

Assessment of the Impediments to Fair Housing and Fair Housing Plan Strategies



Eugene and Springfield, Oregon



April 13, 2010



Table of Contents

I. Introduction	5
II. Fair Housing Law.....	5
III. Community and Demographics.....	9
IV. Fair Housing Complaints.....	26
V. Identification of Impediments to Fair Housing Choice.....	33
Impediments to Fair Housing	35

Fair Housing Plan

I. Introduction

Eugene and Springfield, neighboring cities, have a long history of cooperation as they work together to address increasing the supply of low and moderate income housing and furthering fair housing choices. The two jurisdictions formed a consortium to receive federal HOME funds. Elected officials from both jurisdictions serve on the Intergovernmental Housing Policy Board. The joint Consolidated Plan and this Fair Housing Plan are other examples of the jurisdictions working together.

The federal Fair Housing Act requires the Secretary of HUD “to administer the Department’s housing and community development programs in a manner to affirmatively further fair housing.” The Housing and Community Development Act of 1974 and the National Affordable Housing Act, as amended, govern the administration of CDBG and HOME funding and require participating jurisdictions to certify that they will affirmatively further fair housing.

In order to uphold its commitment to affirmatively further fair housing and meet its federal obligation to engage in fair housing planning, Eugene and Springfield have jointly produced this document which examines laws, demographics related to population, housing and housing choice. Eugene and Springfield conducted an “Analysis of Impediments to Fair Housing Choice” that identifies road blocks affecting fair housing choice.

II. Fair Housing Law

Laws have been adopted at the federal, state and local level to provide protection for people seeking housing.

Federal Law

The Civil Rights Act of 1866 states, “All Citizens of the United States shall have the same right in every State and Territory, as is enjoyed by White citizens thereof, to inherit, purchase, lease, sell, hold and convey real and personal property.”

Between 1866 and 1968 the law was interpreted only to prohibit racial discrimination in housing by government or public action, such as restrictive zoning and enforcement of restrictive covenants. In 1968, the US Supreme Court ruled that the Act prohibited “all racial discrimination, private as well as public, in the sale or rental of property.” Also, in 1968, specific fair housing legislation was enacted in Title VIII of the Civil Rights Act of 1968. The private housing market in the USA was, for the first time, subject to federal laws prohibiting discrimination.

Title VIII prohibits discrimination in the provision of housing based on race, color, religion, sex or national origin. These population groups are known as “protected classes”. Title VII, as amended, is now known as the Fair Housing Act. The law also requires that people with disabilities be allowed to

make “reasonable modifications” to housing at their own expense; that “reasonable accommodations” be made in rules, policies, practices, and services to allow people with disabilities access to and use of a dwelling, and; that housing intended for occupancy on or after March 13, 1991 be constructed so that it can be made accessible.

Under the Fair Housing Act, the following actions are illegal if based on an individual’s race, color, religion, national origin, sex, familial status, or disability.

- Refusing to rent or sell a dwelling after a bona fide offer has been made
- Refusing to negotiate for the sale or rental of a dwelling
- Setting different terms, condition, or privileges related to the sale or rental of a dwelling or to use the facilities or services provided in conjunction with a dwelling
- Saying a dwelling is unavailable for rent or sale when it is available
- Making a profit by convincing owners to sell or rent properties based on fear of declining property values because members of a protected class are moving into a neighborhood (an action known as “blockbusting”)
- Advertising the availability of a dwelling in a way that implies a preference for a certain type of buyer or renter, or places a limitation on the use of a dwelling for certain groups
- Denying access to or membership in any multiple listing service, real estate brokers association or other organization in the business of selling or renting housing, or setting different terms or condition for membership in such organizations
- Refusing to make a mortgage loan
- Refusing to give information about loans
- Setting different terms or conditions for loans
- Discriminating in the appraisal of property
- Refusing to purchase a loan or setting different terms for the purchase of a loan
- Interfering in any way with a person’s exercise of their fair housing rights

