



**CITY OF
ASHLAND**

**ACTION PLAN: ONE YEAR USE OF FUNDS
Program Year 2008
(July 1, 2008 – June 30, 2009)**

Prepared for:
The U.S. Department of Housing and Urban Development

By:
The City of Ashland
Department of Community Development
Planning Division
Ashland, Oregon

Mission Statement

The following mission statement is taken from the City of Ashland's current Strategic Plan.

HOUSING

The City has a responsibility to ensure that proper amounts of land are set aside to accommodate the various housing needs in the City, and that its land development ordinances are broad enough to allow for variation in housing type and density.

ECONOMY

The City seeks to provide opportunities for a variety of economic activities in the City, while continuing to reaffirm the economic goals of Ashland citizens. Economic development in Ashland should serve the purpose of maintaining and improving the local quality of life.

SOCIAL AND HUMAN SERVICES

To ensure that all people in Ashland live in a safe, strong, and caring community, the City seeks to enhance the quality of life and promote self-reliance, growth and development of people. To these ends, the City will strive to provide resources and services to meet basic human needs.

Strategic Plan

The City of Ashland anticipates an annual allocation of **\$204,831** in Community Development Block Grant funds for Program Year 2008 (July 1, 2008-June 30-2009) by the Department of Housing and Urban Development (HUD). Additionally in the coming program year the City will utilize **\$192,657** in prior year carry over funds that were not expended as originally expected. Following the recommendation of the Housing Commission, the City Council awarded \$10,000 to the Fair Housing Council of Oregon (FHCO) of the competitive 2008 CDBG award in support of Fair Housing education, outreach and enforcement. The remainder of funds is to be applied to administration of the program and an activity that will provide low-moderate income housing in keeping with the priority goals set forth in the 2005-2009 Consolidated Plan.

This document, the CDBG Action Plan for Program Year 2008, describes the project(s) that the City will undertake and the manner in which the project(s) are consistent with the priorities of the Five-Year Consolidated Plan.

Within this document is a table summarizing the projects to be funded by CDBG dollars in Program Year 2008 (page 4).

The Five-Year Consolidated Plan is a planning document required by the U.S. Department of Housing and Development (HUD) for the receipt of the City's Community Development Block Grant (CDBG) funding. The purpose of the Consolidated Plan is to outline a strategy the City will follow in using CDBG funding to achieve the goal of the CDBG program, *"to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons."* In 2004-2005 the City of Ashland completed an update of the 5-year Consolidated Plan and the 2005-2009 Consolidated Plan was approved in May of 2005. The award of \$10,000 the 2008 CDBG allocation to the FHCO, and the intention to apply the remainder of the annual allocation and past carryover to support the development of affordable housing meets the priority needs identified within the current Consolidated Plan.

The Community Development Block Grant program allows for numerous activities as eligible uses of the Federal funding. Ashland's local Consolidated Plan focuses the available funds to activities that address the highest priority need identified, affordable housing. However, CDBG can be used to fund a variety of activities that benefit low-moderate income families and individuals. One of these eligible uses includes Fair housing counseling, outreach and enforcement and it is such an activity that was identified in the FHCO proposal and award.

Other common applications include:

- Acquisition of real property
- Relocation and demolition
- Rehabilitation of residential and non-residential structures
- Construction of public facilities
- Development of neighborhood centers
- Public Services
- Activities related to energy conservation
- Job Creation activities

Additionally, Federal regulations permit up to 15% of the yearly CDBG allocation to be directed to public services. Such eligible public services include health care services, substance abuse services, fair-housing counseling, architectural services, homeless prevention, and many others. The City of Ashland identified such public services in the 2005-2009 Consolidated plan and re-instituted the 15% allocation potential to support such activities. In 2008 the City of Ashland will direct approximately 5% (\$10,000) of the 2008 CDBG allocation (\$204,831) to an activity that affirmatively furthers fair housing through an award to the Fair Housing Council of Oregon, in keeping with *Goal 9* of the City's Consolidated Plan.

Un-requested CDBG Funds

For the second consecutive year the City of Ashland did not receive responses to the Request for Proposals issued for affordable housing projects. As a result the City of Ashland has accumulated \$346,522 in CDBG funds that have yet to be allocated to a specific activity.

At a public hearing on April 1, 2008 the Ashland City Council directed that the City aim to expend the entirety of these funds on a yet to be identified activity that addresses Ashland's Housing Goals (Goals 1,2, or 3), or provides for the installation of Public Facilities in direct support of an affordable housing project (Goal 7).

Specifically the Council motion as approved was as follows: *The remaining CDBG funds shall be made available to support eligible affordable housing related activities such as land acquisition, public facility improvements, and/or housing preservation in the 2008 Annual CDBG Action Plan.*

To expedite the expenditure of CDBG funds, the City will actively work with are housing providers to identify an eligible project that can expend the available funding the prior to July 1, 2009. Once a use is identified the City will process an amendment to this 2008 Action Plan to explicitly state the amount of funding to be awarded, which Consolidated Plan goal is supported, and what measurable outcomes will be provided by the specific project.

This expected modification of the annual CDBG Action Plan will include opportunities for public review of the proposed use, including public hearings before the Ashland Housing Commission and City Council.

The table provided below shows the projects awarded CDBG funds in Program Year 2008:

CDBG Funded Projects for Program Year 2008

Project ID	Recipient Organization	Activity Name	Location	CDBG Funds	Households or Persons Assisted Annually
2008-1 (Consolidated Plan Goal 14)	City of Ashland	CDBG Administration	city wide	\$40,966 (Additionally unexpended Administration funds in the amount of \$42,547 from FY2007-2008 will drawn once the entirety of the CDBG award (2008-3) is expended.) Combined 2 year total = \$83513	city wide
2008-2 (Consolidated Plan Goal 9)	Fair Housing Council of Oregon	Fair Housing Project	city wide	\$10,000	city wide benefit
2008-3 (Consolidated Plan Goal 1,2,3, or 7)	City of Ashland	To be Determined	To be Determined	\$346,522	Modification of this action plan will be presented once a specific project is identified
Unfinished CDBG Funded Projects from prior Program Years to be cancelled with funds reprogrammed per the awards above.					
1 (Goal 14)	City of Ashland	CDBG Administration	city wide	\$42,547	As the majority of CDBG funds were not expended in 2007 the City could not apply the 20% of available funding on administration. The funds are thus to be rolled forward to 2008 (2008-1) to cover the administration expenses from 2007 and will be drawn once the carryover funds are expended.
2007-2 (Goal 12)	Rogue Valley Community Development Corporation	Youthbuild Program	Economic Development Activity – multiple sites (Ashland and Medford) but primarily on-site construction at 795 Park Street.	\$31,190	ACTIVITY CANCELLED: RVCDC unable to recruit adequate number of Ashland residents to qualify the project.
2007-3 (Goal 1)	City of Ashland	Land Acquisition	To be Determined	\$152,801	PROJECT UNIDENTIFIED< FUNDS TO BE REPROGRAMMED UNDER GOAL 2008-3 above.

