

**Metro Regional Affordable Housing Bond Program
Washington County Local Implementation Strategy
DRAFT ONE
4/15/2019**



Washington County Local Implementation Strategy

DRAFT ONE

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I. Introduction

This Local Implementation Strategy guides the efforts of Washington County to create permanent affordable housing using the Metro Affordable Housing Bond Program. Housing developed will primarily be regulated affordable rental housing units, with the potential for regulated affordable home ownership units. County departments engaged in implementation of the bond include: Housing Services, Finance, Land Use and Transportation, Facilities, Community Development, and the County Administrative Office. Additionally, the staff will be working closely with cities located in Washington County to create affordable housing throughout the area. As an implementing jurisdiction, Washington County, will leverage bond resources with other resources to address a range of important critical needs throughout the County.

Policy leadership for the implementation of the Metro Affordable Housing Bond Program will be guided by the Washington County Board of Commissioners. Also, as part of the review of bond funded housing development projects, the Housing Authority of Washington County (HAWC) will also have an important role in implementation of the bond program. The HAWC is governed by a seven-member Board of Directors, which includes all five Washington County Commissioners, one member who is a HAWC client, and one at-large member.

As stated in Washington County's Strategic Plan 2020, **the Washington County Community – Our Vision** is to be a model *community for 21st century America, reflecting the best of our community's resources, achievements, diversity, values, and pioneering spirit. Washington County is a special community that deserves the best of our individual and collective efforts. Maintaining the quality of life in this community will require the planning, creativity, and action of all – across the divide of sectors and organizations. The fulfillment of our community vision will require governments, business, nonprofits, religious and civic organizations to align passion and resources to serve our community and citizens. The challenge is two-fold: 1) maintain the quality and effectiveness of existing mission-driven organizations and institutions; and 2) link together these vast resources to serve, protect, and reinforce the attributes of a safe, healthy, and vibrant community.*

For our part, we envision a “collaborative community” that recognizes the role, contribution, responsibility and interdependence of citizens and institutions, a community in which:

- *The diversity of our residents is celebrated.*
- *Our children and families have access to the resources and support to reach their full potential.*
- *Our housing is safe, comfortable and diverse, spanning the spectrum of affordability, effectively exploiting the benefits of proximity to work, school, services, and transportation.*
- *Our educational system provides a consistent level of excellence from preschool through graduate-level higher education, and residents have life-long access to a variety of educational opportunities.*
- *Our nonprofit institutions are known for their strength and dedication to the needs of their constituents, working in concert with government, business, and religious partners.*
- *Our residents and visitors are safe, and our justice system is coordinated, balanced, efficient, and responsive.*
- *Our abundant natural resources are nurtured for their inherent beauty, and their contribution to the health and well-being of our residents now, and for generations to come.*

- *Our environment and neighborhood livability are maintained, enhanced, and balanced with our community's growth and development.*
- *Our community recognizes the social, economic, and environmental factors that contribute to the health and well-being of citizens and works together to prevent illness, disease, and injury.*
- *Our economy is known for its diversity, future orientation, vitality, and commitment to the local community.*
- *Our private and public institutions work together to identify and problem-solve critical community issues.*

Principles of Autonomy & Collaboration

Three jurisdictions in Washington County will participate in implementation of the Metro Affordable Housing Bond Program —Washington County, the City of Hillsboro and the City of Beaverton. While each will have a separate Implementation Strategy, the jurisdictions have agreed to several principles and practices with respect to the development and operation of their Implementation Strategies.

- First, the three jurisdictions have agreed to share both the bond resources and the goals established for Washington County as a whole, based on the share of bond revenue generated by each of the three jurisdictions. This allocation is voluntary rather than a requirement of Metro or of the legal framework of the bond.
- Second, each jurisdiction will have autonomy in project selection, commitment of bond resources, and oversight of bond funded projects. The jurisdictions may choose to collaborate on specific projects that will serve their individual as well as collective community needs. This may result in actual expenditure of the bond allocations across the three jurisdictions in a different blend than envisioned at the outset.
- Third, recognizing that many community partners serve the larger Washington County area, and that many citizens perceive that their needs could be met without respect to jurisdictional boundaries, the three implementing agencies will collaborate on community engagement efforts and on developing the partnerships that will help to ensure the success of all bond projects in Washington County.

In addition to working closely with the cities of Hillsboro and Beaverton, Washington County will also be working in conjunction with other cities located in the county and within Metro's jurisdictional boundary including Cornelius, Forest Grove, Tigard, King City, Tualatin, Sherwood and Durham.

Principles of Available Resources and Framework Targets

This Local Implementation Strategy focuses on housing that will be developed in the areas of Washington County inside of the Metro Jurisdictional Area and outside of the cities of Beaverton and Hillsboro. Bond revenues dedicated to Washington County are approximately **\$116,465,532**. The overall goal is to support the development of at least **814 units of affordable housing** throughout Washington County. These may be newly built units or existing units that are at risk of rapidly rising rents. While many of these units are expected to provide rental housing, affordable homeownership units may also be supported with bond resources.

Household Size	30% MFI (annual)	60% MFI (annual)	80% MFI (annual)
1 person	\$ 17,100	\$ 34,200	\$ 45,600
4 people	\$ 24,420	\$ 48,840	\$ 65,120

Source: HUD.gov accessed on 9/10/2018

Recognizing that our lowest income neighbors have the greatest challenges in securing affordable housing, and consistent with the Metro Bond Framework, Washington County has a goal of developing **334** units that are affordable for households with an income at or below 30% of Median Family Income (MFI). These units may serve people with special needs as well as people who earn low wages or have fixed incomes. As least **124** of these units will be supported with rental assistance provided by HAWC, allowing those units to be targeted to the most fragile households. Washington County will utilize its project-based vouchers in different ways to leverage and support providers who can bring services to the table.

The provision of supportive services is essential to successfully house and stabilize many of our community's most vulnerable populations. To provide critical affordable housing services, Washington County is working with social service agencies and other community partners to link supportive services to the affordable housing to help people recover, achieve stability and thrive.

Much of the private rental housing market is concentrated on small unit sizes, while the need for rental housing crosses a range of household sizes. This miss-match between need and available units is especially difficult for lower income households. As a result, the Metro Bond Framework has set unit production targets and guiding principles. A unit production target is that half of the units developed under the bond program must include two or more bedrooms. For Washington County, this means that at least **407** units will include two or more bedrooms. Another unit production target is that no more than 10 percent of homes will be provided for households making 61-80% of MFI.

