

City of Medford



Revised 2003/2004

Action Plan

Community Development Block Grant

Summary of the One-Year Action Plan Process Fiscal Year 2003/04

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 May 12, 2003 and ended on June 10, 2003. No comments were received. A public hearing was held on June 19, 2003 at 7:00 p.m. in Council Chambers.

A revision of the Action Plan was written in March 2004. The 30-day comment period for the Action Plan amendment began on March 15, 2004 and ended on April 13, 2004. A public hearing was held on April 15, 2004.

A second revision of the Action Plan was written in October 2005. The 30-day comment period for the Action Plan amendment began on October 27, 2005 and will end on November 25, 2005. A public hearing will be held on December 1, 2005.

Copies of the City of Medford Consolidated Plan plus the One-Year Action Plan for fiscal year 2003/04 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 2003-2004 CDBG funding allocation is \$758,000 plus an additional \$215,000 is expected in program income. An additional \$750,000 in Section 108 Loan Guarantee funding will also be sought in 2003/2004 for the construction of sidewalks. (*Amendment: This Section 108 Loan funding was not sought in 2003/2004 and the project was cancelled in 2005.*)

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 *Consolidated Plan for Housing and Community Development* in the upcoming fiscal year.

The City of Medford allocates its CDBG funds annually through a competitive process. A Grants Subcommittee reviews all proposals and makes its recommendations to an overall Budget Committee. The Budget Committee approved the Subcommittee's recommendations at its April 29th meeting.

FY 2003/04 ACTIVITIES TO BE FUNDED WITH CDBG FUNDS

The Action Plan allocates \$758,000 in new 2003-2004 CDBG funds, \$215,000 in estimated program income, \$750,000 of Section 108 Loan Guarantee funds (*Cancelled in 2005*) with \$70,700 in carryover dollars to support the following program areas:

- **Housing-** The City of Medford has established a First Time Homebuyer Assistance Program to provide no interest loans for income qualified homebuyers in Medford offering up to \$5,000 for down payment assistance and/or closing costs. Funding of \$70,000 for this program was allocated from carryover funds. (Consolidated Plan 2000-Strategy 2.2)
- **Housing Rehabilitation-** The Housing Authority of Jackson County was granted \$100,000 in new grant funds and an estimated \$86,000 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. (Consolidated Plan 2000 –Strategy 2.1)
- **Housing Rehabilitation-** The Housing Authority of Jackson County received \$177,000 in new grant funds to renovate and weatherize 86 units of affordable housing, the Royal Apartment complex, located on Royal Avenue in Medford. (Consolidated Plan 2000- Strategy 2.2, Goal 1)
- **Housing Development-** An estimated \$100,000 in program income and \$63,000(*2005 Amendment: \$49,690*) in new grant funds has been granted to the Rogue Valley Community Development Corporation to purchase land and renovate approximately three houses(*2005 Revision: one home instead of three homes*) to sell to eligible low-income buyers in the West Medford area of the City. (Consolidated Plan 2000- Strategy 2.1)
- **Housing Development-** Living On Track was allocated \$64,400 (*2005 Amendment: Increased to \$77,710; includes \$13,310 from RVCDC's original \$63,000; This project was then canceled in October 2005 and funds carried over to 2005 Action Plan activities.*) for infrastructure development for a scattered site housing project providing 63 units of low income and special

needs housing. This funding was reallocated from a debt repayment for the Section 108 Loan of \$63,700 and \$700 of carryover funds. (Consolidated Plan 2000- Strategy 1.1 and Strategy 13-1)

