

ASHLAND

CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT

(CAPER)

Program year 2018

(July 1, 2018 - June 30, 2019)

Date of Report September 1, 2019

Prepared for:

The U.S. Department of Housing and Urban Development

By:

The City of Ashland

Department of Community Development

Planning Division

Ashland, Oregon

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a) This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Ashland is an entitlement jurisdiction, receiving an annual allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). As a recipient of CDBG funds, the City is required to prepare a five-year strategic plan that identifies housing and community needs, prioritizes these needs, identifies resources to address the needs, and establishes annual goals and objectives to meet the identified needs. This five year plan is known as the Consolidated Plan.

The purpose of the Consolidated Plan is to outline a strategy for the City to follow in using CDBG funding to achieve the goals of the CDBG program, "to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons." This Consolidated Annual Performance and Evaluation Report (CAPER) Addresses the goals identified in the 2015-2019 Consolidated Plan which was approved in April of 2015.

Each year the City is required to provide the public and HUD with an assessment of its accomplishments toward meeting the priority goals outlined in the Five Year Consolidated Plan. This annual assessment is known as the Consolidated Annual Performance and Evaluation Report (CAPER).

This document provides a review and evaluation of the City of Ashland's progress toward meeting the annual goals and outcomes as outlined in the Action Plan for the Program Year 2018-2019 as well as the larger five year goals of the 2015-2019 Consolidated Plan. The CDBG Program Year begins July 1st and ends on June 30th, this report will summarize the City's accomplishments for that time period.

During PY 2018 the City of Ashland continued working toward meeting its homeless, at-risk and special needs priorities for supportive services through activities such as emergency rent and utility funding for low-income households at risk of homelessness by supporting the St. Vincent De Paul Home Visitation Program as well as Maslow Project, by providing assistance to homeless school children. The City awarded funds to Columbia Care to complete the acquisition of land on which to build a low income housing complex for peoples with mental illness. The City also awarded funding to the Public Works department to install audible crosswalk signals for peoples with hearing impairment, and to Ashland Fire and Rescue to complete safety repairs in households occupied by low income seniors and peoples with disabilities. Lastly, the City awarded funding to Habitat for Humanity to purchase land on which to build five units of affordable ownership housing. Neither Columbia Care nor Habitat have completed the housing projects. The tables that follow provide a comprehensive overview of the Consolidated Plan's 5 year goals and the City's progress toward attaining those goals.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete
Create and Maintain Affordable Housing Units/Units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$50000	Rental units constructed	Household Housing Unit	50	0	0.00%
Create and Maintain Affordable Housing Units/Units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$50000	Homeowner Housing Added	Household Housing Unit	0	0	
Create and Maintain Affordable Housing Units/Units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$50000	Homeowner Housing Rehabilitated	Household Housing Unit	15	9	60.00%
Create and Maintain Affordable Housing Units/Units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$50000	Other	Other	15	0	0.00%
Improve safety and access in neighborhoods and are	Community Development/Public Facilities Improvements		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	
Improve safety and access in neighborhoods and are	Community Development/Public Facilities Improvements		Other	Other	15	981	6,540.00%

Improve Transportation Options for low-income and	Homeless Non-Homeless Special Needs Public Facilities Improvements		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%
Support Economic Development activities that assis	Homeless Non-Homeless Special Needs	CDBG: \$7143	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	61	
Support Economic Development activities that assis	Homeless Non-Homeless Special Needs	CDBG: \$7143	Other	Other	20	0	0.00%
Support housing and services for peoples with spec	Non-Homeless Special Needs	CDBG: \$50000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	10	0	0.00%
Support housing and services for peoples with spec	Non-Homeless Special Needs	CDBG: \$50000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%
Support housing and services for peoples with spec	Non-Homeless Special Needs	CDBG: \$50000	Rental units rehabilitated	Household Housing Unit	0	0	
Support housing and services for peoples with spec	Non-Homeless Special Needs	CDBG: \$50000	Homeowner Housing Rehabilitated	Household Housing Unit	0	5	

Support Services for Homelessness outreach, preven	Homeless	CDBG: \$16655	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	485	97.00%
Support Services for Homelessness outreach, preven	Homeless	CDBG: \$16655	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	100	36	36.00%
Support Services for Homelessness outreach, preven	Homeless	CDBG: \$16655	Homeless Person Overnight Shelter	Persons Assisted	0	0	
Support Services for Homelessness outreach, preven	Homeless	CDBG: \$16655	Homelessness Prevention	Persons Assisted	0	48	

Table 1 - Accomplishments - Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

In April of 2015, the City of Ashland adopted the Five-Year Consolidated Plan (2015-2019). Eleven priorities (goals) are identified in the Five-Year Consolidated Plan. The priorities are not ranked in order of importance, however some have a higher priority than others.

