	4%	5%	3%	19,509

\*Race alone; may also be Hispanic.

Source: 2010 U.S. Census

**Table 7: Ethnicity 2010**

Location	Ethnicity*		Total Population
	Hispanic	Non-Hispanic	
Oregon	12%	88%	3,831,074
Clackamas County	8%	92%	375,992
Barlow	15%	85%	135
Canby	21%	79%	15,829
Damascus	4%	96%	10,539
Estacada	8%	92%	2,695
Gladstone	9%	91%	11,497
Happy Valley	4%	96%	13,903
Johnson City	15%	85%	566
Lake Oswego	4%	96%	36,619
Milwaukie	7%	93%	20,291
Mollala	14%	86%	8,108
Oregon City	7%	93%	31,859
Rivergrove	2%	97%	289
Sandy	9%	93%	9,570
West Linn	4%	96%	25,109
Wilsonville	12%	88%	19,509

\*May be of any race.

Source: 2010 U.S. Census

Table 7 shows 2010 data on ethnicity of County residents, along with residents of Oregon and cities in Clackamas County. Of the more populated cities, Canby and Molalla had the highest percentages of Hispanic/Latino residents (21% and 14% respectively).

- 
- Lower education levels are associated with higher unemployment and lower wages:
    - Less than high school diploma: median earnings \$444/week; unemployment 14.9.
    - High school diploma: median earnings \$626/week; unemployment rate 10.3.
    - 4-year degree: median earnings \$1,038/week; unemployment rate 5.4.
  - Job losses since 2007 have been greatest and gains lowest for less-educated workers. The trends are predicted to continue – to be “far reaching and long lasting” and to “mark a dramatic shift away from low-skilled labor.”
  - Unemployment is highest for young people (< 25) and higher still for minority youth. Youth may feel more pressured to work than enroll in college, or to work and enroll part-time, which increases the time and barriers to a college degree.
  - Overall 91% of County residents age 25 and over had a high school degree or better; yet, just 58% of Hispanics had a high school degree or better.
  - 12% of 2009-2010 graduating class in 10 districts in Oregon dropped out of school and did not graduate with their class.
  - Failure to graduate affects both the student and the community: Cutting the number of students who dropped out in Oregon (from 11,800) would result in: \$59 million in increased annual earnings, \$44 million in annual spending and \$72 million in economic growth.

#### ***Income/Poverty***

- Median household income in Clackamas County (\$62,030) was higher than in Oregon, but there was substantial differences in cities – from \$100,510 in Happy Valley and \$89,118 in West Linn to just \$23,438 in Johnson City and \$36,713 in Estacada.
  - Low income households are struggling: 17% of County households have incomes <\$25,000; 26% of County households have incomes <\$35,000.
  - Poverty has increased in the County – 6.7% of the population lived in poverty in 2000 and by 2010 the estimate had risen to 10.4%. Nearly half of female householders with young children under 5 lived in poverty.
  - Rise in poverty and unemployment is accompanied by more doubled up households and more adult children living at home.
  - Federal poverty (FPL) thresholds underestimate the income needed to live:
    - Single adult with 1 preschooler needs \$44,337 to meet basics (301% of FPL)
    - TANF for single parent in family of 3 in Oregon was \$485 as of July 2010
-



Table 25 shows types of units within the County's incorporated cities, as estimated in the 2005-2009 American Community Survey. While 72% of units in the County were single family (attached or detached), this varied by city. Notably, the cities of Barlow, Damascus, Happy Valley and Rivergrove had almost exclusively single family units. Wilsonville had a slight majority of multifamily units and the majority of units in Johnson City were mobile homes.

- Demand for rental units is increasing with foreclosures and reducing vacancies, which makes it even more difficult to find affordable housing.
- The current housing stock will be insufficient to meet the needs of an aging population for affordable housing.
- Given the slow development in this economy, the focus on housing should be on maintaining existing housing, including rehabilitation of rental properties.

(Interviews/focus group participants)

Table 25: Type Units by City

Location	Total Units	Type of Unit		
		Single Family*	Multi-family	Other**
Clackamas County	156,945	72%	21%	7%
Barlow	45	95%	0%	5%
Canby	5,890	72%	22%	6%
Damascus	3,769	92%	0%	8%
Estacada	1,155	62%	30%	9%
Gladstone	4,779	67%	27%	6%
Happy Valley	4,708	91%	9%	0%
Johnson City	278	4%	0%	96%
Lake Oswego	16,995	72%	28%	<1%
Millwaukie	9,138	68%	31%	1%
Mollala	3,017	77%	17%	6%
Oregon City	12,900	71%	25%	4%
Rivergrove	133	99%	0%	1%
Sandy	3,768	73%	20%	7%
West Linn	10,035	83%	17%	<1%
Wilsonville	8,487	46%	51%	3%

\*Detached and attached.

\*\*Mobile homes, boat, RV, van, etc.

Source: 2010 Census (total); 2005-2009 American Community Survey (type of units)

Mobile homes accounted for 7% of housing units in Clackamas County (Table 21). Mobile homes can be an affordable housing option for lower income households, both as rentals and as owner-occupied units. Mobile home parks (manufactured home parks) sometimes sit on land attractive for redevelopment. The condition of some of the units constructed prior to the 1978 revised national standards may have deteriorated rendering them unsuitable for rehabilitation.

Still, a recent study of several manufactured home parks (MFH) in Clackamas County found that, in light of better quality of current construction, continued steps to preserve MFH is warranted and suggests additional steps to sustain this affordable housing option.<sup>7</sup> The parks included in the study were in three

locations along transportation corridors in unincorporated Clackamas County and represented 23% of mobile homes in the County. Park closures for redevelopment displace low-income individuals and families. Three parks closures in Clackamas County since 1999 displaced 349 tenants, including many elderly tenants.

<sup>7</sup> Sirais, M. (2011). *Study of Manufactured Home Parks in Selected Areas of Clackamas County, Oregon*. Masters thesis at Portland State University.