

City of Medford, Oregon



July 1, 2005—June 30, 2006

ACTION PLAN
COMMUNITY DEVELOPMENT
BLOCK GRANT

City of Medford
Neighborhood Resource Division
City Manager's Office
May 5, 2005
Revised October 2005

**City of Medford
2005-2006 One Year Action Plan
Community Development Block Grant Program**

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Summary of the One-Year Action Plan Process Fiscal Year 2005/06

The Consolidated Plan for Housing and Community Development is a requirement of the 1990 National Affordable Housing Act and the Community Development Plan for the U.S. Department of Housing and Urban Development. Such a plan is required of entitlement communities, which receive Community Development Block Grant (CDBG) funds under HUD's housing and service programs related to the needs of low and moderate-income persons.

The One Year Action Plan, an annual requirement, must be submitted to HUD 45 days prior to the beginning of the entitlement fiscal year. A citizen participation plan element requires that interested parties have a 30-day period in which to review and comment upon the funding proposals. It also requires that at least one public hearing be held. Any information received during the public comment period or at the public hearing is to be attached to the Action Plan.

The 30-day comment period for the use of the City of Medford's CDBG funds began on April 4, 2005 and ended on May 3, 2005. A public hearing was held on May 5, 2005 at 7:00 p.m. in Council Chambers. There were no comments received.

An Action Plan amendment was written in October 2005. The 30-day public comment period began on October 27, 2005 and will end on November 25, 2005. The public hearing will be held on December 1, 2005 in Council Chambers.

Copies of the City of Medford Consolidated Plan plus the One-Year Action Plan for fiscal year 2004/05 are available at the following location:

City of Medford
City Manager's Office
City Hall, 3rd Floor
411 W. 8th Street
Medford, OR 97501

The Action Plan is available online at www.ci.medford.or.us on the Neighborhood Resource Division website.

DESCRIPTION

The City of Medford is an entitlement jurisdiction, receiving an annual allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The City of Medford's Fiscal Year 2005-2006 CDBG funding allocation is \$703,504 plus an additional \$ 70,000 is expected in program income. (*2005 Amendment: The program income estimate is increased to \$170,000*) There was carryover dollars from the 2003/2004 Action Plan of \$77,710 and carry forward dollars from the 2004/2005 Action Plan of \$194,325 for a total of \$272,035 which was reprogrammed into 2005 activities.)

The one-year *Action Plan* is an annual document that describes the City of Medford's HUD-funded projects and community development related activities that will be conducted within the community to implement the five-year *2005-2009 Consolidated Plan for Housing and Community Development* in the upcoming fiscal year.

The City of Medford allocated its CDBG funds through a competitive process. The Housing and Community Development Commission, a nine-person citizen advisory group, reviewed all proposals and made its funding recommendations to the Medford City Council.

FY 2005/06 ACTIVITIES TO BE FUNDED WITH CDBG FUNDS

The Action Plan allocates \$703,504 in new 2005-2006 CDBG funds, \$70,000 in estimated program income with \$78,196 (*plus \$272,035*) in carryover dollars to support the following program areas:

- **Housing Rehabilitation-** The Housing Authority of Jackson County was granted \$100,000 in new grant funds and an estimated \$56,000 in program income to provide low interest loans for improvements to residents occupied by low-income homeowners. Examples of eligible repairs include roof replacement and emergency repairs to plumbing, heating and electrical systems. (*2005 Amendment: Estimated program income has been increased to \$156,000*)
- **Housing Rehabilitation-** The Housing Authority of Jackson County received \$91,000 in new grant funds to replace the roof and windows on the Southernaire Apartments, providing 58 affordable units.(*2005 Amendment: An additional \$96,500 was allocated from 2004 carryover for a total project of \$187,500*)
- **Housing Development-** Shelter Resources, Inc. in partnership with ACCESS, Inc. was allocated \$105,000 of new CDBG dollars to acquire the Conifer Apartments, a 52 unit low income senior citizen apartment complex. (*2005 Amendment: An additional \$80,000 of program income and \$76,400 from 2004 carryforward dollars was added to this project bringing the total project to \$261,400.*)
- **Transitional Housing-** The Salvation Army was granted \$200,000 in new CDBG funds to acquire land to expand their homeless transitional shelter, Hope House. (*2005 Amendment: An additional \$25,000 was allocated to this project from program income and \$76,500 from 2003 carryforward dollars bringing the total project to \$301,500*)
- **Public Services Operations-** The City of Medford has granted \$76,000, which falls within the 15% limitation established in the CDBG regulations, to fund operations for public services agencies serving low-income families, homeless and persons with special needs.
- **City Capital Improvement Projects-** The City has allocated \$14,000 of new CDBG funding to be used for neighborhood improvement grants in eligible neighborhoods undergoing revitalization to assist with street trees, sidewalk repair and other neighborhood improvements.
- **Code Compliance Coordinator-** The City has allocated \$55,000 in new funds in funding for program costs related to the education, awareness and enforcement of municipal codes focusing

on substandard housing in CDBG eligible areas where at least 51% of the residents of the area are low/moderate income persons.

- **Administration-** \$140,700 in new funds and \$14,000 in estimated program income will be used for general program administration, fair housing activities, project implementation, and other planning activities.

GEOGRAPHIC DISTRIBUTION

For the purpose of the Consolidated Plan, the City of Medford defines areas of minority concentration as *a Census Tract where the total percentage of minority population is 20 percent or more of the total population in the Census Tract.* 2000 Census data shows that the City of Medford has three such Census Tracts where there exists more than a 20% concentration of minorities. In specific, Census Tract 1 is showing a concentration of 30.1% of Hispanics and Census Tract 2.01 is showing 22.4% concentration of Hispanics. Census Tract 2.02 shows a 22% concentration of Hispanics. The City has consistently targeted funds to these areas in West Medford throughout the years due to the low-moderate income base and to the higher than average minority populations. In fact, since 2000, 5,154 Hispanic individuals out of 53,610 persons or a total of 10% of all persons served has received assistance through a CDBG- funded Public Service activity.