Housing Goals

Goal 1: To increase the supply of affordable rental housing for extremely low-, low- and moderate-income families. Where possible, give funding priority to those projects that will provide benefits to residents with the lowest incomes.

Action to meet priority and time-line:

The City of Ashland received no applications for CDBG funds in 2008 to address the goal of increasing the supply of affordable housing. This lack of applications had occurred in 2007 as well and at that time the Ashland Housing Commission and City Council directed that the un-awarded CDBG funds in 2007 program year (\$152,801) would be applied to land acquisition by the City to develop affordable housing.

Given the City is again facing a year in which no non profit housing providers have come forward to utilize the CDBG funds the City recognizes it must take a more active role in identifying a project whereby this goal and objective can be achieved. Land acquisition to provide affordable rental or ownership housing (Goals 1 and 2) remains the most straight forward application of CDBG funds, however to ensure the CDBG funds are expended in a timely manner the City would also entertain projects in support of affordable housing including rehabilitation and preservation to retain or secure affordable housing (Goal 3), as well as the installation of public facility improvements including roads, curbs, gutters, public utilities, and sidewalks adjacent to proposed affordable housing projects (Goal 7) in the 2008 program year.

It is estimated based on past subsidy amounts that \$346,522 can assist the City and selected housing provider in developing 8 affordable housing units should the funds be utilized for raw land acquisition. This amount includes a reprogramming of the \$152,801 reserved for a similar project in the 2007 CDBG Action Plan. That specific activity (2007-3) noted in the 2007 CDBG Action Plan is to be considered eliminated by adoption of this 2008 Action Plan. This approval therefore constitutes a modification of the 2007 Action Plan, to reprogram unexpended funds from that program year.

It is anticipated that the CDBG funds will be provided as a grant to a qualified housing provider, or will be expended by the City directly in support of this goal during the program year. Upon identification of a project the City will amend the 2008 CDBG Action Plan to explicitly include the proposed activity.

Program Year 2008 Projected Number of Households to be Assisted: 8

Funding sources for this project include:

\$346,522 CDBG

City of Ashland General Funds amount to be determined

Funding Level: \$346,522

Target Date for Completion: Land Acquisition to be completed by July 1, 2009.

Accessory Residential Units

Action to meet priority and time-line: The City of Ashland allows small second units in the single-family residential zones) to increase the supply of affordable rental units. Many on the Accessory Units are created through the conversion of existing space within single family homes to provide small market rate rentals. In this ways these units provide both relatively affordable for single individuals, and simultaneously assist the homeowner-occupants in realizing additional rental income to offset the mortgage costs of the primary home. The market rate rents for the units created through conversion of existing spaces are typically affordable to small households earning less than 80%AMI although they remain unregulated in that regard.

The Conditional Use Permit Procedure was changed in 1990 to allow an accessory apartment or cottage (Accessory residential Unit – ARU within single family residential zones. This provided valuable affordable housing units without unreasonable impacts on the neighborhood. A total of 115 units have been made legal or been newly constructed since 1990. Four new Accessory Residential units were added between April 15, 2007 and April 15, 2008.

These four new Accessory residential units are as follows:

237 Almond St.:	separate structure
184 Meade St.:	separate structure converted
980 Starlite Ave.:	basement conversion
469 Jennifer St.:	basement conversion

The number of ARUs approved has each year has consistently decreased in the last three years illustrating a trend. It is important to note that there has also been a decrease in the total number of all housing units developed each year from a recent high of 128 units in 2005 to just 52 total units in the 2007 calendar year.

In prior years the number of new ARUs created annually was between 8 and 10 units dropping to just 4 ARUs in 2007. The number of ARU's developed remains at about 7.5% of the total number of housing units built in a given year, so although there has been a drop in actual number of units, the proportion has remained fairly constant.

Projected number of ARU to be approved in FY2008: Four

Funding sources for this project include: City of Ashland general funds utilized for staff support.

Probable Funding Level: N/A

Target Date for Completion: Ongoing

Goal 2: To increase the homeownership opportunities for extremely low-, low- and moderate-income households. Where possible, give funding priority to those projects that will provide benefits to residents with the lowest incomes.

Action to meet priority and time-line:

The development of affordable housing ownership opportunities for low and extremely low income households is a high priority for the City of Ashland. As mentioned under Goal 1 the City is in the process of selling City surplus property which is expected to generate approximately 1.2 million dollars to be applied to the goal of addressing Ashland's Housing needs. A portion of these proceeds has been applied toward the purchase of a small area (.32 acres) of a 2 acre property recently acquired by the Ashland Parks Department on upper Clay Street to be used as a neighborhood park. In February of 2008 the Rogue Valley Community Development Corporation, was selected by the City Council and Ashland Housing Commission to develop 5 affordable townhomes on the site through the USDA Self-help program. As the Land was acquired with City of Ashland General funds no CDBG have been used to assist this development. All five units are expected to benefit households earning less than 80%AMI and shall remain affordable in perpetuity through incorporation of a land trust.

Funding sources for this project include:

No CDBG funds are allocated to this project.

The City of Ashland's general fund has paid the entire cost of the land acquisition of \$125,000 , with construction costs to be assisted by USDA Self-Help, and construction loan financing.

A project Performa has not been developed to delineate all project costs and anticipated funding sources.

Projected Number Households to be Assisted:

5 households at less than 80%AMI

Probable Funding Level:

\$125,000 City of Ashland

Other costs and sources to be determined

Target Date for Completion:

Density Bonus and Deferred SDCs for Affordable Housing

Action to meet priority and time-line:

The City currently provides a density bonus to developers who construct affordable rental and ownership units to provide an incentive based strategy to encourage the additional units. The City also waives the system development charges, the Engineering Services fees, and the Community Development for affordable rental and single family homes targeted at households earning less than 80%AMI. The waived system development charges become a "sleeping second" mortgage and deed restrict the property to be affordable for a minimum of 30 years. At the conclusion of the period of affordability the obligation is considered satisfied without payment. The maximum rent limit for covered units is set by reference to the State of Oregon HOME program for households earning 60% of the Area Median Income. In the provision of for-purchase housing participants can earn up to 80% of area median income (AMI), although in some cases developers will target households at the 60% AMI level per land use regulatory incentives (zone change or annexation). In 2006 the Housing Commission and City Council completed significant revisions to the SDC deferral program restructuring the affordability targets, maximum rents, and maximum purchase prices as outlined above.

