

Gresham 2025-26 CAPER Draft

CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Gresham (City) received \$943,169 in Community Development Block Grant (CDBG) 2025 EN and \$694,962.80 in carryover for a total of \$1,638,131.80. The City was allocated \$438,773 in HOME funds, received \$24,128.75 in Program Income and had \$1,206,012.90 in carryover funds for a total of \$1,668,914.65 in HOME funds. The City was also allocated HOME-ARP funds in 2022-23, which totaled \$2,238,403. In 2022-23, \$845,731.51 of the HOME-ARP funds were spent down and \$151,092 was committed to the Portland Housing Bureau to use as administration for their role in administering the HOME-ARP funds for the Portland Consortium. In 2023-24, HOME-ARP spending totaled \$994,165.04 and in 2024-25, \$241,814.45 in HOME-ARP funds were spent down. Remaining HOME-ARP funds totaling \$5,600 rolled into 2025-26 and were spent in the first quarter of the program year. The Portland Housing Bureau (PHB) submits all HOME and HOME-ARP information for the CAPER, but the City will share accomplishments throughout the CAPER.

GOAL 1: Increase and Preserve Affordable Housing Choice— The City funded Adapt-A-Home, which provided accessibility improvements to 22 households, and Mend-A-Home, which provided emergency home repairs to 21 homeowners. The City also funded DIY Weatherization Workshops, which exceeded its annual goal by providing weatherization kits and installation demonstrations to 100 low-income households. Overall, the City spent \$257,000 in CDBG funding on these programs and assisted 143 households, or 107% of the combined annual goal. The City also funded 2 homebuyer programs using HOME funds, the City's internal WELCOME HOME program and a program through the community land trust Proud Ground. A total of \$240,000 in down payment assistance and \$9,300 in activity delivery costs was spent to provide assistance to 6 households through the City's program. Proud Ground's program was unable to find a suitable buyer and Gresham HOME to purchase in the 2025-26 program year.

GOAL 2: Reduce & Prevent Homelessness— The City funded projects under this goal using CDBG and HOME funds as well as remaining HOME-ARP carryover. The Willow Tree program, which provides stabilization services and case management to alleviate homelessness, was funded with CDBG and provided supportive services for 51 individuals. Tenant Based Rent Assistance (TBRA), which was funded with CDBG and HOME funds, provided 1-6 months of rent assistance (with extensions up to 12 months as needed) and housing services to prevent homelessness and

served 43 households. These two programs spent \$106,012 in CDBG funds, \$288,526.05 in HOME funds (TBRA only) and achieved 146% of CDBG Action Plan goals.

With remaining HOME-ARP, the City also funded Living Solutions, a job training and educational services program that target unhoused individuals and those at greatest risk of housing instability. This program expended the final \$5,600 remaining HOME-ARP funds on their existing contract to continue serving individuals who began services under the program in late 2024-25.

GOAL 3: Livability & Economic Opportunities- The City used CDBG funds to provide additional job training through Living Solutions under this goal. The program spent \$263,014 in CDBG funds and assisted 90 Gresham residents, exceeding their goal of assisting 79 individuals. Two youth services programs were also funded under this goal to provide tutoring, mentoring and an after-school program for low-income Gresham youth. These programs spent \$65,018.44 and assisted 438 children, or 109% of their combined goal of 400. MESO was funded under this goal to provide microenterprise assistance to low-income Gresham small businesses with 5 or fewer employees. MESO spent down \$57,723.34 assisted 21 businesses, falling short of their goal of serving 40 businesses.

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)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Increase & preserve affordable housing choice	Affordable Housing Public Housing Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	389	311.20%	85	100	117.65%

Increase & preserve affordable housing choice	Affordable Housing Public Housing Homeless	CDBG: \$	Rental units rehabilitated	Household Housing Unit	50	64	128.00%	12	10	83.33%
Increase & preserve affordable housing choice	Affordable Housing Public Housing Homeless	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	130	168	129.23%	36	33	91.67%
Increase & preserve affordable housing choice	Affordable Housing Public Housing Homeless	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0				
Increase & preserve affordable housing choice	Affordable Housing Public Housing Homeless	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
Infrastructure, facilities & economic opportunity	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		49300	0	0.00%
Infrastructure, facilities & economic opportunity	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	15000	0	0.00%			

Infrastructure, facilities & economic opportunity	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1875	2560	136.53%	479	528	110.23%
Infrastructure, facilities & economic opportunity	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	100	146	146.00%	40	21	52.50%
Reduce homelessness & increase stability	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	125	31.25%	28	51	182.14%
Reduce homelessness & increase stability	Homeless Non-Homeless Special Needs	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	200	123	61.50%	31	43	138.71%
Reduce homelessness & increase stability	Homeless Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	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.

Demand for public services funding usually exceeds the City's capacity to fund such projects each year while remaining under the 15% cap. As low-income households get displaced from Portland, many are pushed to Gresham and East Multnomah County due to the relative affordability and lower housing costs. CDBG entitlement in Gresham has been reduced over recent years, further limiting the amount of funding for these

programs. Participants in the City's annual Community Needs Hearings and Surveys stress the need for critical services in Gresham to meet the needs of the growing community, especially for programs that serve Gresham youth and job training programs. As a result, the City tends to spend the maximum allowable under the public services cap each year to fund several public services projects under all three goals and must turn away public services applicants for funding and reduce application asks to stay within the cap. Additionally, the City funded East County Solutions, a Community Based Development Organization (CBDO), for job training, which is a public service, but does not hit the cap if it is administered by a CBDO. Combined across all three goals, public services activities assisted 679 people in the 2025 PY with regular entitlement included in the 2025 Annual Action Plan. Some of our subrecipients fell short of their annual goals, but most met or exceeded goals. Many service providers have noted there is an increased need for services while many temporary funding sources have been exhausted and regular entitlement funding levels have remained stagnant or seen slight decreases. With the increase in costs year over year, subrecipients can assist fewer and fewer clients with the same amount of funding.