Targeted 2005/06 CDBG funds include: \$32,000 for Kids Health Connection to provide health and dental care to children in Census Tract 2.01 and 2.02 and \$ 14,000 for infrastructure development and neighborhood improvements in Liberty Park neighborhood in West Medford (an area where the Hispanic population concentration reaches 36.8%) and in the McLoughlin Neighborhood where the Hispanic concentration is 23%. There is also funding priority for code enforcement in West Medford.

Last year, \$55,500 funding is being targeted for the Emergency Home Repair Program in the Liberty Park and McLoughlin neighborhoods. These neighborhoods are the most diverse in the City with high concentrations of Hispanic populations in particular.

SOURCES OF FUNDS

There are many potential resources available to provide affordable housing and related services in Medford. This section provides an overview of the potential resources. Only the programs that are most suitable and likely to be available have been included. The City of Medford is an Entitlement city for Community Development Block Grant funds. Most other resources, however, are provided on a competitive basis and require grant writing skills and well organized local organizations that demonstrate competence and effectiveness. Fortunately, there are several such organizations in Medford which have been successful in obtaining federal, state and local grants and public contributions for their housing and related service programs, including the Housing Authority of Jackson County, ACCESS, On Track, and Community Works.

a. Federal Programs

1) Community Development Block Grant (CDBG)

CDBG funds are an entitlement received by the City of Medford based on a formula related to population and other parameters. The eligible uses of these funds permit the City to provide direct funding for such programs as streets, sidewalks and other infrastructure in low-income neighborhoods. The City of Medford also encourages agencies and organizations to provide housing and related services by awarding CDBG funds for housing related projects or as leverage to generate additional funding, thereby maximizing the benefits from this federal funding.

2) Section 108 Loan Guarantee Program

The City of Medford applied for Section 108 loan guarantee assistance amounting to approximately \$400,000 to construct new sidewalks around elementary schools in CDBG eligible neighborhoods. Due to other federal and local resources being made available to construct safe sidewalks to schools, the City decided to not borrow the Section 108 loan monies.

3) HOME Program

The City of Medford is not currently an entitlement city for HUD's HOME funds. Consideration is currently being given to forming a consortium of Jackson County, Ashland, and other cities in order to receive a HOME grant. Affordable housing organizations in Medford currently need to apply to the Oregon Housing and Community Services Department, which allocates funds based on a statewide Consolidated Plan.

4) Low-income Energy Assistance and Weatherization

ACCESS, the local community action agency, receives U.S. Department of Energy Funds, which are distributed through the Oregon Housing and Community Services Department. These funds are used to provide low-income households with help in paying their energy bills and weatherizing their homes.

5) Mortgage Credit Certificate Program

This federal program enables a purchaser of a home to qualify for a higher loan amount than would otherwise be possible.

6) Low-income Housing Tax Credit

The Federal Low-Income Housing Tax Credit Program assists both for-profit and non-profit housing developers in financing affordable housing projects for low-income families and individuals whose incomes are 60% or below of median family income. Local nonprofit developers have been successful at pulling in tax credit dollars. The "Difficult to Develop" designation, which allowed these nonprofits to pull down additional tax credits has recently been removed which may increase the funding gaps for these types of projects.

A recent example of a successful project that was developed using Low-income Housing Tax Credits is Sky Vista, a Living On track scattered site housing project providing 63 units of low

and special needs housing, which was funded through a combination of Low-Income Housing Tax Credits and other State and Federal funding sources.

7) Exemptions from Local Property Taxes

Non-profits that provide services for low and moderate-income persons are often eligible for exemptions from local property taxes.

8) Resources for Homeless Populations

The Oregon Housing and Community Services Department receives federal and state resources to be used in the state for homeless persons. These include: Emergency Housing Account, Emergency Shelter Grants, State Homeless Assistance Program, Shelter Plus Care, and Supplemental Assistance for Facilities to Assist Homeless. Additionally, under the Federal Continuum of Care program administered by HUD, local governments and agencies can apply for federal funding for programs and services to prevent and combat homelessness. The Continuum of Care has been successful at acquiring McKinney Vento funds. This year, they received \$429,226 to fund three programs/projects: The Hope House Transitional Shelter Expansion, the Home At Last Program and Living On Track's Sky Vista Housing Project.

ACCESS, Inc., as the Community Action Agency for Jackson County, is also the designated lead agency by Oregon Housing and Community Services Department for administering many of these funds.

9) Public Housing Assistance

The Housing Authority of Jackson County can receive funds from HUD for a variety of purposes. Principal funds include Housing Choice Vouchers, of which HAJC has 1390 for all of Jackson County. They also offer special programs such as the Family Self Sufficiency and are able to offer housing choice vouchers for mortgage payments for qualified families. The Housing Authority of Jackson County is a member of Valley Individual Development Account (VIDA) and will be administering up to 10 IDAs.

10) Direct Loans for Housing the Elderly (Section 202)

This program provides low interest loans to private, non-profit organizations to develop housing for the elderly. Medford has two Section 202 facilities developed and managed by Pacific Retirement Systems.

11) Cash Advances for Housing the Handicapped (Section 811)

This program provides assistance to private non-profits to develop rental housing with supportive services for persons with disabilities. ASI Jackson County accessed Section 811 dollars for its Catalpa Shade project for persons with brain injuries.