Framework Unit Production Targets for Washington County (excluding Beaverton and Hillsboro)	
Total Housing Units Production Target	814
Target Housing Units with 2 or more bedrooms	407
Target Units for 30% MFI Households	334
Target Units for 31% - 60% MFI Households	399
Target Units for 61% - 80% MFI Households	81

Principles of Advancing Racial Equity

Washington County is the most racially diverse county in the state. The Metro Council and Washington County have made advancing racial equity a priority for implementation of the Affordable Housing Bond Program. Decades of housing policy from the federal to local level has contributed to disparate outcomes for communities of color in housing. People of color are much more likely to struggle with unaffordable housing, displacement and homelessness. The implementation of the Metro Affordable Housing Bond Program provides an opportunity to address this inequity and to meet the needs of historically marginalized communities.

The efforts and opportunities to address racial equity occur at many points in the implementation of the Affordable Housing Bond Program. The selection of project sites, inclusion of minority-owned contractors and workforce in building housing, formation of culturally specific partnerships for outreach and services, accessible tenant selection processes, and ongoing reporting of outcomes all provide opportunities to advance racial equity. The specific implementation strategies to address these issues that Washington County will employ are discussed in the various sections below.

In addition, Washington County, along with the cities of Hillsboro and Beaverton and HAWC, receives federal housing and community development funds from the U.S. Department of Housing and Urban Development (HUD) and is, therefore, required to periodically prepare an Analysis of Impediments to Fair Housing (AI). The last AI was produced jointly with the City of Beaverton in 2012 (Hillsboro began receiving its CDBG funds as a separate allocation in 2018). The new AI will be completed as part of the next Consolidated Plan update, which is underway currently and will be completed in 2020. The AI must “affirmatively further” fair housing according to HUD’s *Fair Housing Guide* by:

- Analyzing and eliminating housing discrimination in the jurisdiction
- Promoting fair housing choice for all persons
- Providing opportunities for inclusive housing occupancy patterns
- Promoting housing that is structurally accessible and usable by all people, regardless of ability
- Fostering compliance with the nondiscrimination clauses of the Fair Housing Act

The 2012 AI identified six Fair Housing strategy areas:

1. Awareness, information & training
2. Access to decent and affordable housing
3. Land use and zoning tools to promote access to opportunity
4. Overcoming linguistic and cultural isolation and serving communities of color
5. Overcoming disability-related barriers
6. Data collection and analysis

The above strategies identified in the 2012 AI will also affirmatively further fair housing within the equitable housing lens within the LIS. The Washington County Housing Services Department which includes the HAWC, is also a recipient of Federal Funds and directly owns housing and/or operates housing as a limited partner. HAWC provides housing services in alignment with Fair Housing guidelines and will similarly do so with Metro Affordable Housing Bond Program funded housing developments.

II. Local Implementation Strategy Development

The development of the Implementation Strategy is based on review of recent studies and planning efforts that have involved diverse community members within Washington County, along with direct community engagement specifically addressing the Metro Affordable Housing Bond Program. Studies and planning efforts reviewed include:

- Metro’s 2017 Regional Affordable Housing Inventory Database
- *2015-2020 Washington County Consolidated Plan* (housing needs assessment section)
- The Coalition of Communities of Color report, *Leading with Race* (particularly sections on housing justice)
- Metro-funded Southwest Corridor Equitable Housing project report

- Washington County’s Aloha-Reedville and Aloha Tomorrow studies
- Housing need studies prepared for specific jurisdictions within the County, excluding Hillsboro and Beaverton (housing needs assessment section)
- Oregon Housing and Community Services *2019-2023 Statewide Housing Plan* (housing needs assessment section)
- Metro’s *Tri-County Equitable Housing Plan*

Information from these studies and reports were used to develop various sections of this strategy. For example, the Metro Regional Affordable Housing Inventory Database is discussed in the Project Selection Process Section. It is important to note that in many ways the input and suggestions received through the County’s community engagement process substantiated the findings from the above - mentioned studies and planning efforts.

Community Engagement – Phase I

During the months of Feb, March and April in 2019, the Washington County regional project team, which included staff from the County, Beaverton and Hillsboro, undertook extensive consultation with the community to better understand key issues and suggestions to addressing affordable housing within Washington County. To be most efficient, the project team opted to attend existing community and agency-based meetings to gain as much varied input as possible from a broad range of stakeholders. Every effort was made to approach all community engagement activities through a lens of equity and inclusion with special attention paid to gathering the perspective of historically underrepresented groups.

The project team was able to hear from over 200 people representing over 50 agencies (XX appendix), as well as members of affected communities, by attending existing meetings. At each opportunity the team provided a brief overview of the Metro Affordable Housing Bond Program and its impact in Washington County, and a description of the collaborative community engagement conducted between the three jurisdictions (cities of Beaverton and Hillsboro and Washington County). Opportunities also included facilitated discussions to answer the following questions:

- 1) What community-based organizations, service providers, advocacy groups, and communities should we connect with for input about Metro bond implementation strategies?
- 2) What are the things that are most important to you and/or your family when you think about where you want to live?
- 3) What do you think are the biggest challenges people have with keeping their housing?
- 4) What types of services, programs, and/or activities are needed to overcome these challenges?
- 5) What do you think are the biggest challenges people face when trying to find a place to live?
- 6) What is the best way for you to find out about available affordable housing?
- 7) Is there anything else you’d like to share about your experience or the need for housing in your community?

The table below outlines the community engagement opportunities that the project team attended.

Date	Stakeholder Group	Location	Total Participants	Agencies
02/07/2019	Community Housing Advocates	Beaverton	12	11
02/06/2019	Housing Support Services Network	Beaverton	57	42
02/13/2019	Washington County Resident Advisory Board	Hillsboro	20	
03/11/2019	Self Determination Resources	Beaverton	5	1
3/14/2019	SOAR Immigration Legal Services/EMO	Hillsboro	3	1
3/18-3/27	Homeplate Youth Services	(survey)	10	1
3/18/2019	Con Plan Workgroup	Hillsboro	31	17
3/25/2019	Washington County Parole and Probation	Hillsboro	11	2
3/26/19	OR Law Center	(survey)	15	1
3/27/2019	Community Action/CPOs Homeless Forum	Cornelius	43	2
4/4/2019	Community Action – Family Advocates & Housing Specialists	Hillsboro	15	1
4/16/2019	Head Start Policy Council (parents)	Hillsboro		
4/15-4/17	Con Plan Focus Groups (6)			
TBD	Community Action – Rent Well			
TBD	DAVS Betsy – Tribal Community Spanish speaking seniors			
TBD	Culturally Specific Behavioral Health Providers			

Learnings from Input Sessions

Input from all the engagement opportunities was compiled, coded and analyzed for key themes related to the following 5 categories:

- Barriers (52% of total)
- Service Needs (21% of total)
- Location (16% of total)
- Marketing (8% of total)
- Other (3% of total)

A summary of detail within each category is below.