The assessment provided in this CAPER covers the 2018 Program year (July 1, 2018-June 30, 2019).

For the 2018 Program year the City continued to support several activities which had been supported in previous years. These activities continue to provide supportive services to some of the most vulnerable populations in the City while also meeting several goals of the 2015-2019 Consolidated Plan.

Affordable and Workforce Housing: In the five year strategic plan the City identified several numerical goals for the creation, preservation, and maintenance of new and existing housing units to be occupied by low income households. Since the adoption of the Five Year Consolidated Plan the City has added 1

rental unit targeted to low-income populations and deed restricted for long term affordability. In Program Year 2018 the City did not add any new deed restricted affordable ownership units. The City did award funds to an affordable housing project in 2018 utilizing remaining 2017 funds. Unfortunately, the project was unable to utilize the CDBG funding as the stormwater mitigation required to meet NEPA standards increased the cost to the point of making the project unfeasible even with the addition of CDBG funds. Consequently the grantee declined the award. One new affordable housing project were submitted for funding in program year 2018, however that project has not moved forward. Please see tables 2A, 1C, 2C, and 3A for details.

Homeless, At-Risk and Special Needs Populations: The five year strategic identifies four specific activities to assist homeless, special needs, and senior populations. In program year 2018 the City continued to make progress on these goals for homeless, at-risk and special needs populations. In 2018 the City funded two projects that serve homeless and populations at-risk of homeless; Maslow Project which served 70 homelessness and at-risk youth with a variety of services ranging from resource referrals to ongoing case-management, St. Vincent De Paul Home program was able to prevent homelessness for 12 individuals by assisting them to obtain or maintain housing. The City also awarded funds in the 2018 program year to Ashland Fire and Rescue to complete repairs to prevent falls and provide basic health and safety needs in the homes of elderly and disabled citizens. Lastly, the City provided funding to the public works department to install audible crosswalk signals to aid the hearing impaired. All of these activities taken together have allowed the City to make headway on the identified numerical goals for the year.

Economic and Community Development: CDBG funds were not used in direct support of this goal in program year 2018.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	124
Black or African American	1
Asian	0
American Indian or American Native	4
Native Hawaiian or Other Pacific Islander	1
Total	130
Hispanic	15
Not Hispanic	109

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

While the racial make up of those assisted with CDBG funds in the 2018 Program Year is prodominantly white, the demographics of the populations assisted is reflective of the population as a whole. 2014 American Community Survey Data shows that 9% of the total population of Ashlaand identifies as white and 95.7% of the population identifies as not Hispanic or Latino.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	197,282	120,533

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
None		0	None

Table 4 - Identify the geographic distribution and location of investments

Narrative

The City of Ashland is a relatively small community both in population and incorporated area. Ashland is 4.4 miles long and 1.7 miles wide and comprises seven census tracks and 20 block groups. Of those 20 block groups 8 qualify as Low- to Moderate- Income area benefit block groups. There are no areas that fall under HUD's definition of racial or minority concentrations within the City. The 2010 Census estimated that 90% of Ashland's population was White alone, down from 92% in 2000. The City of Ashland does not have any designated Revitalization Neighborhoods nor does the City have any areas that quality as being affected by slum or blight conditions. Consequently, the city did not target any CDBG funds to a designated area.

The City utilizes a declining amount of CDBG funding to work toward meeting the goals identified in the five year strategic plan. The City also utilizes some general fund money to address the needs identified in the five year strategic plan, however, the City does not require reporting from all agencies receiving funding on the use of those funds, consequently the City will report on those outcomes within the numerical goals listed.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Applicants who applied for CDBG funding identified over \$222,615 in matching funds from federal, state, local, and private sources. For the 2018 program year the City awarded \$146,314 in grant funding. While the City itself did not use CDBG funds to leverage other public and private resources, local non-profits have reported the CDBG funds to be essential in obtaining private donations and other public and private grants. With regard to projects funded in PY 2018 the amount leveraged from other sources totals \$222,615.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	25	128
Number of Non-Homeless households to be		
provided affordable housing units	3	0
Number of Special-Needs households to be		
provided affordable housing units	5	990
Total	33	1,118