12) Rural Development Programs

Rural Development funds are targeted to rural communities and cannot be used in Medford except for Farm Labor Housing Loans and Grants (Section 514/516). The Housing Authority of Jackson County is using these funds for its Lilac Meadows project for the farm worker housing portion of the project.

b. State Programs

1) State of Oregon Affordable Housing Resources

The Oregon Department of Housing and Community Services administers a number of programs to provide affordable housing. These include the Single Family Mortgage Program, the Multifamily Housing Revenue Bonds program, the Elderly and Disabled Loan Program, Risk Sharing Loans, Predevelopment Loans, Seed money advance, Oregon Rural Rehab Loans, and Multi family Accelerated Loan Processing, the Oregon Housing Development Grant Program, the Oregon Affordable Housing Tax Credit for Lenders, the Low-Income Rental Housing Fund, HELP and other programs as determined by local community need.

c. Private Resources

1) Foundations and Other Private Resources

There are a number of private foundations and other sources which provide grants and technical assistance for low-income housing. These include:

The Enterprise Foundation

Neighborhood Reinvestment Corporation (NSC)

Northwest Area Foundation

Meyer Memorial Trust

Rural Community Assistance Loan Fund (RCAC)

National Congress of Community Economic Development (NCCED)

Federal Home Loan Bank Affordable Housing Programs

d. City General Fund Resources

1) Neighborhood Matching Grant Funds

Through its Neighborhood Resource Division, the City has implemented a neighborhood small matching grant program to assist in funding worthwhile projects citywide, as well as in low and moderate-income neighborhoods. In the past year, funding went to fund a community cleanup for residents of Census Tracts 1 and to fund two street tree plantings for neighborhood groups in Census Tract 2.01 as well as an alley cleanup. Funding also went to sponsor a bicycle/pedestrian workshop in these two Census Tracts.

2) City General Fund Grants

The City of Medford offers approximately \$275,000 annually in general fund dollars to help fund the day –to–day operations of public service agencies and organizations providing essential safety net services and those programs working towards improving the overall livability of the

City. Funding in FY 2005/06 will help support the domestic violence shelter and rape crisis programs, Hope Transitional homeless shelter, Food Share and Food Rescue programs, senior and disabled services, legal services, alcohol and drug treatment services, victim offender and peer mediation services, and health and dental services. Forty-three programs received funding from this grant program.

MONITORING STANDARDS AND PROCEDURES

The City of Medford is responsible for monitoring only those funds that it receives from HUD, which are limited to the Community Development Block Grant. The City has both a Neighborhood Resource Coordinator and a Grants Specialist who are responsible for overseeing the use of CDBG funds. They maintain a close working relationship with grant recipients. Quarterly financial and beneficiary reports are required of all public service agencies receiving CDBG funds. Annual beneficiary reports are required of all subrecipients of capital grants. All capital projects are administered under federal procurement standards and labor standards. The programs are closely monitored and an annual report prepared.

In Program Year 2003/04, the two higher risk subrecipients were monitored with site visits because they were both new CDBG subrecipients. In Program Year 2004/05, the City monitored those same subrecipients plus the Housing Authority of Jackson County on two of its programs.

The City will monitor the progress of all 2005/06 Action Plan programs and prepare an annual report (CAPER) which will cover progress made for each activity, as well as number of beneficiaries, number of units and number of dollars spent through the annual Grantee Performance Report. The City has expanded its role as a supportive partner and coordinator of affordable housing through its nine-person Housing and Community Development Commission. This Commission helps provide a stronger citizen participation component for the CDBG program. Housing Commissioners monitor the progress of all CDBG- funded capitol improvement projects, review funding decisions and make recommendations to City Council on programs and funding.

In addition to reviewing all subrecipient draw down requests, program and financial reports, the City will complete a risk assessment of 2005/06 CDBG subrecipients. The purpose of this risk assessment is to identify which subrecipients will require comprehensive monitoring during the program year. The risk assessment uses the following criteria **to identify high-risk** subrecipients that will require comprehensive monitoring:

- subrecipients new to CDBG program;
- subrecipients that have experienced turnover in key staff positions;
- subrecipients with previous compliance or performance problems;
- subrecipients carrying out high-risk activities; and
- subrecipients undertaking multiple CDBG activities for the first time.

Comprehensive monitoring of high-risk subrecipients will include a minimum of one on-site project monitoring visit during the 2005/06 program year. If a subrecipient is determined to be high-risk, they may also be required to submit monthly financial and program outcome reports (vs. quarterly). The schedule of each on-site monitoring visit will be determined by the subrecipient project schedule and a

standardized monitoring checklist will be used when evaluating each subrecipient CDBG- funded project.

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES

The City of Medford partners with other governmental jurisdictions, agencies and organizations, in a collaborative effort to address homelessness and other special needs. The Jackson County Homeless Task Force uses a Continuum of Care approach to provide for services and linkages for low income and homeless citizens. City staff serve on the Homeless Task Force, which meets on a monthly basis. Subcommittees include the following:

- Annual Homeless Survey
- Accessible Affordable Housing
- Homeless Youth

Through the support and coordinated efforts of this Task Force, the Rogue Valley Council of Government's Senior and Disability Services program in partnership with DASIL is sponsoring the Home at Last supportive housing program designed to give mentally and physically disabled adults the assistance they need to find a home and keep it. Clients receive a range of services from assistance in obtaining permanent housing to medical treatment. The program was a three-year \$496,000 program funded by a HUD McKinney grant and just received notification from HUD that they have received an additional \$133,665 for 2005.

Also through the coordinated efforts of the Homeless Task Force, there are other McKinney Vento recipients for 2005 including the Living On Track Project and the Salvation Army for its Hope House project.

The Homeless Task Force conducts an annual homeless survey, one night shelter count and gaps analysis. The annual homeless survey reveals a steady climb in the number of homeless persons in Jackson County. Survey results for 2005 noted an increase with 799 persons responding. More than half of the people surveyed were female and 43% were children between the ages of birth through 19 years.

Nonprofit housing providers and social service agencies continue to address the needs of special needs populations. The Catalpa Shade project, administered by ACCESS, Inc., provides 22 units of supportive housing for persons with brain related injuries. ACCESS is also in the process of constructing 10 units of housing for mental health patients in partnership with Jackson County Mental Health. This project will include an onsite manager.