- **Public Services Operations-** The City of Medford has granted \$100,000, 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. (Consolidated Plan 2000- Strategy 5-1)
- **City Capital Improvement Projects-** The City has allocated \$27,700 of new CDBG funding and an estimated \$750,000 of Section 108 Loan Guarantee funding (*2005 Amendment: \$750,000 was cancelled.*) for infrastructure development including new sidewalk construction within CDBG eligible areas of the City. (Consolidated Plan, Strategy 6-2,6-4 and 7.5)
- **Code Compliance Coordinator-** The City has allocated \$60,000 in new funds in funding for program costs related to the education, awareness and enforcement of municipal codes in CDBG eligible areas where at least 51% of the residents of the area are low/moderate income persons. (Consolidated Plan 2000- Strategy 16-2 and Goal 8)
- **Administration- in CDBG eligible areas.** \$151,600 in new funds and \$29,000 in estimated program income will be used for general program administration, fair housing activities, project implementation, revisions to the Consolidated Plan 2000-2005, drafting of the new Consolidated Plan and the annual audit. (Consolidated Plan-Strategies 3-1, 4-1, 16-1,16-2)
- **Contingency -** \$15,000

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.* New 2000 Census data shows that the City of Medford now 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, 4083 Hispanic individuals out of 45,368 persons or a total of 9% of all persons served has received assistance through a CDBG- funded Public Service activity.

Targeted 2003/04 CDBG funds include: \$100,000 of *estimated* program income and \$63,000 (*2005 Revision: \$49,690*) of CDBG funding toward a housing rehabilitation program operated by Rogue Valley Community Development Corporation in West Medford; \$ 27,700 for infrastructure development in Liberty Park neighborhood in West Medford (an area where the Hispanic population concentration reaches 36.8%) and funding priority for code enforcement in West Medford.

Approximately \$350,000 is designated for building new sidewalks around Washington School, which is Census Tract 2.02. Also, \$35,000 in public service dollars for the Kids Health Connection serves children in the school districts of Jackson, Washington and Oak Grove Elementary Schools, all schools within Census Tract 2.01 and 2.02 with high concentrations of minority populations.

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 good 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, OnTrack, 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 plans to apply for Section 108 loan guarantee assistance amounting to approximately \$750,000 to construct new sidewalks around elementary schools in CDBG eligible neighborhoods. (*The City did not apply for this funding in Program Year 2003/2004 and thus this project was cancelled in 2005.*) The Section 108 Loan Guarantee program allows the City to transform a small portion of our CDBG funds into federally guaranteed loans large enough to pursue physical revitalization; in this case, the construction of safe school sidewalks in CDBG eligible areas of the City.

3) HOME Program

The City of Medford is not currently an entitlement city for HUD's HOME funds (a block grant for providing affordable housing). Consideration was given to forming a consortium of Jackson County, Ashland, and other cities in order to receive a HOME grant. However, it was decided not to form such a consortium at this time, but instead to apply to the state, which distributes HOME funds to non-entitlement communities. Affordable housing organizations in Medford must apply to the Oregon Housing and Community Services Department, which allocates funds based on a statewide Consolidated Plan. Organizations in Medford have done well in pursuing this approach. The Housing Authority of Jackson County, ACCESS and OnTrack have received HOME grants in the past few years. In 2002, Medford received \$450,000 in HOME dollars for the Lilac Meadows project (Housing Authority). Ashland received \$518,354 for the Community

Land Trust. In the future, if organizations from Medford are not successful in competing statewide for HOME funds, the City can reconsider forming a consortium to receive HOME funds. In fact, discussion has begun between Ashland and Medford about the feasibility of forming a Home Consortium in Program Year 2004/2005.

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.

A recent example of a successful project that was developed using Low-income Housing Tax Credits is Lilac Meadows, developed by the Housing Authority of Jackson County in 2002. The 42-unit farm worker-housing complex 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.

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 1440 for all of Jackson County. They also are eligible for special programs such as the Family Self Sufficiency Coordinator and Homeownership Coordinator. They are eligible for ROSS funding but have not applied for this funding in this program year.

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. Currently ASI Jackson County is accessing 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 farm worker housing.

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 1,2 and 3 and to fund hazardous tree removal, pruning and planting of street trees for neighborhood groups in Census Tracts 1 and 2.

2) City Livability Grants

The City of Medford offers \$300,000 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 Program Year 2003/04 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.

