

# 2020-2024 Fair Housing Analysis of Impediments to Fair Housing Choice

## Update for the City of Ashland

City of Ashland

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## Introduction and Executive Summary

The Analysis of Impediments to Fair Housing Choice (AI) is required by the US Department of Housing and Urban Development (HUD) of all state and local governments that receive housing and community development funds from the following programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Shelter Grant (ESG)
- Housing Opportunities for people with HIV/AIDS (HOPWA)

As a requirement of participation in these federal programs, entitlement grantees submit a certification stating they affirmatively further fair housing, and that their grant will be conducted and administered in compliance with the Title VIII of the Civil Rights Act of 1968, also referred to as the Fair Housing Act. The AI is part of the ongoing commitment to furthering fair housing. The purpose of the AI is to:

- Review the laws, rules, administrative policies, procedures, and practices of the jurisdiction.
- Assess how the laws, etc. affect the location, availability, and accessibility of housing.
- Assess public and private conditions affecting fair housing choice.

This update of the 2008 Analysis completed by the Fair Housing Council of Oregon (FHCO), is undertaken by City staff in order to determine what types of impediments to fair housing choice, identified through a process similar to that undertaken by FHCO in 2008, may continue to exist, or if any new impediments have developed within the City of Ashland. Impediments may include actions, omissions, or decisions taken with the intent of, or effect of, restricting availability of housing choices for members of any of the federally protected classes (race, color, religion, gender, disability, familial status, and national origin), or the statewide protected classes (marital status, source of income and sexual orientation, including gender identity and survivors of domestic violence), and lastly, the jurisdictionally protected classes (age, and domestic partnership).

In addition to identification of impediments, each jurisdiction is required to develop approaches to addressing impediments that limit the ability of residents to rent or own housing regardless of their inclusion in a protected class. The methods for addressing the impediments become a Fair Housing Plan (FHP). The AI is the foundation of developing a FHP, it provides essential information to policy makers, defining a clear set of objectives with measurable results.

HUD requires that the AI include;

- An analysis of demographic, income, housing and employment data
- An evaluation of the fair housing complaints filed in the jurisdiction

- A discussion of impediments, if any, in 1) the sale or rental of housing, 2) provision of brokerage services, 3) financing, 4) public policies, and 5) administrative policies for housing and community development activities that affect housing choice for minorities
- An assessment of current fair housing resources
- Conclusions and recommendations

This update largely reproduces much of the narrative of the 2008 document with few alterations. However, the data has been updated, where appropriate, and the conclusions and recommendations have been revised based on an evaluation of conditions from 2008 through the present.

## Participants/Funding

The City of Ashland, as a recipient of CDBG funds is committed to the goal of affirmatively furthering fair housing practices, as well as encouraging others to do so. Funding for this update was provided by the City’s Federal allocation of CDBG funding and City of Ashland General Funds. The City consulted with several organizations in the drafting of this document including the Center for Non-Profit Legal Services, the Community Alliance of Tenants, the Southern Oregon Rental Owner’s Association, Options for Helping Residents of Ashland, and United Way. The City of Ashland originally contracted with the Fair Housing Council of Oregon to perform the ancillary research used to develop conclusions and objectives identified to address the issues related to housing choice and impediments which may have existed in 2008, this update utilizes some of 2008 AI narrative but has provided updated data and discussion. City staff utilized historical data and current data to re-evaluate the existing conclusions and recommendations and develop new and revised conclusions and recommendations based on conditions from 2008 through the present.

The Fair Housing Council of Oregon is a private, non-profit agency with the mission of providing equal access to housing in Oregon and South West Washington. The FHCO has been in operation since 1990. The mission of the agency is accomplished through education, outreach, enforcement, advocacy, and technical assistance activities.

The AI update identifies impediments to fair housing choice in the City of Ashland and offers recommendations to address impediments. Below is a summary of those impediments and the recommendations for remediation over the Consolidated planning period 2020-2024. The recommendations include objectives, measurable goals, and actions steps for completion. The recommendations also establish a timeline for completion of each goal, the resources needed and partners who will help the City achieve the identified goals.

### Private Sector

Impediment	Objective	Goal	Action Step	Resources	Partners	Timeline
Discrimination against peoples with disabilities	Reduce instances of discrimination against peoples with disabilities	Educate landlords and property managers about Fair Housing Laws and reasonable accommodation requests	Offer one Training per Consolidated Plan Cycle	CDBG Federal and State Fair Housing funding	FHCO CNPLS SOROA City of Medford	2020-2024 Consolidated Plan Period
Discrimination against families with children	Reduce instances of discrimination against families with Children	Provide Fair Housing Education to landlords and property managers	Offer one Training per Consolidated Plan Cycle	CDBG Federal and State Fair Housing funding	FHCO CNPLS SOROA City of Medford	2020-2024 Consolidated Plan Period

## Public Sector

Impediment	Objective	Goal	Action Step	Resources	Partners	Timeline
Limited availability/accessibility of resources to minority populations, which may include access to mainstream resources and access to homeownership, lending, and credit programs	Improve the availability/accessibility of resources to minority populations	Make City Resources more accessible to minority population	Review City policies through a diversity, equity and inclusion lens	CDBG funding City General Fund	Unite Oregon Rogue Action Center OHRA Northwest Seasonal	2020-2024 Consolidated Plan Period
		Support Capacity building for organizations that serve minority populations	Daft and implement a plan to undertake outreach and ensure inclusion to organizations that serve minority populations in grant funding processes	CDBG funding City General Fund	Workers Ashland Supportive Housing Neighborworks Umpqua FHCO La Clinica	2020-2024 Consolidated Plan Period
		Encourage Diversity, Equity and Inclusion (EDI) training throughout the City	Provide Trainings in EDI for all City departments elected and appointed officials and community partners	CDBG funding City General Fund		2020-2024 Consolidated Plan Period
Limited knowledge and understanding of Fair Housing Laws by the general population	Increase basic knowledge and understanding of Fair Housing Laws among the general population	Increase the number of Ashland citizens who know their rights and responsibilities under Fair Housing Laws	Undertake an information and education campaign through a broad-based approach	CDBG funding City General Fund Other	FHCO HUD BOLI Housing and Human Services Commission RVTV	2020-2024 Consolidated Plan Period

## **Methodology and Public Engagement**

The process for updating the AI included data review, and the collection of additional data. City staff and the Housing and Human Services Commission collected additional data through outreach to community members and members of the housing industry, service agencies and advocacy groups. Staff undertook a review of demographic information gathered through the Consolidated planning process which included citizen and stakeholder input through public hearings and an online questionnaire. And lastly, staff reviewed fair housing complaint, testing and litigation data from all legal, regulatory, and advocacy agencies with jurisdiction in the City of Ashland. This data was evaluated to determine the types of housing transactions about which complaints have been lodged and the protected class bases of these complaints. Allegations and examples of discriminatory actions, which were identified through the complaint process, were examined to identify any specific or perceived impediments to fair housing choice. The community participation process for completion of the AI included:

- An online questionnaire which received 134 responses
- Consultation with several community groups that work with minority populations and peoples with disabilities
- Interviews with individuals representing 16 agencies and non-profit and community organizations.
- In addition, the draft AI was presented to the Ashland Housing and Human Services Commission and the City Council Liaison during a public meeting.
- Extensive media engagement through newspaper articles, advertisement of the survey and the AI update process through a news items on the City's webpage, Facebook and twitter pages.

## **Conclusions**

A review of the data collected has revealed that there are several areas where Ashland could focus efforts and resources to better promote the removal of impediments to fair housing choice and reduce instances of discrimination and inequity.

## **Impediments Found and Actions to Address Them**

Census Data has shown that there are concentrations of minority and low-income households in two census tracks within the City. These concentrations may be due to several factors, however, the City should strive to promote diversity through the development of a variety of housing types and cost throughout the City. The City can promote this through innovation in land use policies, and through support with grant funding and incentives.

Outreach to the community has shown that there is limited community awareness about fair housing protections and resources. This lack of awareness could mean that discrimination and violations of the Fair Housing Act will go unreported by victims, and fair housing protections may not be upheld by landlords and property owners. The City can work to promote

community awareness of fair housing rights and responsibilities under the law by undertaking an education and information campaign. The City of Ashland should coordinate with the Fair Housing Council of Oregon, the Community Alliance of Tenants, and the Center for Non-profit Legal Services to provide educational trainings.

There is overwhelming data to show the lack of affordable housing in Ashland. The City should continue to work toward finding innovative ways to promote and support the development of more affordable, and more varied, housing types throughout the City. Specifically, affordable rental housing and housing that is accessible to peoples with disabilities and/or allows for aging in place.

Community feedback has shown a critical need for the City to work toward reducing instances of discrimination in housing transactions to specific populations including peoples with disabilities, families with children, and people with non-traditional income sources. The City should prioritize fair housing education and training with landlords, property managers, and citizens to ensure that fair housing laws are widely known and understood, and that the rights of tenants are upheld. The City should also work to strengthen partnerships and support of fair housing advocacy groups such as the Fair Housing Council of Oregon, the Center for Non-Profit Legal Services, and Community Alliance of Tenants.

Research has shown that there is limited availability and/or accessibility to mainstream resources which are available to all populations, and to resources that are specific targeted to minority populations. In an effort to increase the availability and accessibility of resources for low-income and minority populations, the City should partner with community organizations and other funding organizations to build the capacity of agencies and organizations that serve minority populations, including support of affordable housing, homeownership and lending or credit access programs. The City should also promote community education regarding issues of equality, diversity and inclusion (EDI), through education and training. The City should devote resources to providing this education within the City departments, to elected and appointed officials, with community partners and to the community as a whole.

### **Jurisdictional Background Data**

Incorporated in 1874, Ashland had a population of just 300. Located on a stage line with established woolen and lumber mills, the economy of the city at that time was predominantly agricultural. By 1900 the City had grown to 3,000 residents. Ashland became the division point for the Southern Pacific's San Francisco-Portland rail line. The city experienced a population boom with the coming of the rail road. In 1899 a normal school was established. Over time the institution became known as Southern Oregon State College and eventually Southern Oregon University. The University has helped attract diverse populations to the community contributing to both the economic and cultural development of the community.

