CITY OF Salem
AT YOUR SERVICE

CITIZEN PARTICIPATION PLAN

COMMUNITY DEVELOPMENT BLOCK GRANTS
HOME INVESTMENT PARTNERSHIPS PROGRAM

URBAN DEVELOPMENT DEPARTMENT-FEDERAL PROGRAMS DIVISION
350 COMMERCIAL STREET NE, SALEM, OREGON 97301

April 2014 (2015-2019 Con Plan)
I. INTRODUCTION

As an entitlement community, City of Salem is eligible to receive Community Development Block Grants (CDBG) and HOME Investment Partnerships program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). These funds are used to administer housing and community development loans and programs within the cities of Salem and Keizer. The goals of the CDBG and HOME Investment Partnerships programs are to develop viable urban communities through the provision of decent housing and economic opportunities for low- and moderate-income residents. Federal law requires the City to develop a detailed Citizen Participation Plan to describe the City’s policies and procedures for public involvement in the use of CDBG and HOME funds. Salem receives HOME funds as part of a consortium with the City of Keizer.

The Citizen Participation Plan provides for and encourages citizens to participate in the planning, development, implementation, and evaluation of the City’s Housing and Community Development plans and programs. The Citizen Participation Plan focuses on public involvement in the process of developing the City’s Housing and Community Development Consolidated Plan (Consolidated Plan), Annual Action Plan, and a review of the Consolidated Annual Performance and Evaluation Report (CAPER). Substantial amendments to the Consolidated Plan and the Annual Action Plan go before citizens for evaluation and comments prior to City Council approval.

DEFINITIONS

Community Development Block Grant

Community Development Block Grant (CDBG) is a formula grant provided annually to the City to administer, subject to federal appropriations. It is used for a variety of housing and community development programs and activities with the objective of providing decent housing, a suitable living environment, and expanded economic opportunities that benefit low- and moderate-income persons in the City.

HOME Investment Partnerships Program (HOME)

HOME program funds are provided by HUD, subject to annual federal appropriations, to the City on behalf of the Salem-Keizer Consortium. HOME funds are utilized to carry out activities that expand the supply of decent affordable housing to low- and moderate-income households, expand the capacity of non-profit housing providers, strengthen the ability of State and Local government to provide housing, and leverage private sector participation in the provision of decent affordable housing.

Housing and Community Development Consolidated Plan

Every five years, staff of the Urban Development (UD) Department, with assistance and input of Salem and Keizer residents, develops a new Housing and Community Development Consolidated Plan (Consolidated Plan). The Consolidated Plan identifies community needs and formulates a Five-Year strategic plan with objectives, implementation strategies, and outcomes that address the needs for housing, community and economic development, and human service needs of residents within the cities of Salem and Keizer.
Annual Action Plan

The Consolidated Plan guides the development of an Annual Action Plan. The Annual Action Plan outlines the City’s funding priorities and sets goals during the program year for assisting citizens of Salem and Keizer in obtaining clean, safe, and affordable living conditions. The plan outlines the City’s efforts towards reducing homelessness, and lists community and economic development projects targeted for funding. The City works with advisory boards, social service agencies, non-profits, and interest groups to develop the Annual Action Plan.

Before the Consolidated and Annual Action Plans are adopted, the City makes public the amount of funds available (including program income), the range of activities that can be undertaken with each grant, the estimated amount of funds that will benefit low- and moderate-income persons, the City’s plans to minimize displacement, and when and how the City will make this information available to the public.

Consolidated Annual Performance and Evaluation Report (CAPER)

Performance measurements are designed to monitor all applications and to determine the impacts of the City’s housing and community development programs and activities. The City has established a vigorous performance measurement system to review the outcomes of all programs funded with HUD dollars. The Consolidated Annual Performance and Evaluation Report (CAPER) documents accomplishments of CDBG and HOME program investments in the City. The CAPER presents information to assist citizens in the evaluation of the City’s performance in meeting goals of the Annual Action Plan and subsequently the Consolidated Plan.

II. FEDERAL CITIZEN PARTICIPATION REQUIREMENTS

Annual program application submitted to HUD must:

1. Give maximum feasible priority to programs that will principally benefit low – and moderate-income families or aid in the prevention of slum and blighted conditions.

2. Have provided citizens with information as to the amount of funds expected to be annually available (including the annual program income that is expected to be received during the program year, together with any program income received during the preceding program year that has not yet been allocated to a project during the development of the annual program.)

3. Set out costs and other resources to be used, as well as a description of the targeted areas.

Encouraging Public Participation
Citizen Participation Plan requirements are designed to encourage participation by low- and moderate-income persons, particularly those living in low- and moderate-income areas where CDBG funds are proposed to be used. Local and regional institutions and organizations, including businesses, non-profits, neighborhood associations, and faith based groups are encouraged to take part in the process of developing and implementing the City's housing and community development plans and programs.

Low- and moderate-income individuals, minorities, non-English speakers, and residents of public and assisted housing benefiting from CDBG and HOME programs will be notified and encouraged to participate through community newspapers, neighborhood group meetings, minority publications, and through attending various community meetings.

The City will consider all comments received in writing or given orally at public hearings during the preparation of the Consolidated Plan, Annual Action Plan, and the CAPER.

The Role of Low Income Persons
Citizen Participation Plan requirements are aimed at developing viable urban communities through the provision of decent housing and the implementation of mechanisms that enhance community development. This includes assisting low- and moderate-income persons to find suitable living environments, decent housing, and sustained living wage jobs.

A variety of local service agencies and private groups are involved in recommending and implementing specific funding strategies that address affordable housing, homelessness, and community development activities in the City. In order to grasp the true needs of low income residents, representatives of social services agencies and the low- and moderate-income individuals they serve are encouraged to take part at all stages of the process including:

- Identifying needs
- Setting priorities and goals
- Funding allocation
- Recommending strategies and programs that best serve the needs of individuals receiving assistance from CDBG and HOME funded activities.

III. STAGES OF THE CITIZEN PARTICIPATION PLAN DEVELOPMENT PROCESS

1. Assessment and identification of housing and community development needs.
2. The draft Consolidated Plan and/or Annual Action Plan.
3. Formal approval by the City Council of the Consolidated Plan and/or final Annual Action Plan.
4. Substantial and Minor amendments necessary to change the use of funds already budgeted in an Annual Action Plan or established in the Consolidated Plan.
5. Performance Reviews in the CAPER.
STRUCTURE OF CITIZEN PARTICIPATION PLAN

1. Citizens will be given reasonable and timely access to local meetings, information, and records relating to the proposed use of community development funds. Copies of all reports and materials relevant to a Salem Council meeting will be available on the Thursday before the Monday meeting at the Urban Development Department, 350 Commercial Street NE. Information can also be found on the City’s website at http://www.cityofsalem.net.

HOME Consortium amendments affecting the City of Keizer will be provided to the Keizer City Council as specified. Materials relevant to the Keizer City Council meetings will be made available according to City of Keizer policy.

2. Technical assistance will be provided to groups and agencies representing low- and moderate-income persons when requesting assistance in developing project/funding proposals. Typical entities requesting technical assistance may include neighborhood associations, city advisory boards and commissions, interest groups, non-profit agencies, and citizens. Such groups will be responsible for the actual writing and submission of proposals.

3. At least two public hearings will be held every year to obtain citizen views and to respond to proposals at different stages of the programs administered by UD, specifically: the development of the Consolidated Plan, the solicitation of program/project proposals for the Annual Action Plan; and the annual hearing on the prior year’s CAPER.

4. The meeting place of public hearings or public meetings shall be suitable to accommodate persons with disabilities.

5. Written answers to complaints and grievances will be provided within 15 working days. Complaints and grievances may either be addressed to the Urban Development Department, 350 Commercial Street NE, or the City Manager’s Office, Salem Civic Center, 555 Liberty Street SE, Salem, Oregon 97301.

6. Efforts will be made to meet the needs of those likely to benefit from housing and urban development programs including persons with special needs, the homeless, minorities, and non-English speaking residents by providing opportunities for participation in planning and public hearings. Alternative forms of documents including translated versions will be provided upon request. Staff will need a 48 hour advance notice to provide for those who can reasonably be expected to attend and participate in such activities.

7. Consultation efforts will be made with social service agencies, State of Oregon departments specifically concerned with lead based paint hazards and non-housing activities, adjacent local government entities, and local housing authorities.

8. A variety of methods, including the City’s internet site, shall be used to facilitate the review and evaluation of proposed housing and urban development policies, programs, and projects.
URBAN DEVELOPMENT DEPARTMENT – FEDERAL PROGRAMS

Each year citizens and interested agencies will be notified of the funding level of assistance expected in the upcoming year; initial information may be based on local estimates. Citizen and interested entities will also be informed of the amount of funding expected to benefit low- and moderate-income persons.

Except as outlined in Amendments, the types of activities funded each year will be determined through the process outlined in this Citizen Participation Plan. Programs and activities administered by the Federal Programs Division of UD will be aligned directly to the needs and goals identified in the Consolidated Plan.

PUBLIC NOTICE

City of Salem will provide advance notice once any of the following documents are available for public comment.
1. Consolidated Plan
2. Annual Action Plan
3. Proposed Amendments

Notice will be published in a newspaper of general circulation to advise citizens of the hearings and deliberations scheduled. Information of the date, time and place of these hearing will be made available through these advertisements and other publications. Efforts will be made to advertise in media that serves non-English speaking households in the community.

Prior to final adoption of the Consolidated Plan and Annual Action Plan, a 30-day comment period will be required to receive written comments. A brief summary of the plan will be published in the Statesman Journal and, if feasible, in media that serves non-English speaking persons. The notice will also provide information about the location where complete copies of the plan may be reviewed.

IV. CITY OF SALEM NEIGHBORHOOD ASSOCIATIONS

A primary vehicle for the citizen participation element of the Community Development Block Grant Program will be the City's neighborhood associations. These associations are officially recognized by the Planning Commission and City Council. The City has adopted policies and procedures ensuring fair and open access by citizens pursuant to SRC 64.250-64.350.

All of Salem’s 18 neighborhood associations have a Neighborhood Services Specialist from the City assigned to assist with communications, obtaining information, and organizing of various events. Neighborhood association volunteers make a difference in the Salem community by providing information to decision-makers, working on self-help projects, and acting as a communication link between the City and other citizens.
To support the activities of neighborhood associations, the City publishes a monthly newsletter – Salem Community Connections. The purpose of the Salem Community Connections is to engage citizens in activities that benefit their neighborhoods as well as the general community. Information presented includes educational workshops, volunteer activities, the opportunity to review and comment on proposed City Plans, City news and updates, and an overview of City Council activities.

V. AMENDMENTS

Substantial and minor amendments to the Consolidated Plan and Annual Action Plan may be made subject to the following procedures and requirements: The Housing and Urban Development Advisory Committee (HUDAC) will review all amendments, if a quorum can be met, and make recommendations to the UD Director to decide minor amendments to the Consolidated Plan or Annual Action Plan. All substantial amendments must be acted on by Salem City Council. Amendments affecting housing related policies or projects within the Keizer City Limits must also be addressed by the Keizer City Council as described below.

A. CONSOLIDATED PLAN

1. Substantial Amendment

A substantial amendment to the Consolidated Plan means an amendment that changes the intent of the plan by modifying adopted priority needs and implementation strategies. Substantial amendments require a public hearing and City Council approval. HUDAC and City staff shall review substantial amendments. Either HUDAC or City staff may provide recommendations to the City Council. Written notices of City Council consideration of substantial amendment shall be published in a newspaper of general circulation to provide a period of not less than thirty days to receive comments on the substantial amendment before implementation.

2. Minor Amendment

a. Amendments that change the text of the Consolidated Plan to correct errors, or changes to text which will not modify the intent of the plan by changing adopted priority needs, and implementation strategies; or

b. Any amendment that does not qualify as a substantial amendment as defined above.

c. The UD Director or designee is granted authority to decide minor amendments to the Consolidated Plan. Notwithstanding this authority, the UD Director or designee may refer a minor amendment to HUDAC for action. The decision of the UD Director and HUDAC is the final local determination unless acted upon by City Council.
B. ANNUAL ACTION PLAN

1. Substantial Amendments
   A substantial amendment to the Annual Action Plan means an amendment that includes:
   
   a. Changes in approved federal funding sources.
   b. Proposals that change land use to one that requires a special or conditional use permit or is likely to result in a 50% change in capacity or amount of service provided.
   c. There is a change in the priority needs served by the original proposal.
   d. The cost of completing the project or conducting a program exceeds the original approved budget by 50% or more.

Substantial amendments require a public hearing and City Council approval. HUDAC and City staff shall review all substantial amendments. Either the Committee or staff may provide recommendations to the City Council. Written notices of City Council consideration of substantial amendments shall be published in a newspaper of general circulation to provide a period of not less than thirty days to receive comments on the substantial amendment before implementation. HOME Consortium amendments shall be processed according to Consortium agreement.

2. Minor Amendments
   Any change to a project contained in the Annual Action Plan that does not meet the conditions for a substantial amendment.

   The UD Director or designee is granted authority to decide minor amendments to the Annual Action Plan. Notwithstanding this authority, the UD Director or designee may refer a minor amendment to HUDAC for action. This is the final local determination unless acted upon by City Council.

C. HOME CONSORTIUM AMENDMENTS
   The City of Keizer may initiate amendments to modify priorities and funding of any project located within the Keizer city limits and approved in the Consolidated Plan and Annual Action Plan. Such amendments shall be referred to HUDAC and UD Department staff for recommendation to the Salem City Council. Such amendments must be approved by the Keizer City Council and Salem City Council.

   The City of Salem may initiate amendments to modify priorities and projects approved in the Consolidated Plan and Annual Action Plan. Amendments that require Salem City Council action to modify funded projects approved in the Annual Action Plan shall also be approved by the City of Keizer, if the project is located within the Keizer city limits. An amendment requiring Salem City Council action to modify a funded project within the Salem city limits shall be approved by the Salem City Council. The City of Keizer shall be provided with written notice at least 30 days in advance of Salem City Council consideration of such an amendment to provide the City of Keizer with an opportunity to comment on proposals prior to Salem City Council action.
Written notice of an amendment to projects acted on by the Salem or Keizer City Council shall be published in a newspaper of general circulation to provide a period of not less than 30 days to receive comments on the amendment prior to implementation.

VI. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)
Citizens and citizen groups will be requested to assess and comment on the performance of programs, projects, and services funded through the Federal Program division of the City’s UD Department. A 15-day comment period is required prior to Council approval of the CAPER.

VII. RESPONSE TO SUBMISSION OF VIEWS AND PROPOSALS
The City will respond to all complaints or grievances submitted. Project proposals shall be responded to and addressed at the public hearing for the program year. Testimony received at a public hearing, if properly addressed, will not require a written response.

VIII. COMPLAINT PROCEDURES
When complaints are addressed to the City regarding the Housing and Urban Development programs, every effort will be made to respond in writing within fifteen (15) working days of receipt of such complaint. Complaints should be addressed to: Urban Development Department, 350 Commercial St NE, Salem, Oregon 97301, 503.588.6178; or to the City Manager’s Office, 555 Liberty St. SE, Salem, Oregon 97301, 503.588.6255.

IX. AVAILABILITY OF PROGRAM RECORDS AND INFORMATION
The Consolidated Plan and other documents, including citizen comments related to the final plan and relevant to covered programs, will be made available for public review at the Urban Development Department, 350 Commercial St. NE, Salem, Oregon 97301, phone: 503.588.6178. These documents include but are not limited to the Consolidated Plan, Annual Action Plan, Citizen Participation Plan, Annual Performance Report, Analysis of Impediments to Fair Housing, and minutes of public meetings. Copies will be provided free of charge and are located at www.cityofsalem.net.
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

City of Salem CDBG
City of Salem/Keizer HOME Consortium

September 2014 (2015-2019 Con Plan)

Contact:
City of Salem
Urban Development Department
350 Commercial Street NE
Salem, OR 97301

INTRODUCTION AND GENERAL SUMMARY
ASSESSMENT OF THE IMPEDIMENTS TO FAIR HOUSING

In order to continue receiving federal funds for housing and community development activities in Salem and Keizer, the City of Salem is required by the U.S. Department of Housing and Urban Development (HUD) to prepare a Housing and Community Development Consolidated Plan (Consolidated Plan). The Consolidated Plan describes strategies, priorities, and proposed actions including activities taken to Affirmatively Further Fair Housing. In order to Affirmatively Further Fair Housing, LHD requires jurisdictions that receive federal funds to prepare an Analysis of Impediments to Fair Housing Choice and develop strategies to overcome the effects of identified impediments.

