

TABLE OF CONTENTS

INTRODUCTION AND SUMMARY	1-1
Conduct of the Study.....	1-1
Summary of Conclusions and Recommendations	1-1
Recommendations	1-2
FAIR HOUSING LAWS.....	2-1
Federal Laws.....	2-1
Oregon Law.....	2-3
BACKGROUND INFORMATION.....	3-1
Demographics	3-1
Population	3-1
Race and Ethnicity	3-2
Households	3-3
Economics and Employment.....	3-4
Income	3-6
Housing.....	3-7
Planned Development.....	3-8
Tenure.....	3-8
Housing Costs.....	3-9
FAIR HOUSING COMPLAINTS	4-1
National Trends.....	4-1
Complaints in Medford	4-2
IMPEDIMENTS TO FAIR HOUSING	5-1
Housing Rentals.....	5-1
Testing	5-2
Advertising	5-2
Housing Sales and Financing.....	5-2

TABLE OF CONTENTS

Home Mortgage Disclosure Act (HMDA).....	5-2
Predatory Lending.....	5-5
Community Reinvestment Act.....	5-5
Brokerage Services.....	5-6
Public Policies and Administrative Actions.....	5-6
CURRENT FAIR HOUSING ACTIONS	6-1
Improved Consumer Awareness.....	6-1
Legal assistance to low-income households.....	6-1
Staff, provider and agency training	6-1
Responsiveness to community fair housing needs of at-risk populations	6-2
Improvement of neighborhood conditions	6-2
Coordination of information and services.....	6-2
Readiness of low-income home buyers	6-2
Increased opportunities for access to affordable housing.....	6-2
CONCLUSIONS AND RECOMMENDATIONS.....	7-1
Any Discriminatory Practice in Housing Rentals is an Impediment to Fair Housing.....	7-1
Any Discriminatory Practice in Lending is an Impediment to Fair Housing	7-1
Any Predatory Lending as an Impediment to Fair Housing.....	7-1
Recommendations	7-1

LIST OF TABLES

Table 1 Population 1990 and 2000	3-1
Table 2 Age of Population, 2000.....	3-1
Table 3 Population by Race and Ethnicity, 2000.....	3-2
Table 4 Medford Households 1990 and 2000	3-3
Table 5 Medford Household Size 1990, 2000 and 2006.....	3-4
Table 6 Unemployment Rates, 2000-2008 (Biennial).....	3-6

TABLE OF CONTENTS

Table 7 Household and Family Income, 2006.....	3-6
Table 8 Percent of Population Living in Poverty, 1999.....	3-7
Table 9 Medford Housing Units 2000 and 2006.....	3-7
Table 10 Medford Housing Tenure, 1980 - 2006	3-8
Table 11 Tenure by Household Type, Medford 2000.....	3-9
Table 12 Estimated Housing Costs, 2009.....	3-9
Table 13 Housing Costs and Income, Medford-Ashland Area	3-10
Table 14 percentage of claims per protected class.....	4-1
Table 15 Annual HUD Fair Housing Complaints	4-2
Table 16 2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report Disposition by Race/Ethnicity of Applicant	5-3
Table 17 2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report Disposition by Income and Race/Ethnicity	5-3
Table 18 2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report Disposition by Gender	5-4
Table 19 FFIEC Interagency CRA Ratings 2009	5-5

LIST OF FIGURES

Figure 1 – Population by Age (2007).....	3-2
Figure 2 – Hispanic Population Growth.....	3-3
Figure 3 – Medford Households.....	3-4
Figure 4 – Labor Force Participation Rates (2000)	3-5
Figure 5 – Annual Unemployment Rates	3-5

INTRODUCTION AND SUMMARY

The purpose of the Analysis of Impediments to Fair Housing Choice (AI) is to identify any possible barriers to fair housing, such as discriminatory or predatory practices, that may exist within the City of Medford. The Analysis of Impediments also provides recommendations and possible efforts that may address or reduce those identified fair housing barriers within the community.

The AI is a required document by the U.S. Department of Housing and Urban Development (HUD). This Analysis of Impediments utilizes and builds upon the AI completed in 2004, which has served as the basis for the City's fair housing efforts over the last five years. This Analysis of Impediments is an associated document with the City of Medford's 2010-2014 Consolidated Plan.

In order for the City of Medford to certify to the HUD that they are affirmatively furthering fair housing, the jurisdiction must:

- Conduct an Analysis of Impediment to Fair Housing Choice;
- Take appropriate action to overcome the effects of impediments identified through that analysis, and;
- Maintain records reflecting the analysis and actions.

CONDUCT OF THE STUDY

This analysis incorporates data and information captured in the AI completed in 2004. Furthermore, this AI relies on data from the 2000 Census and other information presented in the 2010-2014 Consolidated Plan.

To obtain an updated picture of fair housing within the community, interviews were conducted with local housing and services providers, City staff, County staff, consumer advocates, and other representatives of the community. Specific complaint/case information was obtained through the local HUD Spokane Field Office, the Fair Housing Council of Oregon and the U.S. Attorney's Office.

SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

The 1996 and 2004 Analysis of Impediments provided multiple recommended actions, including supporting and fostering fair housing education, continuing to support the efforts of the Fair Housing Council of Oregon, supporting the inclusion of group homes and residential care facilities, including persons of protected classes on boards and commissions and monitoring loan activities of lending institutions. These efforts, and many others taken by the City of Medford and its partners over the last five years have gone far to address potential impediments and barriers to fair housing within the community.

Summary of areas of impediments or potential impediments identified in this analysis:

- Any discriminatory practice in housing rentals is an impediment to fair housing.

Over the last five years, from January 1, 2005 through October 31, 2009, only eight fair housing complaints were filed with the U.S. Department of Housing and Urban Development (HUD). The majority of complaints filed with HUD in the last five years concerned disability. More specifically, five

INTRODUCTION AND SUMMARY

of the eight had a basis of disability while the other three were based on national origin or other origin discrimination.

For several years the City, along with the Fair Housing Council of Oregon and other housing partners, have continuously facilitated fair housing and anti-discrimination training for both landlords and tenants. Though these efforts have been effective and therefore are a value to the community, not all discrimination has been eliminated. A concern identified in the 2004 AI that appears to remain an issue within the community today is discriminatory practices in the rental market. Out of the eight HUD complaints filed, six, or 80 percent, are directly tied to concerns of discrimination in efforts to rent housing.

The City and its partners understand that continued education and support are needed to battle against rental discrimination and to encourage persons who feel discriminated against to speak up. Persons who are reluctant to report discrimination because of fear of reprisal will benefit from the ongoing efforts to educate them of their rights and support them in taking corrective action.

- Any discriminatory practice in lending is an impediment to fair housing.

Review of 2008 Home Mortgage Disclosure Act (HMDA) aggregate reports indicated that there is a similar unbalance in lending practices based on the ethnicity of the applicants as was identified in the 2004 Analysis of Impediments. As Medford is experiencing a more rapid influx of Hispanic/Latino persons when compared to the county and state, it is expected that lending practices may experience fair housing barriers due to the population growth. Such data does not prove unfair lending practices, but it does call for continued scrutiny and outreach to lenders, brokerage firms and consumers.