Adjustments to Table 1: Accomplishments under the TBRA/Rapid Rehousing GOI did not automatically pull into the table. 43 households were served under the City's TBRA program, which is funded in part using CDBG funds for activity delivery costs, so these accomplishments were added manually into the GOI for both annual and cumulative Con Plan goals.

Infrastructure Needs

Stakeholders have also stressed a need for infrastructure improvements such as parks and sidewalk and transportation improvements. In 2020-21, the City began a CDBG funded parks project, and funds were added to this project in 2022-23 and 2023-24. A combination park and transportation project was identified for this funding in 2023-24. Additionally, in 2022-23, the City funded a streetlight infill project. These projects have been delayed due to staff capacity, Environmental Review requirements, supplier delays and the need to update the City's bid documents for CDBG funded projects to reflect new Federal laws and requirements. Both projects began spending funds for design work and materials purchases in 2025-26 and are anticipated to be completed in the 2026-27 program year.

GOAL 1: Increase & Preserve Affordable Housing Choice

The City has exceeded all Goal Outcome Indicator (GOI) targets under this Con Plan goal. Under the Public Services (other than LMH) GOI, the City aimed to serve at least 125 individuals with the DIY Weatherization Workshops program. Over the 2021-2025 Con Plan this program has served 389 individuals, or 311% of the Con Plan goal. The expected Con Plan accomplishments for the Rental Units Rehabbed GOI was 50 households and through the Adapt-A-Home program, 64 households have been served to date, or 128% of the Con Plan goal. Additionally, the

City planned to serve at least 130 households under the Homeowner Housing Rehabilitated GOI and has served 168 households with the Adapt-A-Home and Mend-A-Home programs, which is 129% of the Con Plan goal. All three programs under this goal nearly met or exceeded their goals annually. Goals for the homeowner and rental units rehabbed can be difficult to estimate because Adapt-A-Home serves both renters and homeowners, but we don't know how the total served will be split between those two populations when goals are being set at the beginning of the Con Plan or Action Plan.

GOAL 2: Reduce Homelessness- Increase Stability:

Con Plan accomplishments under this goal show the City is behind on progress. This is largely due to the fact that the City funded 2022-23 and 2023-24 projects under this goal using HOME-ARP funds, so no progress is shown in the tables for those two years because it only reflects CDBG accomplishments. The CDBG accomplishments shown include 2021-22, 2024-25 and 2025-26 accomplishments that total 31.25% of the Con Plan goal for public services and 61.5% for TBRA. If HOME-ARP data was factored into the achievement data it would show 226 households served with TBRA, or 113% of the Con Plan goal and 358 individuals served under public services, or 89.5% of the Con Plan goal. The Willow Tree program, which is a public services project funded under this goal, has also updated the scope of services the project provides and provides more in-depth services to a smaller number of individuals, which has impacted the accomplishments achieved by the program.

GOAL 3: Infrastructure, Facilities, Economic Opportunities:

The City exceeded the Con Plan goal for public services and businesses assisted under goal 3. Overall public services projects served 2,560 people under this goal since 2021-22, or 136.53% of the Con Plan goal. The City also funded a microenterprise assistance program, which fell short of annual goals, but has exceeded the Con Plan goal with 146 businesses served over the Con Plan to date, or 146% of the Con Plan goal. The City did not make progress toward infrastructure goals because the planned infrastructure projects included in the 2021-2025 Con Plan were delayed due to environmental review requirements, staff capacity, supplier delays and the need to update bid documents due to updated Federal laws and requirements. These projects began spending funds in 2025-26 and will complete work on the Streetlight Infill and Yamhill Sidewalk Infill projects in 2026-27.

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	296
Black or African American	102
Asian	27
American Indian or American Native	14
Native Hawaiian or Other Pacific Islander	27
Total	466
Hispanic	172
Not Hispanic	294

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

Narrative

According to 2025 U.S. Census estimates, Gresham’s racial/ethnic composition is 56.8% White, 8.9% Asian, 7.9% African American, 2.4% Native American, .3% Pacific Islander and 23.7% “Other” or Two or More Races. The clients served under HUD funded programs are reflective of these populations and service providers work to meet varying needs of Gresham residents from a variety of backgrounds.

The table above only includes CDBG funded activities that serve *individuals or businesses* in the 2025-26 program year in the race categories listed. Activities that serve households do not populate in the table and all ethnicity categories that include multiple ethnicities do not have a space to populate in the table, resulting in a smaller number served displaying. In total, CDBG funded programs in Gresham assisted 679 individuals, 21 small businesses and 86 households.

The attached table includes all racial and ethnic categories by funding source and includes accomplishments for activities serving households.

	Households	Individuals	Businesses
White	54	293	3
Black or AA	10	93	9
Asian	3	27	0
Native American	0	13	1
Pac Islander	1	27	0
Asian & White	0	5	0
Black or AA & White	5	24	0
Native & White	2	2	0
Native & Black or AA	0	1	0
Other Multi Racial	11	194	8
TOTAL	86	679	21
Hispanic or Latino	11	300	9
Not Hispanic	75	379	12

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	public - federal	1,638,131	1,206,012

Table 3 - Resources Made Available

Narrative

The City of Gresham (City) received \$943,169 in Community Development Block Grant (CDBG) 2025 EN and \$694,962.80 in carryover for a total of \$1,638,131.80. The City was allocated \$438,773 in HOME funds, received \$24,128.75 in Program Income and had \$1,206,012.90 in carryover funds for a total of \$1,668,914.65 in HOME funds. The City was also allocated HOME-ARP funds in 2022-23, which totaled \$2,238,403, most of which was spent in prior years. Remaining HOME-ARP funds totaling \$5,600 rolled into 2025-26 and were spent in the first quarter of the program year. The Portland Housing Bureau (PHB) submits all HOME and HOME-ARP information for the CAPER, but the City will share accomplishments throughout the CAPER.

