

City of Medford



2015-2016 Annual Action Plan

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Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Medford only receives funding from the Community Development Block Grant Program. The CDBG program will bring \$625,366 into the City support affordable housing, homeless, and community development programs and projects in the first program year. Additional funding will come from unspent program administration funds, return funds from projects that finished under budget, and viable projects carrying forward into the 2015-2016 program year. Additional resources are restricted to capital improvement project allocation.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	625,366	110,000	228,768	964,134	2,501,464	Expected amount for remainder of Con Plan equals the Year 1 Annual Allocation times four.

Table 1 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will be leveraged through the ability of service organizations to raise program funds through outside sources, other loan sources needed for housing development activities, and the City's General Fund, where appropriate.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

None currently identified. The City will continue to evaluate opportunities to use public lands for future development.

Discussion

The City has allocated \$964,134 for the 2015-2016 CDBG program year. This amount includes \$625,366 from 2015 entitlement funds, \$228,768 in carry-forward funds and \$110,000 in estimated program income. These funds will be used to operate a range of private and public services as described later in the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing - Objective 1	2015	2019	Affordable Housing	Citywide	Major Home Improvements Minor and Emergency Home Improvements	CDBG: \$200,000	Homeowner Housing Rehabilitated: 16 Household Housing Unit
2	Affordable Housing - Objective 2	2015	2019	Affordable Housing Public Housing Homeless	Citywide	Emergency Assistance	CDBG: \$7,000	Tenant-based rental assistance / Rapid Rehousing: 7 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Services Availability - Objective 1	2016	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Domestic Violence and Child Abuse Senior & Disabled Services Youth Services Fair Housing Child Care Services Homeless Facilities/Services Mental Health/Substance Abuse Domestic Violence Emergency Shelter Emergency Assistance/Operations and Services	CDBG: \$86,805	Public service activities other than Low/Moderate Income Housing Benefit: 860 Persons Assisted Homeless Person Overnight Shelter: 375 Persons Assisted
4	Community Development - Objective 1	2015	2019	Non-Housing Community Development	Citywide CDBG Eligible Block Groups	Public Infrastructure Parks and Recreation Infrastructure Code Enforcement Demolition and Blight Clearance Community Facilities/Park and Recreation Senior Center	CDBG: \$411,256	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1206 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted Buildings Demolished: 7 Buildings

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing - Objective 1
	Goal Description	-Provide no interest loans to low- and moderate-income homeowners for the correction of recognized hazards to health and safety such as leaking roofs, failed heating systems, unsafe wiring, failed plumbing and other necessary and eligible repairs. Each loan is secured by a lien on the property with repayment due upon sale or transfer of property by owner(s).
2	Goal Name	Affordable Housing - Objective 2
	Goal Description	-Provide rental assistance to low-income families for up to three months reducing Medford homelessness by decreasing rental evictions.

3	Goal Name	Public Services Availability - Objective 1
	Goal Description	<p>-Provide runaway, homeless and transitional youth ages 10-17 with emergency shelter, crisis services and basic needs. Family services focus on increasing family member interconnectedness, stability and well-being while addressing dysfunctional patterns of behavior.</p> <p>-Provide wrap-around safety net services for homeless Jackson County youth – ages 0-21 – and their families.</p> <p>-Provide services, resources and skills that increase sense of security, financial stability and educational success of youth aging out of the child welfare or juvenile justice system, homeless or at risk of becoming homeless, and survivors of domestic and/or sexual abuse.</p> <p>-Provide scholarships for children in poverty to attend afterschool programs</p> <p>-Deliver essential safety net assistance to seniors in need of subsidized housing, health and financial services, meals, food stamps and emergency food bank information. Coordinated services for educational, social and physical activities, and the opportunity to serve others are also made available to the senior population.</p> <p>-Promote volunteerism within the senior population that will assist with mentorship and tutoring of students during critical times in the children’s lives.</p> <p>-Recruit and train volunteers to provide critical services for abused and/or neglected children who are wards of the court.</p> <p>-Assist vulnerable, low-income seniors and persons with disabilities find resources needed to help live safe and healthy lives while remaining in their homes.</p> <p>-Provide funds for low-and moderate-income families and families in crisis to obtain preschool tuition for their children.</p> <p>-Provide legal service assistance to Medford veterans, seniors, disabled and low-income persons by increasing access to transportation, employment, housing, healthcare and public benefits.</p>

4	Goal Name	Community Development - Objective 1
	Goal Description	<ul style="list-style-type: none"> -Remove and replace six aged pieces of playground equipment, soft fall material and edging; and install an ADA accessible ramp and concrete walkway in a low-income neighborhood park. -Restore a parking lot at a City senior center. -Build sidewalks and associated improvements in low- and moderate-income neighborhoods. -Identify buildings that have been boarded up and become unsafe, problem properties. Funding will be used to demolish or remove unsafe debris to bring properties up to standards of health and safety on both an area benefit and spot blight basis.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects were developed by staff with consultation from non-profit service providers and community input through priorities established with involvement of the community survey.