The program of System Development, Engineering, and Community Development Fee waivers is ongoing.

The 25% Density Bonus provision of affordable housing is ongoing.

Funding sources for this project include: The City of Ashland's general fund absorbs the entire cost of systems development charges (SDCs) for affordable housing, and forgoes the collection of Engineering Services and Community Development Fees for select projects. No CDBG funds are allocated toward this program.

Projected Number Households to be Assisted in FY 2008: 7 new households.

The seven units expected to benefit from the SDC and Engineering Service Fee waiver includes five units to be affordable to be built on property acquired by the City and to be provided to the Rogue Valley Community Development Corporation to complete a SelfHelp project during the coming program year. Additionally the Ashland Community Land Trust are undertaking a 2 unit development on Bridge Street in 2008 that will take advantage of the SDC and Fee waiver program.

Probable Funding Level: Approximately \$52,500 in waived System Development Charges, Engineering Services fees, and Community Development Fees – City General Fund (\$7500 per unit).

No CDBG funds will be applied to this project.

Target Date for Completion: Ongoing

Housing Commission

Action to meet priority and time-line: The Housing Commission was established in 1995 to monitor the accomplishments of the City's housing program, to make recommendations to the City Council on housing policy, and to serve as an advocate for affordable housing in the City's political process. The Housing Commission will also oversee specific affordable housing projects undertaken by the City in partnership with private groups.

The City of Ashland's 2005-2009 Consolidated Plan establishes the Housing Commission as a public review body to hold public hearings and provide recommendations to the City Council, for awarding CDBG funds. Further the 2005-2009 Consolidated Plan charges the Housing Commission with review and approval of the annual Action Plan for use of CDBG funds.

Funding sources for this project include: Federal CDBG and City of Ashland general funds utilized for staff support. *(see Goal 14 for a description of CDBG funds used for Staff support).*

Target Date for Completion: Ongoing

Technical Assistance

Action to meet priority and time-line: The City will provide technical assistance to nonprofit organizations whose mission includes providing affordable housing. This technical assistance will include educating agencies on Community Development Block Grant requirements, anti-discrimination and fair housing, relocation and displacement policies, and provide referral services to appropriate local, state, or federal agencies as needed. Further staff will provide agencies, or individuals, with information on the City's affordable housing program including deferred systems development charges and density bonuses. The City of Ashland will provide technical assistance through the Planning Division as requested and will support applications consistent with the Consolidated Plan.

Funding sources for this project include: Federal CDBG and City of Ashland general funds utilized for staff support. *(see Goal 14 for a description of CDBG funds used for Staff support).*

Target Date for Completion: Ongoing

Goal 3: To maintain the existing affordable housing supply. Where possible, give funding priority to those projects that will provide benefits to residents with the lowest incomes. Also, give funding priority to those programs which retain the units as affordable in perpetuity, or recapture the rehabilitation costs for further use in Ashland.

As noted in the section on Un-expended funds on Page 4, the City has aimed to provide a degree of flexibility to allow the identification of an eligible project during the 2008 program year as we did not receive any such proposals in response to the annual Request for Proposals. As stated previously, once identified, a modification of the 2008 CDBG Action Plan will be processed.

One potential use includes the application of CDBG funds to assist in the acquisition or rehabilitation of a 51 unit affordable housing project called the Stratford Apartments. These apartments were originally funded in part with assistance of USDA funding, and are subject to removal from the affordable housing requirements through re-payment of the remaining subsidy. The Housing Authority of Jackson County has made an offer on the apartments in order to secure them as affordable and may be requesting the \$346,522 in available Ashland CDBG funds to assist in the projects acquisition or in rehabilitation of the units once acquired. This would be an eligible use of CDBG funds and in keeping with the Council direction for use of these funds (pg 4). In the event the City and the HAJC identify this as an appropriate use of the available funds this 2008 Action will be modified accordingly.

Homeless Goals

Goal 4: Encourage the development of emergency and transitional housing for homeless families with children and/or individuals.

Action to meet priority and time-line

The City Council on April 3rd 2007 approved a resolution setting forth policies and conditions under which Ashland will provide emergency housing for homeless and other individuals during severe weather conditions. In the event of the need for an emergency shelter during extreme weather, the use of Pioneer Hall or other available city-owned buildings may be used. The Community Emergency Response Team (CERT – a division within the Ashland Fire Department) is activated during extreme weather condition, and with assistance from volunteers,

churches, nonprofit organizations, and other organizations a “no-frills” shelter is opened.

Ashland experiences “extreme weather” conditions primarily during the winter months where temperatures can drop below 20degrees, and exposure to the elements can be hazardous to persons without adequate shelter. The provision of such emergency housing in City buildings is a new activity for the City instituted in 2007 and is expected to be an ongoing policy.

During the month of January 2008 (typically our coldest month) the No Frills Emergency Shelter was opened 14 times when weather conditions warranted it, of which 12 days it was utilized by those in need of emergency shelter. With an average use of 7.4 people per use the shelter served 89 individuals over the course of January.

Funding sources for this project include: The City of Ashland's general fund absorbs the cost of maintaining the facilities and making them available to individuals in need of emergency housing during extreme weather conditions. Support in the form of CERT volunteers, and assistance from non-profit organizations also contributes to this endeavor.

The City does not plan to use CDBG funds made available for this activity during Program year 2008.

Target Date for Completion: Ongoing

Technical Assistance

Action to meet priority and time-line: The City will provide technical assistance to nonprofit organizations whose mission includes providing emergency housing, and support services for homeless prevention. Further the City remains an active and supportive member of the Jackson County Continuum of Care Consortium's Homeless Task Force.

Jackson County is coordinating the development of a 10 year plan to eliminate homelessness and the City of Ashland will work with the County, and the Continuum of Care Consortium's Homeless Task Force to implement that plan.

The City of Ashland will provide technical assistance through the Planning Division and the Housing Program Specialist position as requested and will support applications consistent with the Consolidated Plan

Funding sources for this project include: Federal CDBG and City of Ashland general funds utilized for general staff support. No specific CDBG award for technical assistance funds was made during program year 2008.