Gresham receives an annual CDBG entitlement directly from HUD and a HOME entitlement through the Consortium. Table 3 identifies the HUD CDBG funds available for projects in 2025-26. The "Resources Made Available" listed here differs from what was entered into the 2025 Action Plan because the City had more carryover than anticipated when the Action Plan. The City expended \$1,029,741.95 of the entitlement and carryover funds on 2025 projects. The table above rounds these figures to the nearest whole number. The remaining funds will be carryover, which will be used to fund other projects in the 2026 program year. Most carryover is committed to infrastructure projects funded during the 2021-2025 Con Plan that are still underway.

The City conditionally funded a HOME development project with \$700,000 of this funding and the project is currently finalizing a HOME agreement for the project. Carryover from the homebuyer assistance programs the City funds has contributed to the large amount of carryover in the past few years. During the pandemic, housing prices increased, and the number of houses on the market went down, so both homebuyer programs have struggled to find suitable homes for buyers below the HOME maximum purchase price. In response, the City increased the amount of assistance provided by our internal program from \$20,000 to \$40,000 in 2022-23, which has proven to increase the number of loans the City has been able to provide with our internal loan program over the past two years.

The City of Gresham has promoted homeownership through various programs over the last several decades. The City's internal Shared Appreciation Mortgage (SAM) program offers zero interest loans with a share of appreciation returned to the City. The City also funded the community land trust Proud Ground to provide homebuyer assistance and has participated in the Neighborhood Stabilization Program (NSP). SAMs and NSP loans are payable upon transfer of the home and Proud Ground funds stay in the home to create a permanently affordable unit. The City's CDBG and HOME SAMs are eligible

for forgiveness when the homeowner maintains their home as their primary residence through a set affordability period. The City currently has 134 active homebuyer assistance files. Active files include 3 CDBG funded SAMs totaling \$90,000, 6 CDBG funded Proud Ground files totaling 304,100, 5 NSP loans totaling \$110,000, 108 HOME funded SAMs totaling \$2,970,302.83 and 12 Proud Ground files with a total of \$1,032,500 in HOME assistance. The City also funds emergency home repair loans through Unlimited Choices, Mend-A-Home Loan program. These loans are forgivable if the homeowner remains in the home for 5 years after the loan. There are 15 Mend-a-Home loans totaling \$64,691.56 which are payable upon transfer of the title of the home, but many are eligible for forgiveness.

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

The City has no geographic targets in the Consolidated Plan, however, much of the funding goes to non-profit partners in or serving the Rockwood area. Rockwood has the highest concentration of urban poverty between Seattle and Los Angeles.

The City of Gresham regularly plans public infrastructure improvements on publicly owned land. Whenever opportunities arise publicly owned land and property will be included to the extent practicable.

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 Gresham alone, and as part of the HOME Consortium with the City of Portland and Multnomah County, makes every effort to leverage HUD grant funds with other public and private investments. Housing development and rehabilitation activities are highly leveraged because public funds are used as “last in” gap financing, which requires that more substantial investments are in place. The Portland Housing Bureau as the Consortium lead makes required matches for use of HOME funds.

In the months and years ahead, communitywide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunities and resources to support housing stability and reduction in homelessness.

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	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	43
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	42
Number of households supported through Acquisition of Existing Units	0	0
Total	0	85

Table 6 – Number of Households Supported

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

According to HUD Exchange CR-20 is to be completed by PHB as Lead for the Consortium. However, as the City funds rent assistance with HOME-ARP and HOME, we have set internal goals for these programs. The City, through its HOME funded TBRA program with Our Just Future, assisted 43 households with rent assistance. Additionally, the City funds two housing rehab projects, Adapt-A-Home and Mend-A-Home. 42 of the units rehabbed under these programs meet the HOME definition of affordable housing and have been reflected in the table above.

Discuss how these outcomes will impact future annual action plans.

The City's TBRA program exceeded annual goals in 2025-26, while both home repair programs came close, but fell short of annual goals. This is due in part to rising costs, stagnated funding levels and diminished staff capacity. Subrecipients have continued to see an increased need for longer term assistance and overall increased costs, which meant fewer households could be served. In response, the City adjusts annual goals to ensure realistic targets are set for projects funded within each Annual Action Plan.

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	75	0
Low-income	10	0
Moderate-income	1	0
Total	86	0

Table 7 – Number of Households Served

Narrative Information

The CDBG funded programs that serve households include Tenant Based Rent Assistance, Adapt A Home and Mend A Home. The accomplishments for these programs by income level are reflected in the table above. Note, this does not align with the 85 households reflected in the previous table because that table only includes rehab on homes that meet the HUD definition of "affordable". One homeowner served under a rehab program qualified as low-income, but their home is estimated to exceed the current HOME purchase price limit and therefore does qualify as an "affordable" unit.

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

Since 2015, the unhoused population in Multnomah County has nearly tripled. The 2015 Point in Time report identified 3,801 unhoused individuals in Multnomah County, while the 2025 Point in Time report counted 10,526 unhoused individuals. Given the magnitude of the problem, the City-County decided upon a reset of the community's response to homelessness. The Consortium partners have diligently worked towards addressing the challenges faced by the homeless population regionally. Multnomah County adopted the Homelessness Response Action Plan (HRAP) in 2024, outlining ambitious measures to reduce homelessness across Multnomah County. This plan was updated in December 2025.

The HRAP is a multi-year roadmap focused on setting and reaching shared goals, increasing transparency, and working together to address the homelessness crisis. This is being accomplished with a collaborative oversight structure that's guiding the work and strengthening links between healthcare partners, community members, the justice system, housing providers, service providers, treatment providers, and government partners at all levels. Notably, in 2024, the City of Portland established Portland Solutions, a centralized program hub to address Portland's most pressing homelessness and livability challenges, including outreach, shelter, impact reduction, and reclaiming public spaces. At the same time, Multnomah County transformed the Joint Office of Homeless Services (JOHS) into its own formal department within the County, now known as the Homeless Services Department (HDS).

