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HOUSING DEVELOPMENT CORPORATION OF WASHINGTON COUNTY
C/O WASHINGTON COUNTY COMMUNITY ACTION ORGANIZATION
451 SOUTH FIRST, SUITE 700
HILLSBORO, OR 97123

December 21, 1992

Department of Housing Services
560 SE Third
Hillsboro, Oregon 97123

To The Department of Housing Services:
RE: 1993 Comprehensive Housing Affordability Strategy (CHAS)

Thank you for the opportunity to comment on the Washington County's 1993 CHAS. While we recognize that the 1993 version of the CHAS is only an update of the initial 1992 document we believe the CHAS is, or certainly should be, the key local planning and management tool in the area of affordable housing.

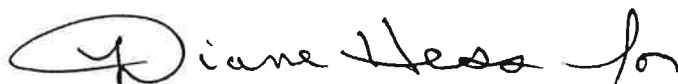
We further feel that the CHAS should be: a high profile process whereby local government focuses and analyzes the whole spectrum of housing needs; a mechanism which enables low income housing advocates input on a broad range of housing issues; a tool that the public can use to monitor and discuss local efforts to address housing needs; and, finally, the process that provides strong public momentum and support for developing affordable housing. By these standards the 1993 CHAS is inadequate. It, like the 1992 version, talks about a more comprehensive and inclusive planning process, but once again puts this planning off for another year.

We need look no further than Portland and Multnomah County to find jurisdictions that have embraced the "spirit" of the CHAS regulations, and spent the last two years developing effective community based efforts to build local support, participation and capacity to address low income housing needs. We are not suggesting that Washington County has similar needs or conditions as our neighbors to the east, but we are suggesting that the County needs to truly commit itself and provide leadership to an open and inclusive approach whereby real strategies to address housing needs are put in place.

In addition to these general comments HDC has a very specific concern with the proposed implementation strategy. Farmworkers, the group the HDC is dedicated to serve, are considered a top

priority for allocating investments in affordable housing. Brief reference is made to the HDC/CASA project to build 40 units of new rental housing for farmworkers. (No reference is made, by the way, of the HDC's project to build 25 units of single family housing to be offered on a lease-purchase basis for home-ownership by low-income farmworker families.) It is indicated that the Office of Community Development has provided assistance in the form of CDBG funds to package an application for permanent financing to the USDA Farmer's Home Administration. What is not indicated is that HDC/CASA has, on numerous occasions over the last year, requested short term assistance through CDBG Land Acquisition funds administered by the Department of Housing Services. Such funds would be used by HDC/CASA to secure properties and would be repaid to the County, in approximately two years, out of permanent financing proceeds for the project. The Department essentially put the HDC/CASA request on hold and indicated that a public RFP process for CDBG Land Acquisition funds would be undertaken at the same time the RFP process for HOME funds occurred. This, however, did not occur. The CHAS, on page #5, would on the contrary, seem to indicate that the Department is reserving these CDBG funds for its own 13 unit home-ownership project. The issues related to the process, or lack thereof, in allocating these public funds, the criteria used to determine funding priorities, the relation to CHAS investment priorities, and the ability of the Department to be both a competing developer and an impartial distributor of public funds are neither explained nor justified by the CHAS and remain of great concern to us.

Once again thank you for the opportunity to comment on the CHAS. We hope our remarks will be received in the constructive manner in which they are intended and will help focus and strengthen public efforts to support the development of affordable housing.

A handwritten signature in cursive script that reads "Diane Hess". The signature is written in dark ink and is positioned above the typed name and title.

Board of Directors
Housing Development Corporation

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