Between 1900 and 1950 the population grew steadily to 7,739. Then with the emergence of the timber industry in the Rogue Valley, the city once again experienced a population boom almost

doubling in size to 12,342, by 1970. The decade between 1970 and 1980 saw heavy migration to Oregon from other states, in that time the City's population increased by approximately 2,600 people. By the late 1970's the main economic support for the Ashland community came from the growth of the tourism industry spurred by the popularity of the Oregon Shakespeare Festival. The travel/tourism industry helped to establish a base for the hospitality industry, retail shops, and restaurants, as well as other cultural and artistic venues. By 1980, population growth tapered off as the City experienced the impacts of a statewide recession and the decline in the timber industry. The city long known for its cultural attractions and quality of life became an ideal spot for retirees. At the same time, mills were closing taking with them the living wage jobs that they provided to many area families. Despite the presence of Southern Oregon State College, the number of people aged 15-29 began to decrease.

Oregon's current demographic makeup has been shaped by a long history of discrimination. This has led to very little racial, ethnic or religious diversity throughout much of the state, but particularly in rural areas, like Ashland. The impact of exclusion continues to persist to this day, where the lack of diversity, lack of affordable housing options, and limited employment opportunities continues to discourage minority populations from settling in Ashland.

Oregon's early history is one of intentional exclusion to non-white settlers. Specifically, black exclusion served as a deterrent to African American populations from settling in Oregon. Although these early exclusion laws were eventually rescinded, while in effect they established a legal framework intended to ensure Oregon would develop as primarily white.<sup>i</sup> Notably, on September 21, 1849 an exclusion law was enacted by the Territorial Legislature that specified that "it shall not be lawful for any negro or mulatto to enter into, or reside" in Oregon..<sup>ii</sup> This pattern of discrimination continued under the Oregon Land Donation Act of 1850, which limited land claims to white settlers — and "American half-breed Indians". In 1859 Oregon became a "free state" upon joining the Union. Although slavery was not permitted, Oregon was the only "whites-only" free state in the Union. The statute wasn't repealed until 1927.

Southern Oregon's history of discrimination adversely impacted most minority and native populations. The migration of Chinese men to the U.S in the mid-19<sup>th</sup> century were subject to restrictions on owning property, working in mines, or testifying against a white person in Oregon. The 1882 Chinese Exclusion Act institutionalized such discriminatory practices and was the first major law restricting immigration in the United States. In rural areas such as Southern Oregon, exclusion laws authorized and condoned violent discrimination against Chinese individuals effectively displacing these populations to larger urban areas, or forcing them to leave Oregon. The Japanese who migrated to Oregon were met with much resentment from white farmers at the turn of the Century, and such dispiriting treatment continued through the first half of the 1900's until Executive Order 9066 during World War II was issued which incarcerated more than 4000 Japanese, and Japanese Americans, in concentration camps with squalid housing, poor sanitation and inadequate health care.

This recurring pattern of discrimination against non-white residents repeated itself for the Mexican immigrants in Southern Oregon between 1942 and 1947. According to SOU Professor Alma Rose Alvarez, more than 15,000 Mexican men came to Oregon as part of the bracero program to serve as a labor force. They were promised decent living conditions but ended up sleeping in tents and facing a risk of food poisoning.<sup>iii</sup> They didn't receive public accommodation, as most businesses declined to serve nonwhites, Alvarez said. Mexican families also went on circuit trips, where they moved from one location to another to work on the field seasonally. "It left a deep consequence on the migrant population — a type of invisibility," she said. "The perception of Mexicans in the Valley is that we are foreigners and that we don't belong."

Fiery crosses and marchers in Ku Klux Klan (KKK) regalia were common sights in Oregon and the nation during the 1920s. Southern Oregon was one of the many areas of Oregon which experienced a strong resurgence of Klan membership in the 1920's. However, as noted by local historian Jeff La Land, the Klan of the 1920's in Oregon was primarily focused on social and cultural values, often aimed at racial and religious issues<sup>iv</sup>. Klan members at the state level passed a Compulsory School Bill, requiring all children eight to sixteen years of age to attend public schools. While targeting Roman Catholics, the compulsory school bill would have eliminated other private and denominational schools.<sup>v</sup>

In 1959 Oregon passed its Fair Housing Law. Despite both State and Federal Fair Housing and antidiscrimination laws hotels in the area refused service to black people and informal and unwritten "sundown laws" were enforced on people of color, requiring they leave towns by sunset. A clear example of such discrimination was evident in downtown Ashland where the Palace Cafe had its prejudicial sign — "All White Help" — displayed for years. Professor Alvarez of Southern Oregon University cited her own experience with discrimination in the 1990's explaining "People don't put up signs anymore, but it's a more subtle form of discrimination."<sup>vi</sup>

The State's long history of institutional racism provides the context for the lack of diversity in Southern Oregon, and in Ashland specifically. It is due to this lack of diversity, and the pervasive historic attitudes toward other races and religions that contributes to be a legacy of housing discrimination that people continue to experience to this day.

## Demographic Data –Decennial Census

Year	1960 <sup>1</sup>	1970	1980	1990 <sup>2</sup>	2000	2010
Population	12,193	12,342	14,943	16,234	19,522	20,078
Households	3,829	4,124	6,318	6,876	8,537	9,409
<b>Race/Hispanic Origins</b>						
White	12,124			15,582	17,873	19,281
Black or African American	4			81	118	225
American Indian and Alaska Native				152	199	174
Asian				339	365	423
Native Hawaiian/Pacific Islander				---	26	55
Two or more Races				---	608	278
Other	65			80		
Hispanic or Latino				478	695	1,028

**Race and Ethnicity:** Decennial Census Data show that Ashland’s population is overwhelmingly white, at 96% of the total population. The largest percentage of non-white residents identify as Asian, representing 2.1% of the population, followed by residents who identify as two or more races at 1.4% and then those who identify as African American at 1.1%. In total, minorities represent only 4% of the total population. Those residents who identify as Hispanic or Latino have increased steadily to represent 5.1% of the total population. As can be seen in the table above, Ashland has become more diverse (with the exception of American Indian/Alaska Native) over the last few decades, but that all non-white races/ethnicities still only represent a very small percentage of the total population.

One way of measuring racial and ethnic population concentration is to examine census data by tract and identify those tracts which include high population numbers from specific groups. Some planning strategies consider census tracts in which the percentages of minority populations are 50% or greater than the percentage of that group found as a whole for the area analyzed, as suggestive of the minority concentration. The table below is a listing of all Ashland census tracts and the minority population distribution among the Census Block Groups. The data compiled for the 2008 AI is included to show the change in minority concentration.

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<sup>1</sup> 1960 Decennial Census counts include Ashland and Surrounding Areas

Minority Population Distribution Among Ashland Census Tract Block Groups					
2000 Census			2014-2018 ACS		
Census Tract/Block Group	Total Population	Minority Population	Census Tract/Block Group	Total Population/Census Tract Only	Minority Population
17.3	577	5%	17.3	7585	14.5%
18.1	1362	8%	18.1	8722	11.1%
18.2	1863	7%	18.2		
18.3	2045	10%	18.3		
18.4	1473	15%	18.4		
19.1	2019	18%	19.1	2842	27.2%
19.2	1205	15%	19.2		
20.1	746	11%	20.1	2082	10%
20.2	609	10%	20.2		
20.3	720	10%	20.3		
21.1	1852	7%	21.1	3368	10%
21.2	886	5%	21.2		
21.3	655	7%	21.3		
22.1	799	5%	22.1	4546	10%
22.2	1010	6%	22.2		
22.3	1067	6%	22.3		
22.4	1789	10%	22.4		
24.2	1080	9%	24.2	1843	12.3%

Ashland has a minority population of 9%. Census tracts that contain 13.5% or more of a minority population are considered as having a minority concentration. Three block groups meet that criteria: 17.3, 19.1 and 19.2. Two of the tracks with the largest concentrations are near Southern Oregon University.

**Peoples with Disabilities:** American Community Survey Data estimates that there are 981 individuals who experience hearing difficulties, 434 individuals who experience visual difficulties, and 795 individuals experience cognitive difficulties. Furthermore, 986 individuals experience ambulatory difficulty, 368 experience difficulty with self-care, and 900 report difficulty with independent living. The population of individuals 55 years old and older has increased from 20.5% of the total population in 1990 to 32% of the total population in 2010. Ashland has seen the population shift to an older demographic, this may be the reason that the majority of fair housing issues reported are issues pertaining to peoples with disabilities and requests for reasonable accommodation.

Ashland Population by Age Group								
	1990	% of total	2000	% of total	2008	% of total	2010	% of total
Under age 5	793	4.8%	802	4.1%	1,315	6.3%	1068	5.3%
Age 5-9	5,391	33.2%	923	4.7%	1,065	5.1%	1002	5%
Age 10-14			1,144	5.9%	951	4.6%	1206	6.0%
Age 15-19			1,906	9.8%	1,613	7.8%	1655	8.2%
Age 20-24			2,314	11.9%	2,251	10.8%	1885	9.4%
Age 25-34	5,126	31.5%	2,174	11.1%	2,873	13.8%	2248	11.2%
Age 35-44			2,378	12.2%	2,096	10.1%	1918	9.5%
Age 45-54	1,545	9.5%	3,249	16.6%	2,072	10.0%	2694	13.4%
Age 55-59	551	3.3%	1,042	5.3%	1,822	8.8%	1806	9.0%
Age 60-64	595	3.6%	694	3.6%	1,318	6.3%	1406	7.0%
Age 65-74	1,279	7.8%	1,272	6.5%	1,671	8.0%	1562	7.8%
Age 75-84	771	4.7%	1,143	5.9%	1,279	6.2%	1259	6.3%
85 and over	184	1.1%	481	2.5%	456	2.2%	394	2.0%
<b>Total Population</b>	<b>16,234</b>	<b>100%</b>	<b>19,522</b>	<b>100%</b>	<b>20,782</b>	<b>100%</b>	<b>20,103</b>	<b>100%</b>
<b>Total Population 55 and older</b>	<b>3,380</b>	<b>20.5%</b>	<b>4,632</b>	<b>23.8%</b>	<b>6,546</b>	<b>31.6%</b>	<b>6,427</b>	<b>32%</b>

**Peoples experiencing Domestic Violence:** Community Works is the community’s sole provider of services to victims of domestic and dating violence. The City provides Social Service grant funding to Community Works to help support the work they do throughout the community. From 2017-2019 Community works provided shelter to 494 individuals experiencing domestic violence, 22 of those were identified as residents of Ashland. In that same time period Community Works served 615 victims of sexual assault, 50 of those individuals identified as Ashland residents.