The Fair Housing Act exempts coverage from three types of housing:

- Religious organizations or private clubs, which own or operate housing (for other than commercial purposes) may give preference to members of the organization in the sale, rental, or occupancy of that dwelling
- Dwellings whose owner does not own more than three single-family homes and does not use the services of a Realtor or broker in renting or selling the home. This does not exclude the owner from compliance with the laws pertaining to discriminatory advertising or retaliation.
- Housing for people aged 62 or older and housing for people aged 55 and older is exempt from the prohibition against discrimination based on familial status. This housing is still subject to the

prohibitions against discrimination based on membership in other protected classes and in regard to advertising and must meet specific criteria to be so designated.

When there are complaints, the Fair Housing Act establishes a process for a HUD administrative law judge to review complaints in cases that cannot be resolved by an agreement between the parties and sets financial penalties where a charge of discrimination is substantiated.

Cases may be closed when the complainant cannot be located, refuses to cooperate or withdraws their complaint with or without resolution

Oregon Revised Statutes

Chapter 659A of the Oregon Revised Statutes prohibits discrimination in the sale or rental of housing based on race, color, religion, natural origin, sex (gender), disability, familial status, marital status, sources of income or sexual orientation. The Oregon Family Fairness Act (2007) grants domestic partners the same benefits as married persons. The Oregon Equality Act (2007) prohibits discrimination based on sexual preference or gender identity.