The HRAP created new governance and accountability structures to allow decision-makers across governments, healthcare, housing providers and service providers, and those with lived experience to set goals, objectives, and the budgets needed to achieve outcomes. It created a co-governance model in the Steering and Oversight Committee to identify responsibilities, coordination, and goals. Under that committee, it called for an Implementation Committee to track progress, identify challenges, collaborate, and hold one another accountable to solutions. It assembled a Community Advisory Committee to elevate the issues of those across the spectrum of providers, partners, and impacted stakeholders to offer their input on goals and solutions, and other kinds of feedback.

The Homelessness Response Action Plan built a system to address the needs of people pushed into homelessness, including preventing homelessness, coordinating behavioral health and mental health interventions, and adding hundreds of shelter and recovery beds to provide safety off the street. The was an outcomes-focused, iterative approach to addressing, resolving, and preventing homelessness. Its focused goals and outcomes created a coordinated approach across systems and jurisdictions. It included accountability and measured key metrics to assess the effectiveness of the work through better data collection and tracking, allowing for continuous improvement of our systems. In the original plan,

the core goals of this strategic work included the following specific objectives:

- Shelter or house 2,699 unsheltered people by Dec. 31, 2025 – a number equivalent to half of those known to be living unsheltered in January 2024
- Add 1,000 units of shelter, including new and planned units, to increase shelter system capacity by nearly 40%
- Improve the number of people moving from shelters to permanent housing by 15%
- Add hundreds more behavioral health beds and open a 24-hour drop-off receiving, deflection, and sobering center
- Increase the supply of affordable housing

Progress Report

Progress towards goals are outlined on the Homelessness Response Action Plan Dashboard. Between January 2024 and December 2025, the Homelessness Response System housed or sheltered 23,301 people, exceeding HRAP goals. Of these individuals, 1,952 were placed in temporary housing, 7,849 were placed in permanent housing and 16,460 were placed in shelters. This exceeded the original goal of sheltering 18,650 people by the end of 2025. In 2025, 83% of people served retained their housing for at least 24 months following their permanent supportive housing placement, exceeding the HRAP goal of 75%. The report also highlights significant challenges to ongoing efforts. It notes that the progress has been happening in an increasingly difficult environment. Although efforts are helping to return record numbers of people to housing and stability, the high cost and limited availability of housing, combined with insufficient income and access to ongoing health care services, mean more people are at risk of homelessness than ever before. Additionally, at a time when the demand for services like shelter, case management, and rental assistance continues to grow, the funding to meet that need is decreasing. Local and regional budgets for the upcoming fiscal year, including those at the City of Portland, Multnomah County, and through Metro's Supportive Housing Services measure, face deficits across the board.

Gresham Homeless Services

The City of Gresham operates a Homeless Services Program funded by the Multnomah County Homeless Services Department. The program is staffed by four city employees who provide hands-on outreach in the Gresham community seven days a week. Staff provide direct client assistance to address basic needs and rental assistance to help households transition from unsheltered homelessness to permanent housing. In FY 2025-26, the Gresham Homeless Services team recorded more than 875 instances of street engagement with people experiencing unsheltered homelessness, including many repeat contacts. The team also provided more than 400 instances of case management, facilitated more than 200 connections to emergency shelter, made 146 referrals to services to help clients overcome barriers to housing, provided more than 200 instances of transportation assistance, and connected 41 clients to employment opportunities. During FY 2025-26, the program provided rental assistance that helped permanently house 86 households, representing 169 adults and children. The availability of rental

assistance has made the transition from unsheltered homelessness to permanent housing more efficient and provides a meaningful incentive for clients working toward housing stability. Staff work closely with clients to address barriers to housing, connect them with sustainable employment and other resources, and then assist with securing permanent housing. Once housing is identified, the program can provide three to six months of rental assistance to help support a successful transition to housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

According to the 2025 Point In Time Count Findings, 10,526 Individuals were documented as experiencing unsheltered homelessness in Multnomah County in January 2025. In the two years before HRAP (2022 and 2023), Multnomah County, the City of Portland, and regional partners sheltered or housed 15,959 individuals. To achieve the HRAP goal of sheltering or housing an additional 2,699 people by the end of 2025, the jurisdiction needs to house 18,658 individuals between January 2024 and December 2025. The City-County partnership surpassed this target and served 23,301 individuals. Ongoing expanded shelter and housing efforts, as outlined in HRAP, will be necessary to sustain this progress.

County-wide, there are just under 3,000 shelter units available to unhoused residents. These units include a mix of congregate, non-congregate, motel and alternative shelter units. Gresham shelters include the Gresham Women's Shelter, Rockwood Bridge Shelter and the Stark Street Motel.

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

Permanent supportive housing (PSH) is an important form of housing to support some, though not all, people experiencing homelessness to stably return to housing. It is a specific type of housing program for people with disabilities and extremely low incomes who have long or multiple histories of homelessness and other significant barriers to housing stability. PSH provides permanent housing, rent assistance, or other support to make sure the rent is permanently affordable, and provides intensive yet voluntary services, with no time limits. Helping people placed in PSH retain their housing for at least 24 months following their move-in is an important measure of our success in helping permanently end their experiences of homelessness.

The City-County efforts continue to exceed the HRAP goal of maintaining at least 75% retention in permanent supportive housing 24 months after placement. In 2025, 83% of people remained in permanent supportive housing 24 months after placement.

In 2022-23, the City of Gresham added a Housing Resources Coordinator position to assist residents with

housing related concerns. With multiple services providers, programs, funding sources and qualification requirements, navigating the resources available can be difficult and confusing, especially for residents in crisis who are at risk of losing their housing. The Housing Services Coordinator acts as a primary point of contact for residents in need of housing assistance so that callers can get information and referrals to a variety of programs. Since 2022, the Housing Resources Coordinator has fielded 3,300 calls from community members seeking a wide range of assistance including rent assistance, housing, how to apply for Section 8, senior housing, tenant complaints, legal assistance, mold, landlord inquiries, down payment assistance and more. While this position does not directly place individuals in housing, referrals often result in households receiving assistance that helps them remain housed. Since June 2022, the Housing Resources Coordinator has made 190 referrals to energy assistance, 115 referrals to rent assistance and eviction prevention with Our Just Future, and over 500 referrals to eviction prevention through Bienestar.