Barriers

This category includes a variety of factors that prevent people from being able to secure or maintain housing. Specifically, these responses fell into one of the following categories:

- Cost (33%) – affordability of rent; application fees; costs to move; deposits; costs related to past rental history, criminal history, and credit history; and utility costs
- Screening Criteria (31%) – rental history; criminal history; credit history; citizenship status; and understanding what purpose screening serves and why it is necessary
- Navigation (16%) – complex system of finding and securing housing; complex application process; ability to understand and follow through with finding and securing housing; bureaucracy is overwhelming; mobility/transient nature of clientele
- Housing Needs (9%) – unit size; accessibility for developmentally delayed people; safety/livability of units; spaces not trauma informed
- Cultural and Trust (8%) – Cultural differences in understanding of norms and compliance; and fear or distrust about stability of housing, neighbors, environment

Service Needs

This category includes factors that are related to specific services that could be offered onsite or ways in which services could better meet the needs of tenants. For the most part, responses were categorized as the following:

- Education (37%) – skills building for self-sufficiency, housing sustainability; vocational training and mentorships; and renter education related to navigating the system, understanding tenant rights, and compliance with rules
- Service Alignment (31%) – coordination between community-based organizations, agencies and other service providers; coordination of services specific to families and seniors;
- Addictions/Mental Health or other Case Management (16%) – onsite mental health and addictions services as well as case management for others who need that level of support
- Other mentions included accommodations within the physical space such as community rooms, common space, and storage space

Location

This category includes specifics about where housing is located, proximity to things people may need to thrive and the environment in which housing is situated. Responses primarily fell into the following groups:

- Services (29%) – proximity to grocery stores, employment, medical providers, and other supportive services
- Safe/Sense of community (35%) – good schools; sense of community; and safe, quiet, walkable neighborhood
- Transit (21%) – close to public transportation; and accessible for special needs transportation (LIFT)
- Other comments included equitable distribution of housing in mixed-income areas with broad geographical dispersal

Marketing

This category was specifically focused on how people hear about housing and considerations in how to share information about housing with communities. This was a much smaller number of comments that

predominately focused on sharing information through community-based organizations and other word-of-mouth opportunities as well as communicating information in multiple languages and formats.

III. Implementation Phases

Implementation of Bond funded projects is expected to occur over a period of five to seven years. During this period staff will identify sites, secure needed resources for capital and services, develop partnerships with developers and service providers, and develop and construct housing.

During this period, it is expected that community needs, and opportunities may change. New census data will become available, new community planning efforts will be initiated or completed (e.g. development of Washington County's 2020-2024 Consolidated Plan), and new resources or opportunities may become available while other resources or opportunities may not materialize as anticipated. In addition, certain framework goals may be easily fulfilled while others may prove more challenging. Because of the dynamic nature of this work, Washington County proposes to periodically review, and potentially reset, this Implementation Strategy.

Washington County proposes to review the Implementation Strategy at two points. The first review will occur 18-24 months following the initial roll-out of bond funds. The second review will occur 48-60 months following initial roll-out of funds. Should these reviews result in modifications to the Implementation Strategy, the review process will include community outreach and engagement, review and amendment by the Washington County Board of Commissioners, and submission to Metro's Community Oversight Committee for review and approval.

IV. Organizational Plan for Implementation

Washington County will use a combination of staff and consultants to administer this Implementation Strategy. In-house staff will be responsible for community engagement and outreach, project selection, project documentation and funding processes, overall program monitoring and reporting. In-house staff will also be responsible for the site selection, financial packaging and development process for projects that the Housing Authority will own. Washington County may engage consultants with expertise in financial packaging of affordable housing to review proposed projects during the selection and commitment phases. Similarly, Washington County may engage consultants with expertise in construction management to help oversee development. Washington County will also continue to collaborate with bond implementation partners within the County and throughout the region as appropriate to increase efficiency and effectiveness.

Metro has committed \$2,451,906 over five years to support Washington County's staffing plan for bond implementation. Initially, Washington County anticipates that these funds will support the addition of three new limited duration positions at the Housing Authority. Specifically, those positions include: 1 FTE Housing Development Manager, 1 FTE Tenant Support Specialist, and 1 FTE Financial Specialist, in addition to existing staff.

V. Project Selection Process

Washington County anticipates that projects funded by the Metro Affordable Housing Bond Program will be a variety of sizes that meet the overall targets regarding unit sizes and income levels and address specific needs in jurisdictions throughout the County. In identifying strategies to identify local opportunities, needs and location priorities for housing, Washington County will rely on ongoing relationships with jurisdictional partners and be based on internal information from housing studies conducted by Washington County for the Office of Community Development and the Housing Services Departments. Washington County anticipates selecting projects both on a rolling basis and with targeted Request for Proposals (RFP).

Needs

Washington County conducted a housing needs assessment in 2014 as part of the *2015-2020 Washington County Consolidated Plan*. The study identified the need for 14,000-23,000 additional housing units in Washington County for those at <50% MFI (2006-2010 and 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data). In addition, a housing needs analysis is currently underway for the upcoming *2020-2024 Washington County Consolidated Plan* planning process which will also use the most recent CHAS data from 2011-2015. This CHAS data will be used in the upcoming Consolidated Plan and is included here.