Impediments to Fair Housing Choice are defined as any actions, omissions, or decisions taken because of protected class status that have an effect of restricting housing choice or the availability of housing choice. The federally protected classes are race, color, religion, sex, disability, familial status, or national origin. The state of Oregon adds the following classes as protected classes within the state of Oregon: marital status, source of income, sexual orientation including gender identity, honorably discharged veterans/military status (WA) and domestic violence. At a local level, age is added. The Analysis reviews the entitlement community’s laws, regulations, administrative procedures, and practices. It assesses how laws affect the location, availability, and accessibility of housing while considering conditions, both public and private, affecting fair housing choice for all protected classes within the jurisdiction.

City of Salem recognizes that there are many obstacles that prevent residents from attaining or retaining housing. The costs of housing or incentives to develop, maintain, or improve housing in Salem and Keizer are affected by both public and private sector policies. Public policies include taxation of land and other property, land use regulations, zoning ordinances, building codes, fees, and urban growth boundaries. Private sector policies include the tightening of lending standards, unfair lending practices, housing discrimination, and other issues that directly or indirectly affect an individual’s housing choice.

Funding and Services
The Federal Programs Division of the City of Salem Urban Development Department administers the federal allocations of Community Development Block Grant (CDBG) for Salem and HOME Investment Partnerships Program (HOME) funds for both Salem and Keizer. CDBG and HOME funds are provided by HUD to fund housing activities, community development projects, public improvements and public services for the benefit of low- and moderate-income individuals, families, and neighborhoods. In 2012, staff of the Urban Development Department-Federal Programs Division attended a Fair Housing class.

FAIR HOUSING LAWS
Title VIII of the Civil Right Act outlaws discrimination in regards to access to housing resources. Also known as the Fair Housing Act, the act currently encompasses federally-protected classes including:

- Race
- Color
- Religion
- National Origin
- Sex
- Disability (added in 1988)
- Familial Status (having children under 18 in a household, including pregnant women) (added in 1988)

The Fair Housing Act outlaws discrimination in the sale, rental, and financing of housing based on the protected classes listed above.

The state of Oregon adds the following classes as protected classes within the state of Oregon:
- Marital status
- Source of income
- Sexual orientation including gender identity
- Honorably discharged veterans/military status (WA)
- Domestic violence.

Salem’s Revised Code Chapter 97 (Human Rights), in addition to the above stated protected classes, ensures that age and domestic partnership are protected against housing discrimination.

**CONDUCT OF THE ANALYSIS**

This Analysis of Impediments to Fair Housing builds on the Impediments Analysis completed in September 2014. It considers information, strategies, and goals contained in the 2015-2019 Housing and Community Development Consolidated Plan. City of Salem Urban Development Department staff reviewed several documents and information during the development of this analysis. Information from the following agencies was included in the analysis:

- Fair Housing Council of Oregon (FHCO)
- Mid-Willamette Valley Council of Government
- Salem Human Rights and the Human Rights & Relation Advisory Commission
- Salem Housing Authority
- United States Census Bureau
- United States Department of Housing and Urban Development (HUD)
- Salem Area Transit
- City-data.com
- Salem Community Development Department-Planning Division
- Oregon Labor trends
- City of Salem Urban Development
- Mid-Willamette Valley Community Action Agency (Continuum of Care documentation)

**SUMMARY OF IMPEDIMENTS IDENTIFIED**
Impediments to fair housing are affected by both the public and private sector in Salem and Keizer. Fair housing programs and practices, especially in recent years, have gone a long way toward addressing many actual and potential impediments in the area. A summary of identified impediments and recommendations are discussed below.

✓ **Impediment: Fees and Charges**

In the City of Salem’s Organizational/Business Survey, 75% of respondents stated that the primary barrier to their clients accessing affordable housing were fees and charges. Some of the reasons that this is a barrier for their clients include: inability to qualify for jobs with adequate salaries (full-time, permanent), lack of income, increase in rental application fees, and coming up with move-in costs (i.e. deposit and first month’s rent). This is consistent with the overwhelming response to the Organizational/Business Survey, the Housing and Community Needs Survey, and documentation from other reports such as the Housing Needs Assessment (Mid-Willamette Valley Council of Governments, City of Salem) stating that the highest priority for the next five years is funding of job training programs and job creation projects so that persons are able to pay the fees associated with housing.

✓ **Impediment: Limitations**

In the City of Salem’s Organizational/Business Survey, 50% of respondents indicated that the primary barriers to their clients accessing affordable housing are limitations. The three primary limitations listed in the survey response were criminal record, negative rental history, and alcohol and drug issues. Additionally, through this analysis, it appears there is a significant limitation for persons with disabilities. As indicated in the fair housing complaints, this population reports more frequently violations of fair housing. Disabilities may also limit the number of units that the person can live in due to accessibility requirements and the costs associated to make reasonable accommodations. Other limitations listed included: limited English proficiency, lack of culturally appropriate services, gender status (transgendered), fair market rent (FMR), cycle of abuse and poverty, and mental illness.

✓ **Impediment: Limited Availability**

In responses to the City of Salem’s Organizational/Business Survey, Limited Availability was the third most frequently reported barrier for their clients accessing affordable housing. The reasons listed for limited availability included the following: lack of affordable units for persons with disabilities, limited funding, lack of affordable housing in desirable areas, long wait lists, and policies affecting return on residential investment. The need for additional affordable housing was also indicated in the Housing Needs Analysis (Mid-Willamette Valley Council of Governments and the City of Salem). The overwhelming type indicated through these analyses and national housing analyses are “aging in place” units. “Aging in place” units would meet the needs of all populations including the elderly and the disabled, and ensure lower vacancy rates.
Other Impediments
The 2014 Impediments analysis identified numerous barriers to fair housing in Salem and Keizer. Several barriers to affordable housing were also identified in the Consolidated Plan to be problems intensifying the lack of access and availability to fair housing choices. Some of the barriers to affordable housing include:

- Job Training and Higher Education
- Job Creation
- Lack of “Aging in Place” units
- Lack of 1-2 bedroom Units
- Lack of coordinated housing (integrated self-sufficiency programs)

BACKGROUND DATA

Demographics Information
Salem, the capital city of Oregon and its third largest city, lies in the center of the lush Willamette River Valley, 47 miles from Portland. Salem is a city of over 47 square miles, located an hour from the Cascade Mountains to the east and an hour from the Pacific Ocean beaches to the west. Salem’s current population is 157,770 (2013). Real GMP Growth Rates for Salem 2014 are 1.0. The unemployment rate is 7.5 according to the U.S. Conference of Mayors U.S. Metro Economies publication.

Presently, at a population of 36,295, Keizer is the 14th largest City in Oregon. It is nestled in the center of the Willamette Valley and is recognized as the “Iris Capital of the World.” The City is bordered on the western edge by the Willamette River, southern edge by the city of Salem, eastern edge by interstate 5, and the northern edge by rural portions of Marion County. In the 1990’s, the City experienced a rapid amount of new residential building and growth, establishing Keizer as one of the fastest growing cities in Oregon. In spite of this growth, the community continues to preserve its small-town pride by supporting the largest volunteer little league organization in Oregon and community-wide events, such as the Keizer Iris Festival and the annual Miracle of Christmas lighting display. Opening for the first season in 1997, the Keizer Stadium is home to the Volcanoes, a minor league baseball team affiliated with the San Francisco Giants.²

Population
The rapid increase in population growth experienced in Keizer and Salem is due to net migration into the area. Major industries in the Mid-Willamette Valley region, including agriculture, food & beverage products, metals, machinery and equipment, forest products, specialty materials manufacturing (e.g. fertilizer mixing, plastic products, and fabric coating), and traded sector services (e.g. office administrative services, higher education, and state and local non-education), have a competitive advantage as evidenced in the Mid-Willamette Valley Council of Governments Comprehensive Economic Development Strategy (CEDS). Salem alone witnessed an increased population growth of 36.6% from 1990 to 2005. Between 2000 and 2010, the

¹ This discussion is taken from the welcome page on cityofsalem.net
² This discussion is taken from Keizer.org
population grew by 12.9% in Salem while Keizer witnessed an increase of 13.3% in its population. Between 2012 and 2013, Marion County experienced a 0.7% increase in population and Polk County experienced a 0.6% population increase according to Portland State University's Population Estimates for Oregon and Counties. The total population estimate for Salem-Keizer in 2013 was 194,565. Salem's population alone was 157,770.

The Median age of residents in Salem and Keizer stands at 34.5 years and 35.7 years respectively, compared to 38.4 years for the entire state of Oregon.

Table 1
Population Total: 2000 and 2010

<table>
<thead>
<tr>
<th></th>
<th>Salem</th>
<th></th>
<th>Keizer</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2000</td>
<td>2010</td>
<td>% Change</td>
<td>2000</td>
</tr>
<tr>
<td>Population</td>
<td>136,924</td>
<td>154,637</td>
<td>12.9%</td>
<td>32,203</td>
</tr>
<tr>
<td>Families</td>
<td>32,326</td>
<td>36,261</td>
<td>12.1%</td>
<td>8,642</td>
</tr>
<tr>
<td>Households</td>
<td>50,676</td>
<td>57,290</td>
<td>13.1%</td>
<td>12,110</td>
</tr>
</tbody>
</table>


Racial and Ethnic Composition
A majority of Salem and Keizer residents are white although data shows a 1.2 and 4.5 percentage decline in that population between 2005 and 2010 for the two cities respectively. The increasing numbers of minorities in the Salem/Keizer area suggests that the jurisdiction is expected to have greater responsibilities serving low- and moderate income individuals and an opportunity to reach out to minority groups and communities.

Table 2
Population by Race and Ethnicity, 2010

<table>
<thead>
<tr>
<th>Race</th>
<th>Salem</th>
<th>Keizer</th>
<th>Oregon</th>
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<tbody>
<tr>
<td>White</td>
<td>79%</td>
<td>82.5%</td>
<td>83.6%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>1.5%</td>
<td>0.8%</td>
<td>1.8%</td>
</tr>
<tr>
<td>American Indian and Alaskan Native</td>
<td>1.5%</td>
<td>1.3%</td>
<td>1.4%</td>
</tr>
<tr>
<td>Asian</td>
<td>2.7%</td>
<td>1.6%</td>
<td>3.7%</td>
</tr>
<tr>
<td>Native Hawaiian and Pacific Islander</td>
<td>0.9%</td>
<td>0.6%</td>
<td>0.3%</td>
</tr>
<tr>
<td>Some other race</td>
<td>10.1%</td>
<td>9.0%</td>
<td>5.3%</td>
</tr>
<tr>
<td>Two or more race</td>
<td>2.8%</td>
<td>4.1%</td>
<td>3.8%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Hispanic or Latino (of any race)</td>
<td>20.3%</td>
<td>18.3%</td>
<td>11.7%</td>
</tr>
</tbody>
</table>


Income Data
In 1999, Census Bureau reported median household incomes for Salem and Keizer as $38,881 and $45,052 respectively. Median household incomes for Salem and Keizer in 2005 were $39,259 and $43,200 respectively, while Oregon's statewide median household income was reported to be $42,944. Salem's median household income ($43,880), as seen below, falls short
of the income levels for both Oregon ($46,618) and U.S. ($50,054) income figures while Keizer's ($48,544) exceeds Oregon, however it falls short of the U.S. Median Income.

Figure 1

Median Household Income

<table>
<thead>
<tr>
<th>Location</th>
<th>Median Household Income</th>
</tr>
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<tbody>
<tr>
<td>United States</td>
<td>$50,054</td>
</tr>
<tr>
<td>Oregon</td>
<td>$46,816</td>
</tr>
<tr>
<td>Keizer</td>
<td>$48,544</td>
</tr>
<tr>
<td>Salem</td>
<td>$43,880</td>
</tr>
</tbody>
</table>


In the 20 years after 1979, the poverty rate in Marion County increased from 10.8% of the population to 13.5%. In 2008-2012, the rate increased to 18% in Marion County. This was a 3 percent increase from what was reported in the 2000 Census. In Salem 18.2% individuals between 2008 and 2012 were living below the poverty line. According to the most recent U.S. Census data, between 2008 and 2012, the percentage of persons living below the poverty line in Keizer was 14.4%, a five percent increase from the percentage of 9.3% reported in the 2000 Census. In 2013 Kids Count Data Book, Oregon shows a six percent increase in the number of children living in poverty from 2005. The current rate is 24 percent. Additionally, 37 percent of Oregon children have parents who lack secure employment. The cause of poverty in Oregon children is attributed to underemployed parents and housing costs.

Table 3

<table>
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<tbody>
<tr>
<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
</tr>
<tr>
<td>Less than $10,000</td>
<td>3,892</td>
<td>7.1</td>
<td>4,696</td>
<td>8.1</td>
</tr>
<tr>
<td>$10,000-$14,999</td>
<td>3,409</td>
<td>6.2</td>
<td>3,519</td>
<td>6.1</td>
</tr>
<tr>
<td>$15,000-$24,999</td>
<td>7,621</td>
<td>13.9</td>
<td>6,575</td>
<td>11.4</td>
</tr>
<tr>
<td>$25,000-$34,499</td>
<td>7,806</td>
<td>14.2</td>
<td>6,966</td>
<td>12</td>
</tr>
<tr>
<td>$35,000-$49,999</td>
<td>8,779</td>
<td>16.0</td>
<td>9,921</td>
<td>17.1</td>
</tr>
<tr>
<td>$50,000-$74,999</td>
<td>10,877</td>
<td>19.8</td>
<td>10,667</td>
<td>18.4</td>
</tr>
<tr>
<td>$75,000-$99,999</td>
<td>5,474</td>
<td>10.0</td>
<td>6,820</td>
<td>11.8</td>
</tr>
<tr>
<td>$100,000-$149,999</td>
<td>5,028</td>
<td>9.2</td>
<td>5,904</td>
<td>10.2</td>
</tr>
<tr>
<td>$150,000 or more</td>
<td>2,059</td>
<td>3.6</td>
<td>2,844</td>
<td>4.9</td>
</tr>
<tr>
<td>Total</td>
<td>54,946</td>
<td>100</td>
<td>57,912</td>
<td>100</td>
</tr>
</tbody>
</table>

Median Household Income

| Salem | $42,050 |
| Keizer | $51,617 |

| $51,708 |
Employment
Management, professional, and related occupations comprise the largest areas of employment for the civilian population 16 years of age and above in Salem and Keizer according to the ACS 2008-2012 data. Sales and office occupations follow closely in both cities while natural resources, construction, and maintenance occupations jobs have the least individuals in the labor force according to the ACS 2008-2012 data. The Bureau of Labor Statistics for Salem indicated the largest numbers of employees are in trade, transportation, and utilities with education and health services close behind. The total number of employed population 16 years and over for Salem from 2008-2012 was 65,191, for Keizer it was 16,392, and for the state of Oregon it was 1,743,524.

**Table 4**

<table>
<thead>
<tr>
<th>Type of Occupation</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mining and Logging</td>
<td>1,001</td>
</tr>
<tr>
<td>Construction</td>
<td>6,500</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>10,800</td>
</tr>
<tr>
<td>Trade, Transportation, and Utilities</td>
<td>23,800</td>
</tr>
<tr>
<td>Information</td>
<td>1,000</td>
</tr>
<tr>
<td>Financial Activities</td>
<td>7,100</td>
</tr>
<tr>
<td>Professional and Business Services</td>
<td>12,300</td>
</tr>
<tr>
<td>Education and Health Services</td>
<td>23,500</td>
</tr>
<tr>
<td>Leisure and Hospitality</td>
<td>13,100</td>
</tr>
<tr>
<td>Other Services</td>
<td>5,000</td>
</tr>
<tr>
<td>Government</td>
<td>41,000</td>
</tr>
</tbody>
</table>

Sources: Bureau of Labor Statistics-Salem, OR.

**Table 5**

<table>
<thead>
<tr>
<th>Type of Occupation</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Salem</td>
</tr>
<tr>
<td>Management, business, science and arts occupations</td>
<td>23,084</td>
</tr>
<tr>
<td>Service occupations</td>
<td>12,316</td>
</tr>
<tr>
<td>Sales and office occupations</td>
<td>16,586</td>
</tr>
<tr>
<td>Natural resources, construction, and maintenance occupations</td>
<td>5,920</td>
</tr>
<tr>
<td>Production, transportation, and material moving occupations</td>
<td>7,285</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>65,191</strong></td>
</tr>
</tbody>
</table>

Source: U.S Census Bureau, American Community Survey 5-Year Estimate, 2008-2012.