Projects

#	Project Name
1	Hearts with a Mission
2	Maslow Project
3	Community Works, Inc.
4	Rogue Valley Family YMCA
5	Medford Senior Center
6	Community Volunteer Network
7	St. Vincent de Paul
8	Kids Unlimited, Inc.
9	CASA of Jackson County
10	ACCESS
11	Roots and Wings Child Development
12	Center for NonProfit Legal Services
13	Housing Authority of Jackson County
14	City of Medford Parks & Recreation Department
15	Medford Senior Center Parking Lot
16	City of Medford Neighborhood Infrastructure
17	City of Medford Demolition
18	City of Medford Program Administration
19	Housing Authority Fire Hydrant Installation

Table 3 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The projects listed above were selected from the total of project proposals received in accordance with their consistency with the priorities established through the Consolidated Plan forums and community survey process. These projects meet needs enumerated in the Needs Assessment and prioritization process to the extent that funding was available. Organizational competencies were also considered when selecting one project over another, leaning toward those organizations with long-standing histories of successful project management.

AP-38 Project Summary

1	Project Name	Hearts with a Mission
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Youth Services Homeless Facilities/Services
	Funding	CDBG: \$18,750
	Description	24/7 Emergency Sheltering & Safety Net Services for At-Risk Homeless Youth and Families
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	375 youth ages 10-17 will be served.
	Location Description	521 Edwards Street, Medford, OR 97501
Planned Activities	Provide runaway, homeless and transitional youth ages 10-17 with 365/24/7 emergency shelter, crisis services and basic needs. Family services focus on increasing family member interconnectedness, stability and well-being while addressing dysfunctional patterns of behavior.	
2	Project Name	Maslow Project
	Target Area	Citywide

	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Youth Services Homeless Facilities/Services
	Funding	CDBG: \$15,000
	Description	Wrap-around Case Management for Homeless Youth and Families
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	191 homeless or runaway youth will be served by the program.
	Location Description	500 Monroe Street, Medford, OR 97501
	Planned Activities	Provide case management services to homeless or runaway youth including screening to determine needs, establish goals, remove barriers to services, coordinate with other agencies and provide in-house support.
3	Project Name	Community Works, Inc.
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Domestic Violence and Child Abuse Youth Services Homeless Facilities/Services Domestic Violence Homeless Prevention/Emergency Transitional Housing
	Funding	CDBG: \$10,000
	Description	Transitional Living and Empowerment Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	77 youth, homeless or those at risk of becoming homeless, and survivors of domestic violence will be served through the program.

	Location Description	201 West Main Street, Suite D, Medford, OR 97501
	Planned Activities	Provide skills, resources and services that increase sense of security, financial stability and educational success of youth aging out of the child welfare or juvenile justice system, homeless or at risk of homeless, and survivors of domestic and/or sexual abuse.
4	Project Name	Rogue Valley Family YMCA
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Child Care Services
	Funding	CDBG: \$7,250
	Description	No Child Left Alone After School Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Sixty-seven children from low/mod income families will be served.
	Location Description	11 W Jackson Street, Medford, OR 97501
	Planned Activities	Provide scholarships to low-income families for after school care services.
5	Project Name	Medford Senior Center
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Senior & Disabled Services
	Funding	CDBG: \$7,250
	Description	Senior Advocacy Program
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	900 low/mod income seniors will be served.
	Location Description	510 E Main Street, Medford, OR 97501
	Planned Activities	Deliver essential safety net assistance for seniors in need of subsidized housing, meals, food stamps and emergency food bank information. The program offers coordinated service opportunities for educational, social and physical activities as well as an opportunity to serve others.
6	Project Name	Community Volunteer Network
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Senior & Disabled Services Youth Services
	Funding	CDBG: \$7,000
	Description	Foster Grandparent Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	12 foster grandparents will be served.
	Location Description	Various locations across the city.
	Planned Activities	Senior citizens volunteer in area non-profit organizations such as faith based organizations, Head Start centers, public schools and after school youth facilities. Senior citizens help children learn by providing one-on-one tutoring and guidance at critical times in the children's lives.
7	Project Name	St. Vincent de Paul
	Target Area	Citywide

	Goals Supported	Affordable Housing - Objective 2
	Needs Addressed	Emergency Assistance Homeless Prevention/Emergency
	Funding	CDBG: \$12,000
	Description	Reducing Medford Homelessness by Decreasing Rental Evictions Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	7 households at risk of homeless will be assisted with the program.
	Location Description	2424 N Pacific Hwy, Medford, OR 97501
	Planned Activities	Provide rent relief to low-income families for up to 3 months.
8	Project Name	Kids Unlimited, Inc.
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Youth Services Child Care Services
	Funding	CDBG: \$6,750
	Description	Kids Unlimited After School Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	135 children from low/mod families will be served.
	Location Description	821 North Riverside, Medford, OR 97501
	Planned Activities	Provide scholarships for children of poverty to attend afterschool programs.
9	Project Name	CASA of Jackson County