Target Date for Completion: Ongoing

Goal 5: Support services for homelessness prevention and transition.
Where possible, give funding priority to services that are part of a comprehensive approach that improves the living conditions of clients. Safety net services, or services that meet basic needs shall only be funded with CDBG dollars if it can be demonstrated that clients receiving those benefits are part of a program that will eventually help them obtain self-sufficiency.

Action to meet priority and time-line

The Interfaith Care Community of Ashland (ICCA) was awarded \$13,600 through the City's Social Service Grant process to provide client services to homeless individuals including those with mental illness and drug dependencies.

Funding sources for this project include:

The City of Ashland's general fund

The City does not plan to use CDBG funds made available for this activity during Program year 2008.

Special Populations Goals

Goal 6: To support housing and supportive services for people with special needs. People with special needs include the elderly, the frail elderly, persons with developmental disabilities, persons with physical disabilities, persons with severe mental illness, persons with alcohol or other drug dependencies and persons with HIV/AIDS or related illnesses.

The City will continue to support the development of housing and supportive services for individual with special needs. The City allocates over \$100,000 every other year in “Social Service Grants” out of the City’s General Fund. A total of \$119,000 has been tentatively awarded for the FY2008 and FY2009. In each year the full amount is awarded each year, thus a cumulative total of 238,000 was awarded to be expended as allocated to the recipients. These awards as recommended by the City Social Service Grant budget subcommittee were reviewed and approved by the full Budget Committee in June of 2007 as part of the City’s annual budget approval process. A number of these grant allocations (full table below) specifically address supportive services for people with special needs.

The Community Health Center was awarded \$32,000 each year to provide health care services to extremely low and low income residents with unmet medical needs.

The Interfaith Care Community of Ashland (ICCA) was awarded \$13,600 each year to provide client services to homeless individuals including those with mental illness and drug dependencies (see goal 5).

Community Works received \$32,206 each year to provide services including rape crisis counseling as well as temporary shelter for victims of domestic violence.

A two year grant of \$3000 annually was provided OnTrack Inc. to assist in the operating expenses for their drug abuse treatment programs and similarly a \$1030 bi-annual award was provided to Southern Oregon Drug Awareness in their efforts to reduce drug dependency.

Social Service Grant Applicants FY 2008-2010

Organization	Approved annual allocation for a two year period
Community Health Center	32,000
Southern Oregon Drug Awareness	1,030
Children's Dental Clinic	3,104
Planned Parenthood	2,060
Ontrack	3,000
Community Works-Dunn House	15,000
Community Works-Sexual Assault Victims Services	2,575
Community Works-Parent Education	1,442
Community Works-Helpline	7,210
Community Works-Street Outreach	5,979
Help Now!	1,100
WinterSpring Center for Living with Loss & Grief	1,000
Southern Oregon Child Study and Treatment Center	2,900
Center for Non Profit Legal Services	6000
Children's Advocacy Center	2,700
RV Manor- Foster Grandparent	1,200
RV Manor- Retired Senior Volunteer Program	1500
Mediation Works	2,200
Access Inc	5,500
Jackson County Sexual Assault Response Team	2350
Interfaith Care Community	13,600
Jackson County Court Appointed Special Advocates	2,500
Trinity Respite Care	1,700
Southern Oregon Adolescent Study and Treatment Center	1,350

Funding sources for this project include:

\$119,000 City of Ashland's general fund for FY 2008-2009.

The City does not plan to use CDBG funds made available for this activity during Program year 2008 .

Community Development Goals

Goal 7: *To provide safe and convenient access to alternative transportation routes in extremely low-, low- and moderate-income neighborhoods.*

The City has made a commitment to sidewalk improvements in moderate- and low-income neighborhoods and in past years had allocated ten percent of the total CDBG funding for sidewalk improvement and new construction. In an effort to utilize the limited CDBG funds more effectively to address Ashland's highest priority needs (provision of affordable housing), the use of CDBG to fund sidewalk improvements has been eliminated except in cases where the sidewalk is part of an affordable housing development.

As noted in the Council direction for use of CDBG funds in the 2008 Program Year (pg 4) the City has identified that application of currently available CDBG funds to assist in developing public facilities within the public right-of-way may (Streets, curb, gutter, sidewalk etc.), adjacent to an affordable housing project, is a use in which past carryover and currently allocated CDBG funds may be applied. To make such an allocation will trigger a modification of this Action Plan to denote precise amounts of expenditures as well as outline expected accomplishments.

Funding sources for this project include: Should CDBG funds made available for this activity during Program year 2008, this plan will be modified accordingly.

Goal 8: *To make city facilities easier and safer to use for people with disabilities.*

The City committed to providing accessibility improvements to City-owned buildings through an agreement with the Department of Justice (DOJ) to improve access to City facilities. The City has completed all improvements outlined in the Department of Justice Agreement to be compliant with the Americans with Disabilities Act and received an acknowledgement of compliance in FY 2006 from the DOJ, thereby ensuring those identified City facilities are accessible to people with disabilities.

As new facilities are designed and developed the City, or new standards for accessibility are established, Ashland will ensure that the accessibility needs of Ashland's residents are addressed.

Funding sources for this project include: No CDBG funds are currently allocated to this use, the City General Fund is the source for accessibility improvements to City facilities.

Other Goals

Fair Housing

Goal 9: To affirmatively further fair housing.

Action to meet priority and time-line: Fair Housing Council of Oregon

The Fair Housing Council of Oregon has been an invaluable partner to the City of Ashland in affirmatively furthering fair housing. During the coming fiscal year (2008) the City of Ashland has awarded FHCO \$10,000 in CDBG funds to support FHCO in its outreach, education, and enforcement activities. Specifically FHCO will complete two workshops in Ashland specifically targeted to groups impacted by the Fair Housing Act. Further FHCO will provide one attentional training for affordable housing providers to educate them regarding the rights and responsibilities afforded under the Act.

The proposal by FHCO also indicates they will continue to provide consultation for Ashland residents that may have experienced housing discrimination through their toll free hotline.

Lastly, as an administrative function of the CDBG program, the City is presently discussing with FHCO their undertaking the development of an Analysis of Impediments to Fair Housing for the City of Ashland (see next action pg18).

Funding sources for these projects include: City of Ashland general funds and CDBG funds (Planning and Administration allocation) will be utilized for staff support. However no specific CDBG allocation will be used for the proposed activities.

Action to meet priority and time-line: Fair Housing Analysis of Impediments

An Analysis of Impediments (AI) is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice.