Another project designed to meet special needs is a scattered site housing partnership project between Living Opportunities, Inc., a nonprofit working with developmentally disabled persons and On Track, Inc., a nonprofit working with persons with alcohol and other drug addictions and persons with HIV and AIDS- related diseases. The Living On Track project will provide 63 units of housing. This project is modeled after the very successful Stevens Place project, which houses very low income families who are unable to meet tenancy eligibility requirements elsewhere. Stevens Place has both a property manager and case manager on site. CDBG funding is going to help support a case manager at Stevens Place in this program year.

COORDINATION

Coordination between public and assisted housing providers, health providers and service agencies along with municipal and county governments continues to occur through a variety of venues. A number of housing providers include service components for the residents of their housing projects. Along with the Homeless Task Force, there is a Jackson County Community Services Consortium, which advocates for the delivery of affordable, accessible and quality community services in Jackson County and provides a networking structure for agencies.

There is also a Hispanic Interagency Committee which serves as a networking vehicle and advocate for the provision of services to the expanding Spanish speaking community. The Neighborhood Resource Coordinator currently chairs these monthly meetings and promotes City services through outreach and awareness. Also, the West Medford Family Resource Service Center, which is one of three county integrated service sites, serves approximately 4350 families with a variety of coordinated services including adult and family services, employment, child care, housing, health and substance abuse services. They have created a Service Integration Team that meets monthly and addresses housing stabilization as a priority. The Neighborhood Resource Coordinator serves on this committee and has been working to promote various housing services to renters and homeowners through this venue.

A more recent addition to coordination efforts has been the Southern Oregon Housing Resource Center within the county. ACCESS, Inc., in partnership with the Housing Authority of Jackson County, has been named by the State of Oregon as a housing resource center to serve as an information clearinghouse for all housing related issues and data. Program income derived from State- funded CDBG projects in Jackson and Josephine Counties will be funneled through this organization as well. The Neighborhood Resource Coordinator serves on its advisory board.

The Jackson –Josephine Regional Housing Coalition has been established to attempt to address the issue of affordability through political channels. A grant received by the Neighborhood Partnership Trust out of Portland helped fund a series of workshops in the Medford area on housing advocacy. Workshop topics have included building a base of support for housing issues, building coalitions around affordable housing issues and housing tools. The Coalition also sponsored a study comparing housing issues in Missoula, Montana and Medford, Oregon. The study was funded by the Rural Collaborative.

The City of Medford has established a Housing and Community Development Commission to address issues relating to housing accessibility and affordability within the City. Serving in an advisory capacity to City Council on housing issues, they act as a focal point for all housing related issues for the City. In 2003, they were approved by City Council serve in an advisory capacity on issues related to Community Development Block Grant including recommendations regarding CDBG funding.

REDUCTION OF LEAD-BASED PAINT HAZARDS

Childhood lead based paint poisoning is a significant problem nationally. In an effort to address this problem, HUD published its Final Rule to Title X of the 1992 Housing and Community Development Act on September 15, 1999. This rule requires certain prescribed action by HUD grantees to identify, stabilize or remove lead- based paint hazards in any housing receiving HUD assistance. The scope of activities required by HUD is dependent upon the type of housing impacted and the amount of federal

assistant being provided with rehabilitation activities using in excess of \$25,000 of HUD funds requiring the highest level of treatment. The rule only affects residential structures built before 1978.

Non-Profit Housing Rehabilitation Projects

Acquisition and rehabilitation activities of older structures undertaken by area nonprofit housing providers receiving HUD funds will be affected. Many of these projects often require HUD subsidies exceeding \$25,000 per unit and the cost of treating lead-based paint may add greatly to the overall cost of the project. Additional funds may be required to offset this increase, which may result in fewer units being rehabilitated.

It is estimated that 9,063 rental units in Medford occupied by low-income households have lead-based paint and 2,407 owner-occupied homes have lead-based paint. Since the vast majority of homes assisted through the Housing Authority's homeowner rehabilitation programs fall into this age category, it seems apparent that this will have a significant impact. The Housing Authority has on staff one Certified Lead Paint Risk Assessor. He is also trained as a Lead Paint Inspector. His certification comes from the State of Oregon Department of Human Services. Oregon certification currently exceeds federal rules. The Housing Authority of Jackson County continues to sponsor a series of *Work Safe with Lead* classes for local contractors.

Rogue Valley Community Development Corporation buys houses to rehabilitate and then sell to qualified low income buyers. The City of Medford is currently requiring an environmental review process which includes extensive lead-based paint testing. The City will not permit RVCDC to move forward on any given project without complying with current regulations by contracting with certified risk assessors to handle issues related to lead-based paint.

INSTITUTIONAL STRUCTURE

The City of Medford's Neighborhood Resource Division, within the City Manager's Office, was established in 2002 to more effectively address the City's housing concerns as well as issues around community development and neighborhood revitalization.

The City of Medford has on staff an Economic Development Coordinator whose mission is to increase the number of family wage jobs within the City by assisting with business expansion, retention and relocation efforts.

In 2002, the City developed the Neighborhood Resource Coordinator position to manage the Community Development Block Grant program, address housing issues and address all issues relating to neighborhoods including capacity building and leadership development, code enforcement and revitalization of challenged neighborhoods. In May of 2002, the City hired an additional position, a CDBG Coordinator, to address specific issues related to the administration and monitoring of community development block grant funds. This position was recently expanded to include city grants management and is known as the Grants Specialist. The City also has a student intern on staff. This team approach to community and economic development has helped improve the capacity of the community to help its citizens meet their needs.

A consultant, Seattle –based John Epler and Associates, was hired to help staff develop the new 2005-2009 Consolidated Plan as well as completing the Analysis to Impediments to Fair Housing. Both documents were completed in December 2004.