	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Domestic Violence and Child Abuse Youth Services
	Funding	CDBG: \$4,500
	Description	Recruit and Train CASAs for Abused and/or Neglected Children
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	5 abused and/or neglected children who are wards of the court will benefit from this program.
	Location Description	613 Market Street, Medford, OR 97504
	Planned Activities	Recruit and train court-appointed CASA volunteers to provide critical service for abused and/or neglected children who are wards of the court.
10	Project Name	ACCESS
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Senior & Disabled Services
	Funding	CDBG: \$3,652
	Description	Navigator and Companion Program for Seniors and Persons with Disabilities
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	15 low-income seniors and persons with disabilities will be assisted through the program.
	Location Description	3630 Aviation Way, Medford, OR 97504

	Planned Activities	Assist vulnerable, low-income seniors and persons with disabilities find resources needed to help live safe and healthy lives, while remaining in their homes.
11	Project Name	Roots and Wings Child Development
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Youth Services Child Care Services Employment/Job Training, Workforce Readiness
	Funding	CDBG: \$3,652
	Description	Tuition and Assistance for Underserved Children
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	12 children from low/mod income families will be assisted through the program.
	Location Description	3703 International Way, Suite B, Medford, OR 97501
Planned Activities	Provide tuition and financial assistance for low-and moderate-income families and families in crisis to obtain preschool for their children.	
12	Project Name	Center for NonProfit Legal Services
	Target Area	Citywide
	Goals Supported	Public Services Availability - Objective 1
	Needs Addressed	Senior & Disabled Services Fair Housing Health Services Transportation Services Homeless Prevention/Emergency
	Funding	CDBG: \$3,000
	Description	Pathways to Self Sufficiency
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	20 low/mod income persons will benefit from the program.
	Location Description	225 W Main Street, Medford, OR 97504
	Planned Activities	Provide legal assistance to Medford veterans, seniors, disabled and low-income persons by increasing access to transportation, employment, housing, healthcare and public benefits.
13	Project Name	Housing Authority of Jackson County
	Target Area	Citywide
	Goals Supported	Affordable Housing - Objective 1
	Needs Addressed	Minor and Emergency Home Improvements
	Funding	CDBG: \$275,000
	Description	Homeowner Repair Program
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	16 low/mod income households will benefit from the program.
	Location Description	Various locations around the city.
	Planned Activities	Provide no interest loans to low/mod income homeowners for the correction of recognized hazards to health and safety such as leaking roofs, failed heating systems, unsafe wiring, failed plumbing and other necessary and eligible repairs. Each loan is secured by a lien on the property with repayment due upon sale or transfer of property by owner(s).
14	Project Name	City of Medford Parks & Recreation Department
	Target Area	CDBG Eligible Block Groups
	Goals Supported	Community Development - Objective 1

	Needs Addressed	Parks and Recreation Infrastructure
	Funding	CDBG: \$40,000
	Description	Jackson Park Playground Renovation Project
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	306 low/mod income persons will benefit from the project.
	Location Description	815 Summit Avenue, Medford, OR 97501
	Planned Activities	Remove and replace six aged pieces of play equipment, soft fall material and edging; and install an ADA accessible ramp and concrete walkway.
15	Project Name	Medford Senior Center Parking Lot
	Target Area	CDBG Eligible Block Groups
	Goals Supported	Community Development - Objective 1
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$32,000
	Description	Medford Senior Center Parking Lot Renovation-Phase Five
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	900 low/mod income persons will benefit from the project.
	Location Description	510 E Main Street, Medford, OR 97501
	Planned Activities	Clean, prepare, and place 12,734 square feet of parking area for new paving overlay with compacted asphalt and striping.
16	Project Name	City of Medford Neighborhood Infrastructure
	Target Area	CDBG Eligible Block Groups

	Goals Supported	Community Development - Objective 1
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$184,038
	Description	Neighborhood Infrastructure Improvements Project
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	100 low/mod income persons will benefit from this project.
	Location Description	Various locations across the city.
	Planned Activities	The City of Medford's Public Works Division will build sidewalks and the associated improvements in low-moderate income neighborhoods.
17	Project Name	City of Medford Demolition
	Target Area	CDBG Eligible Block Groups
	Goals Supported	Community Development - Objective 1
	Needs Addressed	Demolition and Blight Clearance
	Funding	CDBG: \$185,218
	Description	Unsafe and Problem Properties Demolition & Abatement Project
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	7 buildings will be demolished or properties cleared of unsafe blight/unsafe influence.
	Location Description	Various locations across the city.
	Planned Activities	The City of Medford's Code Enforcement Division in conjunction with the Building Safety Division will identify buildings that have been boarded up and become unsafe, problem properties. Funding will be used to demolish these buildings on a spot basis.