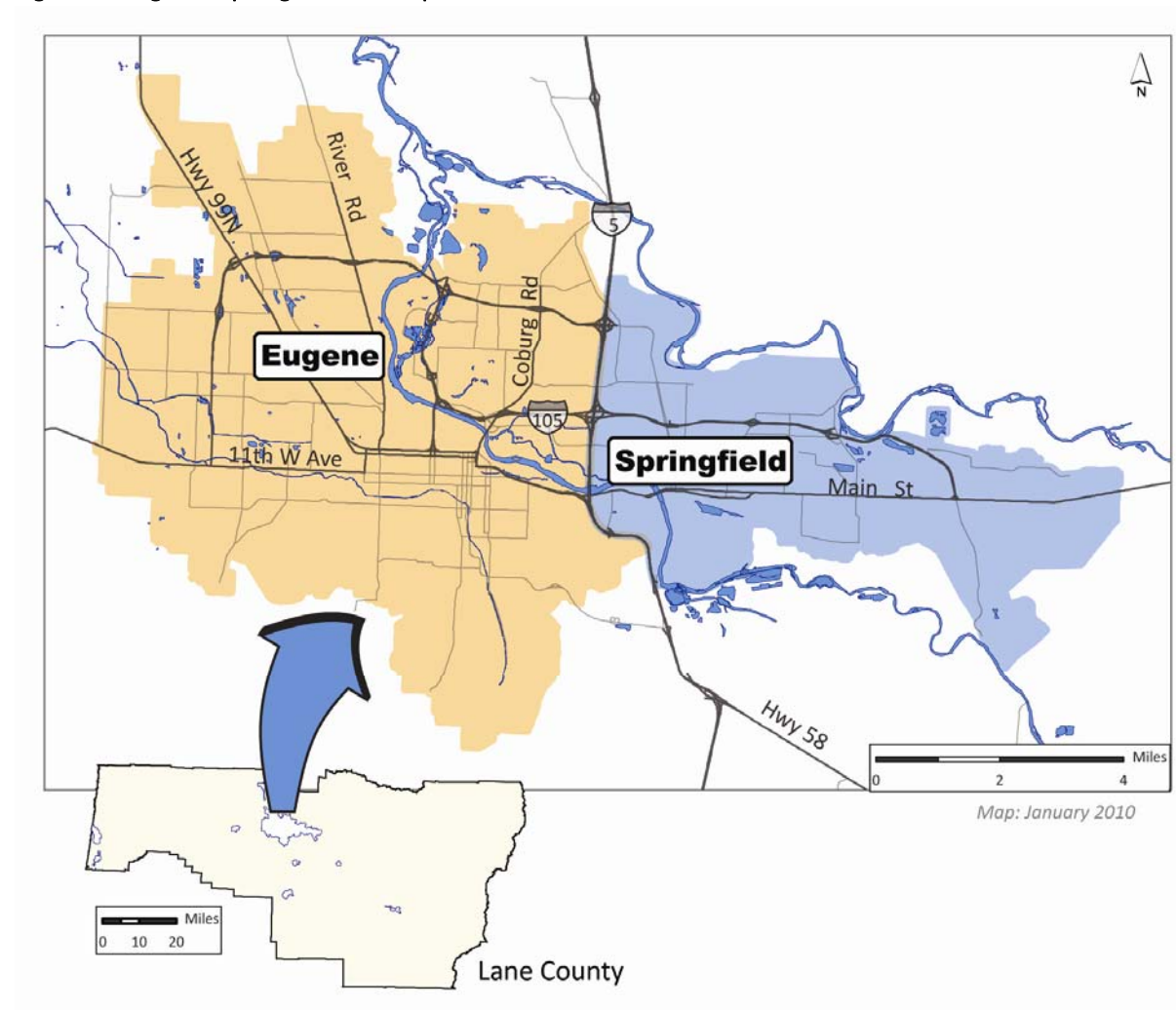
Local Ordinances

The City of Eugene added ethnicity and gender Identity to its list of protected classes. The City of Springfield has not adopted legislation that adds any additional protected classes.

III. Community and Demographics

Eugene and Springfield are located in central Lane County, in western Oregon. Eugene is the second largest city in Oregon with an estimated 157,100 residents. Springfield is the state’s 9th largest city with an estimated 58,085 residents. Eugene and Springfield are separated by Interstate 5, one of the main transportation corridors on the west coast. The communities are approximately an hour’s drive from the Pacific Ocean. Located in the southern tip of the Willamette Valley, Eugene and Springfield are situated near two major rivers, the Willamette River which runs through the community and the McKenzie River which flows along Springfield’s northern border and then joins the Willamette north of Eugene.

Figure 1 Eugene-Springfield Metropolitan Area 2009



Population

Population data shows a 1.4% growth rate between 2000 and 2009. The combined population was 157,352 in 2000 and in 2009 is estimated at 215,185.

Eugene and Springfield have experienced a 12.8% increase in population since 2000. The combined cities female-to-male ratio is about equal, with 51% females and 49% males.

Table 1, Population Trends, 1970-2009 – Cities of Eugene and Springfield

	Eugene	Springfield	Eugene - Springfield	% Change
1970	79,028	26,874	105,902	
1980	105,664	41,621	147,285	39.1%
1990	112,669	44,683	157,352	6.8%
2000	137,893	52,864	190,757	21.2%
2009	157,100	58,085	215,185	12.8%

Data sources: US Census Bureau; Portland State University 2008, 2009 Certified Population Estimates; 1970-2008 Data compiled by Lane Council of Governments

Age distribution for Eugene and Springfield shows that based on 2007 estimates, 84% of the population is over age 15, 12.6% of the population is over age 65, and over 5% is under five years of age. The populace over age 65 has increased numerically since 1990 but is decreasing in its percentage of the total population. The majority of population is within the 25 to 65 age group.

Table 2, Comparison of Age Distribution, 2000 to 2007 - Cities of Eugene and Springfield

	2000		2007		2000-2007
		% of Total Population		% of Total Population	% Change
Under 5 years	11,694	6.1%	11,206	5.4%	-4.2%
5 to 14 years	23,485	12.3%	22,330	10.8%	-4.9%
15 to 24 years	37,028	19.4%	37,972	18.4%	2.5%
25 to 44 years	55,856	29.3%	59,386	28.8%	6.3%
45 to 64 years	40,614	21.3%	49,104	23.8%	20.9%
65 to 84 years	18,555	9.7%	20,426	9.9%	10.1%
85 years and over	3,525	1.8%	5,542	2.7%	57.2%
Total Population	190,757	100%	205,966	100%	