UNDERSERVED NEEDS

There are far more needs than there exists resources to meet them within the City of Medford. The team approach to community and economic development recently put into place by the City seeks to overcome some of these limitations by more effectively targeting assistance to those who need it the most. In addition to targeting those resources through its grant and neighborhood resources programs, the City is continuing to seek better ways to communicate with its citizenry about financial and informational resources, which the City and other community providers can make available.

Underserved needs are also met through the City’s general fund in its effort to fund essential safety net services. Annually, \$275,000 is allocated to eligible social service providers. Many of these providers address strategies of high priority identified in the City’s Consolidated Plan such as services for the homeless and senior citizens.

In late 2004, the City of Medford, in partnership with the Rogue Valley Council of Governments, the United Way of Jackson County City of Ashland and ACCESS, Inc. conducted a Community Needs Assessment. Survey forms were distributed to all organizations in Jackson County providing services to low-income individuals, families, seniors and disabled person to gather information about their needs. The consumer survey was completed by 541 clients, of whom 75% were low-income, 35% were disabled and 30% were seniors. The five most critical needs in priority order include:

1. Housing assistance
2. Medical assistance
3. Food and Nutrition
4. Living Wage Jobs and Employment
5. Transportation

The City of Medford’s Housing and Community Development Commission took these critical needs into account when making its funding decisions. This year, 56% of the CDBG Public Service dollars allocated went to direct medical benefits with over three quarters of that going to benefit children.

Many nonprofit organizations in the area are developing housing to provide for the needs of the underserved. Lilac Meadows, a project recently completed and managed by the Housing Authority of Jackson County serves the needs of 82 families. An additional 42 units are for low-income persons with a preference for those persons transitioning out of farm labor.

Catalpa Shade provides housing for 21 persons with mobility and/or traumatic brain injuries. Funding has been procured for Woodrow Pines, an 11-unit development to house those with serious mental health problems. ACCESS, Inc., in partnership with Jackson County Mental Health, is developing this project, which is currently in the design and engineering phase.

FAIR HOUSING

ACCESS, Inc. and the Fair Housing Council of Oregon held a training for testers in February 2005 and plans to conduct testing for discrimination within the City limits during the next fiscal year. A training workshop for social service agencies was also offered in Medford this past February on fair housing issues. A half hour television show on the community access channel taped in February, focusing on Fair Housing issues, has been shown on public access television many times during the past year.

The City's *Analysis of Impediments to Fair Housing* has been completely updated. The City partnered with the Consumer Credit Counseling Service of Southern Oregon to offer a predatory lending roundtable in April 2004. Lenders providing conventional and sub-prime loans, realtors, and representatives from the Housing Authority, Non-Profit Legal Service, AARP, Senior Protective Services, West Medford Community Coalition, and ACCESS all participated. The City plans to continue partnering with the Consumer Credit Counseling Service to develop an education and awareness program around predatory lending issues.

The Consumer Credit Counseling Service of Southern Oregon also offers counseling to its clientele on fair housing issues. Counselors review with clients the protections various laws and regulations provide the consumer. This includes Fair Debt Collections Practices Act, Fair Credit billing, Fair Credit Reporting, and Fair Lending.

The City provides funding through its General Fund to the Center for Nonprofit Legal Services to enable it to continue to provide assistance on landlord-tenant law and on Fair Housing issues. They have an attorney on staff focusing on fair housing and other housing related issues.

In the City's current Analysis of Impediments, the following actions were listed for the City to address:

1. **Continue to support fair housing education for consumers, lenders, realtors, landlords, advocacy groups and service providers.** The City of Medford has Fair Housing posters posted throughout City Hall and has Fair Housing brochures in all of the City's brochure racks as well as in the Jackson County Library's racks. Staff has put together an ad on fair housing in Spanish and English that was published in the July 2004 citywide newsletter that is distributed to 22,000 households. Another ad will be published in this coming July's newsletter. The City sponsored a booth featuring fair housing materials at the annual Homebuyer Fair in April 2005 and plans to do the same in the coming year.
2. **Continue to support actions to increase the availability of affordable housing.** The City of Medford has established a City Housing and Community Development Commission to determine ways that the City can increase affordable housing. The City also continues to fund nonprofit housing agencies in their efforts to develop more affordable housing for low-income persons and for persons with special needs.
3. **Support the activities of the Fair Housing Council of Oregon (FHCO).** The City has been working closely with the FHCO to offer educational workshops and to provide information to the public about housing discrimination and fairness issues. The City also was a participant in this year's statewide conference "A Dream Deferred: Residential Segregation in Oregon."
4. **Continue to monitor activities of lending institutions.** The City of Medford has contracted with a consultant to obtain data from lending institutions according to the Home Mortgage Disclosure Act (HMDA) and to analyze the differences in loan approval rates. This study was completed in June 2003 and no major problems were noted.

5. **Support a cooperative effort to investigate the extent of predatory lending in Medford and consider strategies to eliminate this practice.** The City of Medford in partnership with Southern Oregon Consumer Credit Counseling Service sponsored a Predatory Lending Roundtable discussion with representatives from the mortgage lending industry, financial institutions, and social service agencies and from the State of Oregon on the situation surrounding predatory lending in Medford and Jackson County. The group is planning a follow-up meeting in the coming year to develop strategies for dealing with the problem.

STRATEGY IMPLEMENTATION

The following is a listing of the goals and strategies that will be implemented in the 2005-2006 Program Year. Each strategy is followed by the activity that will implement the goal and strategy. Where appropriate the activity is followed by proposed accomplishments of the activity for the year.

AFFORDABLE AND WORKFORCE HOUSING

Goal 1: Increase the affordability of housing for the City's lower-income workforce and special needs households.

Strategy 1-1 Improve the quality and long-term affordability of existing rental and/or homeowner housing occupied by lower-income households.

Objective: Maintain housing currently owned or rented by lower-income households through rehabilitation and/or weatherization assistance.

Objective: Continue to support efforts to improve the maintenance and habitability of rental properties.