	Affordable Housing Need – Washington County		
	<30% MFI	30-50% MFI	Total need <50% MFI
<i>2015-2020 Washington County Consolidated Plan, Housing Needs Analysis</i>	10,000-11,000	4,000-12,000	14,000-23,000
2011-2015 CHAS	12,860	12,880	25,740

Needs information for communities within Washington County, using the 2011-2015 CHAS data, are shown below:

Location	Affordable Housing Need, <50% AMI or Less		Existing Regulated Affordable Housing
	Self-Identified	CHAS data, 2011-2015	
Forest Grove*	~1,400 <i>Housing Needs Assessment and Recommendations, 2017 (written by City of Forest Grove staff, being updated currently)</i>	355	560
Tigard*	-	2,898	949
Aloha-Reedville	1,600 <i>Housing Equity and Opportunity Strategy, 2014</i>	-	-
Cornelius	-	325	126**
King City	470 <i>Housing Needs Analysis, March 2018 (Eco</i>	65	0

	<i>Northwest)</i>		
Tualatin	-	1,865	604
Sherwood	292 <i>Housing Needs Analysis, December 2017 (Eco Northwest)</i>	390	123
Durham	-	145	210

*Two communities in Washington County, Forest Grove and Tigard, are categorized as rent burdened cities under the Rent Burdened Cities Bill (HB 4006). This legislation requires that cities of more than 10,000 people in which 25% of the residents pay more than 50% of their income towards rent must “hold at least one public meeting to discuss the causes of severe rent burdens and potential solutions...” and “requires these cities to complete and submit a survey to the Department of Land Conservation and Development (DLCD) and Oregon Housing and Community Services (OHCS) annually, reporting the number of permitted and produced residential units in several different categories.” DLCD technical assistance funds have been allocated to selected communities to support new or updated housing needs analyses, code analysis, code audit, or housing strategy implementation plans. DLCD supported work must be completed by June 2019.

**81 units in Metro Database + 45 units at Cornelius Place (completed in 2019) = 126 total affordable housing units in Cornelius

Priority Housing Development Areas

Washington County will use seven factors to evaluate housing development priority areas:

1. **Jurisdictional and Area Partnerships and Geographic Dispersal.** Jurisdictional and area partners involved in advancing local affordable housing goals and who can also provide financial assistance e.g. SDC/fee waivers or exemptions, density bonuses, property tax waivers, and other financial support, will be better positioned to attract developers due to the high cost of land and construction of affordable housing. However, Washington County will also work to disperse Metro bond-funded projects throughout the implementation area, subject to land availability.
2. **Housing Needs Data and Census Tract Analysis.** As stated above, housing needs data will be used to locate affordable housing developments. Information regarding where affordable housing currently exists (from the 2017 Metro Regional Affordable Housing Inventory Database) will be used, as well as, GIS identification of language predominantly spoken at home, areas of concentration of low-income households, communities of color and people with disabilities will be used to help identify opportunities to locate new affordable housing units.
3. **Land Availability and Cost.** Buildable land that is also appropriately zoned and offered at a fair market price will be a high priority factor in determining the location of an affordable housing development. However, donated land meeting other factors will receive a very high priority.
4. **Local Development Partners.** The County will work in partnership with developers and owners that are skilled and interested in providing affordable housing in the community including local for-profit and not-for-profit affordable housing developers who have successfully developed affordable housing within the Portland metro area; also, local providers who have a proven

track record providing resident services. In addition, HAWC intends to be a developer or owner of housing funded under the Metro Regional Affordable Housing Bond Program.

5. **Major Public Transportation and Transit Corridors.** Areas within a quarter-mile of MAX or high-frequency bus lines as identified by GIS mapping will be given priority. This also includes areas with sidewalk connections to facilitate accessible use of transit.
6. **High Opportunity Areas.** High Opportunity Areas include sites located near transit (as defined above), jobs, high-performing schools, commercial services, parks and open space, and basic needs services.
7. **Areas Identified by HUD (U.S. Housing and Urban Development) as Qualified Census Tracts (QCTs) and Small Area Difficult to Develop Areas (SADDAs).** QCTs and SADDAs are areas where HUD has incentivized development of affordable housing; they allow for projects built in those areas to receive a 30% 'boost' in Low Income Housing Tax Credits (LIHTCs) that can be leveraged with Metro Affordable Housing Bond Program funds. These areas will be identified by GIS mapping.

Threshold Project Requirements

The implementation of the Metro Affordable Housing Bond Program provides an opportunity to address this inequity and to meet the needs of historically marginalized communities. To achieve goals of racial equity, meeting the needs of historically marginalized communities and provide economic opportunities for minority-owned, women-owned or emerging and disabled veteran-owned small businesses, Washington County is applying threshold requirements for all developers and owners of Metro Affordable Housing Bond Program funded housing developments. These requirements will include:

- A. **MWESB Contracting.** Project sponsors will be required to make best faith efforts to achieve 10% or more subcontracting goals of development hard and/or soft costs to certified minority, women, emerging and disabled veteran-owned businesses. Project sponsors will be required to provide documentation of subcontracting efforts and results. The 10% goal may be increased as Washington County completes the development of a corporate plan for purchasing and contracting through its internal diversity, equity and inclusion work.
- B. **Affirmative Marketing, Tenant Selection and Lease-Up.** Consistent with Metro policy, Washington County will work to ensure that housing developed using Metro Affordable Housing Bond Program funding serves communities of color, families with children and/or multiple generations, people living with disabilities, seniors, veterans, households experiencing or at risk of homelessness, and households at risk of displacement. Washington County will require that project developers and/or owners make best faith efforts to make units available to minorities and disadvantaged populations using best practice marketing strategies. In general, this will require:
 - i. Affirmative outreach and marketing to target populations. Developers and/or owners, and their property management companies (if applicable) will be expected to engage in pro-active efforts to make disadvantaged populations aware of the availability of units, and the process and timeline for application. Washington County will work with project sponsors to identify specific target populations for each project and will review the proposed outreach and marketing strategy for each project.
 - ii. Washington County will require that project sponsors use low-barrier screening criteria that balances access to target populations, project operations, and

community stability. Typical requirements may include less than standard market apartment income-to-rent ratios, reduced credit history requirements, and criminal history requirements that only considers recent convictions that are most directly tied to tenant success. Arrest records will not be allowed as a basis for screening at any time. Project sponsors will be required to review appeals to denials of standard screening criteria that take into consideration efforts of applicants that demonstrate stability and potential for tenant success. Project sponsors are also required to review appeals if the disqualifying aspects of a denial are related to a disability and make reasonable accommodations as appropriate.

- iii. HAWC will use the project-based voucher (PBV) RFP process to leverage units with low-barrier screening. This can be done by increasing the score for projects that commit to low-barrier screening such as no credit checks, allowing renters with evictions or poor rental history to lease up.