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 CDBG Coordinator 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 2002/2003, on-site monitoring was conducted with all of the City's subrecipients.

Concerning the Consolidated Plan, the City will monitor the progress of all 2003/04 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 the establishment of a nine-person Housing Commission. The Housing Commission encourages and supports existing public, non-profit, and private organizations that are working to provide affordable housing.

In addition to reviewing all subrecipient draw down requests, program and financial reports; the City will complete a risk assessment of 2003/04 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 2003/04 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:

- Shelter/Transitional Housing
- Homeless Veterans
- 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 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 is a three-year \$496,000 program funded by a HUD McKinney grant.

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 with 692 in 1998 and 969 in 2002, a 40% increase. According to the one night shelter count, on any given night in Jackson County, 210 will attempt to access emergency shelter services.

Nonprofit housing providers and social service agencies continue to address the needs of special needs populations. In the 2003/2004 Program Year, the Catalpa Shade project will be completed providing 22 units of supportive housing for persons with brain related injuries. This is a project of ASI Jackson County and will be managed by ACCESS, Inc. Also, ACCESS, Inc. has just learned that it will receive

the necessary funding to construct 11 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 OnTrack, Inc. an nonprofit working with persons with alcohol and other drug addictions and persons with HIV and related diseases. They are currently in the process of securing funding for approximately 70 housing units.

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 attends 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 new addition to coordination efforts has been the creation of a housing clearinghouse within the county. ACCESS, Inc., in partnership with the Housing Authority of Jackson County has been named by the State of Oregon as a Southern Oregon Regional 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 County will be funneled through this organization as well. This year, the Southern Oregon Regional Housing Resource Center will open. The Neighborhood Resource Center serves on its advisory board, which has recently been established

The City of Medford has established a Housing 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. City staff is recommending that their function be increased in the coming year to 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. At the present time, this certified assessor/inspector is the only one qualified within the County to provide this service.

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 and 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 has recently developed a new division, the Neighborhood Resource Division, within the City Manager's Office to more effectively address its housing concerns as well as issues around poverty 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 team approach to community and

economic development should help improve the capacity of the community to help its citizens meet their needs.

In the 2003/2004 Program Year, staff plans to update the Five Year Consolidated Plan. Staff is currently in the process of updating the Analysis to Impediments to Fair Housing.

UNDERSERVED NEEDS

There are far more needs than there exists resources to meet them within the City of Medford. The new 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 grants programs 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, over \$300,000 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 early 2003, the City of Medford, in partnership with the Rogue Valley Council of Governments, the United Way of Jackson County and ACCESS, Inc. conducted a 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. Approximately 50 agencies responded to the survey. The five most critical needs in priority order include:

1. Medical (including financial assistance)
2. Affordable Housing
3. Food and Nutrition
4. Living Wage Jobs and Employment
5. Mental Health

The City of Medford's Grants Subcommittee took these critical needs into account when making its funding decisions. This year, 74% of the CDBG Public Service dollars allocated went to direct medical benefits with over half 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 being built and managed by the Housing Authority of Jackson County, will open by Winter 2004 to serve the needs of 82 families. Twenty of those units are for migrant farm workers and will be used to house homeless persons when the seasonal farm worker population is gone. An additional 42 units are for low-income persons with a preference for those persons transitioning out of farm labor with an additional 20 units provided for year-round farm labor housing.

Catalpa Shade will open this year to house 21 persons with mobility and/or traumatic brain injuries. Funding has been procured for an 11-unit development to house those with mental health problems.

FAIR HOUSING

The City of Medford, in partnership with ACCESS, Inc. and the Fair Housing Council of Oregon, will be holding training for testers in June 2003 and will conduct testing for discrimination within the City limits during the next fiscal year. A training workshop for social service agencies will also be offered in June on fair housing issues. A half hour television show on the community access channel will be taped in late June and will focus on Fair Housing issues. In July, the Fair Housing Council's three-dimensional display board depicting the history of housing discrimination in Oregon will be available in a public location for two weeks within the City.