18	Project Name	City of Medford Program Administration
	Target Area	Citywide
	Goals Supported	Affordable Housing - Objective 1 Affordable Housing - Objective 2 Public Services Availability - Objective 1 Community Development - Objective 1
	Needs Addressed	Major Home Improvements Affordable Housing Development for Owner/Rental Homeownership Assistance Emergency Assistance Minor and Emergency Home Improvements Domestic Violence and Child Abuse Senior & Disabled Services Youth Services Fair Housing Child Care Services Health Services Transportation Services Employment/Job Training, Workforce Readiness Technical Assistance to Small Business/Incubators Small Business Loans Public Infrastructure Parks and Recreation Infrastructure Code Enforcement Demolition and Blight Clearance Community Facilities/Park and Recreation Senior Center Youth Centers Homeless Facilities/Services Mental Health/Substance Abuse Domestic Violence Homeless Facilities Homeless Prevention/Emergency Emergency Shelter Emergency Assistance/Operations and Services Homeless Prevention/Rapid Re-housing Transitional Housing
	Funding	CDBG: \$125,074

	Description	City of Medford CDBG Program Administration
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Program administration - no direct benefit.
	Location Description	701 N. Columbus Avenue, Medford, OR 97501
	Planned Activities	Funds will used to pay administrative costs including staff salaries and benefits, and other charges related to the planning and execution of the CDBG program as allowed under 24 CFR 570.205 and 24 CFR 570.206.
19	Project Name	Housing Authority Fire Hydrant Installation
	Target Area	CDBG Eligible Block Groups
	Goals Supported	Community Development - Objective 1
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$24,000
	Description	Installation of two new fire hydrants required for construction of a 50-unit low/moderation income housing complex.
	Target Date	9/1/2015
	Estimate the number and type of families that will benefit from the proposed activities	<p align="left">50 low- and moderate-income households. </p>
	Location Description	130 W. Sixth Street, Medford, Oregon 97501
Planned Activities	This project will fund the installation of two new fire hydrants as required for the construction of a new 50-unit low- and moderate-income apartment complex.	

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Much of the funding from the CDBG program is available for use in any of the CDBG neighborhoods or citywide, depending on the specifics of the designated activities. Also, some funding is available according to individual benefit rather than area benefit. It is, therefore, difficult to provide reasonable projections of the distribution of funds by target area. The numbers below are strictly estimates based on experience.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	55
CDBG Eligible Block Groups	45

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed allocation of funds is based on federal funding requirements for each formula-allocated grant. Areas of low to moderate-income concentration and certain areas of high minority concentration are targeted. Areas of low homeownership and deteriorating housing conditions were also considered in the targeting process.

Discussion

The distribution of funds by target area is projected to be primarily citywide due to use of funds for administrative, non-profit support, and individual benefit-oriented programmatic uses of the funds. The remaining funds are estimated to be spread through smaller CDBG-eligible areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The annual goals listed previously specify the following production numbers for housing assistance and for homelessness, non-homeless, and special needs populations.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	23
Special-Needs	0
Total	23

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	7
The Production of New Units	50
Rehab of Existing Units	16
Acquisition of Existing Units	0
Total	73

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

These figures relate to production targets specified in the annual goals for 2015. CDBG funding for these activities may target more households.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of Jackson County does not own any public housing units.

Actions planned during the next year to address the needs to public housing

The Housing Authority of Jackson County does not own any public housing units.

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

The Housing Authority of Jackson County does not own any public housing units.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

NA

Discussion

The Housing Authority of Jackson County does not own any public housing units.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Medford is active in the Medford/Ashland/Jackson County Continuum of Care, addressing issues related to homeless in the region. Funding for homeless projects and services are sources primarily through that process.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Medford/Ashland/Jackson County Continuum of Care, the coalition of local homeless service agencies, conducts annual surveys of homeless individuals, including unsheltered persons. These surveys serve to help focus agency activities for the coming year, as well as provide documentation in response to HUD program requirements.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Medford has no plans that would affect the emergency shelter or transitional housing needs of homeless persons in the coming year.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Medford is funding a program to help homeless persons move from homelessness to permanent housing through skills training, the provision of resources and services that increase a sense of security, financial stability, and educational success of youth aging out of the child welfare or juvenile justice system, homeless or at risk of homelessness, and survivors of domestic violence and/or sexual abuse.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Homeless prevention is a major focus of the participants in the Continuum of Care. Agencies include homeless prevention as a support program in conjunction with the provision of shelter and other support services. The City will be funding a program that provides emergency rental assistance to help prevent homelessness.

Discussion

The participants in the Continuum of Care work closely together to meet the needs of homeless individuals and families through the continuum of services coordinated through the partnership.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Both negative effects of public policies and barriers to affordable housing have been identified under MA-40 and SP-55. Market barriers to development have also been noted throughout the Plan. Through extensive public participation efforts and strategic alignment forums, additional potential barriers have been identified.

Accessing affordable housing appears to be one of the biggest issues as need greatly outweighs the resources available. The Housing Authority of Jackson County (HAJC), as of July 2015, has over 5,600 families on the waiting list for the Housing Choice Voucher program. HAJC's apartment complexes have a waiting list of 100-400 households at any given time. HAJC reports a more accurate vacancy rate for the past year in Jackson County between 1.5-2.0%. This number is perceived to continue to decline. Hesitations from potential developers can be considered a barrier to the construction of new housing developments.

In some instances, the conception of “Not in My Backyard” may be a barrier to the development of affordable housing. There is moderate opposition to affordable housing development projects as a result of perceptions that projects may reduce property values or alter the physical environment and population composition of the neighborhood.