Oregon Employment Department reported that Oregon's unemployment rate for March 2014 was 6.9% and the U.S. rate was 6.7%. In April 2014, the Salem Metropolitan Statistical Area (MSA) unemployment rate was 7.1% with the U.S. rate at 5.9% according to the U.S Department of Labor’s Bureau of Labor Statistics.
Major employers in Salem are shown in Table 5 below. The State of Oregon is the largest employer with 21,000 employees, with Salem-Keizer School District and Salem Hospital following.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>State of Oregon</td>
<td>21,000</td>
</tr>
<tr>
<td>Salem-Keizer School District</td>
<td>4,638</td>
</tr>
<tr>
<td>Salem Hospital</td>
<td>3,900</td>
</tr>
<tr>
<td>Chemeketa Community College</td>
<td>1,651</td>
</tr>
<tr>
<td>Marion County</td>
<td>1,487</td>
</tr>
<tr>
<td>Federal Government</td>
<td>1,400</td>
</tr>
<tr>
<td>City of Salem</td>
<td>1,312</td>
</tr>
<tr>
<td>Norpac Foods Incorporated</td>
<td>1,097</td>
</tr>
<tr>
<td>Kaiser Permanente</td>
<td>1,048</td>
</tr>
<tr>
<td>State Accident Insurance Fund</td>
<td>837</td>
</tr>
</tbody>
</table>


Women-Owned business as a percentage of all firms in Oregon is growing. Census data from 2007 shows that 29.8% of businesses in Oregon are owned by women, 27.6% of businesses in Salem are owned by women while 32.3% of all businesses are owned by women in Keizer. The Oregon Business Development Department currently reports that there are 1,268 certified Women Business Enterprises in Oregon.

Employment levels and trends especially for women are important benchmarks for fair housing analysis. Higher levels of employed women increase homeownership rates and stable households, and assist in lowering fair housing discrimination.

Transportation
The cities of Salem and Keizer are served by the Cherriot public transportation system. Even though Cherriot administers the alternative rideshare program with carpools, vanpools etc., a large percentage of residents in both cities drive alone to their work places. According to the U.S. Census Bureau, ACS 2007-2011, 74% of individuals commuting to work drove alone in Salem compared to 77% in Keizer and 71% in Oregon. Between 2007 and 2011, 74% of individuals commuting to work drove alone in Salem while 13% carpooled. A total of 2% of individuals commuting to work in Salem used the public transit system, while 4% walked to work.

In Keizer, 77% of individuals commuting to work drove alone while 13% carpooled. The public transit system was patronized by 14% of commuters in Keizer while 1% of commuters walked to their work places.
Cherriots operates Monday through Friday on a fixed route service in the Salem-Keizer area with easy connections to Wilsonville and Grand Ronde. Cherriots also oversee Chemeketa Area Regional Transportation System (CARTS) that provides daily service to rural Marion and Polk counties. The RED Line is another service provided by Cherriots. The RED Line is a shopper shuttle and dial-a-ride service for seniors and people with disabilities. There was a decline in transit ridership to workplaces from 5.2% and 3.3% in 1980 and 2000 respectively, to 2.4% in 2005 and in 2007-2011 public transit ridership was 2%. A similar trend was seen in Keizer with transit ridership falling by 5% between 1980 and 2000. Currently, Keizer shows 14% utilizing public transportation. The goals identified in the Salem-Keizer Transit Long-Range Regional Transit Plan October 2013 include: grow service levels significantly but reasonably, balance the goal of highly productive transit service against demands for broad geographic coverage, long operating hours and seven day a week service, and to facilitate development of regional public transit services.

Table 7
Modal Splits for Home to Work Travel: Salem/Keizer Work Area
2007-2011 5-year estimates

<table>
<thead>
<tr>
<th>Commuting to Work</th>
<th>Salem</th>
<th>Keizer</th>
<th>Oregon</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Population %</td>
<td>Population %</td>
<td>Population %</td>
</tr>
<tr>
<td>Drove Alone</td>
<td>47,978 74</td>
<td>12,261 77</td>
<td>1,230,834 71</td>
</tr>
<tr>
<td>Carpoled: Car, truck, or van</td>
<td>8,531 13</td>
<td>2,195 13</td>
<td>181,410 10</td>
</tr>
<tr>
<td>Public Transportation (excluding Taxi)</td>
<td>1,341 2</td>
<td>233 14</td>
<td>72,130 4</td>
</tr>
<tr>
<td>Walked</td>
<td>2,592 4</td>
<td>161 1</td>
<td>66,934 4</td>
</tr>
<tr>
<td>Taxi, motorcycle, bicycle, or other means</td>
<td>1,400 2</td>
<td>357 2</td>
<td>54,676 3</td>
</tr>
<tr>
<td>Worked at Home</td>
<td>2,642 4</td>
<td>704 4</td>
<td>107,356 6</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey 2007-2011.

Housing
According to the 2010-2012 American Community Survey data, there were 61,313 housing units in Salem, 14,539 housing units in Keizer, and 1,679,365 housing units in Oregon. A total of 64.7% of the housing units in Salem were constructed between 1970 and 2009 while 76.8% of all housing units in Keizer and 63.9% of all housing units in Oregon were built during that same period. High construction rates of multiple family housing in the 1990’s, as mentioned in the 2003 Impediments analysis, has assisted in meeting rental demand in both Salem and Keizer.

The Federal Programs Division of the City of Salem Urban Development Department is committed to assisting low- and moderate-income residents of Salem and Keizer in obtaining clean, safe, and affordable housing. The City of Salem identified a total of 22,583 homes as having the potential for lead-based hazards during the preparation of the 2007 Analysis of Impediments to Fair Housing. It is estimated that 9,777 of those homes are inhabited by low- and moderate-income families.
According to the Code of Federal Regulation 24 CFR Part 35, any housing rehabilitation project involving houses constructed prior to 1978, and receiving $5,000 or more in Federal funding, shall be tested for lead-based paint. Projects receiving more than $5,000 in federal funding shall have all identified lead-based paint hazards mitigated or abated. The City has established a policy that all housing rehabilitation projects subject to 24 CFR Part 35 shall utilize abatement methods.

A majority of housing in Salem and Keizer are single-family detached units (See table 7). Almost the same numbers of people are living in single family detached units in Keizer (60.5%) as in Salem (60.6%). This is in line with the State of Oregon statistics of 63.8% of Oregonians are living in single family detached units. Census data indicates that more people were living in mobile homes and trailers during 2010-2012 than in 2005-2007 in both Salem and Keizer. The average household size for the state of Oregon is 2.55 for owner-occupied units and 2.43 for renter-occupied units compared to 2.64 for owner-occupied units and 2.49 for renter-occupied units for Salem and 2.67 for owner-occupied units and 2.54 for renter-occupied units in Keizer.

Table 8
Selected Housing Occupancy Characteristics

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Units in Structure</td>
<td># %</td>
<td># %</td>
<td># %</td>
<td># %</td>
<td># %</td>
</tr>
<tr>
<td>1 unit, detached</td>
<td>34,756 59.0</td>
<td>37,171 60.6</td>
<td>9,045 64.5</td>
<td>8,798 60.5</td>
<td>1,070823 63.8</td>
</tr>
<tr>
<td>1 unit, attached</td>
<td>N/A N/A</td>
<td>3,399 5.5</td>
<td>N/A N/A</td>
<td>1,087 7.5</td>
<td>74,873 4.5</td>
</tr>
<tr>
<td>2 to 4</td>
<td>5,447 9.3</td>
<td>4,436 7.2</td>
<td>1,708 12.1</td>
<td>1,279 8.8</td>
<td>121,083 7.2</td>
</tr>
<tr>
<td>5 to 9</td>
<td>5,726 9.7</td>
<td>3,817 6.2</td>
<td>1,159 8.3</td>
<td>919 6.3</td>
<td>73,850 4.4</td>
</tr>
<tr>
<td>10 or more</td>
<td>7,813 13.3</td>
<td>9,016 14.7</td>
<td>820 5.8</td>
<td>1,777 7.2</td>
<td>195,662 11.7</td>
</tr>
<tr>
<td>Mobile home, trailer</td>
<td>2,852 4.8</td>
<td>3,450 5.6</td>
<td>565 4.0</td>
<td>679 4.7</td>
<td>138,401 8.2</td>
</tr>
<tr>
<td>Boat, RV, van, etc.</td>
<td>83 0.1</td>
<td>27 0</td>
<td>0 0</td>
<td>0 0</td>
<td>4,673 0.3</td>
</tr>
<tr>
<td>Total</td>
<td>58,922 100</td>
<td>61,316 100</td>
<td>14,013 100</td>
<td>14,539 100</td>
<td>1,679,365 100</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2010; American Community Survey 2010-2012 3-year Estimates.

According to Zillow, the cost of single-family housing had decreased in Salem by 0.9% from 2011-2012. In 2014 Zillow stated that the home values in Salem had gone up 7.7% in the last year and are predicted to rise another 4.5% within the next year. This will impact the ability of low-income families to become homeowners and limit their opportunity to create wealth.

The data in Table 9 indicates an increase in homeownership for Asian/Pacific Islander and Hispanic populations from 2000-2010 and a decrease in homeownership for Non-Hispanic White, Black, and American Indian. The decrease in homeownership among the majority of populations could be attributed to the housing market crash over the last few years. From July of 2012 - June of 2013, Federal Programs received approximately fifty subordination requests for second liens associated with the refinancing of properties under the HARP Act. These homeowners had received federal assistance either in the purchase or rehab of the property. The refinances were requested to reduce the monthly mortgage payments for the homeowner when the Loan to Value was greater than 80%. Additionally, there have been five reduced payoff requests for the same types of loans submitted to Federal Programs for properties in Short Sale status submitted between April 2013 and June 2014.
Table 9-Housing Opportunities: Homeownership Rate by Race/Ethnicity

<table>
<thead>
<tr>
<th>Race</th>
<th>2000</th>
<th>2010</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Hispanic White</td>
<td>67.6</td>
<td>66.5</td>
<td>-1.1</td>
</tr>
<tr>
<td>Black</td>
<td>36.8</td>
<td>35.7</td>
<td>-1.1</td>
</tr>
<tr>
<td>American Indian</td>
<td>46.8</td>
<td>45.6</td>
<td>-1.2</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>53.2</td>
<td>54.6</td>
<td>1.4</td>
</tr>
<tr>
<td>Hispanic</td>
<td>37</td>
<td>40.8</td>
<td>3.8</td>
</tr>
</tbody>
</table>

Cost of Housing

A total of 343 new single-family construction building permits were issued in Salem between 06/18/2013-06/17/2014. Forty-six construction building permits were issued in Keizer from 06/01/2013-05/31/2014. Estimated median house/condominium values reported in the 2010-2012 American Community Survey for Salem, Keizer, and Oregon were $186,400, $200,300 and $233,900 respectively. More than 22,677 housing units in Salem, 5,951 housing units in Keizer, and 643,213 housing units in Oregon had mortgages. A total of 14,784 housing units in Salem had monthly mortgage payments between $1,000 and $1,999. In Keizer, 4,178 housing units had mortgage payments between $1,000 and $1,999. In Oregon, 358,085 housing units had mortgage payments between $1,000 and $1,999. More than 9,128, 2,261, and 289,519 housing units in Salem, Keizer, and Oregon respectively were with no mortgage payments. Median gross monthly rent was $776, $799, and $855 for Salem, Keizer, and Oregon respectively as reported in the 2010-2012 American Community Survey.

According to the National Low Income Housing Coalition (NLIHC), the Fair Market Rent for a two bedroom apartment in the Salem Metropolitan Statistical Area (MSA) is $756. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn $2,520 monthly or $30,240 annually. A resident working 52 weeks per year and 40 hours a week must earn a housing wage of $14.54 an hour to be able to afford decent housing. A minimum wage worker earning $8.95 an hour must maintain 1.6 full time jobs in order to afford Fair Market Rent in the Salem MSA.

Tenure

In 2010, 61.0% of occupied housing units in Keizer were owner-occupied. A total of 55.7% of occupied housing was owner-occupied in Salem. The state of Oregon reported that 62.2% of occupied housing was owner-occupied. Vacant housing unit rates stood at 6.5% in Salem, 5.1% in Keizer, and 9.3% for Oregon (See Table 9). The average household size of owner-occupied units was 2.66 persons in Keizer, 2.6 persons in Salem, and 2.53 for Oregon.

Table 10-Housing Tenure by Occupied Housing Units

<table>
<thead>
<tr>
<th></th>
<th>Salem 2010</th>
<th>Keizer 2010</th>
<th>Oregon 2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupied Housing</td>
<td>57,290</td>
<td>13,703</td>
<td>1,518,938</td>
</tr>
<tr>
<td>Units</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Owner Occupied</td>
<td>31,904</td>
<td>8,363</td>
<td>944,485</td>
</tr>
<tr>
<td>Renter Occupied</td>
<td>25,386</td>
<td>5,340</td>
<td>574,453</td>
</tr>
<tr>
<td>Vacant Housing</td>
<td>6.5%</td>
<td>5.1%</td>
<td>9.3%</td>
</tr>
</tbody>
</table>

Evaluation of Jurisdiction’s Current Fair Housing Profile: Human Rights and Relation
Advisory Commission Individual Discrimination Complaint Process

The City of Salem Human Rights and Relation Commission (HRRAC) was created in 1964 by the City Council to respond to concerns of the treatment of minority residents of Salem. The Salem Non-Discrimination Code-Salem Revised Code (SRC Chapters 8 and 97) establishes the Commission and describes the definition, offenses, and administration/enforcement of the City’s local law.

Under City of Salem Revised Code Chapter 8.010, the HRRAC is empowered to take action on alleged acts of discrimination in employment, housing and public accommodation in the City of Salem. Chapter 97 specifically prohibits discrimination on the basis of an individuals’ race, color, religion, national origin, sex, age, marital status, disability, familial status, domestic partnership, sexual orientation, gender identity, and source of income.

Persons who have been discriminated against under the provisions of the Federal Fair Housing Act have the right to file an administrative complaint with HUD and the Oregon Bureau of Labor and Industry (BCLI). The complaint must be filed within one year of the alleged discriminatory activity. The investigating agency will determine where there is “reasonable cause” to believe discrimination has taken place and proceed as required. The Oregon Comprehensive Housing Manual, developed with the assistance of a HUD grant, provides additional details.

People experiencing discrimination or harassment or who have other human rights concerns are able to contact the HRRAC by phone, by sending letters, filing complaint on-line, dropping by the office during business hours, or visiting the Commission during one of the Commission’s monthly general meetings. Commissioner and/or staff determine if the complaint has a reasonable basis under Salem ordinance or other law. This depends on whether the act:

- Was discriminatory if it occurred
- Occurred in Salem
- Was unlawful
- Was significant to human relations
- Occurred within the last twelve months

The HRRAC is empowered to seek informal resolution of a complaint through fact-finding, mediation, and discussion with all parties to the complaint. The HRRAC attempts to accomplish this settlement in a quick and efficient manner. Complaints through state or federal agencies can be more lengthy and complicated but may be appropriate where the complainant seeks more than an informal resolution.
Steps in Complaint Resolution
Two avenues are available to consider in resolving discrimination cases that come to the Commission.

- The first avenue involves complaints except those that are against the City of Salem.
- The second works solely with discrimination complaints that are against the City.

According to the HRRAC individual discrimination complaint process, in the event there are complaints against the City, prescribed administrative processes must be exhausted first. These are mainly involving complaints related to police action or employer-employee cases. If Commissioners receive complaints against the City, they contact staff to assist with the appropriate next steps. For all other complaints brought to the Commission, the following steps apply:

**Step 1.**

When staff or a Commissioner receives a complaint, an intake form is completed immediately. This form includes:

- Date and time of the complaint intake and the name of the person completing the form
- Name, address, and phone (if available) of the individual seeking assistance
- Name, address, and phone of the respondent
- Description of concern, including date and location

Whenever possible and applicable, individuals seeking assistance are urged to submit information in writing. Individuals can also submit this information on-line through the Commission’s website (www.cityofsalem.net/~scserv/HRRAC/complaint_form.htm).

**Step 2.**

In special cases where the role of a Commissioner is necessary, either staff or the Chair may request assistance from a Commissioner or from a community member.

**Step 3.**

By the seventh working day following the intake, a return contact is made with the individual seeking assistance and an interview arranged, either by phone or in person. The Commissioner and/or staff will discuss options with the individual and determine a proposed course of action.

Guidelines for Commissioners And Or Staff - Intake and Initial Processing:
After hearing and taking notes of important points described in the problem, staff and/or the Commissioner work with the individual to determine appropriate resolution options. It may be determined quickly that the complaint either does not fall under the jurisdiction of the Commission or needs to be referred to another agency or organization.
After the interview, a one-page statement of concern is written outlining the issues in the complaint. This statement details the issues discussed in the interview. The statement includes the options chosen for resolution and any referrals given. If the complaint is closed without further action, the statement serves as a record of the Commission's response to the situation.