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

While emergency shelters and other transitional settings help to reduce overall levels of unsheltered homelessness, people who use these services remain homeless until they can return to permanent housing. To truly address homelessness, the City-County efforts are focused on ensuring that more people who experience homelessness are returning to permanent housing with access to the resources and services they need to stay housed. Further, moving more people from shelter to permanent housing opens those shelter beds for other people who would otherwise remain unsheltered.

The HRAP aimed to improve the exit rates from adult shelters to permanent housing by 15 percentage points, increasing from a baseline rate of 26% to 41% by the end of 2025. However, system-level performance on this measure has worsened over time, indicating that we are moving further away from achieving this goal. In 2025, 17% of adults exiting shelter exited to permanent housing. However, it is important to acknowledge several challenges associated with this measure, including:

- In many instances, shelter staff may not know where an individual leaves to, unless they have specifically assisted the individual to find housing. This may lead to an undercount of people leaving shelter to housing
- Because the goal specifies exits from adult shelter to housing, not all efforts to house people experiencing homelessness are fully encompassed in this measure

In 2025, the exit rate from adult shelters to permanent housing was 17%. This reflects a 9 percentage point decline from the baseline data.

In addition to ongoing efforts to move people into permanent housing, the staff on the HSD evaluation team is conducting a rapid assessment of shelter exits to permanent housing. This assessment aims to identify the primary causes of declining performance rates and estimate the additional housing placements and costs needed to achieve the HRAP goal of 41% of individuals exiting adult shelters into permanent housing.

Gresham CDBG and HOME Services

The City of Gresham uses CDBG and HOME funding to support the housing stabilization needs of youth and families through the Willow Tree program and a Tenant Based Rent Assistance. In 2025-26, 43 families who were at-risk of homelessness received rent assistance with supportive services through the TBRA program and 51 individuals were served under Willow Tree's CDBG public services program. Willow Tree offers services to extremely low-income Gresham homeless family members that face significant barriers to permanent housing and those at imminent risk of homelessness.

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

Actions taken to address the needs of public housing

Waiting for updates from Home Forward and PHB.

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

Actions taken to provide assistance to troubled PHAs

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's Rental Inspection Program has been in place since 2007 and has been a model for other jurisdictions. A modest licensing fee has allowed the City to work with landlords to improve properties over the years. The program results in periodic inspection for compliance with a broad range of habitability standards including fire, life, and safety code violations. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. The inspection program is a practical approach to raised expectations for both landlords and tenants. In 2025-26, Rental Housing staff conducted 67 complaint-based inspections and 2,343 mandatory inspections for a total of 2,410 inspections. Through this program, City codes also require that landlords present tenants with an informational handout titled, "Rights & Responsibilities of Landlords & Tenants" upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. Additionally, City code assesses a fine upon property owners if a court determines they have retaliated against a tenant. In October 2024, Gresham's Rental Housing Program won an Award for Excellence from the League of Oregon Cities.

In 2019 the Oregon State legislature passed House Bill 2001 and House Bill 2003, both aimed at helping local communities meet the diverse housing needs of Oregonians. House Bill 2001 expands the ability of property owners to build more affordable housing types in all residential zones. These types of homes already exist in most cities but have been prohibited in many neighborhoods due to zoning requirements. Under this new rule larger Oregon cities and cities in the Portland Metro region must allow duplexes, triplexes, quadplexes, cottage clusters and townhouses in residential areas. This requirement became effective June 30, 2022. Gresham adopted code changes to ensure compliance with these state requirements. The changes aim to create more opportunities for renters and homeowners at different income levels and increase the variety of housing available in Gresham.

Housing Production Strategy

House Bill 2003 requires all Oregon cities with a population over 10,000 people to study the housing needs of their residents and develop and implement strategies to encourage housing production to meet the community's needs. In accordance with this rule, the City of Gresham completed the 2021-2041 Housing Capacity Analysis, which determined the City will need over 6,000 additional housing units over the next 20 years. The results of this report were used to develop the 2023-2029 Housing Production Strategy (HPS), which was adopted by Gresham City Council in June 2023. The HPS is a six-year plan that outlines initiatives and actions the City will take to achieve equitable housing outcomes for all residents of Gresham. Actions planned over the next six years include: Exploring the use of grant

funds and loans and partnerships to acquire, develop and/or rehab housing with longer term affordability periods. Looking into land banking, parcel assembly and public land disposition efforts. Improving City requirements and processes to reduce zoning barriers and streamline permitting processes for housing. Investment in affordable home ownership models. Implementing a rent assistance pilot program with the City's existing Homeless Services staff. To further Gresham City Council's objective of quality housing for all, the City funds Unlimited Choices for rehabilitation of units to provide permanent accessibility for persons with disability and home repair assistance for lower-income households. In addition, the City provides assistance for lower-income homebuyers in the form of down payment assistance. A report on progress toward HPS goals is due to the State every 3 years of the plan. The State is currently working with local jurisdictions to establish reporting criteria and the first report is expected to be submitted by the end of the 2026 calendar year.