Agencies serving the homeless population are eager to develop a plan that will address the housing needs of this population. Agencies are promoting community-wide collaboration to house homeless individuals, which may save the community public service support costs in the long-run. Addressing the barrier of “availability” may stimulate development of transitional housing models, which offers this population an avenue to pursue more permanent affordable housing alternatives.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Medford works to address specific local effects through City Council and the advisory capacity of its Housing and Community Development Commission (HCDC). The following represents potential strategies to ameliorate certain barriers to affordable housing:

- Medford is working on an amendment to its UGB to comply with the 20-year land need established by the Housing and Economic Elements of the Comprehensive Plan. The UGB amendment would increase housing supply by 884 acres and employment supply

by 636 acres.

- As part of the UGB amendment, City Council changed the General Land Use Plan Designations to increase the allowable density for residential development on 145 acres of existing UGB land; 69 acres to *Urban High Density Residential* and 76 acres to *Urban Medium Density Residential*.
- Several local non-profit developers consider high system development charges as a barrier to multifamily affordable housing development. A reduction in development fees for low-income housing and/or a delay in payment were mentioned as possible incentives. Although the City acknowledges development costs can be an affordability challenge to developers, the necessity to provide adequate capacity for overall community development is relevant.
- The HCDC is available to help assist with community awareness of housing development activities that may be eligible for funding through the U.S. Department of Housing and Urban Development's Community Development Block Grant program, which may improve developer awareness of public policy initiatives, partnerships and resources available to assist with development of affordable housing.
- The HCDC may assist with solicitation of affordable housing projects in addition to collaborating efforts to promote viable developer incentives earlier in the planning stage. The HCDC will also continue to support affordable housing projects by providing accurate scoring criteria and ranking results for purposes of competitive state and federal funding opportunities.
- Other issues relating to residential development costs and community-wide awareness to development opportunities and misconceptions can be alleviated through improved community awareness efforts, transparency, education, collaboration and creative funding alternatives.
- House Bill 2564 would permit local government to impose conditions on approved permits that establish sales price for up to 30 percent of residential development or limit purchase to class or group of purchasers in exchange for one or more developer incentives.
- Oregon Housing and Community Services reported 2,830 affordable housing units in Medford are potentially at risk of "expiring use." Lead agencies including the Housing Authority of Jackson County, the City of Medford, ACCESS and OnTrack will continue to evaluate the potential impact of "expiring use" developments.

Discussion:

Several barriers to the development of affordable housing have been addressed herein. The City has taken extensive measures to collect public opinion and remain transparent of the issues affecting affordable housing development within the community. Collaboration among lead agencies is improving, which may stimulate both effective and efficient progress.

AP-85 Other Actions – 91.220(k)

Introduction:

The City currently provides a variety of services to the residents of Medford, some funded by CDBG allocations, with private, State, and City funding bringing additional assets to bear on these problems. Below are some of the actions currently performed by the City or under consideration for the future.

Actions planned to address obstacles to meeting underserved needs

The City will continue to look for new funding sources for programs to address underserved needs. Funding is the major obstacle in providing the services needed to focus on the vast variety of issues that prevent families from breaking out of poverty and from living in the best, most affordable housing possible.

Actions planned to foster and maintain affordable housing

The City will consider providing financial assistance for Tax Credit Projects for affordable housing development to expand multi-family rental development projects and homeownership opportunities when those projects are present for review. Additionally, acquisition, soft costs and site development funds will be used for affordable housing development. Consideration for additional funding will be given upon completion of the pre-development phase.

Actions planned to reduce lead-based paint hazards

- Continue to meet HUD lead-based paint abatement standards in housing rehabilitation programs.
- Seek funding as it becomes available to provide testing and abatement of lead-based paint hazards in single-family housing where young children are present.
- Expand the stock of lead safe housing units through housing initiatives.
- Seek funding as it becomes available to provide for testing, abatement, training, and educational awareness.

Actions planned to reduce the number of poverty-level families

The City will continue its efforts in conjunction with the Continuum of Care to reduce the number of poverty-level families through the development of services needed to assist those families with educational opportunities, job growth, and life skills training through the various social service agencies operating in the city.

Actions planned to develop institutional structure

- Work with non-profit organizations to address community needs and provide support to federal and non-federal funding initiatives.
- Work with private industry to address important issues that hamper housing and community development efforts.
- Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to coordinate planning activities with private housing and social service agencies, including participation in the Medford/Ashland/Jackson County Continuum of Care meetings, development of the Continuum of Care, and enumeration of point-in-time and homeless surveys. City staff will also continue its participation in other coalitions and study groups as the opportunity arises.

Discussion:

These actions are primarily the continuation of what the City is currently doing in the various areas. No major obstacles in the institutional structure have been identified that need to be addressed. The City is also satisfied with its efforts to coordinate with private housing and social service agencies.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The following provides details on program specific requirements for the Community Development Block Grant.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

Discussion:

The City strives to meet all program specific requirements as detailed in the enabling legislation and program guidelines. City staff works with subrecipients to ensure that these requirements are met and oversees internal operations towards the same goal.