- | | |
|---------------|--|
| Project 1: | Rehabilitation of 58 low to moderate-income dwelling units of an existing apartment complex (SouthernAire) owned and managed by the Housing Authority of Jackson County by replacing the roof. |
| Location: | 2578 Table Rock Road |
| Subrecipient: | Housing Authority of Jackson County |
| Funding: | \$91,000 of new CDBG funding. (2005 Amendment: \$96,500 more from 2004 carryover funds for a total of \$187,500.) |
| Outcome: | Retain 58 units of affordable housing for low to moderate income persons within the City of Medford. |
|
 | |
| Project 2: | Acquisition of Conifer Gardens Apartments, designed as a HUD elderly and disabled project housing 52 units of seniors. |
| Location: | 700 Royal Ave. |
| Subrecipient: | Shelter Resources, Inc in partnership with ACCESS, Inc. |
| Funding: | \$105,000 of new CDBG funding (2005 Amendment: \$80,000 more from program income dollars and \$76,400 of carryforward funds for a total of \$261,400.) |
| Outcome: | Retain 52 units of low income housing for senior citizens. |

Objective: Improve the ability of homeowners to maintain their properties.

Project 3: Provide emergency rehabilitation loans to low-income homeowners for provision of emergency repairs for roofs, electrical, plumbing or heating systems, or other health or safety-related problems.

Location: Citywide

Subrecipient: Housing Authority of Jackson County

Funding: \$100,000 CDBG and \$80,000 in estimated program income

Outcome: Approximately 17 homes rehabilitated.

Strategy 1-2 Increase the supply of affordable, safe and decent rental and/or homeowner housing for lower-income households.

Objective: Support the creation of higher density, mixed –income and mixed-use housing in the redevelopment of the downtown.

The City of Medford offers a Vertical Housing Development Zone within its Central Business District. This zone, through the State of Oregon, offers property tax exemptions for mixed use projects. The City of Medford and the Medford Urban Renewal Agency will continue to promote this program.

Outcome: More units of residential development in the Central Business District, including affordable housing, as part of mixed-use development in the downtown.

Strategy 1-5. Affirmatively further Fair Housing choices.

Objective: Assist residents, particularly minority and other households who are traditional underserved, to remain in affordable housing by improving their budgeting and life skills.

The City of Medford will be allocating General Fund dollars to the Southern Oregon Goodwill to assist them in offering their Steps to Success Family Strengthening program helping families to transition off of welfare by providing life skills training including budgeting and financial education.

Outcome: 11 families will participate in financial literacy classes.

The City of Medford will also be allocating General Fund dollars to Consumer Credit Counseling Service of Southern Oregon for its Money Management Program providing volunteers to assist low income senior citizens and persons with disabilities who are having difficulty managing their money.

Outcome: 16 seniors/disabled persons will receive assistance with budgeting, check writing and money management.

Objective: Support programs that provide assistance to prevent discrimination in housing and lending practices and provide educational opportunities for improving household credit ratings.

City staff will continue to distribute brochures and display posters in City Hall indicating who should be contacted if housing discrimination occurs. The City will continue to provide fair housing information to citizens and to place advertisements in the local newspaper and in the citywide newsletter using multicultural approaches.

Outcome: 200 brochures to be distributed. 22,000 households to receive newsletter.

The Fair Housing Council of Oregon and the Center for Nonprofit Legal Services will continue to monitor the City for fair housing law violations. The Center for Nonprofit Legal Services is receiving City general fund monies to continue their landlord tenant program and to handle legal issues relating to Fair Housing.

The City will continue to partner with the Consumer Credit Counseling Service of Southern Oregon to offer multicultural, educational materials to consumers on predatory lending practices.

NEIGHBORHOOD REVITALIZATION

GOAL 2: IMPROVE THE QUALITY OF LIFE OF LOWER-INCOME RESIDENTS THOROUGH NEIGHBORHOOD REVITALIZATION.

Strategy: Preserve and restore existing housing resources in key neighborhoods

Objective: Actively enforce City codes to improve the habitability and safety of housing and eliminate blighting influences in neighborhoods.

Project 1: Code Enforcement
Location: Citywide in CDBG eligible census tracts
Organization: City of Medford Code Enforcement Division
Funding: \$55,000 CDBG funds

Outcome: 25,871 persons served; Improved neighborhood areas in income eligible neighborhoods throughout the City.

Many of the City of Medford's older neighborhoods are experiencing problems with accumulation of trash and junk, abandoned vehicles and substandard housing. A Code Compliance Officer has been hired by the City of Medford to work in CDBG eligible neighborhoods that are experiencing deterioration. Such education and enforcement efforts along with both public and private improvements, rehabilitation and services will serve to arrest further deterioration of those neighborhoods. Working through a coordinated team approach, the Code Compliance Officer serves as a member of the Code Enforcement Division along with a second Code Compliance Officer and an administrative assistant. This position works closely with neighborhood organizations working to clean up and improve challenged neighborhoods within the City. The Code Compliance Office works on a proactive basis performing block-by-block inspections in challenged neighborhoods and educating residents as to city code issues.

Strategy 2-2 Build community through strengthened Neighborhood Councils

Objective: Continue to support the development of strong community –based organizations to organize and plan community events and improvement programs

Strategy 2-3 Improve the community infrastructure/facilities and reduce blighting influences in predominately lower-income neighborhoods.

Objective: Provide assistance to improve basic neighborhood infrastructure such as water and sewer improvements, sidewalks, street improvements, lighting and street trees utilizing several funding mechanisms including paying local improvement district assessments of lower-income neighborhoods.

Project 2: Neighborhood Improvement Grants
Location: Citywide in eligible census tracts
Organization: City of Medford Neighborhood Resources Division
Funding: \$14,000 CDBG
Outcome: Approximately 5 neighborhood improvement grants allocated to assist eligible neighborhoods with improvement projects.