The City's *Analysis of Impediments to Fair Housing* will be completely updated in 2003/2004. The City is in the process of conducting a lending practices review of mortgage activity within the Medford-Ashland MSA to be included in the City's Fair Housing report. This report is due to be completed by the end of June 2003.

The Consumer Credit Counseling Service of Southern Oregon 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. They also counsel clients and present educational opportunities in the area of predatory lending.

The City will be providing funding through its General Fund to the Center for Nonprofit Legal Services to enable that legal services agency to continue to provide assistance on landlord-tenant law and on Fair Housing issues.

City staff has been attending several training workshops and conferences on Fair Housing to increase their own awareness including a workshop held in Ashland in November and a workshop sponsored by HUD-Portland involving a representative from the Seattle FHEO office in April 2003. Staff also participated in the annual Fair Housing Council conference in April.

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

1. **Support a Fair Housing education and outreach program.** 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 will be published in the July 2003 citywide newsletter that is distributed to 22,000 households.
2. **Continue to support actions to increase the availability of affordable housing.** The City of Medford has established a City Housing 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. Over the past year, the FHCO received 5

complaints from Medford. The complaint breakdown was as follows: 2 related to disability, 1 to familial status and 2 to sex. There were no tests found supporting these allegations.

4. **Continue to support the inclusion of group homes and residential care facilities in the community.** Group homes and assisted care facilities continue to be constructed with the City. Increasing education about these facilities has made a difference in controlling NIMBY reactions. There are many model projects that can be pointed to with pride when an organization is interested in building a new facility.
5. **Include persons of protected classes on boards and commissions.** The City of Medford has a Multicultural Commission, which looks at the makeup of the City's boards and commissions and its employees and works to develop strategies to ensure the inclusion of persons of protected classes.
6. **Monitor loan 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 should be completed by June 30, 2003.

STRATEGY IMPLEMENTATION

The following is a listing of the goals and strategies that will be implemented in the 2003-2004 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.

HOUSING REHABILITATION AND DEVELOPMENT

Goal 1: To increase the supply of rental housing for low-income households.

Activity 1:

Project: Rehabilitation of 86 low to moderate-income dwelling units of an existing apartment complex owned and managed by the Housing Authority of Jackson County by replacing roofs, windows and glass doors for weatherization and maintenance.

Location: 726 Royal Avenue

Subrecipient: Housing Authority of Jackson County

Funding: \$177,000

Outcome: Retain 86 units of affordable housing for low to moderate income persons within the City of Medford.

This project also meets the following Goals and Strategies:

Goal 1, Strategy 1.3. Support providers of public housing.

Goal 2, Strategy 2-1. Retain existing affordable housing by supporting rehabilitation projects.

Goal 8: To improve the appearance of neighborhoods.

The project site is in the midst of other multifamily apartments and small professional and medical offices. The area is generally well maintained. However, the project site may become the "slum" of the neighborhood if it is not maintained and repaired.

Goal 2: To Provide and Maintain Home Ownership Opportunities for Low-Income Households.

Strategy 2-1. Retain existing affordable housing by supporting rehabilitation programs. (A)

Activity 1:

Project: Purchase of land and rehabilitation of approximately three single-family dwellings. (2005 Amendment: This was decreased to one house)
Location: At addresses in West Medford not known at this time
Sub recipient: Rogue Valley Community Development Corporation
Funding: \$100,000 in estimated program income and \$63,000 of reallocated CDBG funds (2005 Amendment: The funding was decreased to \$49,690 of CDBG funding with the \$13,310 carried over to 2005 activities.)
Outcome: Approximately three income-qualified families will be able to purchase homes in West Medford.

Activity 2:

Project: 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 \$86,000 in estimated program income
Outcome: Approximately 26 homes rehabilitated.