- Any predatory lending is an impediment to fair housing.

During community meetings and public workshops conducted for the 2010-2014 Consolidated Plan and this AI, the topic of predatory lending had been discussed by members of the public, City staff, City Council members and local service providers. In addition to the community workshops, local agencies such as the Fair Housing Council of Oregon and the local HUD Field Office were consulted to obtain feed back regarding practices over the last five years. These workshops, consultations and discussions leading up to this analysis all pointed toward a need for continued investigation into the extent of predatory lending in Medford.

RECOMMENDATIONS

The City of Medford and its partners have taken an active role in working toward improving housing choice and eliminating discriminatory and predatory practices. Some of these recommendations are consistent with those in the previous Analysis of Impediments and others are unique to concerns raised during this investigation.

1. Continue to support fair housing education for consumers, lenders, realtors, landlords, advocacy groups and local service providers.
2. Continue to support activities of the Fair Housing Council of Oregon and other fair housing partners.
3. Continue to support and work with the local HUD Field Office regarding any local fair housing complaints.

INTRODUCTION AND SUMMARY

4. Continue to monitor activities of lending institutions and investigate the extent of predatory lending in Medford and consider strategies to eliminate the practice.

FAIR HOUSING LAWS

FEDERAL LAWS

Title VIII of the Civil Rights Act of 1968, as amended, (Fair Housing Act) prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on:

- Race or color
- National origin
- Religion
- Sex
- Familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under age 18)
- Handicap (disability)

The Fair Housing Act covers most housing¹. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker and housing operated by organizations and private clubs that limit occupancy to members.

In the sale and rental of housing: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In mortgage lending: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

¹ This discussion is taken directly from the HUD publication in 2002, *Fair Housing: Equal Opportunity for All*. (www.hud.gov/fairhousing)

FAIR HOUSING LAWS

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

In addition, it is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional protections for persons with disabilities: The landlord may not refuse allow:

- Reasonable modifications to the dwelling or common use areas, at the tenant's expense and where the unit can be restored to the original condition, or
- Reasonable accommodations in rules, policies, practices or services, if necessary for the disabled person to use the property.

Buildings constructed after March 1991 are subject to accommodation requirements, depending on the number of units and presence of an elevator.

Familial status is protected unless the building or community qualifies as housing for older persons, that is:

- It is specifically designed for and occupied by elderly persons under a federal, state or local government program
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 or older.

The U.S. Department of Housing and Urban Development (HUD) has been given the authority and responsibility for administering this law. This authority includes handling of complaints, engaging in conciliation, monitoring conciliation, protecting individual's rights regarding public disclosure of information, authorizing prompt judicial action when necessary, and referring to the State or local proceedings whenever a complaint alleges a discriminatory housing practice.

FAIR HOUSING LAWS

OREGON LAW

Oregon law also outlaws discrimination because of:

- Marital status
- Sexual Orientation/Gender Identity
- Source of income

BACKGROUND INFORMATION

DEMOGRAPHICS

POPULATION

Medford's population grew 35 percent between 1990 and 2000, growth substantially higher than that of the State and Jackson County as a whole (24 percent and 20 percent respectively). By 2007, the City's population had increased to an estimated 75,700. People moving into Medford and into Jackson County make up a large percentage of this continual growth pattern. Net migration accounted for the majority of the population increase in Jackson County since the 1970s, when the bulk (85 percent) of the total growth was due to in-migration. Two sub-populations that have strongly added to the growth in Medford are retired persons and Hispanics.

Table 1
Population 1990 and 2000

Location	Year		Change 1990-2000
	1990	2000	
Medford	46,951	63,154	35%
Jackson County	146,389	181,269	24%
Oregon State	2,842,321	3,421,399	20%

Source: US Census.

The number of elderly in Medford is growing at a faster rate than other age groups in the population. Between 1990 and 2000, the number of persons 85 years and older living in Medford increased by 59 percent, compared to the overall population growth of 35 percent. Over the last couple of decades, Medford has seen a shift in the median age of its residents. The median age of the population in Medford rose about two years between 1990 and 2000, reaching 37.0 in 2000. Jackson County had a median age 39.2 years according to the U.S. Census. One of the fastest growing age groups in Medford's population are those between 45 and 64 years. This age group rose from 18 percent of the total in 1990 to 22 percent in 2000. The percent of people 65 and older is higher in Medford than in Jackson County and Oregon.

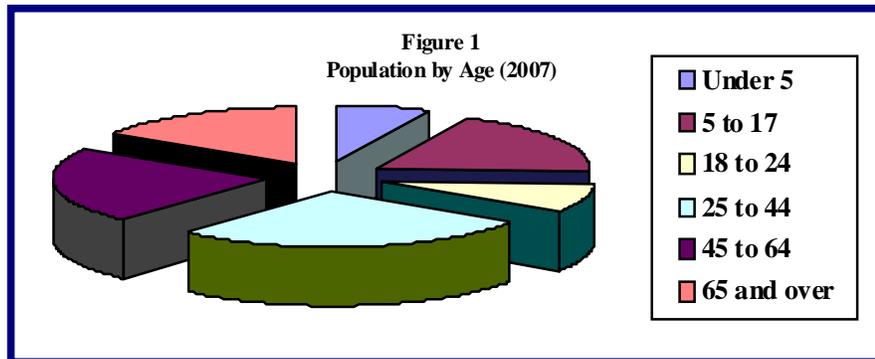
Table 2
Age of Population, 2000

Age	Medford	County	State	US
Birth to 17 years	26%	24%	25%	26%
18 to 44 years	36%	34%	39%	43%
45 to 64 years	22%	25%	24%	19%
65 and older	17%	16%	13%	13%
Median Age	37.0	39.2	36.3	35.3

Source: US Census

BACKGROUND INFORMATION

As the influx continues, the retired population will have a greater impact on the economy, industry and services. By law this population is eligible to live in legally “age-restricted” communities², which, while meeting the housing and service demands for one segment of the population, can reduce housing choices for others.



RACE AND ETHNICITY

Medford is less racially diverse than the United States and a little less diverse than Oregon State as a whole. However, it is slightly more racially diverse than Jackson County. In terms of ethnicity, Hispanics make up a larger percent of the population in Medford than in the County or Oregon State (see Table 3). Whites represent 90 percent of the population.