### **Income and Employment**

The City of Ashland features a strong performing arts cluster centered around the Oregon Shakespeare Festival that has an international tourist draw. The Oregon Shakespeare festival is also considered a hub of diversity within the City, serving as a draw from larger urban and more diverse areas. According to the City’s Economic Development Strategy, in addition to the arts cluster and related commerce, the area has relied upon several key sectors over the past 20 years, including Southern Oregon University, value-added specialty manufacturing, and specialty food and beverage production.

## Business Activity

Occupations by Sector	Number of People
Management, business and financial	1,804
Computer, Engineering and Science	652
Education, Legal, Community Service, Arts, and Media	1,659
Healthcare Practitioners and Technical	913
Protective Service	123
Food Preparation and Serving Related	1,171
Personal Care and Service	206
Farming, fisheries and forestry	11
Service	2,050
Sales and office	2,014
Construction, extraction, maintenance and repair	567
Production, transportation and material moving	387

Data Source: 2018 ACS 5-Year Estimates

## Travel Time

Travel Time	Percentage
Less than 10 Minutes	29.4%
10 to 14 Minutes	16.3%
15-19 Minutes	15.6%
20-24 Minutes	10.5%
25-29 Minutes	7.2%
30-59 Minutes	18.4%
60 or More Minutes	2.6%
<b>Mean Travel Time to Work</b>	<b>17.9 minutes</b>

Data Source: 2018 ACS 5-Year Estimates

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	233	0	19
High school graduate	740	81	310
Some college or Associate's degree	2,127	101	813
Bachelor's degree or higher	4,477	185	1,241

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	

Data Source: 2018 ACS 5-year estimates

### Educational Attainment by Age

	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than High School Graduate	129	205	N/A	N/A	N/A
High School Graduate	618	1,540	2548	5318	4465
Some College or Associates Degree	1,704	3,229	N/A	N/A	N/A
Bachelor's degree	156	4,598	1224	3704	2997
Graduate or Professional Degree	N/A	4,302	N/A	N/A	N/A

Data Source: 2018 ACS-5-year estimates

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	27,188
High school graduate	25,868
Some college or Associate's degree	25,309
Bachelor's degree	29,750
Graduate or professional degree	52,157

Data Source: 2018 ACS-5-year estimates (this table has large margins of error)

The major employment sectors within the City of Ashland are (1) Arts, Entertainment, Accommodations; (2) Education and Healthcare Services; and (3) Retail Trade. Income in Oregon has been below the national average for the last quarter of a century. There are four basic reasons that income has been lower in Oregon and Jackson County than in the U.S.

- Wages for similar jobs are lower;
- The occupational mix of employment is weighted toward lower paying occupations;
- A higher proportion of the population in Jackson County consists of seniors who receive only social security;
- Due to a higher proportion of seniors in the population, there is a lower proportion of working age residents.

Household Income 2000-2018						
	Number of household	Percentage of households	Number of household	Percentage of households	Number of household	Percentage of households
<b>All Households</b>	8,552	100%	9,339	100%	9,816	100%
<b>Less than 10,000</b>	1,173	13.7%	906	9.7%	942	9.6%
<b>\$10,000 to</b>	918	10.7%	677	7.2%	687	7.0%
<b>\$15,000 to</b>	1,300	15.2%	1,203	12.9%	874	8.9%
<b>\$25,000 to</b>	1,090	12.7%	1,286	13.8%	1,188	12.1%
<b>\$35,000 to</b>	1,141	13.3%	1,490	16.0%	1,178	12.0%
<b>\$50,000 to</b>	1,309	15.3%	1,553	16.6%	1,472	15.1%
<b>\$75,000 to</b>	789	9.2%	779	8.3%	1,158	11.8%
<b>\$100,000 to</b>	545	6.4%	819	8.8%	1,040	10.6%
<b>\$150,000 to</b>	166	1.9%	294	3.1%	540	5.5%
<b>\$200,000 or More</b>	121	1.4%	332	3.6%	726	7.4%
<b>Median Income</b>	<b>\$32,670</b>		<b>\$40,140</b>		<b>\$50,613</b>	

Sources: U.S Census Bureau 2000, 2010 Census and 2018 ACS-5-year estimates data

As noted in the narrative above, the City’s economic development grew out of its location along major transportation routes, agricultural pursuits, and natural and cultural resources. As industries based on natural and agriculture resources waned, those farm and factory/mill jobs were replaced by predominantly service sector employment and health care driven by a shift in the population toward an older demographic (see table 1.2 above). Often these service sector jobs offer lower wages, fewer benefits, and less steady employment. The 2018 American Community Survey 5-year estimate data show the median household income for the City of Ashland at \$50,613. This is lower than the median household income of Jackson County as a whole which is estimated to be \$55,929, and significantly lower than the median income of the average American household, at \$61,937. Similarly, the percentage of families and individuals living below the poverty level is greater in Ashland than in Jackson County, in the State of Oregon or in the rest of the Nation.

Percent in Poverty				
Household type	Ashland	Jackson County	State of Oregon	United States
Percentage of families in poverty	12.3%	10%	8%	9.3%
Percentage of Individuals in poverty	20.1%	15.1%	12.6%	13.1%

Source: 2018 American Community Survey 1-Year and 5-Year Estimates

According to 2018 American Community Survey data, the highest proportion of low- and moderate-income households are found in the central areas of the city north of Siskiyou Blvd, primarily in census tracts 19.1 and 19.2. This area has a larger proportion of the city’s multi-family properties and is located near the University. Census data does not separate out the student or seasonal population so no conclusions can be drawn about how the student population affects these census tracts. Census data does show however that these census tracts have the highest percentage of minority populations and can be considered a

concentration of minority population in the city with 27.2 percent minority populations in each census tract.

Income in Oregon has been below the national average for the last quarter of a century. There are four basic reasons that income has been lower in Oregon and Jackson County than in the U.S.

- Occupational mix of employment is weighted toward lower paying occupations;
- A higher proportion of the population in Jackson County consists of seniors who receive only social security;
- Due to a higher proportion of seniors in the population, there is a lower proportion of working age residents.

### **Employment**

Census counts estimate that 17,988 residents are 16 years old and older; of that number 59.2% are in the labor force. The unemployment rate in Ashland at the time of the American Community Survey 2018 5-year estimates was 5.2%. However, current Oregon Employment Department data shows the unemployment rates for Jackson County in May of 2020 to be 14.4%, primarily due to the Corona virus pandemic. Though many sectors of the economy have experienced severe job losses and contraction, the hospitality, restaurant and retail sectors, three major employment sectors in the region and in Ashland, have been hard hit by the recent economic impacts due to the pandemic. It would be difficult to estimate the true impact that the economic downturn has had, or will have on the employment trends in the City of Ashland at this time. However, it is easy to surmise that there is a delicate balance to an economy based on health care, education, tourism, and recreation. Industries that rely on tourism and discretionary income often are the first to suffer in an economic downturn. Within the City of Ashland, the hospitality industry, food service, retail trade, and entertainment top the list of industries in which a majority of area residents are employed.

### **Housing Profile**

The City of Ashland has a total of 10,705<sup>3</sup> housing units. There are approximately 9,816 occupied housing units in Ashland, 54% of the occupied housing units are owner occupied and 46% are renter occupied. Approximately 75% of housing units are single family and 25% of housing units are multi-family units (2 or more units). 54% of the City's housing stock was built prior to 1979. According to 2018 American Community Survey data the median home value of owner occupied units in Ashland was \$428,100. The median rent was \$1,003.

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<sup>3</sup> 2018 ACS 5 year estimates.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	6,754	63.1%
1-unit, attached structure	936	8.7%
2 units	372	3.5%
3 or 4 units	825	7.7%
5-9 units	527	4.9%
10-19 units	369	3.4%
20 or more units	598	5.6%
Mobile Home	225	2.1%
Boat, RV, Van, etc.	99	0.9%
<b>Total</b>	<b>10,705</b>	<b>100%</b>

Data Source: 2018-ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
<b>Total</b>	<b>5,260</b>	<b>54.1%</b>	<b>4,459</b>	<b>45.9%</b>

Data Source: 2018 ACS

**Cost Burden:** According to CHAS Data there are 3,835 households below 80% of Area Median Income in Ashland. CHAS data also identified that there are 2,228 renter households and 906 owner households that experience cost burden.

The populations/household types which are most effected by housing cost burden and housing problems are those households with the lowest incomes, which often includes peoples with fixed or limited incomes such as seniors and peoples with disabilities and/or peoples experiencing mental illness, and large families with children. Extremely Low-Income households experience cost burden at greater levels than other income groups. Renter households also experience greater cost burden than ownership households.

African American households with low incomes disproportionately experience housing cost burden, with those households with the lowest incomes, 30% of the Area Median Income or below, experiencing the greatest levels of cost burden, nearly 15% greater than the jurisdiction as a whole. Asian households earning between 30%-50% of the Area Median Income also experience disproportionate housing cost burden, though just under the 10% threshold to be considered disproportionate, it is clear that Asian households in this income category, experience much greater cost burden than any other group in that income category except African American households.

These problems are not shared disproportionately with any racial or ethnic minority group, except Native American/Alaska Natives who disproportionately experience housing cost burden. Similarly, single family households and “other” households appear to be most affected by cost burden and housing problems, with those households with the lowest incomes experiencing the most cost burden and housing problems.

**Percentage of Housing Problems by Area Median Income** 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Housing Problems	0%-30% Has one or more of four housing problems	30%-50% Has one or more of four housing problems	50%-80% Has one or more of four housing problems	80%-100% Has one or more of four housing problems
Jurisdiction as a whole	1,090	920	1,040	345
White	910	835	950	305
Black / African American	30	15	25	0
Asian	0	20	30	20
American Indian, Alaska Native	0	0	10	0
Pacific Islander	0	0	0	0
Hispanic	75	25	30	4

Units In Structure	2000 Estimate	2000 %	2010 Estimate	2010 %	2018 Estimate	2018 %
<b>Total Housing Units</b>	9,071	100%	10,230	100%	10,705	10.705
<b>1-Unit, detached</b>	5,375	59.3%	6,503	63.6%	6,754	63.1%
<b>1-Unit, attached</b>	544	6.0%	853	8.3%	936	8.7%
<b>2 Units</b>	458	5.0%	526	5.1%	372	3.5%
<b>3-4 Units</b>	641	7.1%	530	5.2%	825	7.7%
<b>5-9 Units</b>	609	6.7%	513	5.0%	527	4.9%
<b>10-19 Units</b>	380	4.2%	405	7.3%	369	3.4%
<b>20 or More Units</b>	821	9.1%	746	7.3%	598	5.6%
<b>Mobile Home</b>	225	2.5%	154	1.5%	225	2.1%

*Housing Needs*

Affordable housing refers to a household’s ability to find housing within their financial means. The standard measure of affordability as defined by the U.S. Department of Housing and Urban Development (HUD) is when the cost of rent and utilities (gross rent) is less than 30% of household income. When gross rent levels exceed 30% of income, particularly by a large percentage, it places a significant burden on household finances. Householders who pay more than 30% of their income toward housing costs are called “cost burdened”. Householders who pay more than 50% of their income toward housing costs are called “severely cost burdened”. When households are housing “cost burdened” their ability to pay for the other necessities of life are compromised.