Strategy 2-2. Support homeownership through down payment and home ownership assistance. (C)

Activity 1:

Project: First Time Homebuyers Assistance Program: Provide no interest loans for loans for up to 50% of the down payment and closing costs for income eligible families interested in becoming homeowners within the City of Medford.
Location: Citywide
Subrecipient: ACCESS, Inc administers the program under the auspices of the Southern Oregon Housing Resource Center
Funding: \$70,000
Outcome: Approximately 12 income eligible families will become homeowners within the City of Medford

Strategy 2-5. Encourage the development of affordable housing by private developers. (C)

The City's new Housing Commission is working to develop incentives for nonprofit and for profit developers to encourage the development of affordable housing within the City limits. Some of the areas being considered include the following:

- Enhance awareness of the density bonus option/Consider a deferral of System Development Charges until time of occupancy/ Promote the bancrofting option for SDCs.

Activity 1:

The City of Medford allows the creation of accessory dwelling units in single-family residential zones. The purpose of this is to encourage in-fill and provide opportunities for affordable housing in existing neighborhoods. The City will continue to promote this tool to increase the number of affordable housing units in the city.

Activity 2:

The City of Medford, on behalf of the Medford Urban Renewal District, has applied to the State of Oregon for a Vertical Housing Development Zone within its Central Business District. In FY 2003/2004, the City will promote the existence of this tool to developers.

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

Goal 3: *To Affirmatively Further Fair Housing.*

Strategy 3-1. Assure that federal laws prohibiting housing discrimination are publicized, and that allegations of discrimination are referred to the responsible enforcement agency. (B)

Activity 1:

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 sponsor a booth featuring fair housing materials at any Homebuyer Fairs being offered in FY 2003/2004. The City, in partnership with the Fair Housing Council and the City of Ashland, will display an exhibit depicting a history of racial discrimination and fair housing concerns in Oregon, in the City Hall or Federal Building during the month of July.

Outcome: 200 brochures to be distributed. Several hundred people to view Fair Housing Council display exhibit.

Activity 2:

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.

COMMUNITY DEVELOPMENT

Goal 4: *To Identify and Enhance Neighborhood Assets.*

Strategy 4-1. Encourage the development of Neighborhood Associations. (C)

One of the City Council goals is to develop a neighborhood revitalization plan, which was brought before Council in March 2002. This plan promotes the revitalization of challenged neighborhoods beginning with the Liberty Park District (formerly Beatty- Manzanita) neighborhood in West Medford. Since that time, several neighborhood groups have formed including one in the Liberty Park. This neighborhood has been identified as the first neighborhood to be revitalized by the City. It possesses both the highest concentration of overall minorities (30%) and the highest concentration of individuals in poverty (40%). Also, staff has been working closely with the West Medford Community Coalition board to help them to reorganize and become a more effective voice for West Medford.

Strategy 4-2. Provide grants to Neighborhood Associations to enhance existing neighborhood assets.

The City, through its new 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 2003, grants went to the West Medford Community Coalition to help cover expenses for the community cleanup day held in April.

Goal 8: To Improve the Appearance of Neighborhoods.

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 Coordinator 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.

Activity 1:

The City hired a Code Compliance Coordinator in December 2002. Working through a coordinated team approach, the Code Compliance Coordinator serves as a member of the Neighborhood Resources Division of the City along with the CDBG Coordinator and the Neighborhood Resource Coordinator. This position will work closely with neighborhood organizations working to clean up and improve challenged neighborhoods within the City.

Project: Code Enforcement Activities
Location: Eligible Census tracts within the City of Medford
Funding: \$60,000 CDBG
Outcome: Improved neighborhood areas in income eligible neighborhoods throughout the City.

PUBLIC SERVICES- OPERATIONS

Goal 5: To Support Public Service Agencies Providing Safety Net Services.

Strategy 5-1. Continue to provide operating grants to public service agencies serving low-income families, homeless, and persons with special needs. (A)

The city plans to use a total of \$100,000 of its 2003/2004 CDBG funds to provide operating grants to five non-profit agencies providing services to low-income residents of Medford.