**Table 3
Population by Race and Ethnicity, 2000**

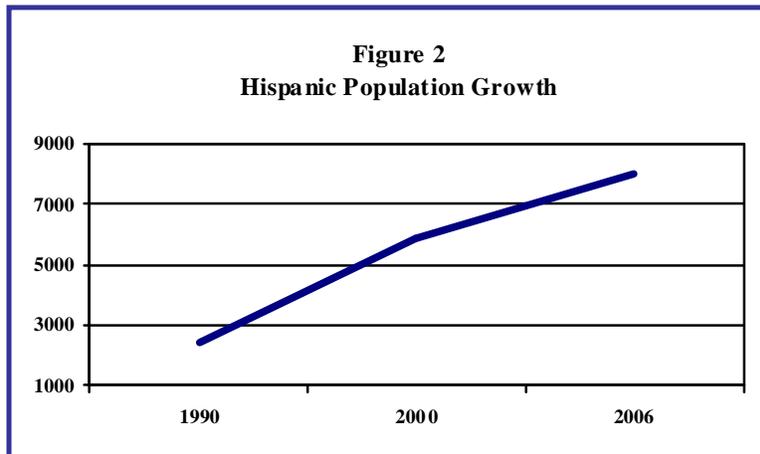
Race	Location			
	Medford	County	State	US
White alone	90%	92%	87%	75%
Black or African-American alone	1%	0%	2%	12%
American Indian or Alaska Native alone	1%	1%	1%	1%
Asian or Pacific Islander alone	1%	1%	3%	4%
Other race alone	4%	3%	4%	6%
Two or more races	3%	3%	3%	2%
Ethnicity				
Hispanic (of any race)	9%	7%	8%	13%

Source: US Census

When looking at Medford’s ethnicity, 9.2 percent of the population was Hispanic in 2000, an increase of 3,454 people from 1990. It is estimated that Medford added more than 2,000 Hispanic persons between 2000 and 2006 (see Figure 2).

² NAHB Housing Facts, Figures, Trends, 2003.

BACKGROUND INFORMATION



HOUSEHOLDS

The total number of households in Medford increased by 33 percent between 1990 and 2000, compared to a 35 percent increase in the total population during the same period. In 2006, according to the American Community survey, total households reached 29,446. Family households comprised two-thirds of the total households in 2000 (see Figure 3), which was a slight decline since 1990. Comparing Medford with the county, state and the nation, the split between family and non-family households was about the same in each location – one-third non-family households and two-thirds family.

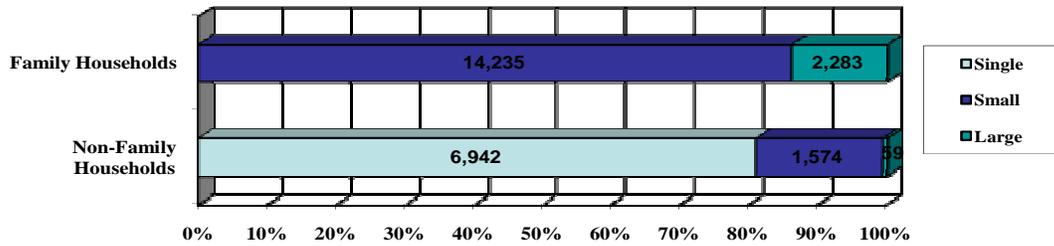
Table 4
Medford Households 1990 and 2000

Type of Household	1990		2000	
	Number	%	Number	%
Non-family households	6,228	33%	8,575	34%
Single	5,054	27%	6,942	28%
(Elderly Single)	(2,308)	(12%)	(3,158)	(13%)
Small (2-4 people)	1,135	6%	1,574	6%
Large (5+ people)	39	<1%	59	<1%
Family households	12,639	67%	16,518	66%
Small (2-4 people)	11,157	59%	14,235	57%
Large (5+ people)	1,482	8%	2,283	9%
Total households	18,867	100%	25,093	100%
Average household size	2.44		2.47	

Source: US Census

BACKGROUND INFORMATION

**Figure 3
Medford Households**



Household size increased slightly from 2.44 in 1990 to 2.47 in 2000. Again in 2006, household size grew to 2.50 according to the American Community Survey (see Table 5). The average household size in the United States in 2000 was 3.14 persons per household. Even with the modest increase in average household size in Medford between 1990 and 2000, it was still substantially lower than the US average, the state (3.02 persons per household) and the county (2.95).

**Table 5
Medford Household Size 1990, 2000 and 2006**

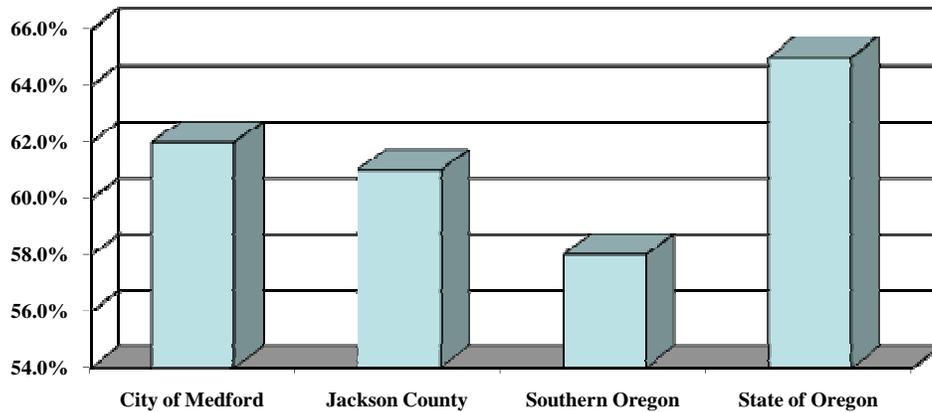
	1990	2000	2006
Average household size	2.44	2.47	2.50
Owner-occupied units	2.62	2.52	2.67
Renter-occupied units	2.33	2.39	2.30

ECONOMICS AND EMPLOYMENT

According to the 2000 U.S. Census, rates of labor force participation are slightly lower locally than statewide. In Medford, 62 percent of residents 16 years and older are participating in the labor force. Jackson County and the region of Southern Oregon have rates of 61 percent and 58 percent respectively. The State carries a higher rate of 65 percent of the total population participating in the labor force (see Figure 4).

BACKGROUND INFORMATION

Figure 4
Labor Force Participation Rates (2000)

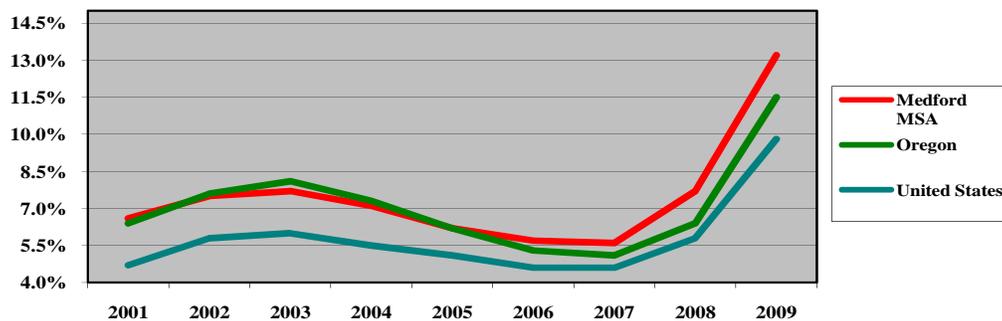


The service and retail trade industries have out paced the historical strong industries of manufacturing, agriculture and timber. More specifically, higher-paying manufacturing jobs have declined overall, comprising just 11 percent of total employment in Jackson County (timber now comprises less than half that).

Unemployment

Recent estimates provided by the Oregon Employment Department set the unemployment rate between 13 to 13.5 percent in 2009. This is dramatically higher than the National average of 9.8 percent and the state average of 11.5 percent (see Figure 5). This sudden upswing in unemployment is a direct result of the national economic recession.