**Step 4.**

Within seven working days of the interview and as appropriate, contact is made with the respondent(s). In cases where a Commissioner is assigned to work on a complaint, if contact cannot be made with the complainant within seven days, staff will meet with the Commissioner to discuss the case. The Commissioner and/or staff discuss the complaint with the respondent and outline the desired outcomes as determined in the initial interview. From this, the Commissioner determines what recommendations may be helpful to achieve resolution. If the respondent is willing and it is appropriate to the case, a meeting should be arranged between the parties in the case. In cases where the individual seeking assistance is or was a client or employee of the respondent, a release of information may be obtained. The respondent may give information contradicting the claims in the complaint. Additional fact-finding may be needed to determine action.

**Guidelines for Commissioners and/or Staff - Resolution Options:**

**Referral:** The nature of the situation may make it appropriate for referral to another agency or group. In some cases, the Commissioner and/or staff may make the initial contact and explain the situation to the referral, and provide other assistance as appropriate. With complaints against law enforcement, the Commission has agreed to help facilitate community members’ access to internal complaint processes.

**Conciliation:** If the complaint is appropriate for resolution by the Commission, the Commissioner and/or staff, after consultation with one another, will attempt conciliation in the most informal manner available. First contact can be made by telephone to the respondent to attempt resolution. The Commissioner and/or staff should explain the situation to the respondent and ask for their response to the situation.

The manner of conciliation will vary according to the issues in the complaint. An apology, an agreement to stop the offending behavior or to have employees attend training to correct behavior, could be part of the conciliation. The Commissioner and/or staff, after consultation with one another, may request a mediated meeting between the person seeking assistance and the respondent to discuss the situation.

If a resolution cannot be reached, or if at any time a request is made, the complaint can be referred to another agency or legal counsel. Financial resources for legal assistance are not provided. At this time, it is considered closed by the Commission but can still be monitored to learn the ultimate outcome.

**Correspondence/Contacts:** All correspondence regarding the complaint between individuals seeking help, and respondents, are either mailed on City letterhead or emailed by staff.
**Step 5.**

When the case is successfully conciliated, it is considered closed. The case will also be considered closed if it is successfully referred to another agency. If an agreement is reached, where appropriate, the Commission prepares a written statement of agreement for both parties. Once the case is closed, Commissioners complete the Discrimination Complaint Case Form and/or provide staff this information to include in the complaint file.

**Step 6.**

After a case is closed, as appropriate, staff follows up with participants for feedback and to determine how to improve services to complainants in future cases. A Case Closing Survey may be used to gather this information. In some cases, the participants may not be satisfied with the result of the Commission's work. Staff and the Commission can then determine further steps that could be taken as a way of improving the process.

**Step 7.**

In appropriate cases, after a case is closed, the Commission Chair and staff will evaluate the handling of the complaint and the overall complaint process. The Case Review form is a two-sided format designed as a self-evaluation tool for the Commissioner involved in the case. The Commission schedules an annual evaluation of its complaint process and case resolution.

**Fair Housing Complaint Statistics**

The Salem Human Rights and Relations Commission provided the fair housing complaint data used in this analysis. Complaint diversity categories provided below covers 2012 and 2013 calendar years.

<table>
<thead>
<tr>
<th>City of Salem: Complaint Diversity Categories by Class</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cases by Protected Classes</strong></td>
</tr>
<tr>
<td>Race/National Origin</td>
</tr>
<tr>
<td>Age</td>
</tr>
<tr>
<td>Disability</td>
</tr>
<tr>
<td>Religion</td>
</tr>
<tr>
<td>Gender Identity</td>
</tr>
<tr>
<td>Familial Status</td>
</tr>
<tr>
<td>Sexual Orientation</td>
</tr>
<tr>
<td>Source of Income</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

Source: Salem Human Rights and Relation Commission
Housing related complaint summaries identified from July 2009 to 2013 showed that 48 contacts were made to the Human Rights and Relations Commission.

**Number of Complaints received related to Housing:**

<table>
<thead>
<tr>
<th>Year</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>11</td>
</tr>
<tr>
<td>2010</td>
<td>8</td>
</tr>
<tr>
<td>2011</td>
<td>4</td>
</tr>
<tr>
<td>2012</td>
<td>9</td>
</tr>
<tr>
<td>2013</td>
<td>16</td>
</tr>
</tbody>
</table>

**Table 12**

Fair Housing Council of Oregon Complaints: Salem

<table>
<thead>
<tr>
<th>Cases by Protected Classes</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race/National Origin</td>
<td>6</td>
</tr>
<tr>
<td>Age</td>
<td>1</td>
</tr>
<tr>
<td>Disability</td>
<td>28</td>
</tr>
<tr>
<td>Religion</td>
<td>0</td>
</tr>
<tr>
<td>Gender Identity</td>
<td>0</td>
</tr>
<tr>
<td>Familial Status</td>
<td>7</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>3</td>
</tr>
<tr>
<td>Source of income</td>
<td>3</td>
</tr>
<tr>
<td>Other</td>
<td>5</td>
</tr>
<tr>
<td>Total</td>
<td>53</td>
</tr>
</tbody>
</table>

The data in the two tables above is consistent in showing that the greatest discrimination is against those with disabilities for Salem, Oregon.

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

According to a report prepared by the Urban Institute for the U.S. Department of Housing and Urban Development (HUD), minorities seeking to buy homes continue to face discrimination from mortgage lending institutions. "Not all Americans enjoy equal access to the benefits of homeownership, in part because of unequal access to capital." The 2006 urban institute report acknowledges, "minorities are less likely than whites to obtain mortgage financing and, if successful in obtaining a mortgage, tend to receive less generous loan amounts and terms."³

In 1975, the U.S. Congress voted to create the HMDA and the Federal Financial Institution Examination Council (FFIEC) to track and disclose information on lending patterns. HMDA data particularly covers home purchases and home improvements loans and includes information on race, ethnicity and income of applicants which allows for an analysis of lending disparity practices. Table 13 below shows the lending disparity profile for Salem Metropolitan Statistical Area (MSA).

In this 2012 review, the percentage of refinanced loans were 72.14%. This number is congruent with Federal Program’s experience over the past 2-3 years. There has been a significant increase in requests for subordinations of existing loans (i.e. single family rehabilitation loans, down payment assistance loans, and public works sewer improvement loans).

**Table 13**

---

³ Discussion from HUD fair lending Studies-Mortgage Lending Discrimination in America
Lending Disparity Profile, 2012
Salem Metropolitan Statistical Area

<table>
<thead>
<tr>
<th>Race</th>
<th>Originations</th>
<th>Denials</th>
<th>Fallout</th>
<th>Purchased</th>
<th>Total Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>9,189</td>
<td>16.10%</td>
<td>19%</td>
<td>1,595</td>
<td>15,754</td>
</tr>
<tr>
<td>Black</td>
<td>38</td>
<td>21.92%</td>
<td>26.03%</td>
<td>12</td>
<td>85</td>
</tr>
<tr>
<td>Hispanic</td>
<td>736</td>
<td>26.32%</td>
<td>20.62%</td>
<td>149</td>
<td>1,536</td>
</tr>
<tr>
<td>Asian</td>
<td>207</td>
<td>19.76%</td>
<td>19.76%</td>
<td>26</td>
<td>360</td>
</tr>
<tr>
<td>Native American</td>
<td>55</td>
<td>18.07%</td>
<td>15.66%</td>
<td>8</td>
<td>91</td>
</tr>
<tr>
<td>Hawaiian</td>
<td>37</td>
<td>18.97%</td>
<td>17.24%</td>
<td>5</td>
<td>63</td>
</tr>
<tr>
<td>Multi-Race</td>
<td>46</td>
<td>28.24%</td>
<td>17.65%</td>
<td>9</td>
<td>94</td>
</tr>
<tr>
<td>Unknown/NA</td>
<td>1,019</td>
<td>25.62%</td>
<td>27.42%</td>
<td>1,390</td>
<td>3,560</td>
</tr>
<tr>
<td>Totals</td>
<td>11,322</td>
<td>18.16%</td>
<td>20.13%</td>
<td>3,194</td>
<td>21,543</td>
</tr>
</tbody>
</table>

Source: 2012 National HMDA-LAR

Public Policies and Fair Housing Actions

Provision of Financial Assistance for Dwelling
The 2009-2014 Housing and Community Development Consolidated Plan, established four primary goals for allocating CDBG and HOME funds. According to the Consolidated Annual Performance and Evaluation Report (CAPER) for 2013-2014, projects receiving allocations of CDBG or HOME funds helped the City to meet one of the three annual goals of the Annual Action Plan by assisting individuals and families earning 80% or less Median Family income obtain or retain decent housing and provided funding through public services for homeless case management and interim housing assistance (subsistence payments). The other two goals in the Annual Action Plan have projects underway that will meet those goals in the 2014 CAPER. The following is a summary of Consolidated Plan goals:

1. End Homelessness
2. Promote economic development by creating economic opportunities
3. Expand and sustain owner and renter affordable housing stock
4. Revitalize low income neighborhoods and create suitable living environment

In order to increase home ownership, support community development, and increase access to affordable housing, HUD provides the City with HOME and CDBG funds. The HOME Investment Partnerships Program was created to develop partnerships between public and private agencies in order to provide affordable housing. HOME funds can be used to carry out multi-year housing strategies through acquisition, rehabilitation and new construction of housing and to provide tenant based rental assistance (TBRA).
The Community Development Block Grant (CDBG) program consolidates several categorical grants such as urban renewal, neighborhood development and model cities into a single block grant program. The primary objective of CDBG, apart from providing affordable housing to low and moderate income persons, is to develop a strong community through the provision of:

- Decent housing
- Suitable living environments and
- Expanded economic opportunities

Table 14
2013-2014 Table of assistance to racial and ethnic populations by source of funds

<table>
<thead>
<tr>
<th>Describe the families assisted (including the racial and ethnic status of families assisted)</th>
<th>CDBG</th>
<th>HOME</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>2,949</td>
<td>242</td>
</tr>
<tr>
<td>Black or African American</td>
<td>63</td>
<td>30</td>
</tr>
<tr>
<td>Asian</td>
<td>12</td>
<td>2</td>
</tr>
<tr>
<td>American Indian or American Native</td>
<td>35</td>
<td>22</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>43</td>
<td>2</td>
</tr>
<tr>
<td>Ethnicity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>441</td>
<td>64</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>2,661</td>
<td>234</td>
</tr>
<tr>
<td>Total</td>
<td>3,102</td>
<td>298</td>
</tr>
</tbody>
</table>


The Federal Programs Section administers the City's federal allocation of CDBG and HOME programs. The 2013-2014 loan and grants impacts include the following:

Table 15: Accomplishments for the Program Year 2013
Annual Goals

<table>
<thead>
<tr>
<th>Goal</th>
<th>Category</th>
<th>Funding Source</th>
<th>Amount Expended</th>
<th>Outcome Indicator</th>
<th>Outcome Expected</th>
<th>Actual</th>
<th>Unit of Measure</th>
<th>Percent Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ending Homelessness</td>
<td>CDBG</td>
<td>$362,973</td>
<td>Public Service Activities (Housing and Non-Housing)/ Public Facility</td>
<td>2,554 served</td>
<td>3,128 served</td>
<td>Persons Assisted</td>
<td>122%</td>
</tr>
<tr>
<td>2</td>
<td>Economic Development</td>
<td>CDBG</td>
<td>$303,320</td>
<td>Businesses Assisted/Jobs</td>
<td>67 served</td>
<td>56 served</td>
<td>Businesses Assisted</td>
<td>83%</td>
</tr>
<tr>
<td>3</td>
<td>Affordable Housing</td>
<td>HOME</td>
<td>$1,612,519</td>
<td>Tenant Based Rental Housing</td>
<td>422 served</td>
<td>222 served</td>
<td>Households Assisted</td>
<td>52%</td>
</tr>
</tbody>
</table>

CONCLUSIONS AND RECOMMENDATION

Conclusions drawn from data gathered in this AI report suggest that:

- Additional cost and requirements make both the rental and owner housing markets unavailable to low/moderate income persons
- Job training and creation will lead to a major reduction in barriers to affordable housing across protected classes by providing personal resources for housing
- Discriminatory and unfair lending practices are impediments to fair housing in Salem and Keizer
- Language and cultural differences are impediments to fair housing
- Increasing resources for fair housing programs and activities will promote access to affordable housing
- Expanding affordable housing through projects including “aging in place” units will resolve barriers for various groups including those with disabilities while providing a foundation for versatile housing

RECOMMENDATIONS

In addition to various strategies mentioned earlier in this report, the cities of Salem and Keizer remain committed to assisting residents in obtaining and retaining decent, safe, affordable housing. Salem and Keizer should continue to partner with non-profit organizations, the Salem Housing Authority, Community Housing Development Organizations (CHDO’s), Fair Housing Council of Oregon, and other government agencies to further improvement towards fair housing.

To promote community and economic development, eliminate homelessness, provide affordable housing, and revitalize neighborhoods, it important that the jurisdiction focuses its attention on removing barriers that impede fair housing. The following activities are intended to steer the City towards achieving fair housing goals:

- Continue funding for programs such as TBRA, multi-family rental rehabilitation, and self-sufficiency programs related to housing to bridge the financial gap for LMI households
- Encourage job training programs for LMI persons to increase their ability to be sustainable in housing
- Encourage job creation to provide jobs for LMI persons (with increased services to special populations including the disabled, veterans, and victims of domestic violence) to increase their ability to be sustainable in housing
- Supporting fair housing education for consumers, lenders, real estate agents, landlords, and all individuals providing housing services
- Supply community education tools to non-English speaking residents in both cities
- Make available, information regarding federal housing assistance programs and resources
- Encourage the production of additional housing, including units for “aging in place” to increase greater choice
- Target communities with high percentages of low- and moderate incomes persons with funding for affordable housing
Certifications

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations; the City of Salem certifies that:

Affirmatively Further Fair Housing -- The City of Salem will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will continue to provide a drug-free workplace by:
1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
   a. The dangers of drug abuse in the workplace;
   b. The grantee's policy of maintaining a drug-free workplace;
   c. Any available drug counseling, rehabilitation, and employee assistance programs; and
   d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
   a. Abide by the terms of the statement; and
   b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
   a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
   b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:
8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit.
City of Salem

Standard Form-LL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG and HOME funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

[Signature]
Steven D. Powers
City Manager

04/05/2016

City of Salem
555 Liberty St. SE
Salem, OR 97301
503.588.6161

2016-2017
Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

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

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

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;

12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2015, 2016, and 2017 shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The City of Salem will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the City of Salem certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

- 2016-2017
14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subsections A, B, J, K and R, of title 24;

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

Steven D. Powers 04/25/2016
City Manager  Date

City of Salem
555 Liberty St. SE
Salem, OR 97301
503.588.6161
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the City of Salem intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the City of Salem's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Steven D. Powers 04/05/2016
City Manager

City of Salem
555 Liberty St. SE
Salem, OR 97301
503.588.6161
APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Drug-Free Workplace Certification
1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplace at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal Inspection. Failure to identify all known workplaces constitutes a violation of the grantee’s drug-free workplace requirements.
4. Workplaces identifiable must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State Highway Department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplace in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code). Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

<table>
<thead>
<tr>
<th>Place Name</th>
<th>Street</th>
<th>City</th>
<th>County</th>
<th>State</th>
<th>Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Development Dept.</td>
<td>550 Commercial St. NE</td>
<td>Salem</td>
<td>Marion</td>
<td>OR</td>
<td>97301</td>
</tr>
<tr>
<td>City Hall</td>
<td>555 Liberty St. SE</td>
<td>Salem</td>
<td>Marion</td>
<td>OR</td>
<td>97301</td>
</tr>
</tbody>
</table>

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

   a. All "direct charge" employees;
   b. All "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and

   c. Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on

2016-2017
City of Salem

the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan

[Signature]
04/05/2016

Steven D. Powers  Date
City Manager

City of Salem
555 Liberty St. SE
Salem, OR 97301
503.588.6161

2016-2017
Application for Federal Assistance SF-424

12. Type of Application:
   - Preapplication
   - Application
   - Change/Correction

13. Date Received: ____________________________
14. Applicant Identifier: ________________________

5c. Federal Entity Identifier: ____________________
6b. Federal Award Identifier: B-16-MC-41-0004

6. Data Received by State: ______________________
7. State Application Identifier: ________________

8. APPLICANT INFORMATION:
   - City: Salem
   - Employer/Taxpayer Identification Number (EIN/TIN): 93-6002249
   - Organization DUNS: 0799777534

9. Address:
   - Street: 350 Commercial Street NE
   - City: Salem
   - County/Parish: Marion
   - State: Oregon
   - Province: ________________________________
   - Country: ________________________________
   - Zip: 97301

10. Organizational Unit:
    - Department Name: Urban Development Department
    - Division Name: Federal Programs

11. Name and contact information of person to be contacted on matters involving this application:
    - First Name: Rona
    - Last Name: Peck
    - Title: Federal Programs Manager
    - Organization Affiliation: City of Salem
    - Telephone Number: (503) 540-2446
    - Fax Number: (503) 589-2054
    - Email: rpeck@cityofsalem.net
**Application for Federal Assistance SF-424**

<table>
<thead>
<tr>
<th>9. Type of Applicant 1 - Select Applicant Type:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of Applicant 2 - Select Applicant Type:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Type of Applicant 3 - Select Applicant Type:</th>
</tr>
</thead>
</table>

* Other (specify):  

* 10. Name of Federal Agency:  

<table>
<thead>
<tr>
<th>11. Catalog of Federal Domestic Assistance Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-218</td>
</tr>
</tbody>
</table>

Community Development Block Grants/Entitlement Grants

12. Funding Opportunity Number:

13. Competition Identification Number:

Title:

Community Development Block Grant, 2016

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Salem

15. Descriptive Title of Applicant's Project:

City of Salem Community Development Block Grant, 2016

Attach supporting documents as specified in agency instructions.
Application for Federal Assistance SF-424

10. Congressional District Of:
   a. Applicant  
   b. Program/Project

   *Attach an additional list of Program/Project Congressional Districts if needed.*

17. Proposed Project:
   a. Start Date: 07-01-2015
   b. End Date: 06-30-2016

18. Estimated Funding ($):
   a. Federal  
   b. Applicant  
   c. State  
   d. Local  
   e. Other  
   f. Program Income  
   g. TOTAL

   *$1,209,846  
   *$1,384,846  
   *$1,175,000  
   *$813,000

19. Is Application Subject To Budget Process (Subject To Executive Order 1371 Process)?
   a. This application was made available to the State under the Executive Order 12372 Process for review.
   b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   c. Program is not covered by E.O. 12372.