Those that are not mentioned under other goals and strategies are:

Activity 1:

Project: Kids Health Connection- Providing school-based health services
Location: West Medford – Jackson, Washington and Oakgrove Schools
Subrecipient: Providence Medical Center
Funding: \$35,000
Outcome: 786 children will receive health care through the elementary schools

Activity 2:

Project: Medford Family Services Office
Location: Citywide
Subrecipient: The Salvation Army
Funding: \$10,000
Outcome: 3,496 people, in danger of becoming homeless, will receive emergency services

Activity 3:

Project: Services to victims of child abuse
Location: Citywide
Subrecipient: Jackson County Child Abuse Task Force
Funding: \$16,400 CDBG
Outcome: Services provided to 220 persons

Activity 4:

Project: Provision of health care services to low and moderate income persons
Location: Citywide
Subrecipient: Community Health Center
Funding: \$38,600 CDBG
Outcome: Health care provided for 1,100 persons.

CITY CAPITAL IMPROVEMENT PROJECTS

Goal 6: To Upgrade Infrastructure in Low-Income Areas.

Strategy 6-3. Replace hazardous sidewalks in low-income neighborhoods as necessary. (A)

Strategy 6-5. Install 20 new streetlights in low-income neighborhoods over the next five years. (A)

Goal 8: To Improve the Aesthetics of Neighborhoods by Encouraging the Planting of Street Trees.

Strategy 8-1. Install 10 street trees per year in low-income neighborhoods. (A)

Activity 1:

Project: Development of infrastructure and planting of new street trees in income eligible neighborhoods undergoing revitalization such as the Beatty- Manzanita (Liberty Park) neighborhood in Census Tract 1.
Location: Liberty Park neighborhood between Riverside and Central, McAndrews and Jackson
Funding: \$27,700 CDBG
Outcome: Infrastructure improvements in a deteriorating neighborhood to help spur private investment and to foster community involvement and pride.

Strategy 6-4. Construct 10,000 lineal feet of new sidewalks in low-income neighborhoods where no sidewalks currently exist over the next five years. (A)

Strategy 7-5. Install a sidewalk on the west side of Union Park. (A)

Activity 2:

Project: New Sidewalks/Hazardous Sidewalk Replacement
Location: Streets around Washington, Jackson and Howard Elementary Schools and in the Liberty Park Neighborhood including the following:
• Construction of sidewalks on Withington between Plum and Hamilton
• Construction of sidewalk, curb, gutter and storm drain on Plum Street (Union Park) between 11th Street and Dakota

- Construction of sidewalks around the Howard Elementary School, Washington Elementary School and Jackson Elementary School.

Other sidewalk priorities will be determined through a parent/citizen/school administrator committee from each of the school districts involved and through the neighborhood group in Liberty Park.

Developer:

City Public Works

Funding:

An estimated \$750,000 in Section 108 Loan Guarantee funds

Outcome:

Completion of safe school sidewalks including the installation of curbs, gutters, and storm drains where necessary in neighborhoods around Washington Elementary School, Jackson Elementary School, and Howard Elementary School. (2005 Amendment: The Section 108 Loan funding was not secured in Program Year 2003/2004 and the project was cancelled.) Also, the replacement of hazardous sidewalks and the construction of new sidewalks in the Liberty Park neighborhood will take place.

COORDINATION

Goal 16: To Provide Institutional Structure and Intergovernmental Cooperation.

Strategy 16-1 The City will consider creating a Housing and Community Development Commission.

Activity 1:

The City has established by ordinance a nine person Housing Commission. The Commission serves in an advisory capacity to City Council on matters relating to housing and community development issues within the City.

Strategy 16-2 The City will consider providing additional housing and community development staff.

Activity 1

The City hired a Code Compliance Coordinator in December 2002. Working through a coordinated team approach, the Code Compliance Coordinator serves as a member of the Neighborhood Resources Division of the City along with the CDBG Coordinator and the Neighborhood Resource Coordinator. This position will work closely with neighborhood organizations working to clean up and improve challenged neighborhoods within the City.