Table 5 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	20	13
Number of households supported through		
The Production of New Units	10	0
Number of households supported through		
Rehab of Existing Units	3	9
Number of households supported through		
Acquisition of Existing Units	0	0
Total	33	22

Table 6 - Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The city has a difficult time meeting the housing related goals for a few different reasons. Chief among them is that the City's allocation of CDBG funds is too limited to induce most housing providers to take on a housing project in Ashland. The high cost of land and properties in Ashland relative to other city's in the Rogue Valley requires more incentive to level the playing field. Similarly, there is a relative scarcity of multi-family zoned, flat, readily developable land within the City which can make it more expensive and more difficult for affordable housing developers to site projects in Ashland. Lastly, like many communities, issues of NIMBY-ism can cause costly delays and potentially derail an affordable housing project in a small community such as Ashland. Recently the City participated in a regional planning process to look at strategies to meet housing demand across the valley. The plan identified several barriers to the development of multi-family rental housing within the Ashland market. These barriers are detailed below.

- Median Home prices and rents in Ashland are higher than surrounding areas
- New development must capture premium rents or sales prices to be financially viable given current construction costs and high land prices.
- Narrow niche markets such as medium-term (e.g. 3- to 6-month) rentals and housing aimed at university students are among the only segments that can currently sustain high enough rents to cover the costs of new development.
- Securing financing for apartment projects in small markets like Ashland is a challenge. Few local
 real estate investors have enough capital to buy an apartment building (vs. a single
 condominium or town home unit), and outside investors rarely show interest in small markets.
- Condominium conversions can displace tenants, but for an apartment property in financial distress, converting to condominiums allows the owner to sell some units and potentially refinance the remainder.

Discuss how these outcomes will impact future annual action plans.

These issues cause significant problems in the City's ability to meet the outcomes identified in the five year consolidated plan. These issues have in the past and will continue to hinder the City's ability to meet the affordable housing goals that are the highest priority need in the future.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	127	0
Low-income	1	0
Moderate-income	9	0
Total	137	0

Table 7 – Number of Households Served

Narrative Information

The City has awarded funding to five projects; one affordable housing development expected to produce 25-30 units of affordable housing for low income households with some units reserved for peoples experiancing severe persistant mental illness was funding in the previous program year, but did not move forward due primarily to a large funding gap to cover precipitously rising construction costs. Similarly the applicant returned to CDBG funding due to the increased cost related to stormwater requirements through the enviornomental review process. This is not the first time that the City has had difficutlites getting affordable housing providers to accept federal funding due to the regulatory constraints. Of the five projects awarded none of them created or retained new or existisng affordable housing.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City has done a very good job of meeting the specific objectives for reducing homelessness identified in the five year consolidated plan. The City is fortuneate to have several providers in the region who partner effectively around the issues of homelessness. Similarly, the City continues its strong committement to involvement in the Jackson County Homeless Task Force the Jackson County Continuum of Care Board, of which the City's leadership is represented.

Program year 2018 was the eleventh year that the HTF organized a Project Community Connect Event. In the 2009 program year the City of Ashland in partnership with the many other individual members and organizations of the Homeless Task Force put on the first annual Project Homeless Connect Event in Jackson County. Since that time new partner organizations and private sector businesses have donated their time and services to the event. Over the past few years the coordination effort has become more efficient, organized, and inclusive. The purpose of the event is always to connect homeless populations and those at risk of homelessness to service providers, government agencies and community resources. The Project Community Connect event also serves as an opportunity for individual community members to welcome those experiencing homelessness or on the verge of homelessness back into the community through volunteerism and recognition. The event provided a hot meal and resources from partner agencies such as La Clinica, a community health center, the Housing Authority of Jackson County, and the Veteran's Administration, just to name a few. The year the event was attended by approximately 485 participants.