Impediments to fair housing choice are defined as: *any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.*

The AI serves as the basis for fair housing planning and provide essential information city of Ashland as well as local housing providers, lenders, and housing advocates. The existing City of Ashland Analysis of Impediments (AI) has not been updated since 1996. The City will undertake an update to the AI through the use of Consultant services during the 2008 CDBG program Year

Complete update of the Analysis of Impediments (AI) to Fair Housing in the 2008 CDBG Program Year.

Funding sources for these projects include: CDBG funds (Planning and Administration allocation) will be utilized to contract with a consultant to complete an AI. Estimated cost \$10,000 in CDBG Planning and Administration costs.

Action to meet priority and time-line: **Legal Services**

The City of Ashland provided the Center for NonProfit Legal Services a general fund grant in the amount of \$6000 explicitly to provide legal assistance for low income Ashland households facing housing discrimination or harassment. Low-income Ashland households facing housing discrimination will be able to obtain legal services through the Center for NonProfit Legal Services that may not otherwise be in a position to pursue legal action.

The award to support the Center for NonProfit Legal Services extended across the two year cycle from July 1, 2007- June 30, 2009

Funding sources for these projects include: City of Ashland general funds support this activity. No CDBG funds will be used for this proposed activity.

Lead-Based Paint

Goal 10: Assure activities assisted by the City are conducted in compliance with state and federal laws that apply to lead-based paint hazards, and the information distributed about lead-based paint is in compliance with current state and federal laws.

Outside of Staff time, the City does not plan to use CDBG funds made available for this activity during FY 2008. The City will ensure that lead testing and clearance is completed on any federally funded project involving a structure built prior to 1979.

Goal 11: To reduce the number of people living in poverty in the City of Ashland.

Outside of Staff time, and the activities listed under Goals 1, 2, 5, 6 and 12, the City does not plan to use CDBG funds made available for a specific activity for Goal 11 during FY 2008.

Within the section on Anti Poverty Strategies is a synopsis of the strategies and activities undertaken by the City of Ashland to address poverty.

Goal 12: Promote and support activities in the community that improve or provide access to economic opportunities for extremely low- and low-income residents of Ashland.

Action to meet priority and time-line: **City of Ashland Living Wage**

During FY2001-2002 the City of Ashland enacted Living Wage Ordinance which requires that recipients of City of Ashland grants, or service contracts provide their employees, working on the City funded project, with a Living Wage (July 2007 minimum is \$12.43 per hour- to be increased by the Consumer Price Index annually). The Living wage ordinance has been in effect and will continue to provide the benefits of a higher wage scale for all people working to provide the City with services, or working on City funded projects.

Funding sources for this project include:

None

No CDBG Funds are used in support of this activity

Target Date for Completion: ongoing

Barriers to Affordable Housing

Goal 13: Remain aware of the barriers to affordable housing in Ashland, and where it is within the City's ability, take steps to overcome such barriers.

To increase understanding regarding affordable and particularly the rental housing market the City of Ashland completed a rental needs analysis in May of 2007. This effort included a phone survey with 500 households to determine what barriers to affordability the respondents perceived. Additionally the survey questions examined issues regarding length of tenancy, reasons for moving, minimum expectations for the housing units (yard, bedroom sizes, proximity to work etc.), income and lastly housing costs. With this information the City will have the data necessary to utilize the Oregon Housing Needs Model made available through the Oregon Department of Housing and Community Services. This forecasting model will assist Ashland in determining where likely barriers to affordability are to be experienced by our residents. With this information and other efforts to examine barriers to affordability the City will be in a stronger position to enact, or remove, regulations within the Cities control to promote affordable housing.

Developed in the later part of 2006-2007 program year the City Council recently approved a Tenant Rights ordinance that aims to minimize the adverse impacts upon renters displaced through the process of condominium conversions of existing apartments. Including provisions to compensate with an amount equal to three times the Fair Market Rent for displaced tenants that are not provided

with a years notice the City believes this will assist households in overcoming one barrier that is the cumulative first months rent, last months rent, and deposit typically required to obtain a new rental.

In further review of the impacts the loss of rental housing stock has on the community, through conversion of existing apartments into for purchase housing, the City passed land use amendments to ensure a measure of rental housing stock is retained through such conversions in 2007. These ne land use requirements address retention of existing rentals and the potential for affordable housing to be provided voluntarily through a conversion in exchange for relief from non-conforming land use requirements.

2008 Activities:

Beginning in 2007 the City Housing Commission and Planning Commission's were presented with a listing of regulatory barriers and potential incentives that could be addressed to promote the development of affordable housing. In 2008 the City Council, and both Commissions are to hold a joint meeting to review the listed barriers and incentives, and determine whether any should be further developed for implementation in the City of Ashland. This is a long range planning process and could potentially lead to ordinance modifications and or City initiated incentive programs.

Education and Outreach is a significant role of the Housing Commission and such activites often have the benefit of not just disseminating information, but collecting information as well. Such a dialogue within the City facilitates an awareness of the barriers to affordable housing and highlights mechanisms available to address such barriers. In the 2008 CDBG program year the Housing Commission will continue its ongoing efforts to produce television shows, handbooks, and other informational material to raise awareness and understanding.

The Housing Commission will continue to implement the actions outlined in the adopted Affordable Housing Action Plan.

<http://www.ashland.or.us/Page.asp?NavID=1350>

Specifically the development of a Housing Trust Fund, and identification of funding methods to support the Trust Fund is a primary goal of the City for the 2008 fiscal year..

The City of Ashland Housing Commission and Planning Commission have also initiated examination of the annexation ordinance to determine what modifications could be used to further promote the development and retention of affordable housing. Proposed revisions to the land use ordinance to meet this goal will be drafted in the coming program year and forwarded to the City Council for consideration and adoption.

Funding sources for this project include Administrative CDBG funds will be used in support of specific activities that address the development of affordable housing units funded in whole or in part with CDBG awards.

The City General Fund will provide funding for addressing the Council goals of establishing a Housing Trust Fund. Further the Land Use modifications that will be proposed to assist in the removal of barriers to affordable housing will be undertaken utilizing Staff funded through the City General Fund.

Goal 14: To provide institutional structure and intergovernmental cooperation.

Action to meet priority and time-line: City of Ashland Staff will continue to provide staff support to the City of Ashland Housing Commission (see Goal 2). The City of Ashland employs a Housing Program Specialist, which will help provide institutional structure as well as examine and implement opportunities for intergovernmental cooperation.

The City will also continue to be an active participant with the Southern Oregon Housing Resource Center to assist in regional coordination of their efforts. Ashland will continue to work with the Jackson County Housing Coalition, and the Jackson County Continuum of Care Homeless Task force to address affordable housing and homeless issues on a regional level.