Metro Housing Bond

In 2018 metro-area voters passed the Regional Affordable Housing Bond, which provides funding for the development of affordable housing. Gresham has committed nearly all of the City's allocated funds. In the City's first RFP in 2020, \$16.5 million in funds was committed to develop Wynne Watts Commons and Rockwood Village. These projects, which were completed in 2022, yielded a total of 194 affordable units. In the City's second RFP, released in 2023, \$10.6 million was committed across four projects, which are currently in various stages of development. Terracina Vista is a 91-unit affordable rental project, near 165th & Burnside, which closed in December 2023, is currently under construction, and will complete summer 2025. Oak Row at Rockwood is an 11-unit affordable ownership project, near 181st and Stark, which closed in December 2024, is currently under construction, and will complete fall 2025. Myrtlewood Way is a 20-unit affordable ownership project near 176th and Glisan, which has received final approval from Metro and closed April 2025. Civic Drive Family Housing is a 59-unit affordable rental project, near Gresham City Hall, which received concept endorsement from Metro, and is applying for state funding. Civic will likely have an additional unit for a total of 60 units when it applies for final approval. At this time, these projects create 375 units of affordable housing, including 77 30% units and 216 family sized units. The City adopted several guiding principles regarding housing as a guide for affordable housing. In essence these principles recognize that everyone in Gresham deserves a decent, safe and affordable place to live and that thriving and vibrant communities require a balance of jobs, housing and services. The principles recognized early on that concentrations of poverty and at-risk populations could block access to opportunities, which is reflected in national policies to promote fairness in all neighborhoods. The City promotes a wide range of housing types across all neighborhoods and recognizes that publicly assisted housing is one component. The City is committed to fostering housing options that working individuals and families can afford. The City will look for new opportunities to preserve and expand housing options for all residents, including low-income residents who need ongoing support.

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

Gresham is seeing an increase in low income residents as a result of households moving to find more

affordable housing, including that affordable to working families. The City funds projects to assist families achieve self-sufficiency and increase earning capacities such as rent assistance, projects that provide supportive services to stabilize households, and job training and placement. Projects included in the Annual Action Plan speak to those efforts. In addition, the City works closely with long-term partner providers to reach out to persons in need. Participating in regional transportation and economic efforts, the City seeks to create vibrant hubs and to increase employment, including local entrepreneurs. Gresham continues a strong monitoring practice to maximize the efficacy of funded efforts.

While the City has pursued a variety of strategies to impact the identified needs of the community, the primary obstacle to meeting the underserved needs is the lack of sufficient financial resources. The City seeks to partner with subrecipients that offer the best outcomes per dollar spent and subrecipients whose projects help pull residents out of poverty permanently. Subrecipients' historical performance in achieving annual goals was used to select applicants for funding with the best track records of success using grant funds. The City, in partnership with Multnomah County, conducted an in person community needs meeting in November 2025 and maintains an online survey that is open year-round for stakeholder input. Summaries of the comments received at the needs hearing and survey responses are compiled and reviewed by City Staff and members of the Community Development and Housing Subcommittee prior to making funding recommendations for the Annual Action Plan. Input from community members is used to help the City prioritize funding to meet the needs of the community.

Through a grant from Multnomah County's HSD, the City maintains a Homeless Services team that works with homeless individuals and families to help them overcome issues preventing them from being housed. This might include obtaining a driver's license, Social Security/disability, bus passes, etc. Staff also work to assist homeless individuals find housing and treatment options. Additionally, the City has added a Housing Services Coordinator position to act as a point of contact for residents in search of housing related services. While this position does not place residents in housing, they do connect callers with appropriate resources and can often make referrals to programs providing various forms of assistance, helping community members access critical resources they may not have otherwise been aware of.

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

The City of Gresham implements its CDBG and HOME programs in compliance with requirements of the Residential Lead-Based Paint Reduction Act. None of the programs or projects currently funded by Gresham provides in excess of \$5,000 in rehabilitation assistance. Notification and visual inspection requirements will be followed for Gresham's HOME funded homeownership programs. The City of Gresham provides brochures about safe lead practices as part of the homebuyer assistance efforts. Buyers and sellers are also required to sign certifications. Inspectors employed in the Rental Inspection Program are trained and certified in safe practices. In addition, Gresham provides Lead Based Paint Hazards brochures in their Permit Center. The City will look for opportunities, in the future, to increase the capacity to reduce lead-paint hazards.

Multnomah County complies with federal regulations and continues to work towards increasing small Lead Based Paint contractors through building their capacity through education and safe work practices. The City of Portland has successfully administered three HUD Lead Hazard Reduction Grants, providing over \$12 million dollars in lead hazard reduction assistance to over 1,000 low-income households (protecting over 1,200 children from lead poisoning) since 1998.

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

Coordination of homelessness prevention and emergency services including the CoC planning and implementation is coordinated through the CoC Board. The City of Portland, City of Gresham, and Multnomah County are all involved in the work of the CoC planning group, which fulfills planning and policy development in addressing homelessness.

The City of Gresham usually budgets to allocate the maximum amount allowable to support public services annually to further the anti-poverty efforts of many local area non-profits. Additional funds provided to the City for pandemic response was used to expand public services and rent assistance programs, however most of this funding had been exhausted prior to the start of the 2025-26 program year.

The City of Gresham has supported a number of projects over the years, and in the current year, to reduce the level of poverty and increase the capacity of families to earn living wages recognizing employment is a key factor in reducing poverty. Workforce development and training efforts were supported through the Living Solutions, which assists low-income persons to gain job skills and then places those individuals in career-path jobs. Living Solutions also offers services tailored to the needs of Gresham's community.

The City's ongoing efforts to support small businesses will continue over the course of the consolidated plan. The Small Business Center provides resources, guidance and step-by-step assistance through the permitting/licensing process. The City's Garage to Storefront program assists qualifying businesses in target areas around the city by waiving first year business license fees, system development charges, and other development related fees.

In September 2025, Gresham City Council voted to adopt the Gresham Downtown/Civic Urban Renewal Plan. The plan establishes a new 900-acre urban renewal area that is estimated to generate \$381 million to invest in the neighborhood over the next 30 years. Planned investments aim to improve commercial storefronts and housing, increase transportation opportunities, and create more job opportunities for area residents. The City plans to strategically purchase property in the area for community development. The first year of funding will become available in July 2026.