The Jackson County Ten Year Plan to end homelessness is available on the Jackson County Website at: http://www.co.jackson.or.us/files/10-Year_Plan_to_End_Homelessness.pdf The City of Ashland continues to contribute to a coordinated effort to serve the Homeless populations and those at risk of homelessness by working to carry out the six strategies identified in the plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

There are currently no permanent overnight shelters or transitional housing options located within the City of Ashland. In Program year 2018 Options for Homeless Residents of Ashland (OHRA) in coordination with Access, the community action agency of Jackson County, the City of Ashland, members of the faith community, and dedicated volunteers worked diligently to identify a location and support services to offer a seven day a week shelter in one location to the most vulnerable citizens in a comprehensive and coordinated way. To that end, the work group identified a location in the County which could serve as a single site location for the seven day a week shelter continuously from November

through April. The work group submitted a planning application to the County, and while waiting for a decision from the County, community volunteers, churches and the City coordinated to offer five nights of shelter every week and during incidents of extreme bad weather throughout the winter months of 2018-2019. CDBG funding is not used to support this effort. Currently the City is continuing to work with community volunteers and Access to implement the 7 night a week shelter in the County approved location that will continue to be staffed by volunteers from November through April. The City is also working regionally to develop a regional year round emergency shelter.

CoC Awards FY 2018	\$246,953
Community Works TLP Renewal	\$117,618
Access-HMIS	\$8,000
Access-Planning Project	\$13,743
Access-Woodrow Pines Renewal	\$11,863
Community Works-DV Bonus	\$50,324
RVCOG-Home At Last Renewal	\$45,405

Table 8 - Medford/Ashland/Jackson County CoC Grants

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City directs over \$100,000 in general fund dollars to safety net services each year. Awards to selected service providers are made on a two year cycle, with recipients receiving the full award amount on July 1st, of each year. Therefore the award indicated in table 2 below is an annual allocation and the recipient ultimately receives twice the amount listed. Several homeless service providers, low income health care, and essential continuum of care services are funded each year. In the 2018 program year the Social Service Grants awarded totaled \$134,00. Given the relatively small size of the award requests, the use of the City's General Fund grant awards enables these non-profits to direct the award to services with a minimal amount of grant administration costs. The City has not directed funds specifically toward addressing the needs of persons with special needs that may require supportive housing (such as persons with HIV/AIDs) preferring instead to target funding and staff time to serving the needs of all populations experiencing or at risk of homelessness. If an affordable housing provider applied for CDBG funds to support the development of permanent supportive or transitional housing for those experiencing homelessness, at risk of homelessness, or living with a disease that necessitated supportive housing that application would meet several of the City's priority goals for CDBG. Jackson County Continuum of Care received renewal awards totaling \$246,953 for all of the programs funded in the prior program year as well as an additional bonus project. For complete CoC grant award details see table 1 above. The City has, for a number of years, supported two organizations that do extensive outreach to unsheltered persons. Both Maslow Project and St. Vincent De Paul's home

visitation program do extensive outreach to homeless and at risk residents.

Organization	Funding Amount
Options for Helping Residents of Ashland	\$25,000
St. Vincent De Paul-Home Visitation Program	\$29,831
Center for Non-Profit Legal Services	\$10,555
CASA	\$4,818
Community Volunteer Network-Foster Grandparents	\$1,147
Community Volunteer Network-RSVP	\$2,294
RVCOG-Meals on Wheels	\$14,227
Community Works-Dun House	\$7,343
Community Works- HelpLine	\$6,884
Community Works-Sexual Assault Victimâ¿¿s Services	\$3,442
Rose Circle	\$3,442
Maslow	\$11,473
First Presbyterian	\$1,147
Jackson County SART	\$6,657
Southern Oregon Jobs With Justice	\$5,736

Table 9 - 2017-2018 City Social Service Grant

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

As mentioned previously in the document the City awarded funds to the St. Vincent De Paul Home visitation program and the Maslow project, both activities work with homeless and at-risk populations to stabilize and improve their situations. The St. Vincent De Paul program primarily assists homeless and those at risk of homelessness to obtain and maintain housing through security deposit and rental assistance and case management. Often the volunteers in this program are able to offer such support services as obtaining SSI and SSD, or assisting with job search and employment. Though these activities are not directly captured in reporting data, the service is part of the mission of the Home Visitation program and as such can contribute to a reduction of the number of people living in poverty. Similarly, Maslow Project provides resources, referrals, and case management for homeless and at-risk populations, along with other services which are also not captured in the CDBG reporting data. The Jackson County Homeless Task Force and Continuum of Care members (which includes representation from Ashland) works with publicly funded institutions and systems of care to coordinate around discharge planning. Lastly, the Ashland Community Resource Center, which is supported in part by City of Ashland social service grant funds assists homeless and at risk populations in a variety of ways, including employment and housing and shelter supports, life skills and case management supports, laundry and shower services as well as general resource referral.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Housing Authority of Jackson County operates all Public Housing Units in Jackson County. In 2006 HAJC filed for disposition of all of their public housing units, three of which were in the City of Ashland. Consequently there are no Public Housing Units within the City of Ashland.