Competitive Selection Criteria

- A. **Workforce Participation.** Washington County is interested in encouraging participation in project workforce hours by minorities, women and disabled veterans. Washington County will work with private and non-profit developers to use apprenticeships through trade organizations and workforce agencies to recruit targeted populations.
- B. **Nonprofit Project Sponsor.** Washington County will solicit nonprofit project sponsors and/or partners, particularly when developing properties for special needs populations or those populations related to special programs for homeless youth, homeless families with children who have come from domestic violence situations, second-chance previously incarcerated individuals or individuals who need stable housing to address and continue a sober and clean life. Non-profit partners and project sponsors will play an important role in reaching difficult to house populations and communities of color.
- C. **Permanent Supportive Housing.** Washington County is committed to providing permanent supportive housing to the most vulnerable individuals and families in the community. To address the need for permanent housing in Washington County, the county will work with various agencies, local governments, non-profits and others to develop housing units in conjunction with the provision of services to allow for an individual and/or family to be successful and thrive.
- D. **Commitment to serving communities of color – demonstrated by culturally specific services to facilitate lease-up process as well as ongoing services.** Washington County will make all efforts to use culturally specific techniques such as marketing in appropriate languages, gathering places and use of social services providers.
- E. **Use of universal design principles.** Washington County will increase the number of accessible and visitable housing units for individuals of all ages and abilities. Use of universal design principles that enhance safety and access both at properties and within apartment units (in addition to accessibility requirements outlined in local community development codes) is important to this work.

Sites Identified by Washington County.

Washington County is in the early stages of exploring various sites that the HAWC may purchase for Metro Affordable Housing Bond Program financed projects. Washington County will prioritize such sites if they help to fulfill Implementation Strategy goals. The County will take into consideration:

- the beneficial leverage of free or discounted land,
- opportunities to meet community development goals or the development of beneficial service partnerships; and/or
- opportunities to use 4% Low Income Housing Tax Credit (LIHTC) resources.

Should Washington County identify high priority sites under this Local Implementation Strategy, it will determine whether to develop and own the project or to select a developer and owner. Should the County decide to select a developer and owner it may use an RFQ, RFP or sole source selection process.

Sites Identified by Metro

The allocation of Metro Affordable Housing Bond Program funds includes an allocation for land acquisitions carried out by Metro rather than by the implementing jurisdictions. Metro has allocated an estimated \$21 million for acquisition in Washington County, including the cities of Beaverton and Hillsboro.

Encouraging Metro to purchase sites within the County will further leverage Washington County's allocation of bond funds and is an important component to the overall successful bond implementation in the County. While it is uncertain whether any such sites will be in the geographic area of Washington County's Implementation Strategy, the County is committed to working closely with Metro should developable sites be identified. If developable sites are identified within Washington County, the County plans to select a developer and owner through a competitive process working in conjunction with Metro.

Sites Proposed by Developers

Washington County may issue Requests for Proposals (RFP) and will accept unsolicited proposals from developers for projects to be funded under the Metro Affordable Housing Bond Program. Developers should be aware that, depending on progress against the Metro Affordable Housing Bond Program framework, proposals may need to achieve specific targets for income levels, unit types, geographic area, racial equity, or other characteristics. Developer and owners will be required to work closely with Washington County Housing Services Department to ensure that their proposals are in alignment with the Washington County's Implementation Strategy.

VI. Leveraging Other Affordable Housing Resources

The Metro Affordable Housing Bond Program is a landmark funding source for affordable housing in the tri-county region. With the leverage of state, federal and other sources funding, the Metro Affordable Housing Bond Program provides an opportunity to substantially increase the number of units that can be developed within a five- to seven-year period.

The Metro Affordable Housing Bond Program unit production goals are ambitious and, realistically, cannot only be accomplished using Metro Affordable Housing Bond resources. A combination of bond funds and both public and private funding sources will be required to meet unit production goals. The following principles that will guide Washington County's efforts to leverage bond funds:

- **Maximize the use of non-competitive resources.** The 4% Low Income Housing Tax Credit (LIHTC) program is available on a non-competitive basis to provide equity for affordable housing development. This program is especially useful for larger projects or scattered site projects that can be bundled to achieve the scale desired by equity investors. Developing projects in Qualified Census Tracts (QCTs) or Difficult to Develop Areas (DDAs) maximizes the usefulness of the 4% tax credits.
- **Maximize use of private resources.** Some projects will generate enough rental income to make debt service payments on loans from private banks. While ensuring that projects have appropriate operating budgets and reserves, private debt should be secured for projects whenever feasible.
- **Maximize local resources.** A variety of local resources may be available to support capital and operating expenses:
 - **Project-based rental assistance.** HAWC has committed project-based Section 8 assistance for 124 units to Washington County bond-funded projects. Some portion of these project-based Section 8 assistance will be committed to HAWC-owned projects and some will be available to other project sponsors. This assistance will allow residents to pay based on their household income, while the project will receive a set rental income based on the Section 8 payment standard.
 - **Property tax exemption.** HAWC-owned projects will be eligible for property tax exemption under the provisions of ORS 307.092(1)(b). Washington County also provides property tax exemption in unincorporated areas for eligible non-profit rental housing under the provisions of ORS 307.540-548. Other jurisdictions providing property tax abatement for eligible affordable housing include: the City of Tigard, City of Forest Grove, City of Beaverton, City of Cornelius (senior properties with a PILOT agreement only), and City of Hillsboro.
 - **HAWC Conduit Bonds.** HAWC may consider issuing conduit bonds for HAWC-owned or other projects. These bonds have the advantage of lower fees than offered by other conduit bond issuers.
 - **Washington County Housing Production Opportunity Fund.** The Housing Production Opportunity Fund (HPOF) is administered by the Housing Services Department and is intended to support affordable housing development projects that encounter a gap in funding for the project after receiving all other funds. In the 2018-2019 fiscal year, HPOF was allocated \$1 million from the Washington County General Fund. The unspent HPOF funds are being rolled into the 2019-2020 fiscal year budget, with a recommended addition of \$4 million to be included in next year's budget.
 - **Resources of partner jurisdictions.** The Housing Services Department will work closely with cities and other jurisdictions in their geographic target areas to identify local resources that can be contributed to affordable housing projects. This may include donated or discounted land, fee waivers or exemptions, grants, or other resources. Examples of this include the City of Tigard's SDC Exemption Program, and Tualatin Hills Parks and Recreation (THPRD)'s potential fee waiver for a limited number of affordable housing units.