As the data in the tables demonstrate, the greatest housing need in Ashland is for housing affordable to both renters and owners. Census and HUD Comprehensive Housing Affordability Strategy (CHAS) data as well as data collected by Oregon Housing and Community Services demonstrate that housing cost burden (paying more than 30% of income for housing costs) and severe housing cost burden (paying more than 50%) are the City’s most frequent and significant housing problems. Although households in all income ranges experience housing cost burden, the problem becomes increasingly more severe when looking at households with very low and extremely low incomes. Households with incomes at the lowest levels, less than 30% AMI, who are housing choice voucher recipients have a difficult time finding rental housing in Ashland that rents for a price that is within the limits of the program in relation to their income.

Data also show that Ashland has relatively few housing units (less than 25%) which would be considered substandard or having severe housing problems such as lack of plumbing and kitchen facilities or who experiencing overcrowding. Similarly, relatively few housing units within Ashland are considered unsafe or may have the potential to contain lead based paint.

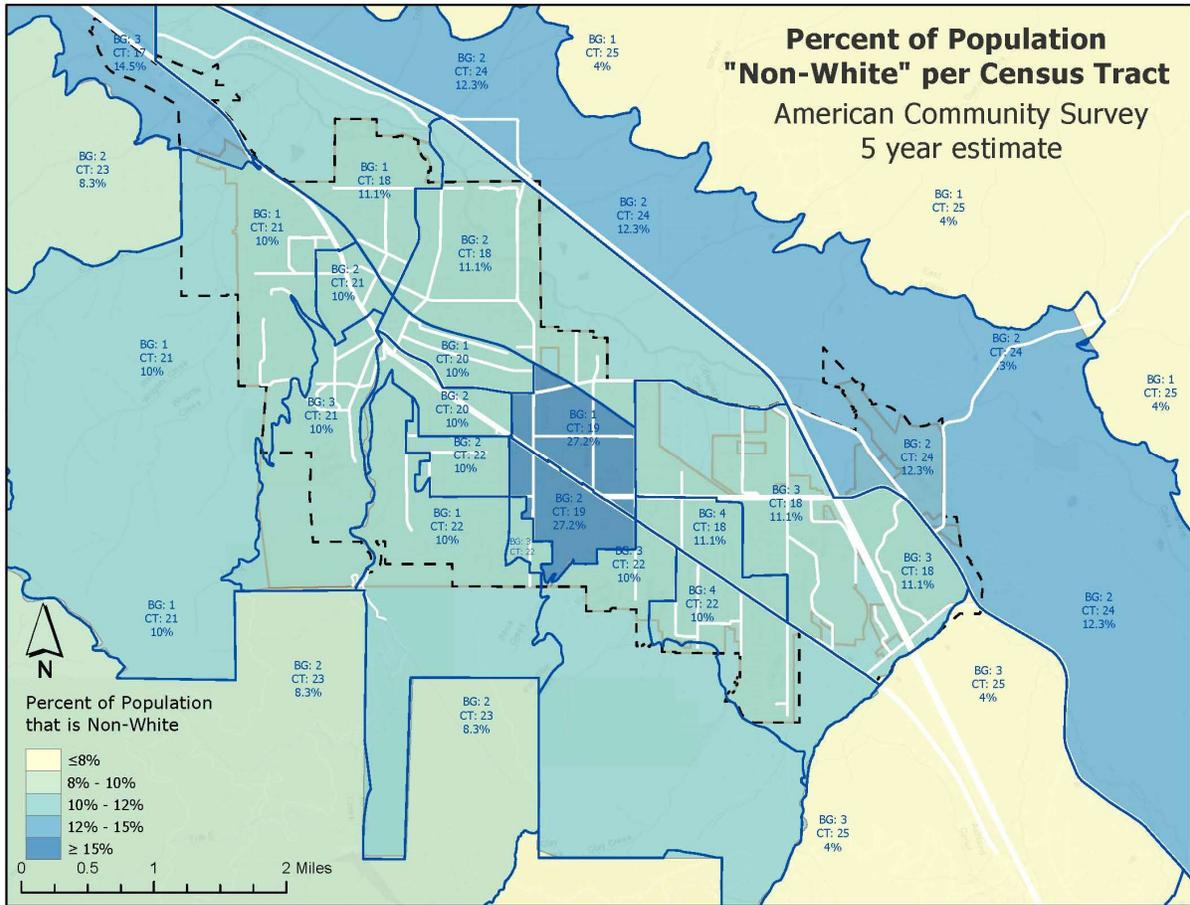
*Homeless Needs*

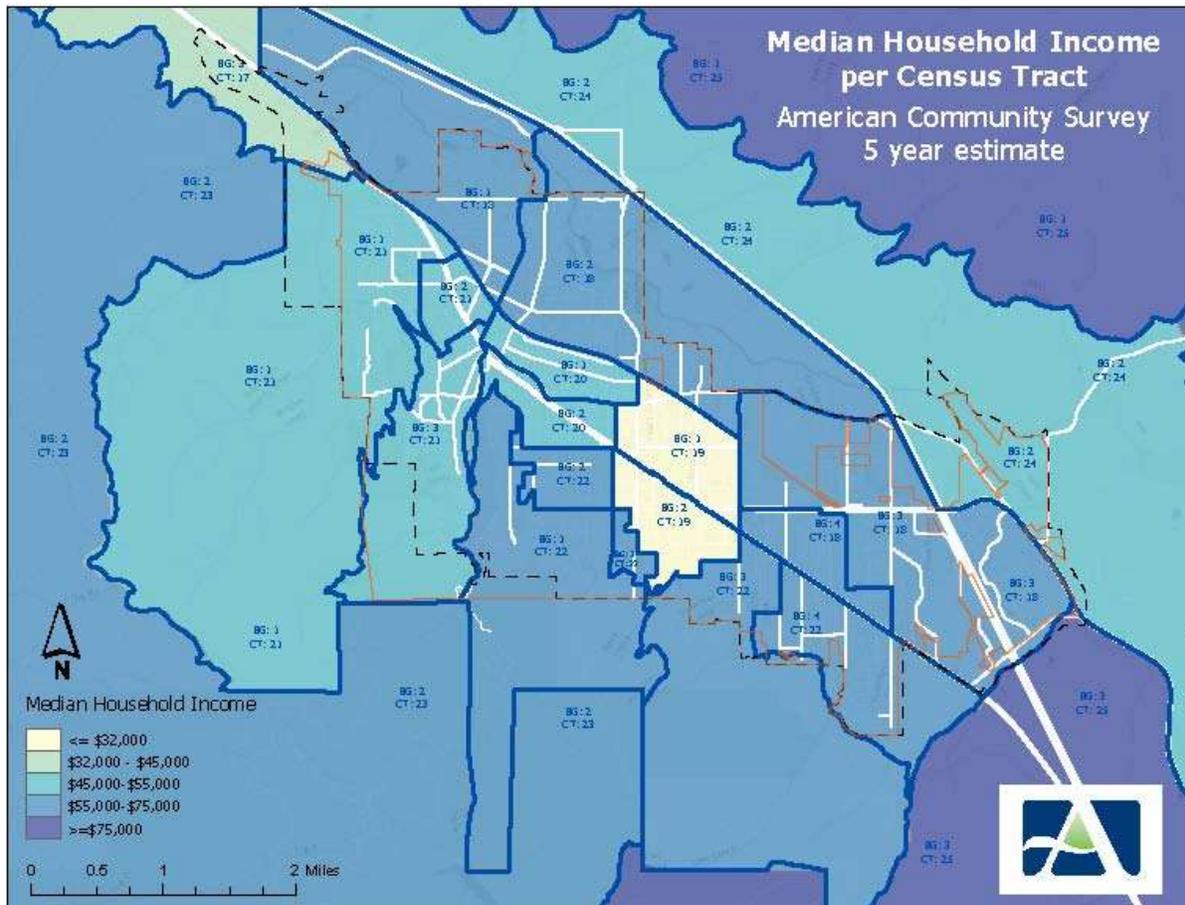
According to data gathered by the Jackson County Continuum of Care during the annual point-in-time homeless count there were a total of 732 homeless persons in Jackson County on January 22, 2018. Of that total, 62 were counted in Ashland alone. Issues identified by the point in time count, citizens and providers of services to homeless populations include; a need for low-cost rental housing, treatment for mental illness, and/or drug and alcohol addiction (dual diagnosis) as well as barrier removal, life skills and employment skills training. These issues are especially prevalent in Ashland; as a smaller rural community Ashland has many housing market constraints, (which are expounded upon elsewhere in this document) that contributes to a lack of rental housing affordable to populations with the lowest incomes, as well as a general lack of services, which tend to be located in Medford, a neighboring City nineteen miles to the North of Ashland, with three and a half times the population of Ashland.

<b>PIT Demographic</b>	<b>2018</b>	<b>Percentage</b>	<b>2019</b>	<b>Percentage</b>
<b>Total number of Surveys</b>	<b>62</b>		<b>77</b>	
<b>Disabilities</b>	21	34%	23	30%
Has no disabling condition	37	60%	15	19%
Has one or more disabling conditions.	12	19%	6	8%
Has three or more disabling conditions.				
<b>Ethnicity</b>			2	3%
Hispanic	6	10%		
<b>Race</b>				
White	44	71%	27	35%
American Indian or Native Alaskan	6	10%	0	
Black	1	2%	1	1%
Multiple Races	2	3%	0	

Asian	0		4	5%
Native Hawaiian or Pacific Islander	0		1	1%
Refused to state or unknown	9		5	6%







**Evaluation of Jurisdictions Current Fair Housing Legal Status** *(this narrative of this section is reproduced almost entirely from the 2008 AI, but with updated information and data)*

In 1968, Congress enacted the Fair Housing Act of 1968 (FHA). This law guaranteed the right to equal opportunity in all housing transactions regardless of race, color, religion, or national origin. Additionally, penalties were added for violation of this law and the Department of Housing and Urban Development was identified as the agency charged with oversight for the enforcement of the FHA. In 1974, the law was amended to make discrimination based on gender a violation of the law. And, in 1988, people with disabilities and families with children were also identified as protected classes under the FHA. In addition, penalties for violations were increased; particularly in the case of parties found to have repeatedly violated the laws. The FHA and the subsequent amendments are now cumulatively referred to as the Fair Housing Act, or the Fair Housing Amendments Act (FHAA).