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

N/A

Actions taken to provide assistance to troubled PHAs

N/A

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The City continues to consider the potential impacts to affordable housing that changes in the Ashland Land Use Ordinance (ALUO) may have, as well as to look at ways that the ALUO needed to be updated in order to promote affordable housing and housing types. Similarly, the City staff is working on updated the Housing Element of the City's Comprehensive Plan which could also put policies in place that support the development of affordable housing. To that end in 2018, with a grant for the Department of Land Conservation, the City was able to hire a consultant, EcoNorthwest, to undertake an evaluation of the City's land use code and incentive programs, and determine what measures, if any, could remove barriers or provide incentives to the development of multifamily rental housing. The Study was called the Ashland Housing Strategies Plan. The strategies considered within that document were identified in a recent regional housing study:

- Increases to maximum allowed density (i.e., dwelling units per acre), height limits, and lot coverage allowances in the R-2 (Medium Density Residential) and R-3 (High Density Residential).
- Decreases to parking requirements for multifamily housing.
- A property tax abatement program for multifamily housing that meets locally established criteria.

The study identified that the most limiting development code factor is the maximum density (dwelling units per acre) standard. The study further identified that "changes to the allowed height, density, and parking ratios offer some construction cost savings, but their main impact is to spread the cost of land over more units. If construction costs—even with greater building efficiencies—are so high relative to rents or sales prices that a development cannot afford to pay for land at all, adding more units makes a project less, not more, viable. As market conditions evolve over time, the details of which developments are viable will shift and change. However, any multifamily development that can balance rents or sales prices with development costs will be able to better afford the high costs of land in Ashland if they can achieve higher densities. While the multiple unit tax exemption program has limitations, it benefits multifamily developments that are marginally feasible but cannot afford high land costs. If applied specifically to rental housing, the tax abatement could help apartments compete with condominium development in the land market."

Ultimately the Study surmised that there is little the City can do to overcome financing challenges for apartment development in small markets. However, the study identified that the City does have some abilty to impact outcomes by removing zoning code obstacles to multifamily development to avoid being part of the problem. The study also identified additional actions the City can take such as offering incentives for development of multifamily rental housing at a range of price points to become a larger

part of the solution. "Enabling more efficient development benefits both market-rate and affordable housing developers and helps supply keep pace with demand, preventing a greater affordability challenge later".

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

No specific actions were taken during 2018 that are not identified elsewhere in the Consolidated Annual Performance and Evaluation Report. The City's continued involvement in the Jackson County Homeless Task Force and the Continuum of Care is instrumental in assessing the needs and resources of homeless populations. The City's continued support for local providers of services to low income, at risk, disabled, homeless, and elderly populations through the Social Service grant program funded out of the City's general fund helps to offset the lack of resources and helps to support local providers of services to those populations. See table 2 above for details.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

No projects were funded in 2018 that had issues of lead based paint or that required any testing or remediation.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The Housing and Community Development Act of 1992 requires communities to include in their Consolidated Plan a description of an anti-poverty strategy. The City of Ashland has limited resources for addressing the issues involved in reducing poverty and improving the self-sufficiency of low-income residents. Affordable housing is one of the factors directly related to poverty that the City of Ashland does have some ability to influence, and the related goals are covered in the Housing Goals section. In addition, the City supports housing, social service, and economic development programs targeted at the continuum of care needs of the homeless.

In another effort to address poverty within Ashland, during 2001-2002 the City of Ashland passed a Living Wage Ordinance. This ordinance requires that employees of the City, or employers receiving financial assistance or business from the City in excess of approximately \$15,000 (adjusts annually) must pay a minimum of \$14.19 per hour (adjusted annually) to employees engaged in work related to the City project or service contract. The City of Ashland operates a variety of funding and other assistance programs which, together, strategically address the goals of reducing poverty and improving the self-sufficiency of low-income residents. The activities undertaken in conjunction with this anti-poverty strategy can be separated into two primary areas of effort: human services programs targeted at the continuum of care needs; and affordable housing programs. The City of Ashland provides funding to agencies that address the needs of low income and homeless residents through a Social Service Grant program. The goal of this program is to improve living conditions and self sufficiency for residents by meeting such basic needs as food, shelter, clothing, counseling and basic health care. The goal is carried out by providing funds in excess of \$100,000 every year to various area agencies whose focus meets one

or more of these targeted needs.