- Seek other existing affordable housing resources (Federal, State and County resources).** Washington County recognizes that despite the substantial amount of Metro Affordable Housing Bond Program funding and the strong commitment of resources from HAWC and Washington County, projects may have financing gaps that are best filled with other traditional affordable housing program resources. Sources such as the County HOME funds, State Document Recording Fee, Oregon Affordable Housing Tax Credit (OAHTC), and other funding sources may be needed to complete financing packages for specific projects. Washington County will also monitor ongoing legislation at the State level that might add additional resources for permanent supportive housing capital, rental and service funds. Washington County will work with funders in a transparent way to find the most effective and efficient path to bring these resources to bond-funded affordable housing projects.
- Support the pipeline of other affordable housing projects.** While much of Washington County’s efforts during the implementation of the Metro Affordable Housing Bond Program will be focused on moving the pipeline of bond-funded projects forward, the ongoing availability of other Federal and State affordable housing resources means there is a likelihood of other projects moving forward during at the same time. HAWC will monitor the pipeline of projects being proposed and funded in the geographic area of this Implementation Strategy and will collaborate with developers to identify the most appropriate funding packages and other support that can be provided to those projects.

VII. Project Selection Criteria

Metro Framework

Washington County will take several factors into consideration in the selection of projects to be funded under the Housing Bond. The first consideration will be how each project contributes to the accomplishment of the Metro Framework. Under the Framework, Washington County has the following targets:

Unit Production Targets for Washington County	
Total Housing Unit Production Target	814
Number of 30% AMI Units	334
Number of Family-Size Units (2Bedroom and Larger)	407
Maximum number of 60% - 80% Units	81

To achieve these unit production targets Washington County expects that 8-12 affordable housing developments will have to be developed or rehabilitated. Washington County does not expect that each project will reflect the ratios expressed by these targets, but instead that the overall portfolio of funded projects will achieve these targets. Or seen another way, more than 814 housing units may be developed while achieving these production targets. The geographic areas covered by this Implementation Strategy are quite varied and call for varied housing types which may have vary significantly in production costs.

Washington County expects that most of the housing development projects will include units that are two bedroom or larger. The ratio of small and large units should reflect the target population for specific

projects, and characteristics of each site in terms of whether it is best suited to families with children or smaller households.

Washington County expects that most projects will include units for residents with incomes of 30% or less of the MFI. It is anticipated that project units that are targeted at the very low-income resident may be low wage earners, people with disabilities or other special needs, or people who have experienced homelessness. With the appropriate non-profit or for-profit organization skilled in delivering supportive housing with services, some projects may be designed exclusively to have 30% MFI units or have high concentrations of 30% MFI units.

Furthering Washington County's Affordable Housing Goals

In addition to fulfilling the Metro Framework, Washington County anticipates that the affordable housing developed with the Metro Affordable Housing Bond Program will also support local goals. These goals are enumerated in the Department of Housing Services *2017-2027 Strategic Plan* and summarized below.

Consistent with this Plan, Washington County:

- Will work to create housing opportunities across the geographic area of this Implementation Strategy. Included in the geographic area are the cities of Cornelius, Durham, Forest Grove, King City, Sherwood, Tigard and Tualatin and the unincorporated areas of Washington County that are within the Metro Jurisdictional Area.
- Will focus its bond funding on new construction of affordable multi-family rental projects.
- May consider acquisition/rehabilitation projects to prevent displacement.
- May support access to homeownership units.

Racial Equity

Based on themes from *Leading With Race* by Coalition of Communities of Color, Washington County's approach to racial equity in project selection will take into consideration factors such as:

- Increasing affordable housing in areas with existing underserved diverse populations, especially in areas that may be subject to gentrification.
- Providing new affordable housing in high opportunity neighborhoods and sites. This would include sites that have good access to transit, jobs, quality schools, commercial services, parks & open space, etc.
- Supporting project teams that provide culturally specific resources and services. Washington County recognizes that culturally specific programs can achieve strong outcomes for diverse groups in the community. Washington County will prioritize projects sponsored by culturally specific organizations or projects sponsored by partnerships in which culturally specific organizations have a meaningful role in project design and operations.

According to the report, *Leading With Race*, disparity in housing stability and affordability for persons of color is directly linked with economic disparity, as well as historic and systemic housing injustice through practices such as redlining. Ongoing community engagement with culturally specific groups throughout the bond implementation period will further inform the project selection criteria.

Connection to Services

Washington County will require resident service coordination to be provided at all projects, appropriate to the level of need of the target population. Resident Services will focus on eviction prevention, helping residents access mainstream services for which they may be eligible, and community building activities.

Metro bond funds can be used for development of housing, not for direct service costs. Projects serving high needs populations will require robust supportive services to ensure resident stability and positive outcomes. Washington County will work closely with its Department of Health and Human Services to connect developer-owners to public and private service providers in the community to create needed partnerships. Washington County will evaluate a project's target population and service plan to ensure that it is appropriate and sustainable.

Washington County will also look for opportunities to leverage existing services with language in RFPs for project-based vouchers. We understand that providing deeper subsidies to properties in the form of project-based vouchers can allow for the flexibility to help fund some of the important services that are needed. As mentioned, Washington County will monitor the legislation at the State level regarding permanent supportive housing capital, rental subsidy and service dollars. Should funding for permanent supportive housing be offered, Washington County will apply and leverage funds with Metro Affordable Housing Bond Program funds to create deeply affordable housing.

Oregon Housing and Community Services (OHCS) *2019-2023 Statewide Housing Plan* identifies Permanent Supportive Housing (PSH) as a priority. According to that plan,

PSH combines lease-based housing affordable at extremely low incomes (less than 30% of the area median income) with tenancy supports and other wraparound supportive services to more effectively serve the most vulnerable populations, including people who are homeless or at risk of becoming homeless and people who are institutionalized or at risk of institutionalization. Properties providing PSH units offer social, health, and employment services for residents, helping to ensure long-term housing success. PSH is a key resource for people who, without support in their tenancy, may not be as successful in maintaining stable housing and who conversely, without housing, may not be as successful in using health care and other services to achieve and maintain recovery, health and wellness (pg. 24).