20. Is the Applicant Entitled to Any Federal Benefit? If so, provide explanation.

   *Yes  
   *No

If Yes, provide explanation and attach.

21. By signing this application, I certify (1) to the statements contained in the list of certifications and assurances herein are true, complete and accurate to the best of my knowledge, and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also certify that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1691)

**The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.**

Authorized Representative:

**First Name:** Steven D.  
**Last Name:** Powers

**Title:** City Manager

**Telephone Number:** (503) 588-6161  
**Fax Number:**

**Signature of Authorized Representative:**  
**Date Signed:** 07/05/2016
Application for Federal Assistance SF-424

*1. Type of Submission:

☐ Preapplication
☐ Application
☐ Changed/Corrected Application

*2. Type of Application:

☐ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

*3. Date Received:

*4. Applicant Identifier:

*5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

M-16-DC-41-024

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. City of Salem

* b. Employee/Taxpayer Identification Number (EIN/TIN):

93-6002249

* c. Organizational DUNS:

079977534

d. Address:

* Street 2:

350 Commercial Street NE

* City:

Salem

* County/Parish:

Marion

* State:

Oregon

* Province:

USA: UNITED STATES

* Zip:

97301

e. Organizational Unit:

Department Name: Urban Development Department

Division Name: Federal Programs

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Rena

Middle Name:

Last Name:

Peck

Suffix:

Title:

Federal Programs Manager

Organizational Affiliation:

City of Salem

* Telephone Number:

(503) 540-2446

Fax Number:

(503) 589-2054

* Email:

rpeck@cityofsalem.net
Application for Federal Assistance SF-424

9. Type of Applicant 1 - Select Applicant Type:
   Municipal

Type of Applicant 2 - Select Applicant Type:

Type of Applicant 3 - Select Applicant Type:

* Other (specify):

10. Name of Federal Agency:

11. Catalog of Federal Domestic Assistance Number:
   15-239

CFDA Title:
   HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

* Title:
   HOME Investment Partnership, 2016

13. Competition Identification Number:

14. Areas Affected by Project (Cities, Counties, States, etc.):
   City of Salem

* 15. Descriptive Title of Applicant’s Project:
   Salem-Keizer HOME Consortium, 2016

Attach supporting documents as specified in agency instructions.
Application for Federal Assistance SF-424

16. Congressional Districts Of:
   * a. Applicant: 5
   * b. Program/Project: 5

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 07-01-2016
   * b. End Date: 06-30-2017

18. Estimated Funding ($):
   * a. Federal: $618,262
   * b. Applicant: 
   * c. State: 
   * d. Local: 
   * e. Other: 
   * f. Program Income: $210,000
   * g. TOTAL: $828,262

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
   ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   ☑ c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (if "Yes", provide explanation.)
   ☐ Yes ☑ No
   If "Yes", provide explanation and attach.

21. "By signing this application, I certify (1) to the statements contained in the list of certifications ** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1031)

   ☑ I AGREE

   ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr.  * First Name: Steven D.  
Middle Name:  
* Last Name: Powers  
Suffix: 

* Title: City Manager

* Telephone Number: (503) 588-6161  
Fax Number: 

* Email: spowers@cityofsaalem.net

* Signature of Authorized Representative:  
* Date Signed: 7-13-2016
COMMENT OF SARAH OWENS AND MICHAEL LIVINGSTON ON THE ANNUAL ACTION PLAN
PROPOSED PURSUANT TO 24 CFR 92.220

Introduction

This Comment is concerned with the narrative portion of the draft 2016 Annual Action Plan (The Plan), prepared for the City of Salem and issued March 31, 2016 for public comment. It is concerned only with the narrative, and assumes, without endorsing, the appropriateness of the most recent funding recommendations, the accuracy of financial statements contained in The Plan, and the correct application of program-specific requirements.

It is understood that The Plan’s format is determined by 24 CFR 91.220. It is further understood that most of The Plan narrative appeared in the 2015-19 Housing and Community Development Consolidated Plan (2015-19 Consolidated Plan), which was adopted by the Salem City Council on April 27, 2015. It’s understood that, mainly, all that’s “new” are the 2016-17 projects and available funding (“resources”). Because most of the narrative has been approved previously, it is assumed and understood that The Plan as drafted probably meets the minimum requirements of the U.S. Housing and Urban Development Department (HUD).

Notwithstanding the fact that The Plan may withstand federal and local governmental scrutiny, the concern expressed here, and below in greater detail, is that, with two exceptions, The Plan narrative contains errors, falls frequently to provide the required information, and makes overly general and sometimes false assertions about the City’s actions and relationships, particularly its efforts to consult, collaborate and coordinate, such that the reader is both denied important information, and given a falsely positive impression of this community’s, and particularly the City’s, commitment to addressing its housing/homeless problems.

The two exceptions are the portions of The Plan describing: 1) federal programs administration, and 2) Salem Housing Authority actions and administration, which seem to be accurate.

Those two exceptions aside, the average citizen reading The Plan narrative would be left with the impression that the City is an active participant in a functional regional (Marion and Polk Counties) “continuum of care”, but would not know what actions, specifically, the City had taken or plans to take to consult, collaborate and coordinate, what specific agencies those actions involve(d), and what the City’s role/relationship is/was with those other agencies. We urge the City to correct these and the other deficiencies detailed below, before approving The Plan.

For example, if, as The Plan asserts, “City staff has been meeting with key community leaders to implement a ‘Housing First’ Model”, The Plan should identify the City agent/department involved, the community leaders involved, the name of the group and its charter/organizational structure, if any, the entity responsible for coordinating meetings and keeping records of any proceedings, how often they occur, whether they’re public, and so on.
If the City cannot describe its actions with greater accuracy and specificity than it has, its
generalized, self-serving statements should be omitted from The Plan as unnecessary and
misleading. As The Plan itself states, all it really need do is “discuss the projects and programs
taking place during the 2016-2017 Plan Year.”

Below, by way of illustration, are described some of the most problematic portions of the
narrative. The list is not meant to be exhaustive.

Specific Features of The Plan

In the section “PR-05 Lead & Responsible Agencies”, The Plan contains this *optional* narrative:

Activities and programs funded by both CDBG and HOME are carried out in cooperation
with several partners: community based non-profit organizations, for-profit
organizations, faith-based groups, private developers, and other City and State agencies
and departments. The creation of this Annual Action Plan is a collective effort of City of
Salem Urban Development staff, Salem Urban Development [sic] Community Services
and Housing Commission (CSHC), participating citizens, and community stakeholders.

CDBG- and HOME-funded activities and programs are carried out in cooperation with the City’s
sub-grantees, which are named later in The Plan. As discussed below, The Plan is basically the
product of the City’s Urban Development Department. To say that The Plan is the result of
some kind of collective effort is greatly overstating the degree to which The Plan reflects
outside inputs.

The CSHC is responsible to review and rank grant applications, and make funding
recommendations to the City Council. At the end of that process, it is asked to recommend *pro
forma* adoption of The Plan.

Neither the CSHC, the citizenry, nor the “community stakeholders” (i.e., sub-grantees) were
involved in any meaningful way in the creation of the plan, or, historically, have ever given it
scrutiny, if they read it at all.

In the section “AP-10 Consultation”, under “1. Introduction”, The Plan states “The
development of this Annual Action Plan is guided by the effort of CSHC.” As discussed above,
the CSHC is responsible to review and rank grant applications, and make funding
recommendations to the City Council. At the end of that process, it is asked to recommend *pro
forma* adoption of The Plan. The CSHC does not “guide the development” of The Plan.

Further on in this section, The Plan states, “Staff is working with...key agencies...to better
coordinate housing, health, mental health, prevention of homelessness, and social services in
the City of Salem.” It is unclear from either this statement or the narrative that follows it what
actions the City has taken or will take, and which agencies those actions involve. If, indeed,
“Staff” are working with “key agencies” in some way *outside* federal programs administrative
activities, the narrative should describe that work in sufficient detail to allow the average citizen to understand and seek more information about it.

Under "Provide a concise summary of...activities to enhance coordination...", The Plan states, "Activities to enhance coordination...are evident in the organizations listed in the Consultation section of this Consolidated Plan." However, no coordinating activities are evident in the section referred to, which is just a list of the most recent federal grant applications, discussed below in more detail.

Under "Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons...and persons at risk of homelessness", The Plan states that "The Continuum of Care is a community[-]based long-range planning organization...[that] is comprised of community stakeholders...", that "Over the next year, the City's strategy...is to support community agencies providing services...", that "The City...will continue to advance the efforts of the Marion and Polk Counties Plan to End Homelessness through partnerships with members of the Continuum of Care", and that "Gap analysis allows the City of Salem to leverage other viable and necessary resources for programs and projects."

The narrative that follows the latter statement fails to support or even make sense of it.

The narrative does not discuss how the City will, beyond being a conduit for federal funds, "support" agencies or "advance the efforts" of the Marion and Polk Counties Plan to End Homelessness (10-Year Plan). In fact, the City has never attempted to implement the 10-Year Plan, as discussed below.

The comparable 2015-19 Consolidated Plan narrative states that the City's "strategy of reducing, preventing, and supporting the elimination of homelessness is to market CDBG and HOME funds." 2015-19 Con Plan at 14. (Emphasis added.) If, as The Plan would seem to suggest, the City's strategy consists of more than marketing CDBG and Home funds, The Plan should describe those elements specifically.

The statement that the Continuum of Care for Marion and Polk Counties (CoC) constitutes a long-range planning organization comprised of community "stakeholders" is misleading. According to the Mid-Willamette Community Action Agency, which is responsible for coordinating CoC meetings, the CoC consists only of the current funding cycle's "sub-grantees", which MWVCAA has, by its own admission, been unable to expand into an effective network, or engage in long-range planning.¹ On information and belief, this fact is well known in the provider community.

If the City does have partnerships with (vs. favorites among) the CoC members (i.e., its sub-grantees) beyond monitoring compliance with funding requirements, then The Plan should describe the partnerships in sufficient detail to allow the average citizen to understand them, including which agencies of the City are involved, with which sub-grantee, and the nature of the partnership.

1
Under “Describe consultation with the Continuum(s) of Care...in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS”, The Plan narrative makes no mention of ESG funds, performance standards, outcome evaluation, funding development or HMIS administration, all of which suggests that no such consultations/determinations occurred, consistent with the City’s limited involvement with CoC members, as described above. If consultations did occur, The Plan should describe them specifically, and describe specifically what, if any, determinations were made as a result. If they did not occur, The Plan should explain why they did not occur and what steps the City intends to take over the next year to remedy its failure.

Under “2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities”, and for each agency/group/organization, discuss “How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?”, The Plan lists, with one exception, only agencies that applied for funds, what the funds were for, and whether the funds were awarded. There is no discussion of anticipated outcomes or improving coordination.

The one non-applicant agency listed in this section is the Emergency Housing Network (EHN), which is a group of “hundreds of community partners and stakeholders who want to network with, educate, or update other advocates and agencies serving the homeless and at-risk populations of greater Salem.” Its monthly meetings follow a lunch/speaker/networking format and is facilitated by the Salem Housing Authority.

The Plan states that EHN “was consulted through notification and distributed information at the March ...2016 meeting.” However, all that occurred at that meeting was that a federal programs employee made a 15-second announcement at the end of the meeting that The Plan’s public comment period would open at the end of the month, followed by the public hearing in May. Announcements and accepting grant applications cannot reasonably be construed as the equivalent of a consultation.

Lastly, the narrative in this section omits one grant applicant: the Salvation Army. The minutes of the CSCHC, which reviews these funding applications and makes federal funding recommendations to the Salem City Council, indicate that the Salvation Army applied for, and was denied funds during the funding cycle covered by The Plan. It is not, however, listed anywhere in The Plan.

Under “Identify any Agency Types not consulted and provide rationale for not consulting”, The Plan states, “A wide range of...[agency types was] consulted during this [sic] Consolidated Plan process and subsequently as listed above for the Annual Action Plan and public meetings. There were no known agency types not consulted.”
However, the Consolidated Plan process took place last year. The information requested concerns consultations made with respect to this year’s Plan. If, as it appears, the City consulted only this year’s grant applicants “and public meetings”, then The Plan should so state, describing any “public meetings” with enough specificity for the average citizen to be able to identify them.

The fact that the City consulted a wider range of agency types last year might, perhaps, be a rationale for not consulting them again during this year’s process. However, if the City has the collaborative relationship with providers (other than its sub-grantees), consulting them during this year’s process should not have been difficult.

Under “Other local/regional/state/federal planning efforts considered when preparing the Plan”, the CoC and its four assigned goals from the 10-Year Plan are listed. They appear in bold print in the excerpt below:

Create new permanent housing beds for the chronically homeless (60 beds in 10 years); increase the percentage of homeless persons staying in permanent housing over six months to at least 71 percent (increase from 80 percent to 85 percent?); increase the percentage of homeless persons moving from transitional housing to permanent housing; increase the percentage of homeless persons employed at completion of the self-sufficiency program (from 33 to 40 percent); decrease the number of homeless households with children (from 292 to at most 155).

The source of the additional information (not in bold) cannot be identified by either the “Lead Organization” (MWCAA) or the City. While some kind of performance metrics are certainly needed, they need to be understandable and tied to a reliable data source/method, which these presently are not. If the source of additional text cannot be determined and its meaning clarified, it should be omitted.

In that same list is a plan called “Housing First Model.” The Plan states:

City of Salem City staff has been meeting with key community leaders to implement a "Housing First" model that would mirror the prevalent permanent supportive housing best practices approach. This includes: Resource mapping to identify all community resources currently flowing into the housing and social service delivery system; leveraging Section 8 vouchers, SHA resources, local, and federal funds in a comprehensive way to provide maximum benefit to target populations; changing housing capital resource allocation processes to ensure integrated, outcome-based investment strategies; and creating new programs utilizing existing unrestricted, market housing units as the backbone for implementing a "Housing First" model. This includes creating financial and non-financial incentives to participate.

The same entry occurs in the 2015-19 Consolidated Plan, however, despite asking dozens of community providers what this entry might be referring to, its origin remains unknown. It
cannot be referring to the MWHI, as that entity was not even conceived until six months after the Consolidated Plan was adopted.

In any event, as noted above, The Plan should identify which City staff have been meeting with which “key community leaders” and where more information about this effort can be found, or it should be omitted as lacking any factual basis.

Under “Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the Implementation of the Consolidated Plan”, The Plan refers to the Mid-Willamette Homeless initiative, but does not describe how the MWHI Task Force is cooperating and coordinating in the implementation of the Consolidated Plan. In fact, there is no mention of the Consolidated Plan anywhere in the MWHI Task Force charter, minutes or meeting materials. Rather, those documents evince the MWHI Task Force’s intent to create its own plan, without reference to the Consolidated Plan.

Below the reference to the MWHI, The Plan states,

Other public entities coordinated with throughout the implementation of the Consolidated Plan include: the City of Salem Planning and Public Works Departments, Mid-Willamette Valley Council of Governments, Oregon Health Authority, etc.

The Planning Division is in the Community Development Department. Neither it, nor the Public Works Department, are “other public entities.” They are parts of the same entity, namely the City of Salem, so their reference here is inapt. Moreover, the narrative fails to describe the nature of the alleged cooperation/coordination with the MWV Council of Governments or the Oregon Health Authority or the entities meant to be included by “etc.”