PROPOSED PROJECTS

The City of Medford is a CDBG Entitlement City. It receives no funds from HOME, ESG, or HOPWA. Revenue for the 2003/04-Program Year is anticipated to be:

2003/04 Grant	\$ 758,000
Carryover from previous year	\$ 70,700
<i>Estimated</i> Program Income	\$ 215,000
RVDCD \$119,000	
HAJC \$ 86,000	
<hr/>	

Total Funds Available \$1,043,700

**U.S. Department of Housing and Urban Development
City of Medford, Oregon
Funding Sources
FY 2003-2004**

Entitlement Grant	\$758,000
Unprogrammed Funds from previous years (carryover)	\$70,700
Total Estimated Program Income	\$215,000
Total Funding Sources	\$1,043,700

Estimated Program Income	
Housing Authority of Jackson County	\$86,000
Rogue Valley Community Development Corporation	\$119,000
Total Estimated Program Income	\$215,000

TO: MAIL TRIBUNE-LEGAL
PUBLISH: Sunday, May 11, 2003

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 2004** will commence on Monday, May 12, 2003, and close on Tuesday, June 10, 2003. The purpose of this public comment period is to solicit citizen input regarding the **Action 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 **Consolidated Plan** was adopted by the Medford City Council in June 2000. 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**.

Copies of the City's draft **Action Plan** are available for public review in the City Manager 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

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

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the City Council, City of Medford, will hold a public hearing on Thursday, June 19, 2003 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 2003/04 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 \$758,000 for the 2003/04 Program Year. In addition, it is estimated that \$169,000 will be received in program income from projects previously funded with CDBG funds. The City also plans to use \$750,000 in Section 108 Loan Guarantee funding to construct sidewalks around Washington, Jackson and Howard Elementary Schools.

The City proposes to use these CDBG funds for the following projects and programs in FY 2003/04:

HOUSING

Homeowner Rehabilitation- Phase 10- \$ 100,000 Estimated Program Income of \$40,000

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

Rental Rehabilitation - \$177,000

Grant to the Housing Authority of Jackson County to rehabilitate 86 low to moderate income dwelling units of an existing apartment complex, the Royal Apartments located on Royal Avenue, by replacing roofs, windows and glass doors.

Housing Rehabilitation – Estimated Program Income- \$100,000

Projected program income to the Rogue Valley Community Development Corporation to provide funds for the projected purchase and rehabilitation of houses in West Medford for the purpose of reselling them to low income families who would not otherwise be able to afford their own homes.

Land Acquisition for Townhouse Development- \$63,000

Grant to the Rogue Valley Community Development Corporation to acquire property to develop a new townhouse home ownership project for approximately seven low- to moderate-income families

COMMUNITY DEVELOPMENT (INFRASTRUCTURE)

Upgrade infrastructure in Liberty Park- \$27,700

Funds will be provided to upgrade infrastructure in the Liberty Park neighborhood including new construction and hazardous sidewalk replacement, street lighting, and street trees.

New sidewalk construction and replacement- \$750,000

Repayment Plan- funds to repay a portion of the Section 108 Loan - \$63,700

The City of Medford will apply for HUD Section 108 Loan Guarantee Funding to build sidewalks for safe school routes in the Washington Elementary School, Howard Elementary School and Jackson Elementary School areas.

Code Compliance Services- \$60,000

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

PUBLIC SERVICES

The following public service agencies will be receiving grants for operating expenses for the 2003-2004 Program Year:

The Salvation Army Family Services	\$10,000
Kids Health Connection	\$ 35,000
Children’s Advocacy Center	\$ 16,400
Community Health Center	\$ 38,600

A total of \$100,000 will be allocated to Public Services in FY 2003-2004.

GRANT ADMINISTRATION--\$151,600 Estimated Program Income- \$29,000

CONTINGENCY- \$15,000

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

Lindsay Berryman, 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) 2002-2004, (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

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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

Lindsay Berryman, 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).