Additionally, financial support from Metro helped develop the *Tri-County Equitable Housing Strategy to Expand Supportive Housing for People Experiencing Chronic Homelessness*. The Washington County Board of Commissioners received and discussed this report at its April 9, 2019 Work Session. This strategic plan provides recommendations to reduce chronic or long-term homelessness for people with complex health conditions through a scaled, blended service and housing system that provides flexible service dollars and ensures a stable, long-term stock of supportive housing adequate to meet the regional need. Based on current chronic homeless data and current unit inventory turnover rate, the strategic plan identifies a need for 226 units of permanent supportive housing in Washington County. While Metro Framework Unit Production Targets and the Washington County Implementation Strategy do not have a specific target for permanent supportive housing units, the County is actively identifying experienced partners to collaborate with the County to deliver housing units with services to reduce chronic or long-term homelessness.

Project Cost Containment and Efficiency

A goal of Washington County is to support a portfolio of projects that provide the best return on investment of public dollars. These projects are characterized by efficient design and durable construction. They will use cost effective measures to create efficient use of energy and water and select materials to create healthy living spaces. They will be designed to meet the needs of the target households in terms of space, amenities and service requirements, and are valuable assets in the communities in which they are located.

Washington County also recognizes that the ability to leverage various funding sources will vary from project to project. The blend and availability of funding sources will have an impact on both hard and soft costs. Hard costs include expenses associated with actual purchase of land or projects and construction of projects. Hard costs will be impacted by development standards of investors, lenders and other public funders. Soft costs include expenses associated with financing, architectural fees, reports, System Development Charges and land development costs. Soft costs will vary with requirements for specific legal, accounting, reserve requirements, and fees. Leverage will also be impacted by the service needs of the residents.

Based on Meyer Memorial Trust's *Cost Efficiency Report* (October 2015), Washington County will evaluate all proposed projects to ensure that the costs are reasonable and appropriate to the specific project. This evaluation may consider:

- Scale appropriate to the target population.
- Scale appropriate to the community in which the project is located.
- Costs associated with design requirements of the jurisdiction in which the project is located.
- Costs associated with mixed use projects.
- Quality of construction materials.
- Costs associated with service needs of the target population.
- Reasonable fees and reserves.

Washington County is anticipating that the amount of bond funds needed for development will vary. Washington County will continuously monitor the overall pipeline of projects to ensure that the Metro Bond framework and Washington County Local Implementation Strategy requirements are met.

Capacity/Readiness to Proceed

Washington County understands that affordable housing is a specialty business that differs in many ways from market rate housing or other real estate development. Washington County will seek to partner with nonprofit, private, or governmental organizations that have demonstrated skills as affordable housing developer and/or owners. Expertise with the framework target unit types and with the specific population proposed by a project will also be considered.

Timely implementation of the Metro Affordable Housing Bond Program is critically important. Washington County will prioritize projects that have a clear path to timely completion. This may include a priority for projects that have appropriate zoning, have secured much or all financing sources, have secured needed service partnerships, etc. While Washington County may not make a funding commitment until projects meet "ready to proceed" criteria, Washington County suggests that

interested developers begin conversations with the County at the earliest stages of pre-development to ensure that the housing development project aligns with the Local Implementation Strategy.

VIII. Project Implementation

Review & Approval of Projects

Bond funded projects will go through a multi-stage review and approval process as follows:

- Washington County initial review and approval. Before a project is forwarded to Metro for concept endorsement a project must, at a minimum, have site control, a preliminary development plan, preliminary estimate of total development costs, preliminary estimate of needed Housing Bond funds, and an identified development team. The Housing Advisory Committee which provides advice to the HAWC Board of Directors regarding affordable housing and programs to ensure tenants are successful will be involved in the initial review of housing development projects suitable for Metro Affordable Housing Bond Program funding and that will be located within the County. The Housing Advisory Committee is comprised of 15 members representing real estate, property management, finance, construction, design, planning, social service providers, minority and elderly groups, veterans and public housing residents.

Washington County will process concept endorsements with a second-step approval process: staff level recommendation to the Housing Advisory Committee, followed by a recommendation for approval to the HAWC Board of Directors which is comprised of the 5-member Washington County Board of Commissioners, one community member and a public housing resident.

- Metro concept endorsement. County staff, in conjunction with Metro staff, will present the project to Metro's Community Oversight Committee which will review the project for conformance to the adopted Local Implementation Strategy and make a recommendation to Metro's Chief Operating Officer (COO) for endorsement.
- Washington County project approval and funding authorization. As the project sponsor completes due diligence and moves to finance closing, the County will process the project approval by recommending the project for final approval to the Board of Commissioners.
- HAWC ownership approval. If HAWC is involved as a partner and/or in an ownership position in a project, the partnership request would go before the Housing Authority Board of Directors for approval. After approval by the HAWC Board of Directors, the County will process the project approval by recommending the project for final approval to the Board of Commissioners.
- Metro project approval and funding authorization. County staff, in conjunction with Metro staff, will present the project to Metro's Community Oversight Committee for final approval and funding authorization.
- Release of Funds. Once a project has received approval by the Washington County Board of Commissioners and Metro, funds will be released from Metro to Washington County Finance

Department and disbursed to the project in accordance with the provisions of the project's legal agreements.

Project Closing

At project closing, the following will apply:

- Metro-Approved Regulatory Agreement. All projects will be required to execute a Metro-approved Regulatory Agreement that acknowledges the use of Metro Affordable Housing Bond funds and the restrictions associated with the use of such funds. The Regulatory Agreement shall be recorded against the project at or prior to closing.
- Period of Affordability. The Regulatory Agreement will generally specify a 60-year period of affordability for new construction. For acquisition projects that are more than 10 years old, Washington County may consider a shorter period of affordability, but the affordability will be no less than 30 years. The Regulatory Agreement will provide a first right of refusal for qualified nonprofit organizations, for-profit organizations or government entities to acquire the project upon expiration of the affordability period.
- Accomplishment of Framework Targets. The Regulatory Agreement will also specify the level of affordability and the unit bedroom sizes of the project.
- Jurisdiction Documents. Washington County may require other documents related to the project. Additional sources that leverage Metro Affordable Housing Bond funds, may require the following:
 - Development and Disposition Agreements. In the case of properties controlled by the HAWC, agreements relating to the transfer of property to the developer/owner will be required by HAWC.
 - Washington County will develop documents relating to how bond funds will be investment in a project. The type of investment may vary depending on the development's projected cash flow. For example, a housing development may require loans or grants to be dependent on the cash flow. In general, Washington County will support the allocation of program income to restricted reserve accounts dedicated to the provision of Resident Services. Projects that are expected to have more significant program income may have requirements for cash flow dependent distributions to the Washington County Housing Production Opportunities Fund (HPOF).
 - Washington County will specify requirements relating to implementation of Racial Equity Strategies. Strategies will be developed for each project and requirements will be documented in agreements with the County.