Oregon has added Marital Status, Source of Income, Sexual Orientation including Gender Identity, and Domestic Violence Victims as statewide protected classes in housing transactions. Some jurisdictions in Oregon, including Ashland, have identified additional protected classes.

Ashland added age and domestic partnership as protected classes in relation to Fair Housing discrimination. Several avenues of redress exist in the event that an individual feels they have been subjected to violations of their civil rights in a housing transaction. Only one option for enforcement may be exercised for an alleged violation. However, all options also allow for on-going consultation with an attorney or an advocate during the enforcement process.

### **Fair housing complaints overview**

#### *Department of Housing and Urban Development (HUD)*

Anyone who believes they have been a victim of illegal discrimination, based on their membership in one of the federally protected classes, during a housing related transaction may file a complaint with HUD. These complaints may be filed on-line, over the phone, and by mail. All complaints must be filed within one year of the most recent event of discrimination. For more information about filing a complaint with HUD see:

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/online-complaint](https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint)

When a complaint is filed by a Charging Party (CP), HUD will contact the Respondent (the party who is alleged to have committed the discriminatory action) to formally notify them of the complaint and request a response and an explanation of their actions. An investigation ensues once the response is received. Investigations may include, but are not limited to, witness interviews; visits to the site of the alleged discriminatory action; canvassing the property for further evidence; records requests, etc. Throughout the investigatory process attempts will be made by HUD personnel to formulate a conciliation agreement between the parties. HUD's role in these investigations is as a neutral finder of fact in regard to the allegation.

After investigating the complaint, a finding of "reasonable cause" or "no reasonable cause" to believe that discrimination has occurred will be made by the investigator. If a reasonable cause finding is made, the CP may elect to file a case in district court or to have their case heard before an administrative law judge (ALJ). HUD attorneys will litigate on behalf of the complainant in these cases. Awards for violations of the fair housing laws may result in compensatory damages, civil penalties of up to \$100,000, and attorney fees for the prevailing party.

#### *Department of Justice (DOJ)*

The DOJ may file a lawsuit on behalf of a Charging Party in a housing transaction when there is believed to have been a pattern and practice of discrimination rather than an isolated incident of discrimination. These are typically situations which have existed over a long period of time, and/or have affected a large number of people. Generally, in pattern and practice cases it is understood that the defendant has a policy of discriminating against particular protected classes. Additionally, alleged pattern and practice violations of the Equal Credit Opportunity Act, or Title II of the Civil Rights Act of 1964 (relating to discrimination in public accommodations), are complaints which may be filed with the Department of Justice. A final

category of civil rights violations, related to property transactions/use, enforced by the DOJ are allegations of adoption or enforcement of land use regulations, by a local government, that discriminate against religious assemblies and institutions or which unjustifiably burden religious exercise. Complaints may be filed over the phone, via email or ordinary mail, or in person in a regional Dept. of Justice office. DOJ complaints must be filed within one year of the most recent event of discrimination. As with HUD, the DOJ's role is that of a neutral finder of fact.

For more information about the Department of Justice enforcement of Fair Housing Act laws, visit the Department of Justice Fair Housing Division at <https://www.justice.gov/crt/housing-and-civil-enforcement-section>

### *Bureau of Labor and Industries*

The State of Oregon Bureau of Labor and Industries (BOLI) is charged with the enforcement of state laws prohibiting discrimination in the areas of employment, credit and insurance transactions, places of public resort; accommodations; or amusement, and in real property transactions. Under the Fair Housing Assistance Program (FHAP) the Bureau also has a contractual relationship with HUD which grants the BOLI "substantial equivalency" to conduct neutral investigation and enforcement of the federal housing discrimination laws on behalf of HUD. The geographical boundaries of this authority cover the entire state of Oregon.

Because of the FHAP contract, the BOLI complaint resolution process mirrors the HUD format. In addition to enforcing laws regarding the federally protected classes, BOLI also enforces laws against discrimination on the state protected classes of marital status, source of income, and sexual orientation. In Oregon an exemption from the familial status, gender, and sexual orientation protections is allowed for the renting of a room in a single-family house which the owner occupies as his/her primary residence, and in which there is some shared space.

The Bureau of Labor and Industries reports two instances of Fair Housing violation complaints originating from the City of Ashland since 2008. One complaint, which was based on familial status was closed after the parties were able to negotiate a conciliation. The other complaint believed that they experienced discrimination due to a physical disability then were retaliated against. This case was closed due to lack of evidence.

For more information about BOLI and the complaint process, visit the Bureau of Labor and Industries Fair Housing Website at <https://www.oregon.gov/boli/civil-rights/Pages/fair-housing.aspx>

### *The Fair Housing Council of Oregon*

The Fair Housing Council of Oregon (FHCO) is a private non-profit agency that investigates allegations of housing discrimination in Oregon and S.W. Washington and conducts education and outreach activities regarding rights and obligations of all parties to a housing transaction under the fair housing laws within the same geographic areas.

After receiving a complaint of housing discrimination, the agency sends “testers” to pose as potential housing consumers. The test is constructed in a manner which most closely follows the fact pattern involved in the discrimination complaint and is an attempt to duplicate the situation that prompted the complaint. A protected class tester is sent to the housing provider and attempts to conduct the type of transaction which was involved in the original complaint. A comparison tester who differs from the original tester only in the membership in whatever protected class is being tested, follows soon after and also attempts to enter into the same type of housing transaction. Testers are not aware of the nature or circumstances of the original complaint, and are assigned to the test independently of one another. In this way, the most objective data is expected to be recorded. A testing coordinator compares the independent test reports and analyses the treatment received by each tester in order to determine if any disparate treatment has taken place. If it can be concluded that the protected class tester was treated in a discriminatory manner the test is considered to provide supporting evidence for the original complaint. When supporting evidence is found, the FHCO refers the complaint to either HUD, DOJ, BOLI, and/or a private attorney for further action.

The following tables show the FHCO calls and complaints through the Fair Housing Hotline for the City of Ashland from 2012-2018.

<b>Hotline Calls from Ashland 2012-2018</b>	<b>Total Number of clients this reporting term</b>	<b>Total number indicating Fair Housing Issue</b>	<b>Issue as a Percentage of all calls</b>
<b>Total</b>	89	13	15%
<b>Disability Related</b>	---	10	11%
<b>Familial Status Related</b>	---	4	4%
<b>Race/Color Related</b>	---	0	---
<b>National Origin Related</b>	---	0	---
<b>Age Related</b>	---	1	1%
<b>Section 8 Related</b>	---	0	---
<b>Source of Income</b>	---	5	6%
<b>Gender Identity/Sexual Orientation</b>	---	1	1%
<b>Gender</b>	---	1	1%
<b>General Fair Housing Question</b>	---	57	64%

## Fair Housing Call Intakes and Outcomes 2012-2018

Basis	Intakes	Alleged Act
Race/Color	0	NA
National Origin	0	NA
Religion	0	NA
Sex	1	Harassment
Familial	0	NA
Disability	5 1	-Reasonable Accommodation Discriminatory Statement
Age	1	Terms and Conditions
Sex. O./Gender I.	1	-Reasonable Accommodation
Income Source	4	Refusal to Rent/unknown/Eviction
Marital Status	0	NA
<b>TOTAL</b>	<b>13</b>	<b>NA</b>

The information contained in the tables are useful as a tool for evaluating trends in fair housing allegations and information related to verification of discriminatory actions through testing processes.

The City of Ashland has contracted with FHCO to undertake testing. The testing is expected to be completed in CDBG program year 2020. This document will be updated with the findings of those tests.

### *Home Mortgage Disclosure Act (HMDA) Data Analysis*

In 1975, in response to concerns about mortgage credit shortages in older, urban neighborhoods (particularly those with a predominantly minority population) Congress enacted the Home Mortgage Disclosure Act (HMDA). The lack of mortgage credit was considered at the time, to be a primary contributing factor to the decline of these urban neighborhoods. HMDA was intended to provide loan data to the public in order to ascertain:

- If financial institutions are serving the housing needs of their communities;
- Where public sector investments should be most strategically distributed so as to attract private investment;
- To identify potentially discriminatory lending patterns.

Depository and non-depository institutions meeting specific criteria are required to report data regarding their lending transaction and the clients and properties involved in these transactions. This transaction data includes.

- Applications for loans
- Loans approved
- Loan denied
- Loans approved and denied by use (i.e. home improvement, single family mortgage, multifamily mortgage, etc.)
- Loans approved and denied by type (i.e. conventional, government insured, etc.)
- Loans purchased or sold by the financial institution

Information reported about the clients and the properties include data related to such elements as race, gender, marital status, income level of the mortgagee and location of the dwelling by census tract, type of housing, value of housing, etc. The information required and the manner of reporting has been modified a number of times since the adoption of the HMDA. Collection information requirements continue to be modified to meet the changing needs of those who utilize this information for the purposes intended by Congress. Additionally, the criteria that determines which institutions must report continues to be modified as well. As of 2007, the following reporting criteria were used to determine if an institution would report HMDA data for the upcoming year:

Depository institutions (banks, savings associations, credit unions)

- Institutional assets which total more than \$36 million on the preceding December 31
- Institutions with a home or branch office in a metropolitan statistical area on the preceding December 31
- Institutions originating at least one home purchase loan or refinancing a home purchase loan secured by first lien on a 1-4 family dwelling in the preceding year
- Institutions which are federally insured/regulated or if the mortgage loan was insured/guaranteed/supplemented by a federal agency, or if the loan was intended for sale to the Federal National Mortgage Association (FNMA) or Federal Home Loan Mortgage Corporation (FHLMC)

Non-depository institutions (for-profit mortgage lending institutions- other than banks, savings associations, and credit unions)

Institutions that are for-profit lenders

Institutions with home purchase loan originations equal to or exceeding 10% of the institution's total loan originations, as measured in dollars, or equaling \$25 million or more, during the preceding year

Institutions that either (a) have a home or branch office in a metropolitan statistical area, or (b) receive applications for, originate, or purchase five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA/MD in the preceding calendar year

Institutions with assets (when combined with any parent corporation) exceeding \$10 million, or originating 100 or more home purchase loans (including refinancing of home purchase loans) in the preceding year

HMDA data is filed with the regulatory agency given oversight for the particular type of financial institution performing the reporting. These agencies include the Comptroller of the Currency, the Federal Reserve Board, the Federal Deposit Insurance Corporation, the office of Thrift supervision, or the National Credit Union Association. The Federal Financial Institutions Examination Council (FFIEC) is directed by the Act to compile annual aggregate lending data by census tract. The reports are grouped according to location, age of housing stock, income level and racial and other demographic categories. These aggregate reports are then filed with the respective metropolitan statistical areas (MSA) about which the data pertains. Typically, this data is available in the libraries or planning agencies for the MSA. It is also available on line at [www.ffiec.gov](http://www.ffiec.gov). HMDA data was used in the AI to evaluate the results of the lending practices of institutions doing business in Ashland.