Figure 5
Annual Unemployment Rates



Between 2000 and 2008, the unemployment rate in Medford was higher in each biennial period than the state, and slightly lower than the unemployment rate in the county.

BACKGROUND INFORMATION

Table 6
Unemployment Rates, 2000-2008 (Biennial)

Location	Year				
	2000	2002	2004	2006	2008
Medford	5.0	6.8	7.1	5.7	7.7
State	4.9	7.5	7.3	5.3	6.4

Source: Bureau of Labor Statistics.

INCOME

From 1990 to 2000, Medford median household income rose by 42 percent (compared to 45 percent in the county and 50 percent in the state.) Both Medford and Jackson County's median household income were substantially lower than the state and national median income in 2000 and 2006. While income measures shown in Table 7 below for Medford exceeded those in the county, all measures were below those in the State of Oregon.

Table 7
Household and Family Income, 2006

Income Measure	Medford	County	State
Median household income	\$41,029	\$40,606	\$46,230
Per capita income	\$22,506	\$22,546	\$24,418
Median family income	\$47,530	\$47,417	\$55,923
Persons below poverty level	11.3%	11.9%	13.3%
Children below poverty level	36.5%	28.3%	29.3%

Source: US Census.

Median family income in Medford in 1999 was higher than median household income, which is generally the case. There are fewer families than households, many including more than one wage earner. (Households include single individuals living alone.)

According to the 2000 Census, 14 percent of Medford's population was living in poverty in 1999, compared to 13 percent in Jackson County, and 12 percent in the state. In 2006, the American Community Survey reported 10.1 percent of all families in Medford were living in poverty. More critically, the survey found that an estimated 36.5 percent of all children in Medford are living in below-poverty conditions.

Households composed of female householders (and no husband present) were most likely to live in poverty: 42 percent of those households with children under 18, and 64 percent of those households with children under the age of 5. Both categories of female householders were considerably above the state and national averages. The percent of the population in Medford living in poverty was higher, for most population groups, than the county and the state.

BACKGROUND INFORMATION

Table 8
Percent of Population Living in Poverty, 1999

Population Group	Medford	County	State	US
Individuals	14%	13%	12%	12%
Individuals 18 or older	12%	11%	11%	11%
Individuals 65 and older	7%	7%	8%	10%
Families	10%	9%	8%	9%
Families with children <18	17%	15%	12%	14%
Families with children <5	26%	20%	17%	17%
Females alone with children <18	42%	37%	33%	34%
Females alone with children <5	64%	56%	47%	46%

Source: US Census.

HOUSING

The number of housing units grew by 34 percent to 26,310 between 1990 and 2000, similar to the overall population increase of 35 percent in the same period. As of 2006, it was estimated that the City of Medford contained a total of 31,205 housing units. This spike of nearly 5,000 units (15.7 percent) between 2000 and 2006 is due largely to the housing boom during the early and mid-part of the decade. The peak of the construction was in 2003 when 1,080 permits were issued (see Table 9).

From 2000 to 2006 a slight shift in owner occupied units occurred as it dipped from 57 percent in 2000 to 55 percent in 2006. The market share of single-family units remained the same from 2000 to approximately 66 percent. Conversely the percentage of multifamily units was unchanged at 32 percent when compared to 2000. The greatest net gain in number of units between 1990 and 2006 belongs to single-family with 6,664, while manufactured units had the largest percentage increase of 78 percent (555 new units between 1990 and 2006).

Table 9
Medford Housing Units 2000 and 2006

Type of Unit	2000		2006		Change 2000-2006
	Number	%	Number	%	
Single family	16,790	64%	19,816	64%	15.5%
Multifamily	8,505	32%	10,126	32%	16%
Manufactured units	1,015	4%	1,263	4%	20%
Total	26,310	100%	31,205	100%	15.7%

Source: US Census.

When compared to Jackson County and the State of Oregon, slightly less of the housing in Medford is single-family (64 percent in Medford compared to 66 percent in both the County and State). At the same time, there is a greater share of multifamily housing and a substantially lower percentage of mobile homes in Medford.

BACKGROUND INFORMATION

PLANNED DEVELOPMENT

The City of Medford has been annexing properties out to the Urban Growth Boundaries in recent years, along with “islands” of unincorporated properties inside City boundaries. No large annexations – which could affect housing or population in a significant manner – are anticipated in the near future.

The undeveloped land available within the Urban Growth Boundaries is, for the most part, held in large tracts by builders, developers or private owners. Development will increase single-family housing units, but this will be primarily at the high end. There is little or no undeveloped land available for the production of housing affordable to lower-income households.

TENURE

In 2000, 57 percent of the occupied housing in Medford was owner-occupied. In 2006, the number of owner-occupied units dropped to 55 percent. This level is far below those seen in Jackson County (64 percent) and the State of Oregon (65 percent owner-occupied).

Table 10
Medford Housing Tenure, 1980 - 2006

Year	Renter-Occupied		Owner-Occupied		Total
	Number	%	Number	%	
1980	6,499	42%	9,060	58%	15,559
1990	8,160	43%	10,707	57%	18,867
2000	10,721	43%	14,372	57%	25,093
2006	13,295	45%	16,151	55%	29,546

Source: US Census.

Tenure varies in Medford by type of unit, type of household, household income, and other factors. For example, multifamily housing is usually built for the rental market, so substantially more multifamily than single-family units are renter-occupied. More single-family (detached and attached) units are owner-occupied – 77 percent of occupied single-family units in Medford in 2000 were owner-occupied and 23 percent were renter-occupied.

More family households live in houses they own or are buying. More single individuals rent, except for the elderly, as is shown below in Table 11.

BACKGROUND INFORMATION

Table 11
Tenure by Household Type, Medford 2000

Type Household	Living in units they:	
	Owned	Rented
All households	57%	43%
Family households	65%	35%
Non-family households	43%	57%
Single individuals	45%	55%
Elderly (65+) singles	55%	45%
Average household size	2.52	2.39

Source: US Census.

Tenure also varied in 2000 by race and ethnicity of the householder. As seen in Table 18, 57 percent of all households owned the house in which they were living at the time of the 2000 census. Owner-occupancy was higher for white householders (59 percents lived in housing they owned or were buying) than non-white householders (38 percent lived in housing they owned or were buying). Owner-occupancy also varied by ethnicity – just 34 percent of Hispanic householders owned the home in which they were living in 2000.

There was also quite a disparity in income, which contributes substantially to the ability to purchase a home. The median household income of households headed by a white (alone) householder in 1999 was \$37,175, compared to just \$28,542 for a household headed by an African-American/Black (alone) householder, \$26,477 for a household headed by an American Indian/Alaska Native (alone) householder, and \$29,358 for a household headed by an Hispanic householder (could be of any race). The median household income for a household headed by an Asian householder was nearer the overall median at \$35,357.

HOUSING COSTS

As of the 2000 census, the median value of all owner-occupied housing in Medford was \$132,400 – lower than the median value in Jackson County and Oregon State. As of 2009 estimates, Medford home prices have a median value of approximately \$189,000 with Jackson County slightly higher at \$191,500 and Oregon at approximately \$225,000.