If there are indeed additional public entities with which the City has cooperated/coordinated, they should be identified and the cooperation/coordination described in sufficient detail to allow the average citizen to understand it. The comparable section of the 2015-2019 Consolidated Plan is more, but not completely, responsive to the question.

In the section “AP-12 Participation”, under “1. Summary of citizen participation process/Efforts made to broaden citizen participation [:] Summarize citizen participation process and how it impacted goal-setting”, The Plan describes the process used last year for the 2015-2019 Consolidated Plan. But, as discussed above, that was last year’s process, so the narrative is not responsive to the question.

The Plan also restates that “The development of the 2015-2019 Consolidated Plan and the Annual Action Plan is guided by the effort of the Community Services and Housing Commission (CSHC)...” Presumably, the City means by this to impart that CSHC is one form of citizen participation, which it is.

As discussed above, however, the CSHC (and up until fall of 2015, the CSHC’s predecessor board [SSAB] and commission [HUDAC]) is responsible to review and rank grant applications, and
make funding recommendations to the City Council. At the end of that process, CSHC is asked to recommend *pro forma* adoption of The Plan. It did not, beyond executing those duties, “guide” the development of the Consolidated Plan or this Annual Action Plan, as shown by the CSHC minutes. The Plan development is guided by staff, not CSHC.

The same is true of the repeated generic reference to the MWHi Task Force in this section. The MWHi Task Force had no role in the citizen-participation process, and has had no impact on goal-setting for The Plan. The fact of its formation is, rather, further evidence of the CoC’s irrelevance in this community, as discussed below.

The MWHi was conceived as a response to pressure from local citizens and downtown businesses on the City Council, particularly the Mayor, arising from the long-unmet need for after-hours public toilets downtown, and concern over the lack of shelter for homeless youth, particularly minor females. If the CoC were in fact the functional network that The Plan describes, Salem’s Mayor and City Council would have turned to it, rather than forming yet another quasi-government entity like the MWHi Task Force to create yet another strategic plan to address the problems of housing/homelessness in this community.

Also in this section, The Plan restates the paragraph, discussed above, from the Introduction: “Staff is working with...key agencies...to better coordinate housing, health, mental health, prevention of homelessness, and social services in the City of Salem.” As observed previously, it is unclear from either this statement or its context what coordinating actions the City has taken or plans to take, and which agencies those actions involve. It is also unclear what, if anything, these actions have to do with The Plan’s citizen-participation process.

The City’s efforts to broaden citizen participation were and are inadequate, notwithstanding that they may, nominally, satisfy The Citizen Participation Plan. In 2016, it is nothing short of a bureaucratic fiction that a one-day notice in a local paper of steadily diminishing circulation, a “media release”, and two 15-second announcements at monthly meeting of local providers somehow constitute outreach. And it’s not a matter of resources or ability, as discussed below.

The City does know how to encourage citizens to participate, as, for example, demonstrated by the many Facebook postings inviting citizens to attend the Mayor’s State of the City speech luncheon. The City simply hasn’t made the same effort with respect to The Plan.

On request, the City did post, once, on its Facebook page, an announcement of the May 9 hearing on The Plan with an obscure link to something called, “bit.ly” (not what was requested, but technically correct). A slightly more engaging notice and link went out in the April 15 Community Connection. Much more could have been done.

Lastly, despite the fact that the City advertised that paper copies of The Plan would be available at two locations, at no time could we find paper copies of The Plan at the Library, or Library staff that knew anything about the Plan. Urban Development Department staff, when asked, printed a copy of The Plan for us, but, obviously, we had to know to ask for it. There were no
copies with the other literature in the waiting area when we visited during the comment period.

In the section “AP-15 Expected Resources”, The Plan states that “The City does not participate in a Section 108 loan guarantee program...” However, in section “AP-35 Projects”, the name of Project 5 is “108 Loan Payments”, which is described in the section “AP-38 Projects Summary” as “This project is for the payment of 108 Loan Payments [sic].” These apparently inconsistent statements need to be reconciled and the project explained in sufficient detail to permit the average citizen to understand Project 5.

In the section “AP-35 Projects”, is a table that lists Project 5 as “108 Loan Payments”, which is described in the section “AP-38 Projects Summary” as “This project is for the payment of 108 Loan Payments [sic].” However, in section “AP-15 Expected Resources”, The Plan states that “The City does not participate in a Section 108 loan guarantee program...” These apparently inconsistent statements need to be reconciled and the project explained in sufficient detail to permit the average citizen to understand Project 5.

Under “Describe the reasons for allocation priorities and any obstacles to addressing underserved needs”, The Plan states only that allocations are based on Consolidated Plan goals/priorities, which, of course, does not explain why some projects were funded and others were not, or why some received the full amount of the request and some received less. (The standard explanation in section AP-10 that the unfunded projects were not funded “due to the number of applications and the limited amount of funding available” is bureaucratic nonsense and unacceptable.)

It should be acknowledged that, as anyone who has participated in or witnessed the rating process knows, the process is highly political. Therefore, giving true reasons for allocation priorities would be difficult, but not impossible.

As for the obstacles, The Plan asserts that “[t]he largest obstacle to addressing the needs of underserved populations is that there is simply not enough money” and (in more bureaucratic language) that housing subsidies have not kept pace with rising rents. This response is further proof, if any were needed, that The Plan is not the product of collaboration with the community, for the reasons discussed below.

Everyone knows that there is not enough money. There is never enough money. That is precisely why coordination and collaboration are needed. But, like a lot of things, it’s not likely to happen until the City recognizes it’s not happening, and resolves to do something about it. Salem residents must face the fact that Salem is not the “collaboration capital” when it comes to addressing the problems of housing/homelessness. Salem is, rather, the “everybody-does-their-own-thing capital” in this area.

The City is asked in this section to analyze the way that services are provided – not just federally funded services, but all services – and determine what, besides “money”, is preventing those
services from reaching the people who need them. For instance, Salem’s only shelters are in Marion County. The requirement of probation that one reside in the supervising county is an obstacle to serving the need for shelter of homeless West Salem residents on probation. The analysis would be easy if the City had, in fact, engaged in the coordinating and collaborative activities it purports to have done, and more difficult if it has not.

In the section “AP-65 Homeless”, under “Describe the jurisdiction’s one-year goals and actions for reducing and ending homelessness including [:] Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs”, the Plan describes only the annual Point-in-Time Count and the MWHI. The Plan states:

The purpose of [the MWHI] is to address issues that cause and contribute to homelessness, to determine and address barriers to necessary housing, and to respond to needs identified in the Mid-Willamette Valley Community Action Agency’s 2015 Homeless Count Report, the Consolidated Plan, and Council Goals.

However, according to the MWHI’s Charter, the purpose of the MWHI is “to identify and launch proven strategies that will reduce homelessness in the Marion-Polk county region.” The MWHI Task Force includes no one from the homeless community, and it has never stated it intends to carry out the above purpose attributed to it. The MWHI did not even come into existence until 2016.

Aside from administering federal grants, “the jurisdiction” has no one-year goals/actions for reducing ending homelessness or reaching out to homeless persons and assessing their individual needs. That is because “the jurisdiction” is not coordinated, despite The Plan’s assertions to the contrary. For years, segments of the community have engaged in uncoordinated, piecemeal efforts through loosely networked organizations, each doing their own thing, as they compete for funding. They are not working in concert or individually to implement the 10-Year Plan, except insofar as their goals may overlap. Their plans, if they have one, are their own, and they are not coordinated with others’ plans in any meaningful sense.

Under “Addressing the emergency shelter and transitional housing needs of homeless persons”, “Helping homeless persons”, and “Helping low-income individuals and families”, The Plan describes only those organizations and programs that recently received federal grants, and then states, under “Discussion”,

As described above, the City will be continuing the effort to prevent and eliminate homelessness. The issue of homelessness will be addressed through multiple programs…”

The failure to include in this section the “multiple programs” that did not receive funding is a further indication that the City’s goals and actions with respect to preventing and eliminating homelessness are limited to administering the grant process.
There is, moreover, notably absent from this section of The Plan any mention of the annual Salem-Kelzer Community Connect that occurs each March, for which the City of Salem provides two dental vans at a cost of about $2,000, or the fact that the Salem police officers have partnered with mental health and other social workers to assist them in encounters with people living on the streets and in encampments around the City, as opposed to arresting them, as was the practice previously. Once again, had The Plan truly been the product of collaboration, these details, and many others, would have been included.

In the section “AP-75 Barriers to Affordable Housing”, under “Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment” The Plan narrative describes the projects that received funding, the City’s requirement of reserve accounts, and system development charge waivers.

Notably absent from this section is the fact that the Salem Housing Authority Board of Commissioners recently adopted the recommendation of the Salem Housing Advisory Committee’s recommendation

That the City of Salem Housing Authority Board of Commissioners direct the Housing Administrator, in conjunction with the Executive Director, to address the growing deficit of affordable rental housing for low and moderate income Seniors, Disabled and Families by pursuing the development of mixed-income affordable housing on the North Campus of the State Hospital, and elsewhere within the City and the Housing Authority's area of operations. Further, to create an affordable housing committee that is responsible for developing affordable housing policies and strategies and reporting on progress on affordable housing development.

Also absent is the fact that the City Council recently accepted the Housing Needs Analysis and directed staff to begin advancing the study’s recommendations to address Salem’s deficit of land for multifamily housing. Once again the point must be made: had The Plan truly been the product of collaboration, it would have included these details, and likely many others.

Under “Discussion”, The Plan states

Below is a description of how the City intends to address the impediments listed in the Analysis of Impediments to Fair Housing for the City of Salem. A full accounting of the impediments is also included in the attached hard copy of the Annual Action Plan.

First, The Plan is the Annual Action Plan, and it does not include a full accounting of the impediments to affordable housing, so the second sentence cannot be true.

Second, under four categories of impediments, Fees and Charges, Limitations, Availability, and Other, The Plan describes (again) the projects that received funding. However, without some explanation of each impediment, it is impossible to understand how they are addressed by the
projects described. This problem does not occur in the comparable section of the 2015-2019 Consolidated Plan (see page 179).

In the section “AP-85 Other Actions”, under “Actions planned to address obstacles to meeting underserved needs”, The Plan states “Coordination between public and private housing and social services agencies is an extremely important activity”, which is true.

Then it states, “The City participates in the CoC collaborative, which is comprised of various housing and social service agencies”, which is misleading, because, as discussed above, it gives the incorrect impression that the City is participating meaningfully in a functional group called the “CoC collaborative”, when neither is true. As discussed above, the “CoC collaborative” consists of the current funding cycle’s “sub-grantees” who meet infrequently and have never managed to expand into an effective network. The statement is, therefore, mostly false.

The same is true for the next sentence, “The collaboration of many local stakeholders provides better service to the underserved through many different projects and programs.” It probably would, if it were occurring, but it isn’t. At least not on the Marion County side. Polk County is different, but not because of anything the City is doing.

Lastly, “Partnering with these institutions is vital to overcoming any gaps in institutional structure, and will continue in the next plan year.” (Emphasis added.) This statement is just false. You cannot continue what you have not begun. The City may claim as partners the participants in its grant application and administration process, but anything beyond that the City has yet to undertake.

The Plan then describes, again, the projects most recently funded. The fact that the narrative in this section omits to mention any other agencies’ projects is a further indication that the City is not, in fact, collaborating with those agencies, and remains institutionally unaware of their activities.

Under “Actions planned to reduce the number of poverty-level families” The Plan states, “Poverty reduction strategies in the City encompass a variety of processes that provide support to agencies assisting low and moderate-income households as they progress toward economic self-sufficiency.” This statement is nonsense. The City has no “poverty reduction strategies” apart from federal programs administration, and the 10-Year Plan, which it has never implemented or attempted to implement. As noted previously, it was because the City had no “poverty reduction strategies” of its own that the MWHI Task Force came to be created in 2016.

The Plan states “Section 3 guidelines are provided to every organization carrying out construction projects” without explaining what the Section 3 program is, or how providing Section 3 guidelines (presumably an administrative duty) is designed to reduce the number of poverty-level families. Moreover, the inclusion of such bureaucratic minutiae into the narrative shows just how narrow a view the City takes of its role and responsibilities.
Under "Actions planned to develop institutional structure", and "Actions planned to enhance coordination between public and private housing and social service agencies", the Plan narrative continues in this section in the same vein as described above, making false and misleading general statements designed to give the impression that the City is seriously engaged in developing institutional structure, planning, and enhancing coordination between housing and social service agencies, beyond what is needed to administer its federal programs. That this is not the case is partly demonstrated by the fact that the only specific actions cited in this section are those of the most recently funded agencies. The other housing and social service agencies apparently just do not exist, as far as the City is concerned, until they enter the sphere of federal programs.

If the City were seriously engaged in developing institutional structure, planning, and enhancing coordination between housing and social service agencies, beyond what is needed to administer its federal programs, this section would a) cite "other" actions (consistent with the title of the section), and b) show how those other actions develop institutional structure and enhance coordination. The "monitor[ing]" activity of the City's Urban Renewal Agency cited under "Discussion" in this section fails with regard to the latter, but, again, its inclusion illustrates rather well just how narrow a view the City takes of its role and responsibilities, not to mention its lack of vision in this area.

Errata

Below are sections of the narrative that contain minor errors. Followed by the section where the error occurs (e.g., AP-05). (And in parentheses, if needed, an explanation.)

A more detailed account of the goals and the subset goals are identified in section SP-45. AP-05. (That is a reference to the Consolidated Plan. (The Plan does not contain a section SP-45.)

[T]his Annual Action Plan is a collective effort of City of Salem Urban Development staff, Salem Urban Developement Community Services and Housing Commission (CSHC)... PR-05.

Activities to enhance coordination...are evident in the organizations listed in the Consultation section of this Consolidated Plan. AP-10. (Should be "Annual Plan.")

The City support's the rehabilitation of existing homeless shelters and facilities... AP-10

[EHN] was consulted...at the March 11, 2016 meeting. AP 10. (Should be “March 10.”)

The development of the 2015-2019 Consolidated Plan and the Annual Action Plan is guided by the effort of the Community Services and Housing Commission (CSHC), and this draft will be made available to the public for review and comment beginning March 31, 2016. AP-12. (Should be “Salem Urban Development, Community Services and Housing Commission”.

Presentation, review, and recommendation of the plan by CSHC. AP-12. (Should be “Presentation of, review by, and approval of the plan..."
...General Fund dollars for various social service programs and for the annual Homeless Connect. AP-15. (Should be “Salem-Keizer Community Connect.”)

Expected Amount Available Reminder of ConPlan. AP-15

The Continuum of Care (CoC) is a community based long-range plan... AP-15 (Should be “a community-based long range planning organization” to be consistent with The Plan’s statement in AP-10, Introduction.)

SHA administers five homeless vouchers and three domestic violence vouchers... AP-15. (Effective February 2016, SHA administers 10 homeless vouchers and 5 domestic vouchers.)

The City's distribution of HOME and CDBG funds are based on the type of project... AP-35.

The City plans to dedicate $137,448 for CHDO set-aside projects... AP-35. (Acronym only.)

Coordiated Access to Housing. AP-38.

The punctuation was not corrected when the paragraph under section AP-65 Homeless... was converted to bullet points. AP-65.

A colon is missing at the end of this and similar headings: Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including. AP-65.

A full accounting of the impediments is also included in the attached hard copy of the Annual Action Plan. AP-75.

http://yournosalem.blogspot.com/2016/02/mwhitf-first-meeting.html
http://www.cityofsalem.net/Residents/HousingAuthority/Pages/EmergencyHousingNetwork.aspx
http://www.cityofsalem.net/CityCouncil/BoardsAndCommissions/AgendasandMinutes/Community%20Services%20Commission/Minutes-03.02.16-CSHC.pdf
https://www.hudexchange.info/programs/section-108/
Responses to comments received from Michael Livingston and Sara Owens on the Annual Action Plan

The document format required is very prescribed and can be somewhat difficult for readers to follow. US Department of Housing and Urban Development (HUD) requires that Annual Plans be completed in a HUD-approved web based system. The system has very defined fields that only allow for limited comments under a maximum number of character spaces. City staff attempts to provide as much detail as possible within the system’s parameters and constraints.

Some of the information in the Annual Action Plan is automatically populated in the electronic system with information from the electronically approved 2015 – 2019 Consolidated Plan. Furthermore, the system requires sections to be completed that relate directly to the Consolidated Plan rather than the Annual Action Plan. HUD is trying to streamline the process and it can be difficult to differentiate the Consolidated Plan information from the Annual Action Plan information.