Attachments

Citizen Participation Plan

1. INTRODUCTION

This Citizen Participation Plan applies to the City of Medford’s *Consolidated Plan for Housing and Community Development*. The Plan is required by the U.S. Department of Housing and Urban Development in order for the City to receive Community Development Block Grant funds and other HUD funding for federal programs.

Opportunities for citizen participation are required by Federal law. This plan is intended to encourage citizens to participate in the development of the Consolidated Plan, to participate in any substantial amendments to the Plan, and to participate in the performance report which is prepared annually. The Plan particularly is intended to encourage citizens of low and moderate income and residents of low and moderate income areas in Medford. The following table summarizes the citizen participation opportunities in the Consolidated Plan process. Public Participation in the Consolidated Plan Process

Process	Plan Preparation	Consolidated Plan Amendment	One Year Action Plan Amendment	Annual Report
1. Information about the amendment process and content	Yes	Yes	Yes	Yes
2. Review and comment period	Yes	Yes	Yes	Yes
3. Public hearing	1	1	1	2
4. Comment period	30 days	30 days	30 days	15 days
5. Summary of comments and response	Yes	Yes	Yes	Yes

2. CONSOLIDATED PLAN PREPARATION

(1) Information will be provided to citizens, public agencies, and other interested parties information during the planning process that includes:

- The amount of assistance Medford expects to receive.
- The range of activities that may be undertaken.
- Estimated amount that will benefit persons of low and moderate income.
- Efforts to minimize displacement of persons and assistance if displacement occurs.

Information will be provided by public notices, through a public input meeting, and notification to organizations that have participated in previous Consolidated Plan development planning or have requested information.

(2) The City of Medford shall provide reasonable opportunities for review and comment on the Draft Consolidated Plan as follows:

- Publish a notice of the availability of the Draft Plan for review.
- Offer a summary of the Draft Consolidated Plan electronically upon request.
- Provide hard copies of the Summary to interested parties and individuals upon request.

(3) The City of Medford shall provide at least one public hearing during the development of the Consolidated Plan.

(4) A period of not less than 30 days shall be provided to receive comments from citizens.

(5) The City will consider any comments whether written or submitted orally in public hearings in preparing the final Consolidated Plan and will include a summary of these comments or views and the reasons for adjusting or not adjusting the Consolidated Plan.

3. AMENDMENTS TO THE CONSOLIDATED PLAN

(1) The following process is required for substantial amendments to the Consolidated Plan. A substantial change is defined as the addition or deletion of a Strategy or a Goal in the Strategic Plan section of the Consolidated Plan. A change in the objectives of the Strategic Plan section including additions or deletions of the objectives is not considered a substantial change and does not require the amendment process.

(2) Prior to amending the Consolidated Plan, the City of Medford shall provide citizens with 30 days' notice and opportunity to comment on substantial amendment(s). Notice shall be given by

a public notice and an electronic mail or letter to persons and organizations which have previously been involved in the Consolidated Plan process or have requested their name be placed on the Consolidated Plan mailing list.

(3) All comments received in writing or orally at the public hearings will be considered, and if deemed appropriate, the City shall modify the amendment(s). A summary of these, and a summary of any comments not accepted and the reasons therefore shall be attached to the substantial amendment(s) of the Consolidated Plan.

4. AMENDMENTS TO THE ONE YEAR ACTION PLAN

(1) The following process is required for substantial amendments to the One Year Action Plan. A substantial change is defined as: (a) for projects over \$25,000 increasing or decreasing the amount budgeted for a project by 25%, (unless a decrease is due to an under run of the project); (b) for projects under \$25,000 increasing or decreasing the amount budgeted for a project by 50% (unless a decrease is due to an under run of a project); (c) changing the purpose, scope, location, or intended beneficiaries or adding a new project.

A minor change in location is NOT a substantial change, if the purpose, scope and intended beneficiaries remain essentially the same. If capital dollars are used for a different portion of the project (e.g. rehabilitation rather than acquisition) this does not constitute a substantial change.

(2) Prior to amending the One Year Action Plan, the City of Medford shall provide citizens with 30 days' notice and opportunity to comment on substantial amendment(s). Notice shall be given by a public notice and an electronic mail or letter to persons and organizations which have previously been involved in the Consolidated Plan process or have requested their name be placed on the Consolidated Plan mailing list.

(3) All comments received in writing or orally at the public hearings will be considered, and if deemed appropriate, the City shall modify the amendment(s). A summary of these, and a summary of any comments not accepted and the reasons therefore shall be attached to the substantial amendment(s) of the One Year Action Plan.

5. PERFORMANCE REPORTS

(1) The City of Medford will provide citizens with notice and an opportunity to comment on the annual Performance Report. Notice will be provided by a public notice. The review and comment period shall be at least 15 days.

6. MISCELLANEOUS

(1) Bilingual Opportunities

Upon reasonable request, or upon identification of a specific need, the City of Medford will provide public notices and summaries of basic information in other languages. Also upon reasonable request, the City will provide translators at workshops and public hearings to

facilitate participation of non-English speaking citizens. To arrange this service, contact the City at least 5 days prior to a scheduled meeting or workshop.