The median values and the corresponding estimated monthly owner costs are shown below in Table 12.

Table 12
Estimated Housing Costs, 2009

Type of Cost	Medford	County	State
Median value owner-occupied	\$189,00	\$191,500	\$225,000
Median monthly owner costs			
PITI	\$1,035	\$1,050	\$1,232

Source: Zillow.com and Jackson County Assessor's Office. Owner costs assume a fixed 5.5% interest rate on 96.5% LTV and fixed taxes and insurance.

BACKGROUND INFORMATION

Housing costs have dropped dramatically since the housing boom peaked during 2005 and 2006. Over the last two to three years prices have declined to levels not seen since earlier in the decade. From 2006, Medford has seen home values depreciate more than a 30 percent from their peak value of approximately \$275,000. Persons with Disabilities

The 2000 census found the City of Medford rental vacancy rate to be 4.9 percent. As of 2007, the Medford vacancy rate dropped to 2.7 percent, far below the county and state rates of 6.5 percent and 8.6 percent, respectfully.

The current low vacancy rates underscore the need to consider affordable rental opportunities in housing planning. The 2002 Housing Study for Downtown Medford emphasized that there were no new or newer market-rate apartment buildings in the downtown core. There are some subsidized apartments, but tenancy is restricted to households with incomes at or below 60 percent of median income. The average monthly rent in Medford in 2007 for a two-bedroom apartment was \$752. This is a 24 percent increase from the 2000 average monthly rent of \$605 for the same type of unit.

The following table shows the relationship between modest housing costs (Fair Market Rents set by HUD based on actual area housing costs) and the income required to afford that housing in the Medford-Ashland area. These estimates are prepared annually by the National Low Income Housing Coalition (NLIHC).

Table 13
Housing Costs and Income, Medford-Ashland Area

Housing/Income Factor	Number of Bedrooms				
	Zero	One	Two	Three	Four
Fair Market Rent (FMR)*	\$499	\$593	\$745	\$1,084	\$1,127
Income needed to afford	\$19,960	\$23,720	\$29,800	\$43,360	\$45,080
Hourly wage required to afford (working 40 hours/week)	\$9.60	\$11.40	\$14.32	\$22.28	\$21.67
Hours per week at minimum wage (\$8.40) in Oregon)	46	55	69	100	104

*HUD 2009 FMR.

Source: National Low Income Housing Coalition.

With minimum wage at \$8.40 an hour, a single person household would have to work 55 hours a week to afford a one-bedroom apartment. If a single-parent household needed to rent a two-bedroom unit, they would have to work nearly 70 hours a week to afford an adequate unit. Even two members in a household working full-time at minimum wage would barely be able to afford the cost of the two-bedroom unit.

FAIR HOUSING COMPLAINTS

The Department of Housing and Urban Development has the responsibility to enforce the Fair Housing Act. Complaints that are filed may be investigated directly by HUD or may be investigated and processed by the Fair Housing Council of Oregon which receives reimbursement from HUD under the Fair Housing Assistance Program. The Oregon Bureau of Labor and Industries has separate jurisdiction over claims of discrimination covered under state law, but not covered under federal law.

The Fair Housing Council of Oregon is a private fair housing organization which receives funding under the Fair Housing Initiatives Program (FHIP) to provide education at the local level to the housing industry and potential victims of housing discrimination. They may also be funded to provide testing, to substantiate claims of discrimination.

NATIONAL TRENDS

The 2009 Fair Housing Trends Report prepared by the National Fair Housing Alliance was based on the analysis of 30,758 fair housing claims and complaints in 2008 reported by member agencies, HUD, the Department of Justice and state and local government agencies. These 30,000 complaints represent just a fraction of the total fair housing violations that occur annually.

A breakdown of the percentage of claims by protected class can be seen in Table 14 below.

Table 14
Percentage of claims per protected class

Discrimination by Protected Class				
Basis	NFHA Members	HUD	FHAP	DOJ
Race	18.5%	31%	36%	39%
Disability	31.3%	49%	43%	36%
Family Status	17.5%	17%	16%	21%
National Origin	9.5%	9%	14%	6%
Sex	3.9%	9%	11%	9%
Religion	1.5%	2%	3%	6%
Color	0.6%	1%	3%	n/a
Other*	17.1%	4%	6%	n/a

* The "other" category for NFHA complaints represents complaints arising from categories protected at the state or local level including sexual orientation, source of income, marital status, medical condition, age, or student status. The "other" category for HUD and FHAP complaints represents complaints of retaliation. HUD, FHAP, and DOJ data are for Fiscal Year 2008. Totals may exceed 100 percent, because a single complaint may have multiple bases. Other than NFHA's data, percentages are rounded to the nearest whole number.

Disability was the most protected class discriminated against throughout 2008. On average, disability represents nearly 40 percent of all complaints filed in 2008. This was followed by race at 31 percent and family status at 18 percent of the claims. Disability complaints focused heavily on rental housing from which 24,350 of the year's total originated from. More specifically, private fair housing groups reported 16,041 complaints of housing discrimination in the rental market, a significant jump from 12,606 in 2007; FHAP agencies reported 6,592 and HUD reported 1,717 complaints. One explanation for the rise in rental market complaints is the current foreclosure crisis. Many families and individuals were evicted

FAIR HOUSING COMPLAINTS

from when the owner defaulted on the mortgage—even if the families were current in their rent payments. Other families lost their homes to foreclosure and went on to experience discrimination in the rental market because of their race, national origin or because they have children or a family member with a disability. Data indicate that these groups filed the most complaints.

HUD processed 2,123 complaints, a 13 percent decline from last year's figure, while state and local agencies (FHAPs) processed 8,429, an eight percent increase from last year.

Table 15
Annual HUD Fair Housing Complaints

HUD Administrative Complaints	
1990	4286
1991	5836
1992	6578
1993	6214
1994	5006
1995	3134
1996	2054
1997	1808
1998	1973
1999	2198
2000	1988
2001	1902
2002	2511
2003	2745
2004	2817
2005	2227
2006	2830
2007	2449
2008	2123

COMPLAINTS IN MEDFORD

Between January 1, 2005 and October 31, 2009, there were eight complaints filed with the Department of Housing and Urban Development pertaining to Medford. The most frequent basis (five of the eight cases) was disability. Generally more than one issue was involved in each of the cases. The issues included failure to make reasonable accommodations, discriminatory refusal to rent and discrimination in terms, conditions, privileges relating to rental or services and facilities. Three of the five cases were

FAIR HOUSING COMPLAINTS

closed with a no cause determination and the other two were closed with conciliation or successful settlement.

Nationality and other origin were the basis of the other three complaints and the issue for all three was discrimination in terms, conditions, privileges relating to rental. All three cases were closed with a no cause determination.

The Fair Housing Council of Oregon received 229 hotline inquiry calls between January 2005 and October 2009.

IMPEDIMENTS TO FAIR HOUSING

Impediments to fair housing are defined as:³

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have this effect.