Funding sources for this project include: \$42,547 in Federal CDBG funds was not expended in 2007 as no major project was complete allowing for the 20% of the yearly expenditure to be applied to Planning and Administrative costs. In the 2008 program year an additional \$40,966 has been directed toward Administration of the CDBG Program. Upon completion of a major project, expenditure of past carryover and the current award, and completion of an Analysis of Impediments (paragraph below) the City will expend both years funding on the administrative costs that have been incurred.

Administration of the CDBG program includes staff support of programs and projects that further the goals outlined in the Consolidated Plan, provision of technical assistance, and the monitoring of the activities of sub-recipients. Further, upon selection of a consultant for conducting an Analysis of Impediments as outlined under goal 9, approximately \$10,000 of the Planning and administration funds noted above will be used for this activity. City of Ashland general funds are also utilized to contribute toward CDBG program administration as well as staff support of non-profit organizations and intergovernmental cooperation.

Target Date for Completion: Ongoing

Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives and Citations	Projects (CDBG Funded)	Performance Indicators	Year	Expected Number	Actual Number
DH-1 Public Service Activity Availability/Accessibility of a Decent Housing						
DH1.1	<p>Public Service Activity funded to increase accessibility to housing through affirmatively furthering fair housing</p> <p>Citations 24CFR 570.201 (e) 24CFR 570.208(a)(2)(i)(A) 24CFR 570.206(c)</p> <p>Hud Matrix Code = 05C LMC</p>	<p>Fund Fair Housing Council of Oregon to provide fair housing services such as discrimination complaint investigation, fair housing testing, housing counseling, outreach and/or education to Ashland residents\.</p> <p>Housing discrimination and tenant/landlord dispute resolution provided to LMI households using CDBG.</p> <p>Fair Housing Council of Oregon Project. Two workshops and one training to be completed in FY2008.</p>	<p>Number receiving Training</p> <ul style="list-style-type: none"> • Improved public access to information about housing discrimination and fair housing rights and responsibilities • Number of educational opportunities provided to the Citizenry including seminars, television broadcasts and informational items within City publications sent as direct mail to all households in Ashland. 	2008	<p>50 individuals</p> <ul style="list-style-type: none"> • 2 Workshops • 1 Training 	<p>Number of people attending workshops, trainings, and those calling the FHCO hotline will be provided by FHCO</p>
DH-2 Affordability of Decent Housing						
DH-2.1	<p>Address the need for affordable housing by development of new ownership housing</p> <p>Citations 24CFR 570.201A 24CFR 570.208(a)(3)</p> <p>Hud Matrix Code = 01 LMH</p>	<p>Project scope to be determined in an amended Action Plan once property for acquisition is identified.</p>	<ul style="list-style-type: none"> • Number of new housing units affordable to, and occupied by, lower income households. 	2008	<p>8 Households</p>	

Outcome measures - In addition to the table above, included in this submission is Table '3C' (OMB 2506-0117) for each of the activities receiving CDBG funds for the 2007 program year and for those remaining open as indicated in the summary of specific annual objectives above. Within the 3C tables the City has indicated the Objective and Outcome categories and incorporated the identification of the CPD outcome statement as an Objective number.

Allocation priorities – The City of Ashland is a small entitlement community with limited resources to apply to CDBG funded activities. As the City of Ashland primarily uses CDBG funds to assist projects that seek to create or retain affordable housing. These priorities are noted as the Housing Goals 1-3 in the

City's 2005-2009 Consolidated Plan. In FY 2008 the City will also utilize available CDBG funding to address Goal 9 of the Consolidated plan through the funding of the Fair Housing Council of Oregon to assist the City in affirmatively furthering fair housing as a goal (Goal 9).

Fair Housing. To affirmatively further Fair Housing the following strategies were outlined in the Consolidated Plan

- 9.1 Establish a local means for citizens to get specific information about fair housing, and report fair housing violations. Review current fair housing violation process, improve as needed.
- 9.2 Develop and provide brochures and advertisements on how to file fair housing complaints.
- 9.3 Continue to support the activities of the Fair Housing Council of Oregon.

It is the City's expectation that the ongoing relationship with FHCO and support of educational and enforcement activities within the City, that our community will benefit substantially through a reduction in housing discrimination.

In 2005 the City of Ashland adopted the 2005-2009 Consolidated Plan and in doing so re-established a 15% allocation for social services per the CDBG eligible activities. Other than the \$10,000 request for funds from the Fair Housing Council of Oregon the City received no other requests for the social service funds.

Affordable Housing - The City of Ashland still intends to pursue the acquisition of property, or otherwise support affordable housing development or retention with the use of CDBG funds in 2008-2009 as indicated under Goal 1, 2, 3 or 7. Within Ashland the affordable housing projects funded are opportunistic based on market availability of property. The City aims to utilize CDBG funds to benefit the greatest number of households as opposed to a direct application of funds to a particular neighborhood as part of a revitalization strategy. With a limited number of applications received for CDBG funds the City has not had to further delineate a spending priority based on location as a selection criteria in evaluation of proposals. However, as land values are slightly lower in designated low-moderate income census block groups the City is often in the position of making awards to acquire property or rehabilitate housing in such neighborhoods. In 2008 the City will utilize unexpected carry over, and the current 2008 competitively available CDBG funds to assist a community development partner in purchasing a yet to be identified property to support a minimum of 8 low income housing units.

During the 2007 CDBG Program Year the City of Ashland expects a number of affordable housing projects to be completed. Through the activities of the Ashland Community Land Trust to construct two new units on Bridge Street.

RVDC completed 9 units of a two phase 15 unit development in 2006, and will complete the remaining 6 units in the 2008 program year. These six new units have broken ground and are underway through the construction phase.

In 2007 Ashland's land use requirement for a set aside of affordability in condo conversions, annexations, and zone changes will add additional affordable housing units to Ashland's Inventory. During 2007 through condominium conversions 8 new affordable housing units were added to Ashland's Affordable Housing Program, and an additional 10 were approved but as of yet have not completed the condiminimization process. In the 2007 program year 15 units (targeted to 80%AMI) were approved as part of an annexation proposal, Verde Village, for which RVDC has been identified as the affordable housing development partner.

As the private development market, and land availability is not within the City's control our established goal for the explicit use of the CDBG program funds (2008-3) remains the production of 8 new units.

Public housing – The City of Ashland does not own or operate any public housing within the City. Additionally, the Housing Authority of Jackson County which serves the Ashland area in this regard and has no proposed projects within our City limits for the 2008 CDBG program Year although they are working on the potential acquisition and rehabilitation of an existing 51 unit apartment complex to retain it as affordable to low income households. It is this potential project that constitutes one potential use of CDBG funds in the coming year (see Goal 3) .