(2) Accessibility

Meetings shall be held in locations that are accessible to people with physical handicaps.

(3) Access to records

The City will provide reasonable and timely access to information and records related to the Consolidated Plan and the use of assistance under programs covered by the Consolidated Plan. Within 15 business days of a request, the City will provide opportunities for citizens to review information regarding the Consolidated Plan and reply to inquiries for information. Copies of the Plan will be available at the City offices and the public library.

(4) Technical Assistance

The City will provide technical assistance to group's representatives of low and moderate income persons that request such assistance. Technical assistance may consist of one-on-one assistance, providing technical materials such as HUD guidelines and information, referrals to sources on the Internet, training workshops, or referrals to specialists at HUD or other communities.

(5) Complaints

Complaints, inquiries, and other grievances concerning the Consolidated Plan, Community Development Block Grant program, or the One Year Action Plan can be made to the HUD Grants Manager at the City of Medford. The City will make every effort to provide a substantive, written response to every written citizen complain within fifteen business days of its receipt.

(6) Use of the Citizen Participation Plan

The City of Medford will follow the Citizen Participation Plan in carrying out the Consolidated Plan, the One Year Action Plan, and the Community Development Block Grant process.

Citizen Participation Comments

FEEDBACK ON MEDFORD'S FIVE-YEAR CONSOLIDATED PLAN AND 2015 ACTION PLAN

Page 64: Any chance you could update Maslow Project's description on this page? Something along the lines of "Wrap-around safety net services for homeless Jackson County youth – ages 0-21 – and their families"

Page 106: Re: Street Outreach services. Does this just refer to those in the City who are funded through CDBG, or is it for any organizations working in the City?

Under "Mobile Clinics" – La Clinica's Mobile Health Center is a great resource in Medford, and it has stops at the Gospel Mission, St. Vincent de Paul's, North Medford High School and Maslow Project.

Under "Other Street Outreach" – Maslow Project is still doing Street Outreach in Medford, it's just not paid for through CDBG funding.

Page 112: Public Service Objective #1 – Shelter/Services: The Goal Outcome Indicator makes this read like this Objective only applies to overnight shelter. We would like to see non-shelter related indicators discussed here too.

Page 113: Public Service Objective #6 – Case Management: We would like to suggest that Case Management isn't a stand-alone category, but rather a tool that is utilized by a variety of service providers – including Maslow Project. It would probably make more sense to include Case Management under the other categories of programs listed in this document (e.g.: Shelter/Services for Homeless Youth, Transitional Programs, After-School Programs, Senior Advocacy, etc).

For Maslow Project, Case Management is an integral part of – and utilizes all of – our wrap-around safety net services. Because of this, we would request that our programs/services be included under Public Service Objective #1 – Shelter/Services, as that's a more accurate representation of what we do and how we impact our target population.

Page 117: Public Service Objective #1: As we discussed in our meeting with you on April 17th, this section reads as an entitlement to one specific organization in Medford – and it suggests that all homeless services must be conducted in a shelter environment. As you know, Maslow Project has been effectively and efficiently providing services to homeless youth in a non-shelter environment since our inception – and we provide those services to the full age range (from 0-21) of homeless youth and their families in Medford. We would like to suggest that (a) this be rewritten to encompass a broader range of services to homeless youth and families – including those services offered in a non-shelter environment – and (b) that Maslow Project be included in this category (rather than the Case Management category), as you've done by including both Kids Unlimited and the YMCA under After-School Programs.

Page 119: Public Service Objective #6 – Case Management: Again, we would suggest that Case Management should not exist as a stand-alone objective, but rather that it be folded into the different programs funded through CDBG - as it is part of those programs.

Also – this is a gross oversimplification of the work that Maslow Project does and overlooks the fact that Case Management draws from all the safety-net services our organization provides.

Page 137: Public Service Objective #1: Comments we made on Page 112 also apply here

Page 138: Public Service Objective #6: Comments we made on Page 113 also apply here. In addition, if the preliminary amount of funding recommended for Maslow Project is not modified, we will need to have a conversation about this target.

Page 141: Public Service Objective #1: This language reads as being very specific to the services offered by Hearts With a Mission. As stated in our earlier comments, we believe that Maslow Project's services should be folded into this category and the goal description should be rewritten to apply to the services offered by both organizations – including the age range and the availability of school-based Family Advocacy and Case Management.

Page 142: Public Service Objective #6: The comments and suggestions we made above apply to this section as well.

Page 148: The full title of our program isn't included here. That title is "Wrap-around Case Management for Homeless Youth and Families". Could this be corrected?



Stabilize ~ Engage ~ Thrive!

April 17, 2015

To the members of the Medford Housing and Community Development Commission:

On behalf of Maslow Project, I am respectfully requesting that the Medford Housing and Community Development Commission reconsider their scoring of our 2015-16 CDBG application.

In specific, the deduction of eight points for our failure to include totals in the "Ethnicities" and "Residences" columns of the Organization Board Profile sheet seem an especially severe penalty. The penalty for entirely failing to include this sheet would have only resulted in a maximum three-point deduction. This simple error (and we do own this as an error on our part) resulted in our application dropping from first place to seventh place in the grant ranking, resulting in a *significant* reduction in funding, which equates to a \$2,500 penalty for each blank space.