Project Monitoring

Projects will be subject to monitoring throughout the development process and period of affordability. The monitoring process and expectations will be documented in agreements with Washington County and HAWC. In general, monitoring will include:

- Monitoring During Development. Washington County will require monthly reports during the project development and lease up period and will conduct periodic site inspections in coordination with other funding partners to achieve on-time and on-budget completion. The Housing Services Department will approve all change orders and on monthly draw requests.
- Lease-up. Washington County will monitor use of low-barrier screening criteria at projects funded by the Metro Affordable Housing Bond Program.
- During Operations. Washington County will require annual reports that include information about a project's physical condition, fiscal condition, occupancy, tenant income verification, and voluntarily collected tenant demographics. Washington County will conduct periodic site inspections in coordination with other funding partners.

Ongoing Community Engagement Plan

The completion and approval of the Washington County Local Implementation Strategy will initiate the beginning of Phase Two for community engagement related to the Metro Affordable Housing Bond Program's implementation. Phase Two is the long-term and ongoing community engagement directly related to planning, identification and development of affordable housing units. For this future effort, Washington County will contract with a community engagement practitioner to provide additional capacity to continue efforts to engage under-represented communities, neighborhoods impacted by a proposed housing development and the community in general.

Washington County will work with the consultant to ensure that the ongoing community engagement will be regular, transparent and include plain-language principles, materials in all appropriate languages, and interpretation as needed. Community engagement will target three audiences:

1. **Underrepresented communities** – These are communities who have historically faced systemic barriers to affordable housing such as communities of color, people with low incomes, seniors, people with physical or mental disabilities, people involved with the justice system, people with limited English proficiency, immigrants and refugees, tenants of affordable housing, people at risk of displacement, and people experiencing homelessness. Engagement will focus on providing advice about how Washington County can address and reduce these systemic barriers. Strategies are more likely to be ongoing rather than one-time or time-limited and consist of both traditional and more diverse engagement methods and opportunities. These may include conversations conducted via existing meetings, in-person gatherings designed to exchange information rather than collect it, storytelling sessions, and may be supported or conducted by nonprofits and community groups that are trusted within the community.
2. **Neighborhoods impacted by a proposed housing project** – Engagement strategies for these groups will focus on neighborhoods where a specific housing project is proposed.

Strategies are likely to be both in-person and online and will be limited to the time during which the project is being developed.

3. General community members – Engagement with the general community will be less intensive than with the first two groups but will be ongoing during the 5-7 years. Strategies are more likely to be electronic in nature and will focus on project updates and providing access to input mechanisms if desired (e.g., online feedback form).

To ensure that impacted communities are involved in decision making as much as possible, the community engagement consultant will:

- Maintain an interested and affected group contact list
- Promote, publish and share opportunities and updates widely and in multiple formats and languages as needed. This may include electronically, hard copy, social media, and by telephone (as requested)
- Provide trauma informed¹ engagement opportunities and environments
- Ensure that engagement opportunities are accessible to all by being held in the evenings and/or on weekends, in different community locations and places where people naturally convene, and include community support such as food, child care and translation services

Ongoing community engagement will be based on expressed needs of the potentially impacted communities for each project. This will be influenced by needs identified in Phase One portion of community engagement activities that informed the development of overall implementation strategies; findings resulting from the Consolidated Plan community engagement process; outcomes of each community engagement process that occurs in relation to bond funded project identification; and the evaluation findings from the Phase One community engagement process. In addition to this information, the consultant will also work with stakeholders to identify preferred methods of engagement and utilize engagement strategies that are flexible, and fluid based on community and stakeholder input. The outcomes and findings from all community engagement will be regularly compiled and shared with project planning staff.

Washington County's community engagement planning and approach will be sensitive to communities who may not trust that their input will lead to meaningful and/or constructive change and that communities may be fearful engaging with government agencies. Planning efforts will incorporate techniques to address these potential barriers to receiving the community's input.

To gain and maintain public trust, Washington County will make every effort to develop ongoing evaluation measures that allow adjustments in response to expressed community needs/wants and expected outcomes as evidenced in participation demographics and quality of participation, as well as

¹ Trauma informed engagement opportunities and environments allow for the acknowledgment of the existence of community-level trauma which stems from historic and structural conditions of racism, disenfranchisement, and isolation and encourages transparency about what partners representing traditional positions of power (such as government agencies) are offering or asking. Examples of trauma informed engagement opportunities might include: acknowledgment of harm done in the past; ensuring consistency with process; peer to peer approaches and/or facilitation by peers; and, barrier free participation such as location (government building vs. library or community center), childcare, accessibility, compensation.

tenant demographics and outcomes in future affordable homes. Some evaluation metrics may include the following considerations:

- Were you able to successfully reach the intended audience?
- Did people receive the necessary information they needed to make a relevant response?
- Did you choose the right type or level of engagement to match the purpose?
- Was feedback received from the community positive or negative?
- Did the community feel like they received proper feedback on the results of the engagement?
- Did they indicate they want to be part of a similar process again?
- If not, why not? And what could be done differently to make the process better, more inclusive, and more impactful?

IX. Reporting on the Washington County Local Implementation Strategy

Annual Report

Washington County staff will prepare an annual report to the Board of County Commissioners on overall progress of the Local Implementation Strategy. This information will be made available to the public and interested stakeholders using a variety of strategies such as published reports, newsletter articles and website postings. The report will include information on committed and completed projects, e.g. project status, bond funding expenditures, total project(s) cost(s), and units produced by unit size, type and income level served. The report will also include information on overall progress toward achievement of the framework goals. Additional updates to the LIS will be made in December 2020 or within six months of the completion of the Washington County Consolidate Plan. New information gathered through the consolidated planning process may be used to update the LIS. Another review will occur by August 2023 or at the time the fifth annual report is prepared for Metro.

Reporting to Metro

Washington County will submit annual reports to Metro in accordance with the Intergovernmental Agreement.