Chronic homelessness -- In the 2006 Program year the City awarded ICC \$32,000 to provide staffing to assist homeless individuals obtain improved access to transitional housing. Due to the late hire of a Transitional Housing Specialist ICC was only able to expend \$23,333.40 of the award amount. The City also provides social service grants to ICC including an award of \$13,600 in both 2007 and 2008.

Jackson County currently does not have a 10year Plan to address homelessness but has been endeavoring over the last year to develop such a plan. A member of Ashland's City Council represents the City of Ashland in this Countywide effort and will work to craft a 10 year plan to end homelessness. Ashland will also continue to work with the Jackson County Continuum of Care Consortium to address the needs of the homeless on a regional scale.

Low/Mod Benefit – The City of Ashland uses 100% of our competitive CDBG grants to benefit extremely low, low- and moderate income households. In the 2008 program year all CDBG funded activities 100% of the intended beneficiaries are to be qualified as extremely-low or low-income.

Anti-Poverty

The activities listed below are completed or ongoing activities, whereas new activities to be undertaken during Fiscal Year 2008 are outlined as activities within the goals above.

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

The goals related to housing and support services are addressed in the Homeless Goals section.

In another effort to address poverty within Ashland, during 2001-2002 the City of Ashland passed a Living Wage Ordinance. This ordinance requires that employees of the City, or employers receiving financial assistance or business from the City in excess of approximately \$15,000 (adjusts annually) must pay a minimum of \$12.43 per hour (adjusted annually) to employees engaged in work related to the City project or service contract (see Goal 12).

The City of Ashland operates a variety of funding and other assistance programs which, together, strategically address the goals of reducing poverty and improving the self-sufficiency of low-income residents. The activities undertaken in conjunction with this anti-poverty strategy can be separated into two primary areas of effort: human services programs targeted at the continuum of care needs; and affordable housing programs. The City of Ashland has limited influence on many of the factors that affect opportunities for workers to earn a living wage. For instance, the city does not directly affect wages provided by employers not engaged in business with the City, nor does the City have influence over income assistance such as Social Security or Aid to Families with Dependent Children.

The City of Ashland provides funding to agencies that address the needs of low income and homeless residents through a Social Service Grant program. The goal of this program is to improve living conditions and self sufficiency for residents by meeting such basic needs as food, shelter, clothing, counseling and basic health care. The goal is carried out by

providing funds in excess of \$100,000 every year to various area agencies whose focus meets one or more of these targeted needs.

The Social Service Grant program is funded entirely with general fund dollars from the City of Ashland budget. The award process is coordinated through the United Way of Jackson County. Local agencies and organizations providing continuum of care activities in the Rogue Valley coordinate their applications through a Community Services Consortium. The coordination of services and related funding requests through the consortium attempts to insure that the broad range of needs is met without overlap or duplication of service (See Goals 4,5,&6). .

The second element of the City's anti-poverty strategy targets the development and retention of affordable housing. The City of Ashland has made a serious effort to address the issues of housing affordability.

An Affordable Housing Committee was formed in 1990 and reconvened in 1994 to search for ways to provide economical housing in Ashland. In 1995 a formal Housing Commission was formed. The Housing Commission has endeavored to create policies that will allow additional housing opportunities for low- and moderate- income Ashland households. The following programs/projects have been developed in an effort to create and retain affordable housing units in Ashland.

- **Ashland Community Land Trust** – The City of Ashland worked to assist in the establishment of the Ashland Community Land Trust (ACLT). The purpose of the land trust is to create and sustain long-term affordable housing in the city limits of Ashland for low- and moderate-income families. The land trust acquires and holds land, while the improvements are sold to the low-income residents. ACLT is a non-profit organization, and is directed by a board including representatives from social service agencies, the Ashland Housing Commission, participants in the trust, City Staff, local developers and local realtors.
- **Accessory Apartments** - The Conditional Use Permit Procedure was changed in 1990 to allow an accessory apartment or cottage within single family residential zones. This provided valuable affordable housing units without unreasonable impacts on the neighborhood. A total of 112 units have been made legal or been newly constructed since 1990, with four approved in FY2007.
- **Incentives for Affordable Housing** - Higher densities of residential development are allowed when affordable housing is guaranteed. All density bonuses (for energy efficiency, landscaping, etc.) were limited to 60%. For every percent of units that are affordable, an

equivalent percentage of density bonus shall be allowed. A maximum bonus of 35% is granted for providing affordable housing. In 1980, Ashland increased development densities in order to encourage the building of more affordable homes. What occurred, however, was that expensive homes were built on smaller lots. Modification of densities in single-family zones were reduced from that level back to the 5,000 to 10,000 square foot lot size and in multi-family zones to 13.5 or 20 dwelling units per acre. This rollback then retained the incentive based increase in density to provide affordable housing as noted above.

- **Deferred System Development Charges for Homes Constructed under the Affordable Housing Program** - This provision of the affordable housing program works in conjunction with the affordable housing density bonus. To increase the affordability of newly constructed homes or rentals the City waives the system development charges which can be between \$8,000 and \$11,000 for a three bedroom two-bath unit. Additionally other Community Development Fees, and Engineering Services fees are exempted for affordable housing. Based on the known number of anticipated affordable housing projects, through these programs the City is expected to provide \$52,500 in uncollected revenue in support of affordable housing in 2008-2009. Units within this program must be sold to households earning 80%AMI or rented to households earning 60%AMI. These units are required to remain affordable for 30 years.
- **Manufactured Housing** - Manufactured housing can involve significantly lower costs than conventional housing. Ashland adopted standards and overlay zone that complied with state law and permitted manufactured homes on individual lots in areas outside the historic district.

Monitoring

The City of Ashland will compare its performance in meeting its goals and objectives set forth in the 5 year Consolidated Plan annually to ensure the yearly Action Plans are developed to meet the intended goals. Specifically the development of housing that is affordable to low-moderate and extremely low income households will be quantified each year. Throughout the year each new unit that is developed, through grant assistance or to meet regulatory requirements, will be deed restricted to ensure a period of affordability (typically 30 years or greater). The development of both rental and owner occupied affordable housing will be compared to the targets established in the Consolidated Plan and subsequent years CDBG awards will be targeted to those types of housing that are not keeping pace with projections.

The City staff will complete an Annual Performance Evaluation Report which will quantify both housing and homeless accomplishments after the conclusion of each fiscal year. Housing accomplishments will be broken into the income and occupancy type categories identified in the 5-year Consolidated Plan.