May 2020, Metro voters passed ballot measure 26-210, the Supportive Housing Services Measure, which is projected to generate as much as \$248 million a year across the region. Funds are being used to expand existing programs and support new services, with the goal of ending chronic homelessness in

the region. Metro began disbursing funds in Summer 2021. Each of the three counties within Metro's jurisdiction submits an annual work plan on April 1 of each year, which describes the annual accomplishment goals for Supportive Housing Services funds for the following fiscal year. Ten year regionwide goals include stabilizing 10,000 households experiencing or at-risk of homelessness in permanent housing and connecting 5,000 chronically homeless households with supportive housing.

Redevelopment Commission

Through its Redevelopment Commission, Gresham has made significant investment in the Rockwood-West Gresham Urban Renewal area. Due to the rapidly growing Portland metro area, low to middle income individuals and families are being displaced into more affordable areas of the region like Rockwood and West Gresham. The escalating prices of land, homes, and commercial retail space is pricing out legacy residents who are long-time renters or leasers of homes and family-owned businesses. The Downtown Rockwood project is building on significant community assets to transform a severely under-resourced neighborhood into a community-sustained economic engine that works to break the generational cycle of poverty and build community prosperity. The Downtown Rockwood Development project is a 5.8-acre site located in the heart of the Rockwood neighborhood. It now houses the Lumen Business Center, a Class-A office building that houses services and local businesses including Wallace Medical Concern, Worksource Oregon, a childcare center, the Mt. Hood Community College Small Business Development Center and more. The site also houses a community plaza and the Rockwood Market Hall, which features local food options from a variety of micro-restaurants as well as small retail spaces. Several of the Gresham small businesses supported by the CDBG-funded micro enterprise assistance program have moved into the Rockwood Market Hall. The AVIVA Apartments opened on the same site in November 2024. The project features 108 new housing units, 22 of which were reserved for and have been filled by individuals/families earning 80% or below MFI. Gresham is presently working to redevelop a site adjacent to the Downtown Rockwood development to further activate the neighborhood and increase services to vulnerable community members.

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

The City is a partner in the Comprehensive Economic Development Strategy (CEDS) and supports links between industry and education (at the K-12 and higher education levels), supports fairness in the workplace and in industry, and supports activities raising the skills and employability of high need populations. The Greater Portland Economic Development District (GPEDD) is leading the process to contract with a consultant to draft the Portland region's next Comprehensive Economic Development Strategy (CEDS) for 2027-2032. The CEDS is regionally driven, strategic planning document that aligns public and private resources to foster economic growth, resilience, and prosperity. When complete, the CEDS will provide a roadmap for implementing programs that support the growth of businesses and economic enhance opportunities across the Portland metro region. It is anticipated that the 2027-2032 CEDS will align well with the 2026-30 Consolidated Plan goals and many of the projects funded throughout the Con Plan will support the goals outlined in the CEDS. Job training, rent assistance, small business assistance and supportive services are all included under the Con Plan goals and will be used to

stabilize Gresham households, increase resident's earning potential and provide stability to families during temporary phases or short-term setbacks.

Transportation

The Transportation System Plan (TSP) is a blueprint for biking, walking, driving and transit through 2035. Goals are for healthy and active transportation options; safe and efficient system; economic development; well-connected, multi-modal system; and increased ecological stewardship. The City is currently in the process of updating the TSP to reflect community needs and priorities, including safety for everyone on the road, access to travel options and ensuring everyone has access to transportation. The plan prioritizes 84 transportation improvement projects totaling \$235 million dollars. The prioritized project list will be used to create the transportation capital improvement program (CIP), which is a five-year plan for transportation projects that is reviewed and adopted annually. Through the CIP process these projects are evaluated annually in order to keep current with the city's needs. The City's Safe Routes to School program partners with local schools to make walking and biking to school safe for all kids in Gresham. This program provides lessons to educate students on road safety and helps create action plans to identify infrastructure improvements that can improve safety on these routes. All of the improvements identified through Safe Routes to School, the TSP and Gresham's other Transportation Planning efforts require significant investment of capital to carry out the improvements identified.

Enterprise Zones

The Gresham Enterprise Zone Program is a public/private partnership program that provides a 3 to 5 year property tax abatement on new investments in exchange for meeting job creation and other business requirements. These zones are a development tool to encourage industrial development, create higher wage jobs and increase capital investments within each zone. The program has been used by 21 traded sector companies for continuing investments at their Gresham facilities, 6 of which have had multiple applications. Depending on the type of employer, program participants' compensation levels must exceed anywhere from 150 to 200% of the Portland metropolitan area minimum wage. Since its adoption in 2006, the program has resulted in the creation of over 4,500 family wage jobs and over \$1.5 billion in new investment.

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

The Homeless Services Department (HSD) is a partnership between Multnomah County and the City of Portland that was created to oversee the delivery of services to people experiencing homelessness across Multnomah County through housing assistance, shelter, outreach and other services. HSD oversees multiple programs including rent assistance programs and supportive housing services and facilitates the Continuum of Care (CoC). The CoC board is comprised of representatives from local jurisdictions and government agencies as well as local community members and homeless services

providers. The board reviews and approves the CoC's application for federal funding, makes decisions about what should be funded locally with federal funds, designates a lead agency for the Homeless Management Information System, and provides planning feedback for the CoC.

As noted previously, the City participates in the Comprehensive Economic Development Strategy (CEDS), as well as in regional transportation planning efforts. Both contain strategies that encompass whole communities and neighborhoods. That includes outreach to residents and businesses. Strategies are cross-cutting recognizing that real opportunity is inclusive – housing, transportation, jobs, shopping, services, and recreation. The City will continue to participate in regional strategies. The City of Gresham is a member of the Continuum of Care and will continue to provide input and act on recommendations. Acting alone and with Multnomah County and the City of Portland, Gresham encourages partnerships across public and private sectors.