Impediments to fair housing choice include actions that:

- Constitute violations, or potential violations, of the Fair Housing Act.
- Are counterproductive to fair housing choice, such as:
 - Community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate- to high-income areas.
 - Community resistance to the siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.
- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

HOUSING RENTALS

Most of the complaints filed with HUD, mentioned in the previous section, concerned rental properties and transactions. The number of complaints filed is an indication of potential discriminatory practices in rentals. It can also mean that the consumer is more aware of avenues available in case of discrimination. An active consumer outreach and education campaign, such as that in the last few years in Medford, could result in increased complaints filed. This analysis found eight complaints filed with HUD over nearly five years. Compared to the 2004 AI, HUD complaints are similar in number and basis, with disability in rental housing being the leading scenario.

There are several agencies advocating for the tenant awareness and assistance in addressing and reducing discrimination. Many are active in consumer education. However, several respondents interviewed for this analysis felt that many minority tenants were vulnerable to rental discrimination. The typically low vacancy rates in Medford can be a disincentive to filing a complaint or even raising an issue about health and safety concerns in a rental unit. Some Hispanic renters may be reluctant to speak up for fear of retaliation, including eviction, or because of fear of legal recriminations.

The Southern Oregon Rental Owners Association includes fair housing information as part of its regular education sessions. Currently the association has more than 500 members representing over 17,000 rental units in Jackson and Josephine County. The Fair Housing Council of Oregon has conducted training for landlords and service providers in Medford and Jackson County, with a recent focus on immigrants, people with disabilities and families with children. Outreach to landlords has been fairly aggressive, using the tax assessment records to notify landlords. The Council felt that attendance was good. The Council also conducted a statewide teleconference on reasonable accommodations and has made marketing and educational materials available.

³ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide, Volume 1*.

IMPEDIMENTS TO FAIR HOUSING

TESTING

Evidence of discrimination and impediments can be obtained from testing results. The Fair Housing Council of Oregon has not completed audit testing in Medford. The Council has, however, tested as part of complaint investigations (as noted in one case above under complaints). National studies indicate that most cases of discrimination are not reported. Testing in the case of suspected discriminatory practices is one way to examine the extent of discrimination in a community. The Fair Housing Council of Oregon has limited funding for testing in the case of enforcement but does have; funding for audit testing is infrequently available. However, council staff has the expertise to conduct trainings in communities so that those communities are able to perform testing on their own. City of Medford representatives have been recently trained in testing by the Fair Housing Council of Oregon.

ADVERTISING

The Fair Housing Act makes it illegal to advertise any preference, limitation, or otherwise encourage discrimination because of race, color, religion, sex, national origin, handicap, or familial status. Most newspapers will publish a statement to that effect, and perhaps include the HUD Equal Housing Opportunity logo along with information on where to phone to complain of discrimination. These inform the public that discriminatory advertising is illegal, that the newspaper screens ads with obviously discriminatory statements, and provides an avenue for victims of discrimination.

HOUSING SALES AND FINANCING

HOME MORTGAGE DISCLOSURE ACT (HMDA)

The Federal Financial Institutions Examination Council (FFIEC) prepares and distributes aggregate reports on behalf of the Federal Deposit Insurance Corporation, Federal Reserve Board, National Credit Union Administration, Office of the Comptroller of the Currency, and Office of Thrift Supervision, and the Department of Housing and Urban Development. The HMDA data cover home purchases and home improvement loans and includes information on race and ethnicity and income of applicants which allows an analysis of lending nationally and at the local level. In January 2003, lenders were required to obtain data on race, ethnicity and gender from phone applicants. That requirement and the resulting data have reduced the amount of missing information and increased reliability of findings.

Table 16 shows the applications that resulted in loan originations and the percent denied by type of institution and race/ethnicity of the applicant. These were aggregated by MSA by FFIEC and include data from 90 financial institutions with a home or branch office in the MSA and 157 financial institutions that do not have a home or branch office in the MSA. These numbers are a sharp decline from the 152 local institutions and more than 200 non-local institutions captured in the 2003 HMDA data that was utilized in the previous AI. This drop of more than 30 percent of active lending institutions is a result of a struggling housing market, lagging economic recession and the failing of multiple financial institutions.

Similar to the 2003 HMDA data results presented in the previous AI, the most popular loan applications in 2008 were for refinancing loans on 1-4 unit residential dwellings. The quantity of refinancing applications out numbered conventional, FHA, VA, and FSA/RHS purchase loans more than two-to-one. However, purchase loans saw an increase in market share of more than 15 percent. As more homeowners began to experience a loss in equity and even being upside down on the mortgage, fewer homeowners had the ability to refinance their loan.

When looking at all loan applications, the overall total submitted in 2008 compared to 2003 dropped by nearly 60 percent. This is a result of the turmoil in the housing industry, the severely tightened

IMPEDIMENTS TO FAIR HOUSING

underwriting requirements and the lagging economy. Across all loan types, Hispanics and other minority groups experienced a lower percentage of submitted applications that resulted in loan originations. Directly related, these population groups experienced a higher percentage of application denials than white applicants. Loan denials are based on multiple factors including credit history, income, debt-to-income ratios and others. The figures presented in Table 16 reflect the loan origination and application denial rates by race and/or ethnicity of the applicants.

Table 16
2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report
Disposition by Race/Ethnicity of Applicant

Race/Ethnicity of Applicant	FHA,VA, FSA/RHS			Conventional			Refinance		
	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied
White	749	69%	13%	1616	60%	18%	4718	44%	31%
Hispanic	52	58%	29%	76	46%	29%	319	27%	46%
Joint (White/minority)	26	27%	12%	30	60%	17%	89	36%	36%
Other minority	13	46%	31%	31	55%	10%	125	35%	46%
Race not available	49	53%	10%	161	55%	19%	668	34%	36%
TOTAL	889			1914			5919		

Table 17 aggregates the data by income of the applicant household. Only applications submitted by Hispanics and whites are shown in the table because of the low numbers reported in other categories broken down by income. When income is factored in, disparities still exist in most income ranges in loans originated and denied between Hispanics and whites. However, the number of loan applications made by those who were Hispanic alone (not part of a joint Hispanic/white couple) was very small in comparison to the number of applications made by white applicants.

Table 17
2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report
Disposition by Income and Race/Ethnicity

Income and Race/Ethnicity of Applicant	FHA,VA, FSA/RHS			Conventional			Refinance		
	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied
<80% of MSA median									
White	128	59%	23%	323	49%	28%	821	41%	40%
Hispanic	15	40%	60%	26	38%	42%	97	22%	56%
80-120% of MSA median									
White	292	69%	13%	349	59%	19%	1166	42%	32%
Hispanic	23	61%	26%	16	56%	31%	109	28%	39%
>120% of MSA median									

IMPEDIMENTS TO FAIR HOUSING

Income and Race/Ethnicity of Applicant	FHA,VA, FSA/RHS			Conventional			Refinance		
	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied
White	319	73%	9%	933	65%	14%	2622	46%	27%
Hispanic	12	75%	0%	33	48%	18%	106	30%	44%
TOTAL	789			1680			4921		

There are many factors considered in processing loans, such as employment and credit history and debt to income ratios. These factors are not taken into account in the tables above. However, these data suggest that there is continued opportunity to work with lenders, consumers, and consumer advocates about discrimination in lending and about reducing disparities that might be found. A number of programs and advocates in Medford are also working with households to repair poor credit history and supplement funds for down payments.