The success of the Ashland Rental Assistance Program, SDC deferral program, and Accessory Residential Unit development, and Land Use requirements and incentives for affordable housing, will be examined and presented to the Ashland Housing Commission for evaluation. This information will inform potential modifications to existing or future programs to meet the goals outlined in the Consolidated Plan. The information contained in the Consolidated Annual Performance Evaluation Report (CAPER) will assist in informing the CDBG award selection process undertaken in February-March of the following year.

Subrecipient Monitoring

The City of Ashland, as the grantee for CDBG grants, will monitor the subrecipients on a quarterly basis. Staff will maintain a close working relationship with the CDBG subrecipients. One benefit of being a small entitlement community with a limited grant amount is that the City typically provides only one award per program year. This enables the City Staff to closely follow the progress of CDBG projects and maintain open communication with Subrecipients.

The City is committed to ensuring that CDBG funds are used as specified in State and Federal regulations through: public and City Council monitoring through public hearings; staff evaluation; annual evaluation of the priorities set forth in the Consolidated Plan; periodic site visits and program evaluations; financial monitoring, record keeping, and reporting requirements.

The City requires recipients of CDBG funds to provide a project timeline with benchmarks for completion which is incorporated into the Subrecipient

Agreement for use of CDBG funds. The City remains in regular contact with each subrecipient throughout the projects development to monitor their accomplishments, ensure they are meeting the projected benchmarks, and provide information on CDBG regulations.

For currently funded projects in development, at a minimum the City CDBG administration staff will meet with each subrecipient's designated representative to review their project's accomplishments and investigate any failures to meet anticipated benchmarks at quarterly intervals. If deemed necessary, the City of Ashland CDBG administrative staff will conduct a formal monitoring visit to evaluate the progress and risk associated with the CDBG funded projects. If at any point the City CDBG administration staff determines a project is failing to move forward the subrecipient will be required to complete a Corrective Action Plan.

In 2007 the City conducted monitoring visits to the Ashland Community Land Trust, the Rogue Valley Community Land Trust, and the Interfaith Care Community. In 2008 a risk analysis will again be completed and monitoring visits will be scheduled according to the CDBG funding at risk in open projects. Again given the limited number of recipients it is expected the City may be able to monitor all subrecipients with open projects during 2008 and review the financial management, asset maintenance, and over all management of the CDBG funded activities by the subrecipients as outlined below:

Financial management

The extent to which program participants account for and manage financial resources in accordance with approved financial management standards. Additionally this criteria relates to the amount of potential monetary exposure to the City, and the Department of Housing and Urban Development.

Analysis to include assessment of:

- Amount of current/total funding obligated and/or expended
- Audits and/or Investigations
- Staff experience with CDBG
- History of performance

Physical asset maintenance and operation

The extent to which HUD-funded physical assets are maintained and operated.

Analysis to include assessment of:

- History of Performance
- Condition of HUD funded physical assets
- Use of facilities or physical assets in conformance with CDBG regulations

Management

The extent which the program participant has the administrative capacity to carry out CDBG requirements.

Analysis to include assessment of:

- Experience level of Key staff particularly as it relates to CDBG funded activities
- Program History including performance indicators
- Reporting consistency

Satisfaction

Extent to which clients express satisfaction or dissatisfaction with the delivery of the program services.

Analysis to include assessment of:

- Types of program activities
- Complaints or compliments received

Services

Extent to which HUD program participants effectively and efficiently deliver services to the intended beneficiaries/clientele

Analysis to include assessment of:

- Types of program activities
- Accomplishments
- Timeliness
- Project development including timing benchmarks

Corrective Action Plan

If the activities funded with CDBG dollars are not being accomplished in a timely manner, as set forth in the subrecipient agreements the City of Ashland may issue a written notice requiring the submission of a corrective action plan that is subject to the approval of the City.

The City shall provide the subrecipient 14 days, or such time as City deems appropriate, to develop a corrective action plan that is acceptable to City for correcting the problem. At a minimum, the corrective action plan must include (1) a written performance measure to be implemented by the Subrecipient that corrects the specific area(s) of noncompliance and how performance measure will be established and executed by the Subrecipient's organization, including subcontractors; and (2) designates the person with authority within the Subrecipient's organization charged with the responsibility of accomplishing and monitoring compliance.

Acceptance of the Corrective Action Plan by the City will establish the curative period necessary to bring the project into compliance. If the Subrecipient has not submitted a corrective action plan that is acceptable to the City within the specified time frame or does not implement or complete the corrective action plan within the specified time frame, the City shall proceed with other enforcement remedies as outlined in the Subrecipient Agreement.

Public Participation

A Public hearing was held on March 27st, 2008 to solicit comments on the potential uses of the 2008 CDBG allocation. Additionally at that meeting the Ashland Housing Commission reviewed the application submitted for CDBG grant awards. After opening a hearing to solicit comments about how the City should apply the CDBG funds one comment was made from an audience member suggesting that the CDBG Action Plan allow for the use of CDBG funds in support of an emergency homeless shelter or other homeless activities. This testimony was considered by the Housing Commission and it was noted that the Action Plan does maintain explicit goals in support of those uses. The Housing Commission held a second hearing to review the proposals received on March 27th following the general Action Plan hearing. The Housing Commission forwarded an award recommendation to the City Council. The City Council held a public hearing on April 1st 2008, at which time no one testified during the public hearing and the Council selected the Fair Housing Council of Oregon as the sole award recipient, and directed Staff to develop the annual Action Plan as follows:

The remaining CDBG funds shall be made available to support eligible affordable housing related activities such as land acquisition, public facility improvements, and/or housing preservation in the 2008 Annual CDBG Action Plan.

The Housing Commission further held a public hearing on April 24th to elicit comments of the draft Action Plan and provide recommendations for potential changes. The public comment period on the 2007 one year began on April 14th and ran through May 15th.

Public testimony was received... Awaiting completion of Hearing) and the Housing Commission [redacted] the 2008 CDBG Action Plan.

All meetings were noticed in the Community Calendar and Legal Notices in *The Ashland Daily Tidings*, and posted on the City of Ashland website.

Any Testimony specific to the CDBG allocations was received and Minutes from the meeting are attached.

The availability of the draft plan was also posted on the City of Ashland web page on April 14th, 2008 and an Adobe Portable document (pdf) of the Action Plan was available for download throughout the public comment period.

An advertisement notifying the public of the availability of the draft Action Plan and the comment period was published on April 15, 2008 in *The Ashland Daily Tidings*.