We would understand such a severe penalty for leaving key information or attachments out of our application, but we did include all requested information (as demonstrated by our average pre-deduction score of 96.89). Further, our understanding was that no points were deducted for budget errors in the scoring process, which to us seems, a far more serious and impactful mistake in a grant application. As noted in our scoring, our budget and all other areas of the application were complete.

Those individuals most seriously impacted by this scoring decision are Medford's homeless children, youth and families who we have been serving effectively and efficiently since our organization began. As we mentioned in our presentation to the Commission, the number of homeless youth and families we are serving has increased by roughly 30% for each of the past two years. The severity of the scoring penalty in our application seems disproportionate when compared to the error. And unfortunately, this price will ultimately be paid by those who can least afford it: the youth we are here to serve.

We greatly appreciate our long-standing relationship with the Commission and the City of Medford, and we have done our best to be good and diligent partners. We are requesting that the Commission change the points deducted from our application from eight (8) points to three (3) points – the amount it would have cost us if we had failed to include the Organization Board Profile altogether.

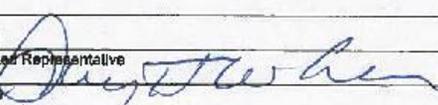
On behalf of Maslow Project and the youth and families we serve, we thank you very much for your consideration of our request.

A handwritten signature in black ink, appearing to read "mferrell", is written in a cursive style.

Mary Ferrell, Executive Director
Maslow Project

500 Monroe Street, Medford, OR, 97501
541-608-6868

Grantee SF-424 and Certifications

APPLICATION FOR FEDERAL ASSISTANCE		OMB Approved No. 3076-0206		Version 7/03	
1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		2. DATE SUBMITTED May 12, 2015		Applicant Identifier	
Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		3. DATE RECEIVED BY STATE		State Application Identifier	
5. APPLICANT INFORMATION		4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier	
Legal Name: City of Medford		Organizational Unit: Department: Parks & Recreation Department		Division: Community Development Grants	
Organizational DUNS: 00788517		Address: Street: 701 N. Columbus Ave.		Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: Mrs. First Name: Angela	
City: Medford		City: Medford		Middle Name Renee	
County: Jackson		State: Oregon		Last Name Durant	
Zip Code 97501		Country: United States of America		Suffix:	
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 93-6002207		Email: angela.durant@cityofmedford.org		Phone Number (give area code) 541-774-2408	
7. TYPE OF APPLICANT: (See back of form for Application Types) C. City of Township Government		8. NAME OF FEDERAL AGENCY: U.S. Department of Housing and Urban Development (HUD)		Fax Number (give area code) 541-774-2580	
8. TYPE OF APPLICATION: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify)		9. NAME OF FEDERAL AGENCY: U.S. Department of Housing and Urban Development (HUD)		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: 2015 Program Year Action Plan; year one of the 2015-2016 Consolidated Plan for Housing and Community Development for the City of Medford, Oregon.	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14-218		12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Cities		13. PROPOSED PROJECT Start Date: 07/01/2015 Ending Date: 06/30/2016	
15. ESTIMATED FUNDING:		14. CONGRESSIONAL DISTRICTS OF: a. Applicant OR-002 b. Project OR-002		15. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE: b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
a. Federal X \$ 625,366.00		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes if "Yes" attach an explanation. <input checked="" type="checkbox"/> No		18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.	
b. Applicant \$.00		a. Authorized Representative Prefix Mr. First Name Gary Middle Name H. Suffix		c. Telephone Number (give area code) 541-774-2000	
c. State \$.00		Last Name Wheeler		d. Signature of Authorized Representative 	
d. Local \$.00		b. Title Mayor, City of Medford		e. Date Signed 5/13/2015	
e. Other Carry-forward funds \$ 228,768.00		f. Program Income \$ 80,000.00		Previous Edition Usable Authorized for Local Reproduction	
f. Program Income \$ 80,000.00		g. TOTAL \$ 934,134.00		Standard Form 424 (Rev. 9-2003) Prescribed by OMB Circular A-102	
g. TOTAL \$ 934,134.00					

CERTIFICATIONS

Amended June 29, 2015

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 Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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 subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing certification.

“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 violation 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 of 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 the subrecipient or subcontractors in covered workplaces).

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, ESG, and HOPWA 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.

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 CFR 24 570.2 and CFR 24 part 570)

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

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

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with 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), (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 percent of the amount is expended for activities that benefit such persons during the designated period;

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 activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

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

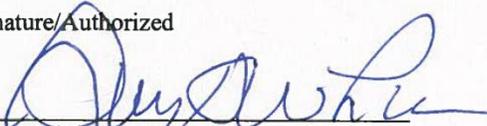
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

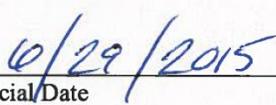
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to 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.

Signature/Authorized



Gary H. Wheeler, Mayor
City of Medford

Official/Date



Official/Date