Table 18 examines the same set of data on loan applications on the basis of gender of the applicant. The percentages of loans originated and those denied to male (alone) and female (alone) applicants were roughly comparable – female applicants had a similar percentage of loans originated, but six percent fewer loans denied than male applicants. Applications made by couples saw a slightly higher percentage of originations and similar denial rates experienced by male applicants.

Table 18
2008 Home Mortgage Disclosure Act (HMDA) Aggregate Report
Disposition by Gender

Disposition by Gender of Applicant	FHA,VA, FSA/RHS			Conventional			Refinance		
	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied	Total Apps	% Orig.	% Denied
Male	252	66%	15%	492	53%	21%	1376	41%	40%
Female	273	66%	9%	396	56%	22%	1090	41%	35%
Joint (male/female)	468	68%	14%	921	64%	16%	3047	46%	29%
TOTAL	993			1809			5513		

HMDA data is useful in identifying possible discrepancies in loans and institutional practices. Review of the 2008 Home Mortgage Disclosure Act (HMDA) aggregate reports for the Medford MSA does demonstrate that Hispanic and other minority applicants are relatively less successful than white applicants at obtaining certain types of mortgage financing. Like the data utilized in the 2004 Analysis of Impediments to Fair Housing Choice, the information did not provide enough data to determine if this was due to a consistent pattern of racial discrimination or if there are other factors affecting decisions. Lenders consider many factors in rating loans, such as debt to income ratio, employment history, credit history, collateral and cash on hand. Additional research is required to determine the real cause of differences observed in the tables above. Furthermore, these results support the City's efforts in providing continuous education on fair housing issues within the community and amongst industry professionals.

IMPEDIMENTS TO FAIR HOUSING

PREDATORY LENDING

The total number of lenders generating mortgage loans within the Medford MSA in 2008 dropped by more than 30 percent since 2003. Loans themselves have become more difficult to obtain as a result of tighter underwriting guidelines imposed by the mortgage banking institutions. As a result, the sub-prime and other alternate forms of financing that allowed an increased number of lower-income, minority, elderly and other sub-populations to obtain mortgage financing are no longer available. This in itself reduced the level of predatory lending being exercised not only within Medford, Oregon, but across the country as a whole.

As the HMDA tables show, the number of refinance loans outnumbered the issuance of new loans. However, the percentage of purchase loans did see an increase when compared to 2003 HMDA reports. All aggregate reports showed an increase in denials in refinancing due to the reduction in home equity seen by homeowners. Furthermore, refinancing options themselves have been reduced due to the turn in the housing market and increased homeowners losing equity or finding themselves owing more on the property than the home is worth.

COMMUNITY REINVESTMENT ACT

The Community Reinvestment Act (CRA) was enacted by Congress in 1977 to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low and moderate income neighborhoods⁴. The CRA requires supervisory agencies to assess performance periodically. The four federal bank supervisory agencies are: the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRB), Office of Thrift Supervision (OTS), and Federal Deposit Insurance Corporation (FDIC). Performance is evaluated in terms of the institution (capacity, constraints and business strategies), the community (demographic and economic data, lending, investment, and service opportunities), and competitors and peers. Ratings assigned are: outstanding, satisfactory, needs to improve, and substantial noncompliance.

The following ratings pertain to banks in Medford. All of the institutions and examinations have resulted in satisfactory ratings.

Table 19
FFIEC Interagency CRA Ratings 2009

Row #	ID	Agency	Exam Date	Bank Name	City	State	CRA Rating
1	32975	FDIC	02/01/1992	Bank of Southern Oregon	Medford	OR	Satisfactory
2	32975	FDIC	01/01/1994	Bank of Southern Oregon	Medford	OR	Satisfactory
3	32975	FDIC	10/01/1996	Bank of Southern Oregon	Medford	OR	Satisfactory
4	32975	FDIC	06/01/1999	Bank of Southern Oregon	Medford	OR	Satisfactory
5	1371	OTS	10/22/1990	Jackson County Federal Bank, A FSB	Medford	OR	Satisfactory
6	1371	OTS	12/16/1992	Jackson County Federal Bank, A FSB	Medford	OR	Satisfactory
7	34685	FDIC	09/01/2000	Peoples Bank of Commerce	Medford	OR	Satisfactory
8	34685	FDIC	03/01/2005	Peoples Bank of Commerce	Medford	OR	Satisfactory

⁴ This discussion and ratings were taken from the Federal Financial Institutions Examination Council web site (www.ffiec.gov).

IMPEDIMENTS TO FAIR HOUSING

Row #	ID	Agency	Exam Date	Bank Name	City	State	CRA Rating
9	32975	FDIC	04/01/2004	Premier West Bank	Medford	OR	Satisfactory
10	32975	FDIC	05/01/2007	Premier West Bank	Medford	OR	Satisfactory

BROKERAGE SERVICES

Real estate brokers are a key contact for potential home buyers. The broker is in a position to influence choice of location and type of housing as well as providing information about financing options. National studies (HUD 2000 Housing Discrimination Study) indicate that minority customers are given full information about housing options less frequently than white customers. Hispanic home seekers, for example, experience this type of discrimination at least 25% of the time.

PUBLIC POLICIES AND ADMINISTRATIVE ACTIONS

Two primary documents provide a vision and guidance to the community in matters of housing and community development. The City of Medford in the 21st Century – Vision Strategic Plan includes the following Council housing vision: “Medford has an abundant variety of attractive, safe, clean housing choice that suit a range of lifestyles, ages and income levels without discrimination.”

The Housing Element of the City of Medford Comprehensive Plan establishes the framework of goals and policies for decisions and action steps related to land use. Three of the broad goals pertaining to housing touch on support of fair housing:

- To provide equal opportunity for safe, decent sanitary, and affordable housing for residents of the City of Medford, regardless of age, race, color, religion, mental or physical disability, sex, sexual orientation, marital or family status, or national origin, in conformance with the federal Fair Housing Act of 1968 and the Americans with Disabilities Act of 1990.
- To ensure opportunity for the provision of adequate housing units in a quality living environment, at types and densities that are commensurate with the financial capabilities of all present and future residents of the City of Medford.
- To ensure opportunity for the provision of Medford’s fair share of the region’s needed housing types, and prices, with sufficient buildable land in the city to accommodate the need.

The Fair Housing Act does not pre-empt local land use and zoning laws. Where a zoning exclusion disproportionately affects protected classes, including persons with disabilities, it can be an impediment. The 1996 Analysis of Impediments indicated a concern about siting of group homes. Interviews conducted for this report did not find respondents voicing concern for this issue. Recent construction of housing for farm labor did not find community opposition. Additional housing for persons with disabilities, including assisted facilities, has been successfully sited.

Lack of affordable housing is a growing problem in Medford, as it is in other built-out communities. There is little land available for new development in Medford. Vacant lots are at a premium. The City of Medford can encourage and permit infill, accessory units, manufactured homes, and other strategies to increase affordable housing. Inclusionary zoning, which has been used to advantage in other states, is illegal in the State of Oregon. The City and housing partners are looking for additional strategies to encourage development of affordable housing within reach of jobs and services in Medford.