May 2020, Metro voters passed ballot measure 26-210, the Supportive Housing Services Measure, which is projected to generate as much as \$248 million a year across the region. Funds are being used to expand existing programs and support new services, with the goal of ending chronic homelessness in the region. Metro began disbursing funds in Summer 2021. Each of the three counties within Metro's jurisdiction submits an annual work plan on April 1 of each year, which describes the annual accomplishment goals for Supportive Housing Services funds for the following fiscal year. Ten year regionwide goals include stabilizing 10,000 households experiencing or at-risk of homelessness in permanent housing and connecting 5,000 chronically homeless households with supportive housing.

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 Gresham actively works to overcome impediments to fair housing choice through its Rental Inspection Program. The City inspects all multifamily units on both a mandatory and complaint basis. The complaint-driven component provides protections for those reporting the violations to the greatest extent possible. Inspections focus on a broad range of habitability standards, and focus is on fire, life and safety issues. The program has proven to improve living conditions for all Gresham residents and has elicited positive feedback. The inspection program is a practical approach to raised expectations for both landlords and tenants. In 2025-26, Rental Housing staff conducted 67 complaint-based inspections and 2,343 mandatory inspections for a total of 2,410 inspections. Through this program, City codes also require that landlords present tenants with an informational handout titled, "Rights & Responsibilities of Landlords & Tenants" upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. Additionally, City code assesses a fine upon property owners if a court determines they have retaliated against a tenant.

Housing Production

The City is committed to fostering housing options that working individuals and families can afford. The

City will look for new opportunities to preserve and expand housing options for all residents, including low-income residents who need ongoing support. The City has assessed housing inventory, and community needs through Gresham's Housing Capacity Analysis for 2021-2041 and subsequent Housing Production Strategy to ensure adequate housing development of all types occurs in the years to come so that housing choices are affordable and accessible to Gresham residents. The implementation of the Housing Production Strategy, which was approved by Gresham City Council in June 2023, began in the 2023-24 fiscal year. In September 2025, Gresham City Council voted to adopt the Gresham Downtown/Civic Urban Renewal Plan. The plan establishes a new 900-acre urban renewal area that is estimated to generate \$381 million to invest in the neighborhood over the next 30 years. Planned investments aim to improve commercial storefronts and housing, increase transportation opportunities, and create more job opportunities for area residents. The City plans to strategically purchase property in the area for community development. The first year of funding became available in July 2026.

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

The City of Gresham carries out desk monitoring on all subrecipients annually and in-depth monitoring as needed when subrecipients are high risk or have not had a full monitoring for 3 or more years. Desk monitoring includes a review of the subrecipient's invoices and reports, back up documentation and financial reports to ensure costs are eligible and the program is being carried out according to HUD requirements. In-depth monitoring is completed in a hybrid format, with some documentation being submitted electronically and other information being reviewed during an in person visit. Members of the Community Development and Housing Subcommittee (CDHS), who makes funding recommendations for CDBG and HOME funds, are also invited to join in-person monitoring visits. Subrecipients selected for monitoring were identified as higher risk due to staff turnover, inexperience with CDBG or HOME funding and/or issues identified during desk monitoring.

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.

The City of Gresham has prepared the CAPER for the program year from July 1, 2025, through June 30, 2026. The City provided a 22-day comment period commencing September 2, 2026, and concluding September 24, 2026. The CAPER includes attached CDBG reports generated by HUD's Integrated Disbursement and Information System (IDIS). The required comment period for the CAPER is 15 days, but the City opts for a longer comment period whenever possible to encourage comments.

A public notice ran in the Outlook on 9/2/2026 and was posted on the City of Gresham's Community Revitalization Website on 8/28/2026. Copies of the CAPER are also made available in person at City Hall, via email or US mail. A hybrid public meeting to hear public comment was held on September 23, 2026, at 3:00 PM and was followed by a remote meeting of the Community Development and Housing Subcommittee to review the 2025-26 CAPER on September 24, 2026 at 5:30 PM. Public comment was also accepted at this meeting. These meetings were held as two separate meetings because the CDHS cannot meet without a quorum and holding a public comment meeting first ensured that public comment could be heard by City staff regardless of whether a quorum was achieved. Translation services and accommodations are offered at all public meetings and hearings held throughout the year and in-person hearings are held in ADA accessible locations. Comments may be submitted using comment cards or general comments may be made via phone, mail, in person or email. A copy of the CAPER draft was also provided to members of the CDHS, a citizen subcommittee comprised of diverse community members that assists with applicant review and budgeting processes for the Annual Action

Plan. Additionally, the City maintains contact with subrecipients, many of whom specialize in providing culturally specific services and services tailored to the needs of people with disabilities and senior citizens. Subrecipient staff are encouraged to invite clients to comment and provide comments themselves based on their experiences serving clients from diverse backgrounds.

The City's Communications team maintains a list of bilingual employees who can assist with translation on the spot and manages the City's translation and interpretation requests when services are needed to translate documents or provide live interpretation or translation for events and meetings. For immediate translation, if a bilingual employee is not available or there are no employees who speak the same language as the community member, the City uses a language line for translation services.

Public comment on the 2025-26 CAPER will be summarized here.

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.

This is the fifth reporting year of the City's performance against its five-year 2021-2025 Consolidated Plan. The Consortium has set broad goals that encompass a broad range of projects and activities to address the needs expressed at our annual community needs hearings and through public comment throughout our planning processes annually. Some Gresham strategic plan goals were not achieved due to adjustments in the activities funded, increased costs for subrecipients and new or varying applicants for future funding years. For example, HOME-ARP funds was be used in 2022-23 and 2023-24 to provide services under goal 2, it appears as though no progress has been made on this goal because HOME-ARP accomplishments will be reported by the City of Portland as the Consortium Lead. Since the HOME-ARP projects have spanned 3 or more years, accomplishments under goal 2 will not show in the CAPER accomplishment data over the course of the Con Plan. Most goals were met or exceeded.

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

No

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

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

Only one activity that triggered Section 3 was funded in the 2025-26 program year. This activity completed the design phase, but no labor hours were completed in 2025-26. Section 3 reporting in 2026-27 will include labor hours for this project.