### HMDA Data-2017

Census Tract	Total # of Loans Originated	Lender/Loan Type		Loan Purpose (purchase/refi/home improvement)			Income Data		Race/Ethnicity Data			
		Gov't Financed (FHA,VA, FNMAE, FNMAC)	Conventional	P	Refi	HI	Median Family Income (CT)	Average Applicant Income	% Minority Pop (CT)	# of Minority loans	His/La	Data not Provided
17	111	25	86	57	49	5	\$53,600	\$76,446	17.9%	7	1	15
18	156	8	148	90	61	5	\$53,600	\$101,487	11.2%	6	2	18
19	24	2	22	8	15	1	\$53,600	\$110,292	21.2%	0	0	3
20	20	0	20	13	6	1	\$53,600	\$118,000	8.5%	0	0	1
21	45	2	43	18	24	3	\$53,600	\$162,533	13.4%	1	0	4
22	104	9	95	55	43	6	\$53,600	\$127,558	7.7%	0	1	17
23	38	1	37	17	18	3	\$53,600	\$139,895	9.4%	1	0	3
24	39	6	33	17	18	4	\$53,600	\$83,102	19.5%	0	1	6

### Reasons for any trends or patterns

The general reasons for the patterns of discrimination that are pervasive throughout the United States, and Ashland as well, are institutional and complex. These patterns, as one Fair Housing

advocate has described, are “risen in the dough and baked in”. The analogy, shows how deeply rooted racism and discrimination are in every aspect of the American society, that although outright racism and discrimination may not be as rampant today as it was 100 years ago, it still lingers in the long term impacts of housing policies, community investments, and in the accumulation of wealth by the privileged group. These long ago decisions continue to haunt the present, hanging around, sometimes latent and unexplored, and often not wanted. To change the future, vigilance and circumspection are needed, along with a willingness to confront deeply held ideological beliefs and even some more common statements or actions which indirectly, subtly, or unintentionally perpetuate discrimination against marginalized groups. Willing examination of the traditional thoughts and beliefs is necessary to expose and eliminate bias in the darkest and most uncomfortable corners of our communities. The trends and patterns that we have seen in our policies, our institutions, and in our fellow community members didn’t happen overnight. But are the result of generations of teaching and acceptance of shared biases. These biases certainly appear in housing transactions, both overtly and unconsciously, and have long lasting impacts on those who experience housing discrimination as a result.

In Ashland, discrimination appears to primarily impact peoples who experience a physical or mental disability, those whose source of income may be non-traditional or may be related to public benefits. In some instances, the impact appears to be more institutional and historic, such as a lack of diversity in the general population and concentrations of minority populations in low income census block groups. Similarly, reduced rates of mortgage applications and lending in low income areas of minority concentrations points to issues of systemic poverty, and a lack of potentially a lack of opportunity. Housing affordability has been an issue in Ashland for several years and is believed to contribute to the lack of diversity within the City. As affordable housing is more readily available elsewhere in the valley, the lack of upward economic mobility for many minority populations is certainly a contributing factor to the low percentage of all minority populations in Ashland. Similarly, in looking at the Home Mortgage Disclosure Act (HMDA) data, the average income of those applying for and receiving loans in Ashland is typically twice the median income for the County. This points to issues of income inequality and high housing costs, as lower and median income household are either unable to secure housing commensurate with their household income, unable to obtain loans to purchase housing, or facing inequitable competition for limited housing stock from investors with significant financial resources. Lastly, none of the census tracts shows lending to minority populations which is equivalent to the proportion of those minority populations per tract.

### **Discussions of other fair housing concerns or problems**

#### *2020-2024 Consolidated Plan questionnaire*

An online questionnaire was made available on the City of Ashland website which included - questions regarding fair housing from January 28, 2020 through March 5, 2020. Over 134 respondents participated in the questionnaire. The community questionnaire identified a

general lack of knowledge or understanding of Fair Housing law as an issue, with 49.6% of respondents ranking fair housing education as a high or critical need.

The results and comments gathered by the questionnaire show that Fair Housing laws are not widely known about or understood by the general population. This may be a root cause of many of the fair housing complaints that take place in the City of Ashland, as private market small landlords may not realize that fair housing laws exist and apply to their businesses. They may also be inadvertently violating fair housing laws in their rental transactions. Similarly, tenants may not be aware of the rights and protections that they have under fair housing law, and therefore may not be addressing or reporting instances of discrimination or fair housing violations.

Fair housing advocacy was also identified as a high or critical need by over 50% of the respondents. The general lack of knowledge and understanding of basic Fair Housing Laws and the process for gaining compliance will be addressed in the public sector goals and actions steps toward the objective of providing basic fair housing education to the community. The actions steps will include broad-based information and education campaign.

#### *Community/Stakeholder Interviews*

The process for updating the AI included the collection of additional data through direct outreach to community members and groups. Interviews with members of the housing industry, service agencies and advocacy groups helped inform the analysis of impediments to fair housing. A review of information gathered from citizen and stakeholder interviews substantiates much of what is identified within the data and analysis presented in the AI report. The lack of affordable, available, and accessible rental and ownership housing is seen as the greatest impediment to housing choice in Ashland. This includes a deficit of housing that is accessible to peoples with disabilities, and affordable to low-income households, seniors on fixed incomes, and young families with children.

Community members and stakeholders specifically identified a need for affordable housing across a continuum of housing, from emergency shelter to permanent supportive housing, which could address the needs of high barrier households such as chronically homeless households, peoples with mental illness and peoples with disabilities. Respondents to the interviews also expressed the need for housing with supportive services to serve these populations noting that these populations experience the most discrimination by the private market and are unable to advocate for themselves, and often become homeless. Some respondents felt that the City needed to promote the development of various housing types, such as workforce housing, group homes, housing for special needs populations, and specifically housing for people with mental illness.

The interview respondents also described individual cases of racial discrimination, including instances of increased rental amounts upon learning of a potential renter's ethnicity. Discrimination against people who spoke English as a second language, as well as barriers to

accessing resources that provide housing assistance and for reporting discrimination for minority populations, were also identified by respondents as barriers to obtaining housing within Ashland. Specific barriers included a lack of bilingual informational resources as well as a lack of workers and advocates in community organizations who could serve bilingual populations.

Lastly, many respondents cited the need for more affordable housing for families with children. Respondents cited issues of overcrowding for large families with children. A lack of multi-family housing options for large families with children, and the high cost of private market housing for large families with children, were cited as reasons for overcrowding. Many respondents felt that families with children were leaving Ashland due to affordability and a lack of housing options to relocate to less expensive communities elsewhere in the valley. These same issues were identified as contributing to the lack of diversity in Ashland.

### **Identification of Impediments to Fair Housing Choice**

The HUD Fair Housing Planning Guide defines impediments to fair housing choice as:

- 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.

Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability, and familial status may constitute such impediments.

Impediments to fair housing choice include actions or omissions in the State or Entitlement jurisdictions 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. (because these classes come from a federal guidebook, they do not include additional state and local protected classes).

## **Public Sector**

### ***Zoning and Site Selection***

The City of Ashland has conducted a substantial amount of research about Ashland's housing market and housing needs within the City. Since 2008 the City of Ashland has undertaken several efforts to review and revise City land use policies and community development documents to remove barriers to the development of needed housing types, as well as to maintain accurate data and resources to inform decision makers in the development process. Since 2008 the City has updated the Buildable Lands Inventory twice (in 2011 and most recently in 2019), the City updated the Housing Needs Analysis in 2012, and is in the initial phases of updating that document again through a grant provided by the State of Oregon Department of Land Conservation and Development. The updated Housing Needs Analysis is expected to be completed by December 2021. In June of 2019 the City also adopted an update of the Housing Element of the Comprehensive Plan.

Ashland is one of the communities that adopted the Regional Housing Strategy, which was developed through a multi-year process and resulted in a document that looked at the development and employment patterns of each individual jurisdiction in the context of the valley as a whole. As a part of this process the City received a grant to work with a consultant, EcoNorthwest, to undertake a review of the City's policies and land use code to identify barriers to the development of affordable housing types, which included the development of multi-family housing, rental housing and manufactured home parks. The overarching goal of the Regional Housing Strategy project was to acknowledge the interconnected nature communities within the Rogue Valley to encourage housing development that addresses the needs of diverse populations throughout the region. One key aspect of achieving this goal is to ensure the development of adequate supplies of multi-family zoned land which is commensurate with identified need.

Over the last decade, Ashland has adopted numerous policies to address the City's housing needs, including encouraging more affordable single family housing types through adoption of a cottage housing ordinance to promote small units on small lots, removing barriers for manufactured housing through elimination of design standards, allowing accessory residential units as a permitted use in all single-family and multi-family residential zones. Ashland also developed a zoning overlay for the Ashland Transit Triangle area to promote the development of residential units in commercial and employment zones at higher densities than previously allowed in proximity to transit.