CURRENT FAIR HOUSING ACTIONS

IMPROVED CONSUMER AWARENESS

The 2004 Analysis of Impediments found limited evidence of housing discrimination in Medford. This may be partially due to the relatively small population of persons of protected classes, including racial minorities in Medford, or to a lack of awareness about fair housing laws and rights. To increase awareness:

- The City of Medford continues to advertise fair housing laws and the names of agencies to contact to report violations through posters and brochures.
- City staff obtained brochures and posters from the Fair Housing Council of Oregon. Brochures are available at the Planning Department front counter and at other locations are widely distributed. Posters identifying contact information related to allegations of housing discrimination are displayed in City Hall.
- A public information display board depicting the history of housing discrimination in Oregon was displayed in a public location for two weeks during the summer.
- Fair housing issues are the focus of a one-half hour television show.
- 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.
- City supports 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 put together an ad on fair housing in Spanish and English that has been published in the citywide newsletter that is distributed to 22,000 households. The ad was also published in the Medford Mail Tribune.
- City supports the activities of the Fair Housing Council of Oregon. 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.

Active investigation of impediments to fair housing and instances of discrimination

- City of Medford, in partnership with ACCESS, Inc. and the Fair housing Council of Oregon will conduct testing for discrimination within the City.

LEGAL ASSISTANCE TO LOW-INCOME HOUSEHOLDS

The City provides funding to the Center for Non-profit Legal Services to provide legal services to low-income residents. These services include assistance on the landlord-tenant law and legal services to households alleging fair housing law violations. The Fair Housing Council of Oregon and the Center for Nonprofit Legal Services will continue to monitor the City for fair housing law violations.

STAFF, PROVIDER AND AGENCY TRAINING

- The CDBG Coordinator attended a training workshop on Fair Housing Law.

CURRENT FAIR HOUSING ACTIONS

- A training workshop on fair housing issues has been offered to social service agencies to increase their awareness of fair housing issues.
- City staff attends training workshops and conferences on Fair Housing. They also participate in the annual Fair Housing Council conference.

RESPONSIVENESS TO COMMUNITY FAIR HOUSING NEEDS OF AT-RISK POPULATIONS

- 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.

IMPROVEMENT OF NEIGHBORHOOD CONDITIONS

City funds were allocated for a Code Compliance Coordinator to fund program costs related to the education, awareness and enforcement of municipal codes in CDB-eligible areas in which at least 51 percent of the residents of the area are low/moderate income persons. The City also supports and works with neighborhood associations in areas with highest minority and low/moderate income populations.

COORDINATION OF INFORMATION AND SERVICES

- Designated by the State of Oregon, the Southern Oregon Regional Housing Resource Center (a partnership between Jackson County, ACCESS, Inc., the Housing Authority of Jackson County) provides a central housing clearinghouse for information on and access to housing resources in the county.
- City staff serves on and supports several important collaborations including the Jackson County Community Service Consortium (partnership of government, housing providers, and human service providers), the Homeless Task Force, and the Hispanic Interagency Committee – for the Spanish speaking community. The West Medford Family Resource Service Center is one of three integrated service sites in the County.

READINESS OF LOW-INCOME HOME BUYERS

ACCESS, Inc. and Consumer Credit Counseling Services of Southern Oregon, together with local lenders, realtors and other housing related professionals, conduct homeowner education classes – the ABCs of Home Buying. The curriculum was developed by the Homeowner Education Collaborative of Oregon as a means of standardizing education classes statewide. It is designed for use in community programs that encourage collaboration among education providers, community partners, and stakeholders in the home-buying education classes, thereby increasing the number of first-time and low-and-moderate income homebuyers. Classes are conducted in both English and Spanish.

INCREASED OPPORTUNITIES FOR ACCESS TO AFFORDABLE HOUSING

- The City of Medford allows creation of accessory dwelling units in single-family residential zones to encourage in-fill and provide opportunities for affordable housing in existing neighborhoods.
- The City of Medford established a City Housing and Community Development Commission to determine ways the City can increase affordable housing.

CURRENT FAIR HOUSING ACTIONS

- The City also continues to fund non-profit housing agencies in their efforts to develop more affordable housing for low-income persons and for persons with special needs.
- The City continues to support the inclusion of group homes and residential care facilities in the community. Group homes and assisted care facilities continue to be constructed within 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.
- The 2010-2014 Consolidated Plan contains a number of strategies to increase the supply of affordable, safe and decent rental and/or homeowner housing for lower income households, such as the following:
 - Provide assistance to acquire land and/or improve infrastructure in support of new affordable housing.
 - Support regional efforts to increase the supply of workforce housing.
 - Support the creation of higher density, mixed income and mixed use housing in the redevelopment of the downtown.
 - Revise city policies and procedures to encourage long-term affordability of housing.
 - Support efforts to make more land available for housing, such as land set asides, land trusts, land aggregation for housing purposes, and the development of an urban reserve.
 - Develop a City Housing Affordability Incentives Policy that encourages developers to provide a percentage of housing developments to low and moderate income households at affordable levels.

CONCLUSIONS AND RECOMMENDATIONS

The following lists general areas of impediments suggested by the data, by community input and by the previous Analysis of Impediments. The attempt here is to define broad areas of action that will improve housing choice and reduce victimization due to discrimination.

ANY DISCRIMINATORY PRACTICE IN HOUSING RENTALS IS AN IMPEDIMENT TO FAIR HOUSING

The majority of complaints filed with HUD in the last five years concerned disability, with three on the basis of national origin. The City, along with the Fair Housing Council of Oregon and other housing partners, has conducted training for landlords and tenants. There was, however, a concern in the community that discrimination in rentals is an issue that should continue to be addressed. Persons who are reluctant to report discrimination because of fear of reprisal will benefit from the ongoing efforts to educate them of their rights and support them in taking corrective action.

ANY DISCRIMINATORY PRACTICE IN LENDING IS AN IMPEDIMENT TO FAIR HOUSING

Review of the Home Mortgage Disclosure Act reports indicated that there was unequal lending on the basis of ethnicity, even within comparable income ranges. While this in itself does not indicate unfair lending, it does point to the need for continued scrutiny and outreach to lenders, brokerage firms and consumers.

ANY PREDATORY LENDING IS AN IMPEDIMENT TO FAIR HOUSING

An active coalition working to expose and eliminate these practices as well as informing consumers of the dangers will reduce that possibility of victimization resulting from predatory lending.

RECOMMENDATIONS

The City of Medford and its partners have taken an active role in working toward improving housing choice and eliminating impediments. Some of these recommendations are consistent with those in the previous Analysis of Impediments and others are unique to concerns raised during this investigation.

1. Continue to support fair housing education for consumers, lenders, realtors, landlords, advocacy groups and local service providers.
2. Continue to support activities of the Fair Housing Council of Oregon and other fair housing partners.
3. Continue to support and work with the local HUD Field Office regarding any local fair housing complaints.
4. Continue to monitor activities of lending institutions and investigate the extent of predatory lending in Medford and consider strategies to eliminate the practice.

CONCLUSIONS AND RECOMMENDATIONS