The Social Service Grant program is funded entirely with general fund dollars from the City of Ashland budget. The award process is coordinated with the City of Medford and the United Way of Jackson County. Local agencies and organizations providing continuum of care activities in the Rogue Valley coordinate their applications through a Community Services Consortium. The coordination of services and related funding requests through the consortium attempts to insure that the broad range of needs is met without overlap or duplication of service. The second element of the City's anti-poverty strategy targets the development and retention of affordable housing. The City of Ashland has made a serious effort to address the issues of housing affordability.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

City of Ashland Staff provides support to the City of Ashland Housing and Human Services

Commission including a Housing Program Specialist, which helps provide institutional structure as well as to examine and implement opportunities for intergovernmental cooperation. City staff also contintues with regional partners to maintain and promote further regional coordination and partnership in housing and community development related activities. Ashland continues to work with the Jackson County Continuum of Care's Homeless Task force to address the development of affordable housing and resources for homeless and at risk populations at a regional level.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

As mentioned previously in years past the City of Ashland worked with the Housing Authority of Jackson County to complete a sixty unit affordable rental housing development. The City also worked with ACCESS on a project to create six new affordable rental units targeted to low income households. More recently the City has worked with Columbia Care and the Housing Authority to help facilitate the predevelopment activities in support of 90 units of affordable housing between the two agencies. The City continues to look for opportunities to work with for profit and non-profit housing developers to increase the City's supply of affordable rental and ownership housing.

The City of Ashland Housing and Human Services Commission continue to explore opportunities to promote and protect the City's affordable housing stock. In the last year the City dedicated an ongoing funding source for the City of Ashland Affordable Housing Trust Fund, as well as working toward finding new resources to serve the City's homeless populations.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Since the Analysis of Impediments to fair house choice was drafted in 2009, the City has undertaken numerous activities to address the public sector and private sector impediments identified in that

document. Some examples of activities that the City has undertaken include; trainings to targeted groups, fair housing testing, support of a local staff person to conduct trainings and promote fair housing throughout Jackson County, financial sponsorhip and staff support for education and outreach events and lastly, policy review and amendment to include expanded fair housing language. Most recently the City sponsored a fair housing training for landlords and property managers and provided fair housing training to City commissioners. the City also provides ongoing support for the Fair Housing Council of Oregon's fair housing hotline, and regulary engages with that organization around trainings and events. The City will continue to look for ways to address identified impediments.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Each Community Development Block Grant (CDBG) Program Year the City reviews each CDBG activity that was underway and ranks the sub-recipient's risk factors by assigning points for each of the rating criteria on the form provided. The designated points on the rating form are established to prove a means of quantifying a Risk Factor and are useful as tools in determining the extent of monitoring for a given activity. Other factors, as deemed relevant by the City of Ashland, can be used in establishing a higher or lower risk factor than the numerical rating system. A CDBG monitoring visit may consist of an on-site monitoring or a desk monitoring. All CDBG grantees will be monitored once prior to a contract being administratively closed. The areas monitored may include:

The CDBG staff objectives for monitoring are to determine if grantees are:

- Carrying out their CDBG-funded activities as described in their contracts (as modified or amended);
- Carrying out the program or project in a timely manner in accordance with the schedule included in the CDBG contract;
- Charging costs to the program or project which are eligible under applicable regulations;
- Complying with other applicable laws, regulations and terms of the CDBG contract;
- Conducting the program in a manner which minimizes the opportunity for fraud, waste and mismanagement; and
- Have a continuing capacity to carry out the approved program or project.
- Overall management system, record keeping and progress in activities.

When a grantee is found to be out of compliance, CDBG staff will identify a specific period of time in which compliance should be achieved. Usually the grantee will have 30 days to correct deficiencies. Copies of supporting documentation demonstrating that corrective action has been taken will be required. Additional time for corrective action may be allowed on a case by case basis. Failure by the grantee to correct deficiencies may result in funds being withheld and possible restrictions on future grants.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The availability of the Consolidated Annual Performance and Evaluation Report (CAPER) for the use of 2018 CDBG funds was advertised in the September 10, 2019 edition of the Ashland Daily Tidings and was posted on the City of Ashland web site from for public comment. Additionally the Housing and Human Services Commission reviewed the CAPER at their September 26, 2019 Regular meeting and held a public hearing to obtain comments. No comments were recieved. The 2018 CAPER document remains archived on the City website.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

N/A

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

N/A

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.