1. **Comment:**

   “In the section “PR-05 Lead & Responsible Agencies”, The Plan contains this optional narrative: Activities and programs funded by both CDBG and HOME are carried out in cooperation with several partners: community based non-profit organizations, for-profit organizations, faith-based groups, private developers, and other City and State agencies and departments. The creation of this Annual Action Plan is a collective effort of City of Salem Urban Development staff, Salem Urban Development (sic) Community Services and Housing Commission (CSHC), participating citizens, and community stakeholders.

   CDBG- and HOME-funded activities and programs are carried out in cooperation with the City’s subgrantees, which are named later in The Plan. As discussed below, The Plan is basically the product of the City’s Urban Development Department. To say that The Plan is the result of some kind of collective effort is greatly overstating the degree to which The Plan reflects outside inputs.

   The CSHC is responsible to review and rank grant applications, and make funding recommendations to the City Council. At the end of that process, it is asked to recommend pro forma adoption of The Plan. Neither the CSHC, the citizenry, nor the “community stakeholders” (i.e., sub-grantees) were involved in any meaningful way in the creation of the plan, or, historically, have ever given it scrutiny, if they read it at all.”

   **Response:**

   The PR-05 Lead & Responsible Agencies: This is a section from the 2015-2019 Consolidated Plan. During the creation of the Consolidated Plan staff attended meetings of Salem neighborhood associations as schedules allowed and the associations had room on their agendas; attended community social service agency meetings as invited; attended and presented to the Emergency Housing Network; posted articles in the Statesman Journal; sent a survey request through Survey Monkey to the public and local business owners and posted a link to the survey on the City’s web site; staffed a booth at the Wednesday Farmers’ Market; posted in the Community Connection and the Urban Development Department Quarterly; posted flyers at locations including but not limited to institutions of higher education, libraries, Social Security Administration, Veterans Administration, social service agencies, public buildings, and the Salem-Keizer School District Lancaster Rd. office; and held discussions with organizations the City has collaborated with currently and in the past.
2. **Comment:**

   "In the section "AP-10 Consultation", under "1. Introduction", The Plan states "The development of this Annual Action Plan is guided by the effort of CSHC." As discussed above, the CSHC is responsible to review and rank grant applications, and make funding recommendations to the City Council. At the end of that process, it is asked to recommend pro forma adoption of The Plan. The CSHC does not "guide the development" of The Plan.

   Further on in this section, The Plan states, "Staff is working with...key agencies...to better coordinate housing, health, mental health, prevention of homelessness, and social services in the City of Salem." It is unclear from either this statement or the narrative that follows it what actions the City has taken or will take, and which agencies those actions involve. If, indeed, "Staff" are working with "key agencies" in some way outside federal programs administrative activities, the narrative should describe that work in sufficient detail to allow the average citizen to understand and seek more information about it."

   **Response:**

   **AP-10 Consultation:** The development of the Annual Action Plan requires staff review HUD’s checklist on Annual Action Plan development to ensure the Annual Action Plan is completed in compliance with HUD expectations. Staff completes the Annual Action Plan (and the Consolidated Plan) in compliance with the federal regulations and then solicits input from the Salem Urban Development, Community Services and Housing Commission (CSHC) and the public. If either group suggests changes or has comments, staff includes those comments in the final Annual Action Plan provided to City Council and then subsequently submitted to HUD for approval.

   Staff participates in meetings and various activities when agencies request City involvement. The 2015-2019 Consolidated Plan lists the organizations the City has worked with in the past and anticipates the same collaboration in the future.

3. **Comment:**

   "Under "Provide a concise summary of...activities to enhance coordination..."", The Plan states, "Activities to enhance coordination...are evident in the organizations listed in the Consultation section of this Consolidated Plan." However, no coordinating activities are evident in the section referred to, which is just a list of the most recent federal grant applications, discussed below in more detail."

   **Response:**

   **Provide a concise summary:** The table provides the name of the agency, types of clients served, the section of the Consolidated Plan that discusses the activities of each organization, and the organization's response to the survey for the development of the 2015-2019 Consolidated Plan. The organizations listed were those that responded to the survey. The survey was available to the public for input during development of the Consolidated Plan. This particular section is a Consolidated Plan element that has been merged over to the Annual Action Plan template. Staff has been in conversations with HUD regarding the applicability of this section to the Annual Action Plan.

4. **Comment:**

   "Under "Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons...and persons at risk of homelessness", The Plan states "The Continuum of Care is a community[-]based long-range planning organization...[that] is comprised of community stakeholders...", that "Over the next year, the City's strategy...is to support community agencies"
providing services...”, that “The City...will continue to advance the efforts of the Marion and Polk Counties Plan to End Homelessness through partnerships with members of the Continuum of Care”, and that “Gap analysis allows the City of Salem to leverage other viable and necessary resources for programs and projects.”

The narrative that follows the latter statement fails to support or even make sense of it. The narrative does not discuss how the City will, beyond being a conduit for federal funds, “support” agencies or “advance the efforts” of the Marion and Polk Counties Plan to End Homelessness (10-Year Plan). In fact, the City has never attempted to implement the 10-Year Plan, as discussed below.

The comparable 2015-19 Consolidated Plan narrative states that the City’s “strategy of reducing, preventing, and supporting the elimination of homelessness is to market CDBG and HOME funds.” 2015-19 Con Plan at 14. (Emphasis added.) If, as The Plan would seem to suggest, the City’s strategy consists of more than marketing CDBG and Home funds, The Plan should describe those elements specifically.

The statement that the Continuum of Care for Marion and Polk Counties (CoC) constitutes a long-range planning organization comprised of community “stakeholders” is misleading. According to the Mid-Willamette Community Action Agency, which is responsible for coordinating CoC meetings, the CoC consists only of the current funding cycle’s “sub-grantees”, which MWVCAA has, by its own admission, been unable to expand into an effective network, or engage in long-range planning. On information and belief, this fact is well known in the provider community.

If the City does have partnerships with (vs. favorites among) the CoC members (i.e., its sub-grantees) beyond monitoring compliance with funding requirements, then The Plan should describe the partnerships in sufficient detail to allow the average citizen to understand them, including which agencies of the City are involved, with which sub-grantee, and the nature of the partnership.”

Response:
Describe coordination with the Continuum of care and efforts to address...: In 2014 the City began the process of creating the 2015-2019 five-year Consolidated Plan which is required by HUD in order for the City to receive federal entitlement dollars. During that process the City provided many avenues for citizens and organizations to give input into creating the 2015-2019 five-year goals as they relate to federal funding (Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) requirements. The City received 424 interested citizen responses to the Survey Monkey survey, 94 citizen responses to the Wednesday Farmers’ Market survey, and responses from 100+ agencies that attended the EHN meeting where the presentation was given. These responses were incorporated into the 2015-2019 Consolidated Plan. Organizations that submitted comments included agencies receiving Continuum of Care funding and that may have been receiving CDBG, HOME, or General Fund from the City. There were also private business owners, non-profits, and governmental organizations that provided responses.

The Marion and Polk Counties Ten-Year Plan to End Homelessness is a document that was created several years ago by many different stakeholders. These stakeholders consisted of individuals, companies, government agencies, local social service organizations etc. This is not a City document and the City is not a lead for implementation. The City does, however, take into account this Plan and other plans such as the Housing Needs Assessment and the local Comprehensive Economic Development Strategy (CEDS) report.
5. **Comment:**

“Under “Describe consultation with the Continuum(s) of Care...in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS”, The Plan narrative makes no mention of ESG funds, performance standards, outcome evaluation, funding development or HMIS administration, all of which suggests that no such consultations/determinations occurred, consistent with the City’s limited involvement with CoC members, as described above. If consultations did occur, The Plan should describe them specifically, and describe specifically what, if any, determinations were made as a result. If they did not occur, The Plan should explain why they did not occur and what steps the City intends to take over the next year to remedy its failure.”

**Response:**

Describe consultation with the Continuum(s) of Care that serves the jurisdiction’s area in determine how to allocate Emergency Shelter Grant (ESG) funds... The City does not receive ESG money and does not require participation in the HIMS system. The information provided in this section was meant to provide information on who the appropriate contact for this information would be.

6. **Comment:**

“Under “2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities”, and for each agency/group/organization, discuss “How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?”, The Plan lists, with one exception, only agencies that applied for funds, what the funds were for, and whether the funds were awarded. There is no discussion of anticipated outcomes or improving coordination.

The one non-applicant agency listed in this section is the Emergency Housing Network (EHN), which is a group of “hundreds of community partners and stakeholders who want to network with, educate, or update other advocates and agencies serving the homeless and at-risk populations of greater Salem.” Its monthly meetings follow a lunch/speaker/networking format and is facilitated by the Salem Housing Authority.

The Plan states that EHN “was consulted through notification and distributed information at the March ...2016 meeting.” However, all that occurred at that meeting was that a federal programs employee made a 15-second announcement at the end of the meeting that The Plan’s public comment period would open at the end of the month, followed by the public hearing in May. Announcements and accepting grant applications cannot reasonably be construed as the equivalent of a consultation.

Lastly, the narrative in this section omits one grant applicant: the Salvation Army. The minutes of the CSHC, which reviews these funding applications and makes federal funding recommendations to the Salem City Council, indicate that the Salvation Army applied for, and was denied funds during the funding cycle covered by The Plan. It is not, however, listed anywhere in The Plan.

**Response:**

Describe agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations... HUD requires the Plan use the table starting on page 10. This table is prescribed and the HUD electronic management system only allows a limited number of characters therefore limiting the amount of detail. The agencies identified in the plan are those agencies that have come to the City for funding and have provided a lot of input into the system and how it works. In some
cases the Executive Directors (or their staff) have participated in CSHC meetings. The Commission is always willing to take comment from any organizations whether in attendance or not.

Emergency Housing Network (EHN) meets monthly at the Union Gospel Mission, and City staff is usually in attendance. City staff was asked to present at a meeting in the fall regarding funding, how it can be used, when applications are available, and how the funds can be used. Staff always provides updates when possible.

7. **Comments:**
   “Under “Identify any Agency Types not consulted and provide rationale for not consulting”, The Plan states, “A wide range of...[agency types was] consulted during this [sic] Consolidated Plan process and subsequently as listed above for the Annual Action Plan and public meetings. There were no known agency types not consulted.”

However, the Consolidated Plan process took place last year. The information requested concerns consultations made with respect to this year’s Plan. If, as it appears, the City consulted only this year’s grant applicants “and public meetings”, then The Plan should so state, describing any “public meetings” with enough specificity for the average citizen to be able to identify them.

The fact that the City consulted a wider range of agency types last year might, perhaps, be a rationale for not consulting them again during this year’s process. However, if the City has the collaborative relationship with providers (other than its sub-grantees), consulting them during this year's process should not have been difficult.”

**Response:**
Identify any Agency Types not consulted...: The Consolidated Plan consultation process was much more expansive due to goal-setting for the next five years. Every year the City publishes and provides information and informs the public of the opportunity to apply for funding.

8. **Comment:**
   “Under “Other local/regional/state/federal planning efforts considered when preparing the Plan”, the CoC and its four assigned goals from the 10-Year Plan are listed. They appear in bold print in the excerpt below:
   
   Create new permanent housing beds for the chronically homeless (60 beds in 10 years); increase the percentage of homeless persons staying in permanent housing over six months to at least 71 percent (increase from 80 percent to 85 percent?); increase the percentage of homeless persons moving from transitional housing to permanent housing; increase the percentage of homeless persons employed at completion of the self-sufficiency program (from 33 to 40 percent); decrease the number of homeless households with children (from 292 to at most 155).

The source of the additional information (not in bold) cannot be identified by either the “Lead Organization” (MWCAA) or the City. While some kind of performance metrics are certainly needed, they need to be understandable and tied to a reliable data source/method, which these presently are not. If the source of additional text cannot be determined and its meaning clarified, it should be omitted.
In that same list is a plan called "Housing First Model." The Plan states:
City of Salem City staff has been meeting with key community leaders to implement a "Housing First" model that would mirror the prevalent permanent supportive housing best practices approach. This includes: Resource mapping to identify all community resources currently flowing into the housing and social service delivery system; leveraging Section 8 vouchers, SHA resources, local, and federal funds in a comprehensive way to provide maximum benefit to target populations; changing housing capital resource allocation processes to ensure integrated, outcome-based investment strategies; and creating new programs utilizing existing unrestricted, market housing units as the backbone for implementing a "Housing First" model. This includes creating financial and non-financial incentives to participate.

The same entry occurs in the 2015-19 Consolidated Plan, however, despite asking dozens of community providers what this entry might be referring to, its origin remains unknown. It cannot be referring to the MWHI, as that entity was not even conceived until six months after the Consolidated Plan was adopted. In any event, as noted above, The Plan should identify which City staff have been meeting with which "key community leaders" and where more information about this effort can be found, or it should be omitted as lacking any factual basis."

Response:
Other local/regional/state/federal planning...: The HUD electronic system included parts of the Consolidated Plan in the Annual Action Plan template. This particular table is one of these instances in which the table is specifically related to the information previously provided in the 2015-2019 Consolidated Plan. During the Consolidated Plan process this statement was true. As for the Marion and Polk Counties Plan to End Homelessness, this is not a City document and City staff did not create this report.

9. Comment:
"Under "Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan". The Plan refers to the Mid-Willamette Homeless Initiative, but does not describe how the MWHI Task Force is cooperating and coordinating in the implementation of the Consolidated Plan. In fact, there is no mention of the Consolidated Plan anywhere in the MWHI Task Force charter, minutes or meeting materials. Rather, those documents evince the MWHI Task Force’s intent to create its own plan, without reference to the Consolidated Plan.

Below the reference to the MWHI, The Plan states,
Other public entities coordinated with throughout the implementation of the Consolidated Plan include: the City of Salem Planning and Public Works Departments, Mid-Willamette Valley Council of Governments, Oregon Health Authority, etc.

The Planning Division is in the Community Development Department. Neither it, nor the Public Works Department, are “other public entities.” They are parts of the same entity, namely the City of Salem, so their reference here is inapt. Moreover, the narrative fails to describe the nature of the alleged cooperation/coordination with the MWV Council of Governments or the Oregon Health Authority or the entities meant to be included by “etc.”
If there are indeed additional public entities with which the City has cooperated/coordinated, they should be identified and the cooperation/coordination described in sufficient detail to allow the average citizen to understand it. The comparable section of the 2015-2019 Consolidated Plan is more, but not completely, responsive to the question."

Response:
Describe cooperation and coordination with other public entities...: This question is a required question of the Consolidated Plan and not the Annual Action Plan. Again, this is a field, specifically related to the 2015-2019 Consolidated Plan. Staff added the information regarding the Mid-Willamette Homeless Initiative to inform the public of other groups looking into the homeless population needs. Organizations or groups are not required to conform to or work towards the goals identified in the City’s 2015-2019 Consolidated Plan.

10. Comments: In the section “AP-12 Participation”, under “1. Summary of citizen participation process/Efforts made to broaden citizen participation [...] Summarize citizen participation process and how it impacted goal-setting”, The Plan describes the process used last year for the 2015-2019 Consolidated Plan. But, as discussed above, that was last year’s process, so the narrative is not responsive to the question.

The Plan also restates that “The development of the 2015-2019 Consolidated Plan and the Annual Action Plan is guided by the effort of the Community Services and Housing Commission (CSHC)...” Presumably, the City means by this to impart that CSHC is one form of citizen participation, which it is. As discussed above, however, the CSHC (and up until fall of 2015, the CSHC’s predecessor board [SSAB] and commission [HUDAC]) is responsible to review and rank grant applications, and make funding recommendations to the City Council. At the end of that process, CSHC is asked to recommend pro forma adoption of The Plan. It did not, beyond executing those duties, “guide” the development of the Consolidated Plan or this Annual Action Plan, as shown by the CSHC minutes. The Plan development is guided by staff, not CSHC.

The same is true of the repeated generic reference to the MWHI Task Force in this section. The MWHI Task Force had no role in the citizen-participation process, and has had no impact on goal-setting for The Plan. The fact of its formation is, rather, further evidence of the CoC’s irrelevance in this community, as discussed below.

The MWHI was conceived as a response to pressure from local citizens and downtown businesses on the City Council, particularly the Mayor, arising from the long-unmet need for after-hours public toilets downtown, and concern over the lack of shelter for homeless youth, particularly minor females. If the CoC were in fact the functional network that The Plan describes, Salem’s Mayor and City Council would have turned to it, rather than forming yet another quasi-government entity like the MWHI Task Force to create yet another strategic plan to address the problems of housing/homelessness in this community. Also in this section, The Plan restates the paragraph, discussed above, from the Introduction: “Staff is working with...key agencies...to better coordinate housing, health, mental health, prevention of homelessness, and social services in the City of Salem.” As observed previously, it is unclear from either this statement or its context what coordinating actions the City has taken or plans to take, and which agencies those actions involve. It is also unclear what, if anything, these actions have to do with The Plan’s citizen-participation process.
The City’s efforts to broaden citizen participation were and are inadequate, notwithstanding that they may, nominally, satisfy The Citizen Participation Plan. In 2016, it is nothing short of a bureaucratic fiction that a one-day notice in a local paper of steadily diminishing circulation, a “media release”, and two 15-second announcements at monthly meeting of local providers somehow constitute outreach. And it’s not a matter of resources or ability, as discussed below.