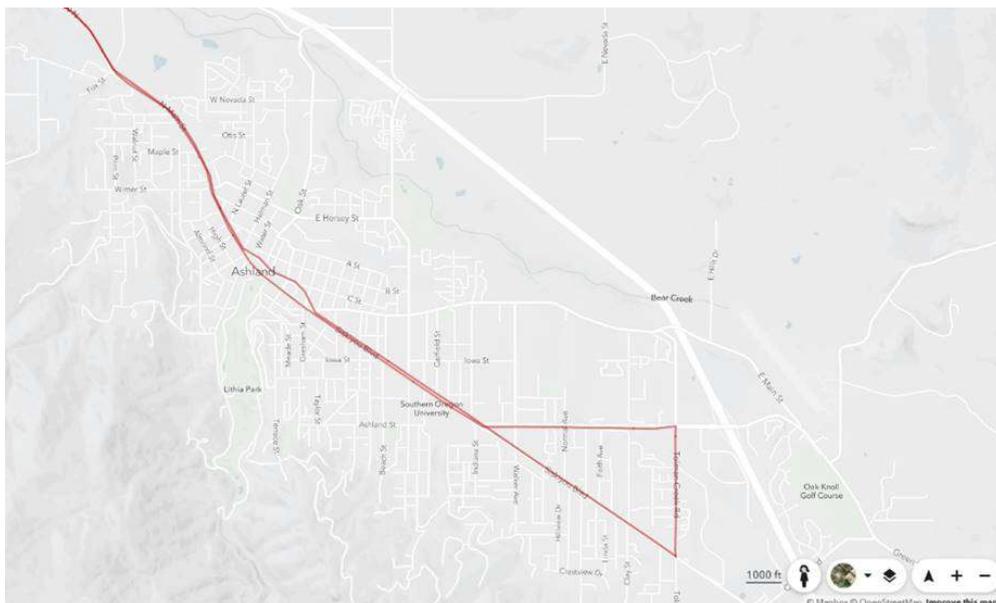
### ***Municipal and Other Services, Employment-Housing-Transportation Linkage***

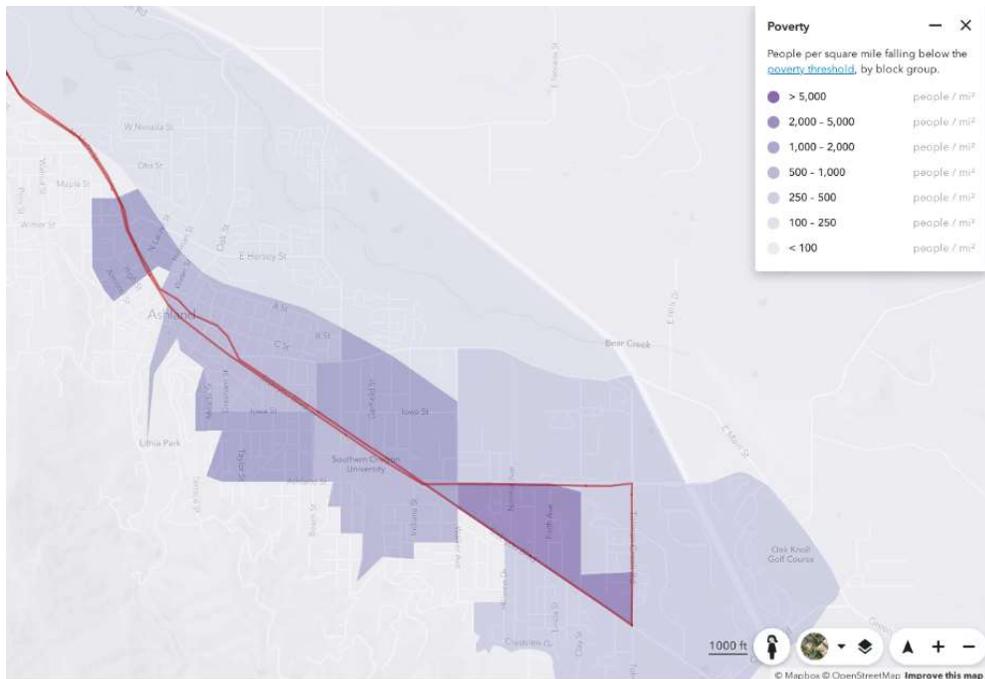
Access to public transportation services are a vital resource to low-income and special needs populations, especially where housing and employment opportunities are as regionally interdependent as they are in the Rogue Valley. Ashland is at the Southernmost end of the public transportation route. Through the years the City has been able to support the

expansion of services (both in area and in frequency of bus service) based on funding availability and relative high ridership within the valley. In times of economic contraction, reductions in the City's support and Federally and State funded transportation programs have led to the to decrease services. These decreases can have a huge impact on vulnerable populations who have traditionally relied on public transportation to access necessary resources, including employment, food, and medical care.

Ashland and the rest of the communities in the Rogue Valley are served by the Rogue Valley Transportation District (RVTD). RVTD operates a fleet of 40 buses. Every bus in the fleet is accessible to people with disabilities and is equipped with a bicycle rack. RVTD's service area covers an approximate 300-miles, which includes a fixed-route system and paratransit service, and serves the residents of seven communities including Ashland.

The Rogue Valley Transportation District provides several specialized transportation programs providing affordable and reliable transportation options to older adults, individuals with disabilities and low-income individuals. Valley Lift is a shared-ride, origin-to-destination, wheelchair-accessible transportation service for persons whose disabilities prevent them from using a Rogue Valley Transportation District (RVTD) lift-equipped, fixed-route bus. RVTD's Valley Lift program picks up riders from their origin and delivers them to their destination. Service is provided within three-quarters of a mile from an RVTD fixed route bus line and operates the same days and times as RVTD's fixed route bus service. RVTD also offers a program called TransLink, which provides Non-Emergent Medical Transportation. The maps below show the bus routes in Ashland in relation to areas of poverty.





The availability of convenient parking has traditionally been an area of strong concern for Ashland residents. Both as a tourist destination and due to the high number of workers who commute to and from work inside and outside of Ashland, parking availability can be limited during peak times within the downtown area and in proximity to the university. As can be seen in the table on travel time to work on page 14, over 50% of workers 16 years old and older in Ashland travel 15 minutes or more to work. The vast majority of workers in Ashland commute alone in a car.

<b>Workers 16 years and over</b>	<b>9,678</b>
<b>MEANS OF TRANSPORTATION TO WORK</b>	
Car, truck, or van	71.4%
Drove alone	64.2%
Carpooled	7.1%
In 2-person carpool	5.7%
In 3-person carpool	1.2%
In 4-or-more person carpool	0.3%
Workers per car, truck, or van	1.06
Public transportation (excluding taxicab)	1.0%
Walked	10.1%
Bicycle	4.7%
Taxicab, motorcycle, or other means	0.5%
Worked at home	12.4%

Source: 2018 American Community Survey 5-Year Estimates

### ***PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders***

Renters in Ashland often struggle to find rental housing, as vacancy rates are very low (1-2% according to the Southern Oregon Rental Owner's Association) and rental units that are available are often beyond the ability of household to afford. The Housing Choice Voucher program is designed to address the disparity between the cost of rental housing and a household's ability to pay.

The Housing Choice Voucher Program provides "tenant-based" rental assistance, so a tenant can move from one unit of at least minimum housing quality to another. It also allows individuals to apply their monthly voucher towards the purchase of a home. Section 8 also authorizes a variety of "project-based" rental assistance programs, under which the owner reserves some or all of the units in a building for low-income tenants, in return for a federal government guarantee to make up the difference between the tenant's contribution and the rent in the owner's contract with the government. A tenant who leaves a subsidized project will lose access to the project-based subsidy.

The Department of Housing and Urban Development (HUD) and the Department of Veterans Affairs (VA) have created a program called Veterans Affairs Supportive Housing (VASH), or HUD-VASH, which distributes vouchers every year to eligible homeless and otherwise vulnerable veterans. This program was created to pair HUD-funded vouchers with VA-funded services such as health care, counseling, and case management.

The Housing Authority of Jackson County (HAJC) is the Public Housing Authority for all of Jackson County, including the City of Ashland. HAJC administers the Housing Choice Voucher program, the project based voucher program, and coordinates with the VA to administer the VASH program. HAJC owns and manages 38 rental housing complexes, two of which are located in Ashland. Individuals can submit an application for the housing choice voucher at any time. Applicants are placed on the waitlist in order of application date. The waitlist is approximately 3-4 years long. Once an applicant's name comes to the top of the list they are notified through the postal service. Applicants are then income qualified for eligibility and attend an orientation. Once an applicant receives a voucher they are given 90 days to find a unit that meets housing quality standards and meets the payment standard for the household size and income.

### ***Sale of Subsidized Housing and Possible Displacement***

There are several subsidized housing properties within the City of Ashland. When a subsidized unit is sold, the residents who occupy the unit at the time of sale are provided with a housing choice voucher. While this helps to continue to provide that individual household with the means of obtaining and maintaining affordable housing, it does have the potential to displace those households to other communities. This is especially true in Ashland where rental units are not as prevalent as they are in neighboring communities, and housing costs for both rentals and ownership tend to be higher than elsewhere in the valley.

## Properties with Project-based Subsidies

Property Name	Property Type	Number of Units	Number of Assisted Units
Ashland Garden	Family	40	20
Ashley Senior	Senior and Disabled	62	41
Stratford	Family	51	50
Donald E. Lewis	Senior and Disabled	40	40
Star Thistle	Disabled	12	12
<b>Total</b>		<b>205</b>	<b>163</b>

### ***Property Tax Policies***

The City of Ashland administers a small housing program, which consists of units that are deed restricted to rent or sell below market rate for a period of time. The County agrees to tax these deed restricted units in accordance with the price set by the City's program. Similarly, the County does not tax non-profit entities such as the Housing Authority of Jackson County. These tax policies serve to promote the development of regulated affordable housing units while also assisting in maintaining affordability over time.

### ***Planning and Zoning Boards/Building Codes (Accessibility)***

The City of Ashland has diligently pursued policies that reduce barriers to building and maintaining affordable housing of various types. As mentioned previously Ashland had a third party audit Ashland's development code in 2018 and has begun the process of implementing several of the suggested changes. The City continues to look for innovative ways to increase the supply of affordable and needed housing types.

### ***Accessibility***

Rogue Valley Council of Governments has created a certification program for universal design in newly constructed housing. Both the City of Ashland's Consolidated Plan for the use of CDBG funds and the Housing Element of the Comprehensive Plan identify the inclusion of universal design in housing development as a priority. Lastly, the City has partnered with Ashland Fire and Rescue, and the non-profit organization Rebuilding Together, to complete fall prevention and aging in place repairs on existing housing occupied by low income households, seniors, and peoples with disabilities.