The City, through its Neighborhood Resources Division, offers small neighborhood matching grants (with general fund dollars) to neighborhood groups to support neighborhood beautification, public safety enhancement and improvement projects. In 2005, grants went to the Liberty Park Neighborhood Association to help cover expenses for a community cleanup day held in April and to two neighborhood street tree planting projects in the McLoughlin Neighborhood. It also went to fund an alley cleanup event in the McLoughlin Neighborhood in May. General funding will continue to fund these neighborhood improvement grants. CDBG funds will also fund neighborhood improvement grants in CDBG eligible neighborhoods with eligible projects.

INDEPENDENCE AND ECONOMIC OPPORTUNITY

GOAL 3: IMPROVE THE ABILITY OF LOWER INCOME HOUSEHOLDS TO BECOME SELF-SUSTAINING

Strategy 3-2. Assist public services to provide safety net services to persons in need.

Objective: Support programs that provide basic health care services to people in need, such as female head of household with children and seniors.

Project 1: Kids Health Connection- Providing school-based health services
Location: West Medford – Jackson and Washington Elementary Schools
Subrecipient: Providence Medical Center
Funding: \$35,000
Outcome: 400 children will receive health care through the elementary schools

Project 2: Provision of health care services to low and moderate income persons
Location: Citywide
Subrecipient: Community Health Center
Funding: \$10,044 CDBG
Outcome: Health care provided for 228 persons.

Support programs to reduce dependency on drugs and alcohol, including the activities of the Commission on Children and Families.

Project 3: Family Advocate services for Stevens Place
 Location: Stevens Place, Stevens Street
 Subrecipient: On Track, Inc.
 Funding: \$14,556
 Outcome: 70 persons

Project 4: Services to victims of child abuse
 Location: Citywide
 Subrecipient: Jackson County Child Abuse Task Force
 Funding: \$16,400 CDBG
 Outcome: Services provided to 325 persons

Strategy 3-3 Provide opportunities for homeless persons and those at risk of becoming homeless to achieve self sufficiency.

Objective: Support activities that expand service-enriched housing for the homeless and other special needs populations, including increased shelter, transitional and permanent supportive housing resources.

Project: Hope House Transitional Shelter Expansion project
 Location: 1059 Crews Road, Medford
 Subrecipient: The Salvation Army
 Funding: \$200,000 CDBG (2005 Amendment: An additional \$101,500 of carryforward funding was added to the project bringing the total to \$301,500)
 Outcome: Land acquisition of 1.18 acres with completion of 12 family housing units

PROPOSED PROJECTS

The City of Medford is a CDBG Entitlement City. It receives no funds from HOME, ESG, or HOPWA. Revenue for the 2005/06-Program Year is anticipated to be:

2005/06 Grant	\$ 703,504
Carryover from previous year	\$ 307,596
<i>New carryforward</i>	<i>\$ 75,000</i>
<hr/> <i>Subtotal</i>	<hr/> <i>\$ 1,086,100</i>
<i>Estimated Program Income</i>	<i>\$ 170,000</i>
<hr/> <i>HAJC</i>	<hr/>
 Total Funds Available	 \$ 1,256,100

The tables on the following pages list the proposed projects for which the City's 2005/06 CDBG funds will be used, including a description of each project in accordance with the requirements of 91.220(C).

**U.S. Department of Housing and Urban Development
City of Medford, Oregon
Funding Sources
FY 2005-2006**

Entitlement Grant	\$703,504
Unprogrammed Funds from previous years (carryover)	\$78,196
Carryforward	\$75,000
Total Estimated Program Income	\$170,000
Total Funding Sources	\$1,028,938

Estimated Program Income	
Program Administration	\$14,000
Housing Authority of Jackson County	\$156,000
Total Estimated Program Income	\$170,000

NOTICE OF OPENING OF PUBLIC COMMENT PERIOD

Notice is hereby given that a 30-day public comment period for the City of Medford's draft **Action Plan for Housing and Community Development for FY 2006** will commence on Monday, April 4, 2005 and close on Tuesday, May 3, 2005. The purpose of this public comment period is to solicit citizen input regarding the **Action Plan** and the **Citizen Participation Plan**.

The National Affordable Housing Act of 1990 established requirements that all cities receiving Housing and Urban Development Community Development Block Grant (CDBG) funds, or intending to apply for various other HUD grant funds, are to prepare a document known as a **Consolidated Plan for Housing and Community Development**. This is a comprehensive planning document that identifies a city's overall needs for housing and community development, and outlines a 5-year strategy to address those needs. The City's **2005-2009 Consolidated Plan** was adopted by the Medford City Council in December 2004. The **Action Plan** is an annual update of the **Consolidated Plan**, which outlines and establishes priorities for the upcoming fiscal year that strive to meet the needs identified in the **Consolidated Plan**. The **Citizen Participation Plan** is a HUD required document which defines the public participation process in developing and implementing the CDBG program.

Copies of the City's draft **Action Plan and the Citizen Participation Plan** are available for public review in the City Manager's Office, City Hall, Third Floor, 411 W. 8th St., Medford. Contact Louise Dix, Neighborhood Resource Coordinator, at 774-2090 to obtain a copy or to submit comments.

A summary of public comments will be incorporated into the final document prior to submission to HUD.

Louise Dix
Neighborhood Resource Coordinator
City of Medford

Contact: Louise Dix, 774-2090
City Managers Office
City of Medford

To: Mail Tribune- Legal

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NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the City Council, City of Medford, will hold a public hearing on Thursday, May 5, 2005 at 7:00 p.m. in the City Council Chambers of the Medford City Hall, for the purpose of soliciting citizen input regarding the proposed expenditures of the City's 2005/06 Community Development Block Grant (CDBG) funds.

The City of Medford is an Entitlement City for Community Development Block Grant (CDBG) funds and has been allocated \$703,504 for the 2005/06 Program Year with \$78,196 in carryover funding. In addition, it is estimated that \$70,000 will be received in program income from projects previously funded with CDBG funds. Total allocation is \$851,700.