The City does know how to encourage citizens to participate, as, for example, demonstrated by the many Facebook postings inviting citizens to attend the Mayor’s State of the City speech luncheon. The City simply hasn’t made the same effort with respect to The Plan.

On request, the City did post, once, on its Facebook page, an announcement of the May 9 hearing on The Plan with an obscure link to something called, “bit.ly” (not what was requested, but technically correct). A slightly more engaging notice and link went out in the April 15 Community Connection. Much more could have been done.

Lastly, despite the fact that the City advertised that paper copies of The Plan would be available at two locations, at no time could we find paper copies of The Plan at the Library, or Library staff that knew anything about the Plan. Urban Development Department staff, when asked, printed a copy of The Plan for us, but, obviously, we had to know to ask for it. There were no copies with the other literature in the waiting area when we visited during the comment period.

Response:

AP-12 – Participation: As previously mentioned, the Annual Action Plan follows the format prescribed by HUD, and the City is required to provide the document for public comment. The CSHC had an opportunity to review the document and make suggested changes or ask for further clarification. Staff attends the Emergency Housing Network (EHN) and made several comments regarding the application cycle, and the plan reviews. EHN is a large collaborative of social service providers and those interested in helping underserved populations. At these meetings selected organizations make presentations to the group, and attendees have an opportunity to add information regarding their organization through agency updates at the end of each meeting.

The Annual Action Plan is made available at the Urban Development Department, City of Keizer, and the City of Salem library. The document, in hard-copy format was hand-delivered to all three locations, and when staff was made aware that the Library could not locate their copy of the document staff immediately hand-delivered a new hard-copy to the reference desk.

11. Comment: In the section “AP-15 Expected Resources”, The Plan states that “The City does not participate in a Section 108 loan guarantee program...” However, in section “AP-35 Projects”, the name of Project 5 is “108 Loan Payments”, which is described in the section “AP-38 Projects Summary” as “This project is for the payment of 108 Loan Payments [sic].” These apparently inconsistent statements need to be reconciled and the project explained in sufficient detail to permit the average citizen to understand Project 5.

In the section “AP-35 Projects”, is a table that lists Project 5 as “108 Loan Payments”, which is described in the section “AP-38 Projects Summary” as “This project is for the payment of 108 Loan Payments [sic].” However, in section “AP-15 Expected Resources”, The Plan states that “The City does not participate in a Section 108 loan guarantee program...” These apparently inconsistent statements need
to be reconciled and the project explained in sufficient detail to permit the average citizen to understand Project 5.

Response:
AP – 15 Expected Resources: The City did not implement a loan guarantee program. Rather the City is repaying HUD CDBG Section 108 funds borrowed for the construction of the Convention Center.

12. Comment:
"Under "Describe the reasons for allocation priorities and any obstacles to addressing underserved needs", The Plan states only that allocations are based on Consolidated Plan goals/priorities, which, of course, does not explain why some projects were funded and others were not, or why some received the full amount of the request and some received less. (The standard explanation in section AP-10 that the unfunded projects were not funded "due to the number of applications and the limited amount of funding available" is bureaucratic nonsense and unacceptable.)

It should be acknowledged that, as anyone who has participated in or witnessed the rating process knows, the process is highly political. Therefore, giving true reasons for allocation priorities would be difficult, but not impossible.

As for the obstacles, The Plan asserts that "[t]he largest obstacle to addressing the needs of underserved populations is that there is simply not enough money" and (in more bureaucratic language) that housing subsidies have not kept pace with rising rents. This response is further proof, if any were needed, that The Plan is not the product of collaboration with the community, for the reasons discussed below.

Everyone knows that there is not enough money. There is never enough money. That is precisely why coordination and collaboration are needed. But, like a lot of things, it's not likely to happen until the City recognizes it's not happening, and resolves to do something about it. Salem residents must face the fact that Salem is not the "collaboration capital" when it comes to addressing the problems of housing/homelessness. Salem is, rather, the "everybody-does-their-own-own-thing capital" in this area.

The City is asked in this section to analyze the way that services are provided – not just federally funded services, but all services – and determine what, besides "money", is preventing those services from reaching the people who need them. For instance, Salem's only shelters are in Marion County. The requirement of probation that one reside in the supervising county is an obstacle to serving the need for shelter of homeless West Salem residents on probation. The analysis would be easy if the City had, in fact, engaged in the coordinating and collaborative activities it purports to have done, and more difficult if it has not."

Response:
Describe the reasons for allocation priorities...: HUD requires the City create a five-year Consolidated Plan. In that Plan the City must indicated how the goals were determined and in the next five years how the City will meet those goals. As federal budgets continue to be reduced and community needs increase, it becomes increasingly hard to provide enough resources to address those needs.

13. Comment:
"In the section "AP-65 Homeless", under "Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including [:] Reaching out to homeless persons (especially
unsheltered persons) and assessing their individual needs”, the Plan describes only the annual Point-in-Time Count and the MWHI. The Plan states:

The purpose of [the MWHI] is to address issues that cause and contribute to homelessness, to determine and address barriers to necessary housing, and to respond to needs identified in the Mid-Willamette Valley Community Action Agency’s 2015 Homeless Count Report, the Consolidated Plan, and Council Goals.

However, according to the MWHI’s Charter, the purpose of the MWHI is “to identify and launch proven strategies that will reduce homelessness in the Marion-Polk county region.” The MWHI Task Force includes no one from the homeless community, and it has never stated it intends to carry out the above purpose attributed to it. The MWHI did not even come into existence until 2016.

Aside from administering federal grants, “the jurisdiction” has no one-year goals/actions for reducing ending homelessness or reaching out to homeless persons and assessing their individual needs. That is because “the jurisdiction” is not coordinated, despite The Plan’s assertions to the contrary. For years, segments of the community have engaged in uncoordinated, piecemeal efforts through loosely networked organizations, each doing their own thing, as they compete for funding. They are not working in concert or individually to implement the 10-Year Plan, except insofar as their goals may overlap. Their plans, if they have one, are their own, and they are not coordinated with others’ plans in any meaningful sense.”

Response:

AP – 65 Homelessness: Social service agencies submit applications for funding to provide services to individuals and/or families experiencing homelessness in ways that will help bring about self-sufficiency.

14. Comment:

“Under “Addressing the emergency shelter and transitional housing needs of homeless persons”, “Helping homeless persons”, and “Helping low-income individuals and families”, The Plan describes only those organizations and programs that recently received federal grants, and then states, under “Discussion”,

As described above, the City will be continuing the effort to prevent and eliminate homelessness. The issue of homelessness will be addressed through multiple programs...”

The failure to include in this section the “multiple programs” that did not receive funding is a further indication that the City’s goals and actions with respect to preventing and eliminating homelessness are limited to administering the grant process.

There is, moreover, notably absent from this section of The Plan any mention of the annual Salem-Keizer Community Connect that occurs each March, for which the City of Salem provides two dental vans at a cost of about $2,000, or the fact that the Salem police officers have partnered with mental health and other social workers to assist them in encounters with people living on the streets and in encampments around the City, as opposed to arresting them, as was the practice previously. Once again, had The Plan truly been the product of collaboration, these details, and many others, would have been included.”

Response:

Addressing the emergency shelter, helping the homeless, and helping low-income.: At the beginning of this section is a list of programs that are being recommended for funding. These programs are
implemented by social service organizations that provide the particular services listed in the heading and are experienced in helping these populations.

15. Comments:
"In the section “AP-75 Barriers to Affordable Housing”, under “Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment” The Plan narrative describes the projects that received funding, the City’s requirement of reserve accounts, and system development charge waivers.

Notably absent from this section is the fact that the Salem Housing Authority Board of Commissioners recently adopted the recommendation of the Salem Housing Advisory Committee’s recommendation that the City of Salem Housing Authority Board of Commissioners direct the Housing Administrator, in conjunction with the Executive Director, to address the growing deficit of affordable rental housing for low and moderate income Seniors, Disabled and Families by pursuing the development of mixed-income affordable housing on the North Campus of the State Hospital, and elsewhere within the City and the Housing Authority's area of operations.

Further, to create an affordable housing committee that is responsible for developing affordable housing policies and strategies and reporting on progress on affordable housing development.

Also absent is the fact that the City Council recently accepted the Housing Needs Analysis and directed staff to begin advancing the study’s recommendations to address Salem’s deficit of land for multifamily housing.” Once again the point must be made: had The Plan truly been the product of collaboration, it would have included these details, and likely many others.

Under “Discussion”, The Plan states
Below is a description of how the City intends to address the impediments listed in the Analysis of Impediments to Fair Housing for the City of Salem. A full accounting of the impediments is also included in the attached hard copy of the Annual Action Plan.

First, The Plan is the Annual Action Plan, and it does not include a full accounting of the impediments to affordable housing, so the second sentence cannot be true.

Second, under four categories of impediments, Fees and Charges, Limitations, Availability, and Other, The Plan describes (again) the projects that received funding. However, without some explanation of each impediment, it is impossible to understand how they are addressed by the projects described. This problem does not occur in the comparable section of the 2015-2019 Consolidated Plan (see page 179).”

Response:
AP – 75 Barriers to Affordable Housing.: Staff solicited information from the Salem Housing Authority, and the information staff received is provided in a previous section of the Plan.

The Analysis of Impediments to Fair Housing is available in electronic format and can be found on the City’s web site; http://www.cityofsalem.net/Departments/UrbanDevelopment/FederalPrograms/Pages/default.aspx as unique appendices.
The Analysis of Impediments is completed in conjunction with the Consolidated Plan and is updated with each five-year Consolidated Plan. The Analysis of Impediments to Fair Housing takes into account local and regional information including citizen input during creation of the Consolidated Plan.

16. **Comments:**

"In the section “AP-85 Other Actions”, under “Actions planned to address obstacles to meeting underserved needs”, The Plan states “Coordination between public and private housing and social services agencies is an extremely important activity”, which is true.

Then it states, “The City participates in the CoC collaborative, which is comprised of various housing and social service agencies”, which is misleading, because, as discussed above, it gives the incorrect impression that the City is participating meaningfully in a functional group called the “CoC collaborative”, when neither is true. As discussed above, the “CoC collaborative” consists of the current funding cycle’s “sub-grantees” who meet infrequently and have never managed to expand into an effective network. The statement is, therefore, mostly false.

The same is true for the next sentence, “The collaboration of many local stakeholders provides better service to the underserved through many different projects and programs.” It probably would, if it were occurring, but it isn’t. At least not on the Marion County side. Polk County is different, but not because of anything the City is doing.

Lastly, “Partnering with these institutions is vital to overcoming any gaps in institutional structure, and will continue in the next plan year.” (Emphasis added.) This statement is just false. You cannot continue what you have not begun. The City may claim as partners the participants in its grant application and administration process, but anything beyond that the City has yet to undertake. The Plan then describes, again, the projects most recently funded. The fact that the narrative in this section omits to mention any other agencies’ projects is a further indication that the City is not, in fact, collaborating with those agencies, and remains institutionally unaware of their activities.”

**Response:**

**AP – 85 Other Actions:** Providing funding through social service agencies is a means to partner with organizations that are equipped to serve underserved populations. It is through this collaboration that assistance can be provided to help families become self-sufficient.

17. **Comment:**

“Under “Actions planned to reduce the number of poverty-level families” The Plan states, “Poverty reduction strategies in the City encompass a variety of processes that provide support to agencies assisting low and moderate-income households as they progress toward economic self-sufficiency.” This statement is nonsense. The City has no “poverty reduction strategies” apart from federal programs administration, and the 10-Year Plan, which it has never implemented or attempted to implement. As noted previously, it was because the City had no “poverty reduction strategies” of its own that the MWHI Task Force came to be created in 2016.

The Plan states “Section 3 guidelines are provided to every organization carrying out construction projects” without explaining what the Section 3 program is, or how providing Section 3 guidelines (presumably an administrative duty) is designed to reduce the number of poverty-level families. Moreover, the inclusion of such bureaucratic minutiae into the narrative shows just how narrow a view the City takes of its role and responsibilities.”
Response:
Actions planned to reduce the number of poverty-level families: Section 3 is a HUD program that requires any contractor that receives CDBG or HOME to document if the contractor or anyone he hires meets the income requirements for the Section 3 program. This is designed to provide employment opportunities to low income individuals that may not otherwise have that opportunity.

18. Comment:
“Under “Actions planned to develop institutional structure”, and “Actions planned to enhance coordination between public and private housing and social service agencies”, The Plan narrative continues in this section in the same vein as described above, making false and misleading general statements designed to give the impression that the City is seriously engaged in developing institutional structure, planning, and enhancing coordination between housing and social service agencies, beyond what is needed to administer its federal programs. That this is not the case is partly demonstrated by the fact that the only specific actions cited in this section are those of the most recently funded agencies. The other housing and social service agencies apparently just do not exist, as far as the City is concerned, until they enter the sphere of federal programs.

If the City were seriously engaged in developing institutional structure, planning, and enhancing coordination between housing and social service agencies, beyond what is needed to administer its federal programs, this section would a) cite “other” actions (consistent with the title of the section), and b) show how those other actions develop institutional structure and enhance coordination. The “monitor[ing]” activity of the City’s Urban Renewal Agency cited under “Discussion” in this section fails with regard to the latter, but, again, its inclusion illustrates rather well just how narrow a view the City takes of its role and responsibilities, not to mention its lack of vision in this area.”

Response:
Actions planned to develop institutional structure...Actions Planned to enhance coordination...: City staff meets with social service organizations as opportunities present themselves and if these organizations need assistance then staff tries to look for ways to help.

19. Comment:
Errata
Below are sections of the narrative that contain minor errors. Followed by the section where the error occurs (e.g., AP-05). (And in parentheses, if needed, an explanation.)

A more detailed account of the goals and the subset goals are identified in section SP-45. AP-05. (That is a reference to the Consolidated Plan. (The Plan does not contain a section SP-45.)

[This Annual Action Plan is a collective effort of City of Salem Urban Development staff, Salem Urban Development Community Services and Housing Commission (CSHC)... PR-05.

Activities to enhance coordination...are evident in the organizations listed in the Consultation section of this Consolidated Plan. AP-10. (Should be “Annual Plan.”)

The City support’s the rehabilitation of existing homeless shelters and facilities... AP-10

[EHN] was consulted...at the March 11, 2016 meeting. AP 10. (Should be “March 10.”)
The development of the 2015-2019 Consolidated Plan and the Annual Action Plan is guided by the effort of the Community Services and Housing Commission (CSHC), and this draft will be made available to the public for review and comment beginning March 31, 2016. AP-12. (Should be “Salem Urban Development, Community Services and Housing Commission”.)

Presentation, review, and recommendation of the plan by CSHC. AP-12. (Should be “Presentation of, review by, and approval of the plan...”)

...General Fund dollars for various social service programs and for the annual Homeless Connect. AP-15. (Should be “Salem-Keizer Community Connect.”)

Expected Amount Available Reminder of ConPlan. AP-15

The Continuum of Care (CoC) is a community based long-range plan... AP-15 (Should be “a community-based long range planning organization” to be consistent with The Plan’s statement in AP-10, Introduction.)

SHA administers five homeless vouchers and three domestic violence vouchers... AP-15. (Effective February 2016, SHA administers 10 homeless vouchers and 5 domestic vouchers.)

The City’s distribution of HOME and CDBG funds are based on the type of project... AP-35. The City plans to dedicate $137,448 for CHDO set-aside projects... AP-35. (Acronym only.)

Coordinated Access to Housing. AP-38.

The punctuation was not corrected when the paragraph under section AP-65 Homeless... was converted to bullet points. AP-65.

A colon is missing at the end of this and similar headings: Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including. AP-65.

A full accounting of the impediments is also included in the attached hard copy of the Annual Action Plan. AP-75.

Response:
Errata: Thanks for these suggested changes; they will be incorporated where possible.

1 http://youcandosalem.blogspot.com/2016/02/mwhitf-first-meeting.html
2 http://www.cityofsalem.net/Residents/HousingAuthority/Pages/EmergencyHousingNetwork.aspx
3 http://www.cityofsalem.net/CityCouncil/BoardsAndCommissions/AgendasandMinutes/Community%20Services%20Commission/Minutes-03.02.16-CSHC.pdf
4 https://www.hudexchange.info/programs/section_108/
5 http://www.cityofsalem.net/CouncilMeetingAgenda/Documents/346/3.2a.pdf