## **Private Sector**

### ***Lending Policies and Practices***

Under the Home Mortgage Disclosure Act (HMDA), financial institutions report data regarding lending transactions and the clients and properties involved in the transactions. The table on page 29 provided the number and type of home loans generated in each census tract in 2018. The table shows that a smaller percentage of loans was generated in the census tracts with the

highest minority concentrations and which also contain the City's highest concentration of low income census block groups. These census tracts also have a high concentration of rental units. However, the lack of lending in these tracts may be due to escalating home costs throughout the City, which make it difficult for even middle income families to move from rental housing to ownership housing.

While some lending policies and practices may continue to be a barrier to home ownership for moderate and fixed income households, the housing costs in Ashland may also be a major deterrent to homeownership for lower income and minority households. Ashland's home sale prices are higher than in other cities in the Rogue Valley. At the beginning of 2018, the median home sales prices for existing housing in Ashland was \$410,000, an increase of \$85,500 or 25% from 2013. Ashland's prices for existing housing were \$142,000 or 50% higher than the median home costs for housing in urban areas.<sup>4</sup>

Housing costs have increased faster than incomes in Ashland over the last decade. The median home value in Ashland increased from 5.8 times the median household income in 2000 to 7.7 times median household income according to the 2011-2015 American Community Survey Estimates. One measure of housing affordability is whether a household is cost burdened. HUD defines a household as cost burdened if the household pays more than 30% of its gross income on housing costs, such as rent or mortgage, utilities, and housing insurance and property taxes. 46% of households in Ashland experience cost burdened, with 32% of homeowners experiencing cost burden and 62% of renters experiencing cost burden.

### ***Public and Private Sector***

#### *Fair Housing Enforcement*

Formal complaints related to housing discrimination in the State of Oregon can be filed through multiple avenues including the Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity. Many of the complaints in the City of Ashland go through the Fair Housing Council of Oregon, which is a non-profit fair housing advocacy group. Complaints can also be processed through the U.S. Department of Justice through the Oregon Bureau of Labor and Industries, and through private litigation.

Between 2012 and 2018 the Fair Housing Council of Oregon received 89 calls to the Fair Housing Hotline from residents of the City of Ashland.

- 10 callers believed they had experienced discrimination based on a physical or mental disability.
- 4 callers believed they had experienced discrimination based on their familial status.
- 1 caller believed that he/she/they had experienced discrimination based on their age.
- 5 callers believe they had experienced discrimination based on their source of income.

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<sup>4</sup> Data source: Rogue Valley Realtors

- 1 caller believed that he/she/they had experienced discrimination based on their gender.
- 1 caller believed that he/she/they had experienced discrimination based on their gender identity or sexual orientation.
- 57 callers had general fair housing questions.

The City of Ashland also provides some funding to the Center for Non-profit Legal Services (CNPLS) to assist that organization in addressing landlord tenant concerns including issues of fair housing discrimination. The CNPLS reports having received 37 housing cases for Ashland from 2015 to the present. Five of the cases concerned Fair Housing, or approximately 14.5%

### *Informational Programs*

The Fair Housing Council of Oregon (FHCO) promotes equal access to housing by providing education, outreach, technical assistance, and enforcement opportunities related to fair housing. FHCO's mission is to provide education and outreach services explaining fair housing laws, as well as enforcement and investigations following complaints they receive. FHCO provides brochures explaining fair housing laws. FHCO provide guidance to individuals who believe they have experienced or who are currently experiencing impediments to fair housing choice.

The City of Ashland contracts annually with FHCO to provide one or more targeted trainings in Ashland, or to Ashland populations, each year. The City of Ashland is a small entitlement jurisdiction with limited resources and often the City coordinates with regional partners around fair housing trainings and events. The most recent training the FHCO provided was targeted to homeless shelters that provide 30 or more days of continuous shelter. Traditionally shelters that offer services for less than 30 days are not subject to Fair Housing laws. But recently many of the area shelters and non-profit service providers have opted to follow a housing continuum model which allows for longer stays. Many of these organization were not familiar with fair housing laws and how they apply to long term shelter programs.

The Center for Non-Profit Legal Services also offers fair housing education. The CNPLS provided a training to the Ashland Housing and Human Services Commission in recent years and has served on panels that address housing issues for Community outreach events hosted by the Housing and Human Services Commission.

### *Visitability in Housing*

All of the regulated affordable housing complexes that have been built since 2010 (66 units in total) have included both ADA units and ADA visitable units. Furthermore, the Rogue Valley Council of Governments has created a certification program for universal design in newly constructed unit. Lastly, the City has partnered with Ashland Fire and Rescue, and the non-

profit organization Rebuilding Together, to complete fall prevention and aging in place repairs on existing housing occupied by low income households, seniors, and peoples with disabilities.

### **Conclusions and Recommendations**

Census Data has shown that there are concentrations of minority and low income households in two census tracts within the City. These concentrations may be due to several factors, however, the City should strive to promote diversity through the development of a variety of housing types and price points throughout the City. The City can promote this through innovation in land use policies, and through support with grant funding and incentives.

Feedback from the community has shown that there is limited community awareness about fair housing protections and resources. This lack of awareness could mean that discrimination and violations of the fair housing act will go unreported by victims and will not be practiced by landlords and property owners. The City can work to promote community awareness of fair housing rights and responsibilities under the law by undertaking an education and information campaign. The City of Ashland should continue to coordinate with the Fair Housing Council of Oregon, the Community Alliance of Tenants, and the Center for non-profit legal service to provide educational trainings.

There is overwhelming data to show there is a lack of affordable housing in Ashland. The opinions and perceptions stated by respondents to the stakeholder interviews is supported by the data within this analysis. The City should continue to work toward finding innovative ways to promote and support the development of more affordable housing types throughout the City. Specifically, affordable rental housing and housing that is accessible to peoples with disabilities and/or allows for aging in place.

Community feedback has shown a critical need for the City to work toward reducing instances of discrimination in housing transactions to specific populations including peoples with disabilities, families with children, and people with non-traditional income sources. The City should prioritize fair housing education and training with landlords, property managers, and citizens to ensure that the fair housing laws are widely known and understood, and that the rights of tenants are upheld. The City should also work to strengthen partnerships and support of fair housing advocacy groups such as the Fair Housing Council of Oregon, the Center for Non-Profit Legal Services, and Community Alliance of Tenants.

Research has shown that minority populations have limited availability and/or accessibility to mainstream resources which are available to all populations, and to resources that are specific targeted to minority populations. In an effort to increase the availability and accessibility of resources for low-income and minority populations, the City should partner with community organizations and other funding organizations to build the capacity of agencies and organizations that serve minority populations. These include affordable housing, homeownership and lending or credit access programs. The City should also promote community education regarding issues of equality, diversity and inclusion (EDI), through

ongoing education and training. The City should devote resources to providing this education within the City departments, to elected and appointed officials, with community partners and to the Ashland community in general.

Our shared history of institutional racism helps to provide context for the housing discrimination people continue to experience to this day, but it is much more than history that perpetuates discrimination. By examining deficiencies in affordable housing, deficits in multifamily development, inequitable lending practices, and both subtle and overt discrimination against minorities, peoples with physical and mental disabilities, and many other protected classes seeking housing, we can use the Analysis of Impediments to begin to elucidate how privilege in Ashland has re-enforced structural systems that are at their core unjust. The continuation of such oppression by the dominant group, to maintain such privilege, is an injustice that one requisite HUD document will not solve. However, the achievement is not always in the solution, but sometimes in the undertaking of the task. The Analysis of Impediments to Fair Housing provides a context through which a community can view the intersection of housing, poverty, and community development, through a social justice lens. But more importantly the AI provides a framework for action, which seeks to dismantle historic systems of injustice and promote equality and inclusivity for the whole community.

# Appendix A-Analysis of Impediments to Fair Housing Interviews

## Fair Housing Analysis of Impediments Interview Questions

1. Are you aware of anyone who had been denied housing or treated differently in housing because of their protected class?
  - a. Why?
  - b. What happened?
  - c. How long ago?
  - d. What action did they take to enforce their rights?
2. What do you see as the primary barriers to housing in the Ashland Community? (discrimination, not enough affordable housing, inadequate housing stock, etc.)
3. Is there adequate housing available in Ashland for people with disabilities?
  - a. Families with children?
4. Were you aware of Fair Housing and Protected Classes before completing this questionnaire?
5. What other trends do you see in housing?
6. Is there anything else you would like to share with policy makers regarding housing and discrimination in the Ashland area?

## Individual and Organizations providing input.

Don Bruland	All Care Community Advisory Committee
Elizabeth Hallet	Peace House/ Uncle Food Diner
Connie Saldana	Senior and Disability Services
Dolores Nims	Interfaith Social Justice Coalition
Deb Bales	community member
Virginia Camberos	Unite Oregon
Rich Rohde	Southern Oregon Housing for All
Michael Stout	Stout Law LLC
Carol Voison	former city council member
Phil Johncock	community member
Leigh Madsen	community member
Dee Ann Everson	United Way of Jackson County
Brenda Doggett	Housing Authority of Jackson County
Erika Bucio	Unite Oregon
Cass Sinclair	Options For Helping Residents of Ashland
Eileen Dunn	Community member
Diane Weyrich	Community member

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<sup>i</sup> [https://oregonencyclopedia.org/articles/exclusion\\_laws/#.XupbEmhKjIU](https://oregonencyclopedia.org/articles/exclusion_laws/#.XupbEmhKjIU)

<sup>ii</sup> [https://oregonencyclopedia.org/articles/exclusion\\_laws/#.XupbEmhKjIU](https://oregonencyclopedia.org/articles/exclusion_laws/#.XupbEmhKjIU)

<sup>iii</sup> [https://oregonencyclopedia.org/articles/bracero\\_program/#.XupfO2hKjIU](https://oregonencyclopedia.org/articles/bracero_program/#.XupfO2hKjIU)

<sup>iv</sup> [https://oregonencyclopedia.org/articles/ku\\_klux\\_klan/#.XupaZGhKjIU](https://oregonencyclopedia.org/articles/ku_klux_klan/#.XupaZGhKjIU)

<sup>v</sup> [https://oregonencyclopedia.org/articles/ku\\_klux\\_klan/#.XupaZGhKjIU](https://oregonencyclopedia.org/articles/ku_klux_klan/#.XupaZGhKjIU)

<sup>vi</sup> <https://ashlandtidings.com/archive/a-dark-stain-in-a-white-history>