The City proposes to use these CDBG funds for the following projects and programs in FY 2005/06:

HOUSING

Homeowner Rehabilitation- Phase 12 \$100,000 Estimated Program Income of \$50,000

Grant to the Housing Authority of Jackson County to provide loans to low-income homeowners for roof replacement and repairs to plumbing, heating, and electrical systems.

Rental Rehabilitation- \$91,000

Grant to the Housing Authority of Jackson County for replacement of the roof on the 58 unit affordable housing project called Southernaire Apartments.

Rental Housing - \$105,000

Grant to Shelter Resources, Inc in partnership with ACCESS, Inc to acquire the 52 unit Conifer Gardens Apartment complex for seniors and disabled.

Transitional Housing- \$200,000

Grant to The Salvation Army to acquire land for the expansion of a homeless transitional shelter, Hope House, for families.

COMMUNITY DEVELOPMENT (INFRASTRUCTURE)

Neighborhood Improvement Grants- \$14,000

Funds for neighborhood based improvement projects including street trees, sidewalks, street lights, and other improvements in income eligible neighborhoods undergoing revitalization.

Code Enforcement- \$55,000

Funds will be provided to pay the program costs related to education, awareness, and enforcement of municipal codes, especially substandard housing, in CDBG eligible areas of the City.

PUBLIC SERVICES

The following public service agencies will be receiving grants for operating expenses for the 2005-2006 Program Year:

Kids Health Connection	\$ 35,000
Children's Advocacy Center	\$ 16,400
Community Health Center	\$ 10,044
On Track's Stevens Place	\$ 14,556

A total of \$76,000 will be allocated to Public Services in FY 2005-2006.

GRANT ADMINISTRATION--\$140,700 Estimated Program Income-
\$20,000

Louise Dix
Neighborhood Resource Coordinator
City Manager's Office
City of Medford

NOTICE OF PUBLIC COMMENT PERIOD

AMENDMENTS TO THE 2003-2004, 2004-2005 and 2005-2006 CITY OF MEDFORD ACTION PLANS

Notice is hereby given that a 30-day public comment period will commence on Thursday, October 27, 2005 and close on Friday, November 25, 2005 to solicit citizen input regarding changes to activities identified in three of Medford's Consolidated Action Plans required by Housing and Urban Development (HUD). The city proposes to cancel or reduce the budget for some older activities and reprogram the funds to new activities or increase the amount for existing activities in Medford's 2005 Action Plan.

2003-2004 Action Plan Amendments:

Reduce the amount allocated to RVCDC from \$63,000 to \$49,490 for the acquisition and rehab of a house on Howard Avenue. Reprogram the \$13,310 to activities in the 2005 Action Plan.

Cancel the Living on Track scattered site housing project. Reprogram the \$64,400 to activities in the 2005-2006 Action Plan.

Cancel a proposed \$750,000 Section 108 Loan Guarantee application to construct sidewalks around Washington and Howard Schools.

2004-2005 Action Plan Amendments:

Cancel the a Rogue Valley Community Development Corporation activity for the purchase, rehabilitation and resale of two homes in West Medford to qualified low- and moderate-income buyers. Reprogram the \$70,000 to activities in the 2005-2006 Action Plan.

Program \$60,125 program income from the sale of the Howard Street property in 2004 to activities in the 2005 Action Plan.

Reduce the code enforcement activity and reprogram \$24,200 to activities in the 2005 Action Plan.

Cancel the First Time Homebuyers Program, \$40,000, for homeownership. Reprogram \$40,000 to activities in the 2005 Action Plan.

Cancel Section 108 Loan Guarantee application for \$400,000 to construct sidewalks around Union Park and Washington School. City funds will be used to complete this activity.

2005-2006 Action Plan Amendments:

Increase the estimated program income amount from the Homeowner Repair Program from \$56,000 to \$156,000.

Increase the budget from \$91,000 to \$187,500, to the Housing Authority of Jackson County (HAJC) to rehabilitate the Southernaire Apartments. The funds will be used to weatherize the 58-unit affordable rental complex owned and managed by the HAJC.

Increase the budget from \$105,000 to \$261,400, to acquire the Conifer Gardens Apartments using program income and funds recaptured in 2004.

Increase the budget of the Salvation Army's Hope House Transition Shelter expansion project from \$200,000 to \$301,500 with program income and funds recaptured in 2003 and 2004.

Comments on these amendments to the Action Plan should be directed to Louise Dix, Neighborhood Resource Coordinator for the City of Medford, at 774-2090 or in the City Manager's Office located in Room 312, City Hall, 411 West 8th Street, Medford. A summary of public comments will be incorporated into the final document prior to submission to HUD.

Louise Dix
Neighborhood Resource Coordinator
City of Medford

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development (HUD) Act of 1974, as amended, in connection with any activity assisted with funding under the Community Development Block Grant (CDBG.)

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs;And
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency; and
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all sub-awards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with CDBG, HOME, Emergency Shelter Grant, and Housing Opportunities for Persons with Aids funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR part 135.

Signature

Gary Wheeler, Mayor
City of Medford
Date

SPECIFIC CDBG CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See 24 CFR 570.2 and 24 CFR part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by Housing and Urban Development.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with Community Development Block Grant (CDBG) funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;

2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2003, 2004, and 2005 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70% of the amount is expended for activities that benefit such persons during the designated period; and

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination Laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its notification, inspection, testing and abatement procedures concerning lead-based paint will comply with the requirements of 24 CFR 570.608.

Compliance with Laws -- It will comply with applicable laws.

Signature

Gary Wheeler, Mayor
City of Medford

Date

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, Housing and Urban Development, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance:

City of Medford, Oregon (City Hall)
411 West 8th Street, Medford, OR 97501

Check **X** if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of sub-recipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan

Signature

Gary Wheeler, Mayor
City of Medford

Date