Data sources: U.S. Census Bureau, Census 2000, DP-1; ACS 200-2007, General Demographic characteristics

Racial and Ethnic Composition

While the majority of the area's population is white (86.1%) there is a consistent trend that this has been decreasing as a percent of the total residents in the community. The Latino population has doubled since 1990, and increased nearly 42% between 2000 and 2007. The white, non-Latino population comprises 83.5 % of the total combined Eugene and Springfield population. People who reported two or more races, versus one single race, represent 3% of the community.

Table 3 Racial and Ethnic Composition, 2000 to 2007 - Cities of Eugene and Springfield

Eugene-Springfield	2000		2007	
	Total Population	As a % Total Population	Total Population	As a % Total Population
White	168,271	88.3%	177,399	86.1%
White, Non-hispanic identity	164,003	86.1%	171,899	83.5%
Hispanic	10,326	5.4%	14,650	7.1%
Hispanic Ethnicity and/or Racial Minority*	26,525	13.9%	34,067	16.5%
<i>White, hispanic identity</i>	<i>4,268</i>	<i>2.2%</i>	<i>5,500</i>	<i>2.7%</i>
<i>Black or African American</i>	<i>1,899</i>	<i>1.0%</i>	<i>2,557</i>	<i>1.2%</i>
<i>American Indian and Alaska Native</i>	<i>1,843</i>	<i>1.0%</i>	<i>3,708</i>	<i>1.8%</i>
<i>Asian</i>	<i>5,074</i>	<i>2.7%</i>	<i>8,620</i>	<i>4.2%</i>
<i>Native Hawaiian and Other Pacific Islander</i>	<i>509</i>	<i>0.3%</i>	<i>278</i>	<i>0.1%</i>
<i>Some other race</i>	<i>4,778</i>	<i>2.5%</i>	<i>6,773</i>	<i>3.3%</i>
<i>Two or more races</i>	<i>8,154</i>	<i>4.3%</i>	<i>6,631</i>	<i>3.2%</i>
Total Population	190,528	100.0%	205,966	100.0%

Source: U.S. Census Bureau, Census 2000, Summary File 3, Table P7; ACS, 2005-2007, Table B0200 ; *This data field represents people identifying on the Census 2000 as being of a racial minority and/or Hispanic/Latino Ethnicity

Immigrant and Migrant Populations

Historically the Eugene Springfield area has had an overwhelmingly large white population. Since the 1970's the minority population has slowly increased as a percentage. Some of this has been due to the growth and diversity of the University of Oregon. Some has been due to an increase in Asian populations. There has also been a significant increase in Latino populations throughout country, and particularly along the west coast. With a larger number of minorities becoming local residents, the issues concerning immigrants and migration are of growing significance, especially in regard to fair housing. Discrimination against foreign-born populations can be under-reported for many reasons, including fear of deportation and language barriers. These populations may face discrimination in housing opportunity because of language barriers and cultural biases.

It is notable that In Eugene, 6.6% of the 2000 population was foreign-born; compared to 5.1% in 1990. The population increased to 7.7% in 2006. In Springfield the number went from 2.7% in 1990 to 4.9% in 2000. There isn't comparable data available in Springfield for 2006. The majority of the population immigrating to the Eugene, Springfield area was born in Latin America and Asia.

Table 4a Foreign Born Population as a Percent of Total Population, 1970-2006, Cities of Eugene and Springfield

	Eugene	Springfield
1970	3.7	2.0
1980	5.4	2.3
1990	5.1	2.7
2000	6.6	4.9
2006	7.9	N/A

Data source: HUD SOCDs

Table 4b Total Foreign Born Population, 1970-2006, Cities of Eugene and Springfield

	Eugene	Springfield
1970	2,838	535.0
1980	5,714	964.0
1990	5,747	1,195.0
2000	9,131	2,566.0
2006	11,528	N/A

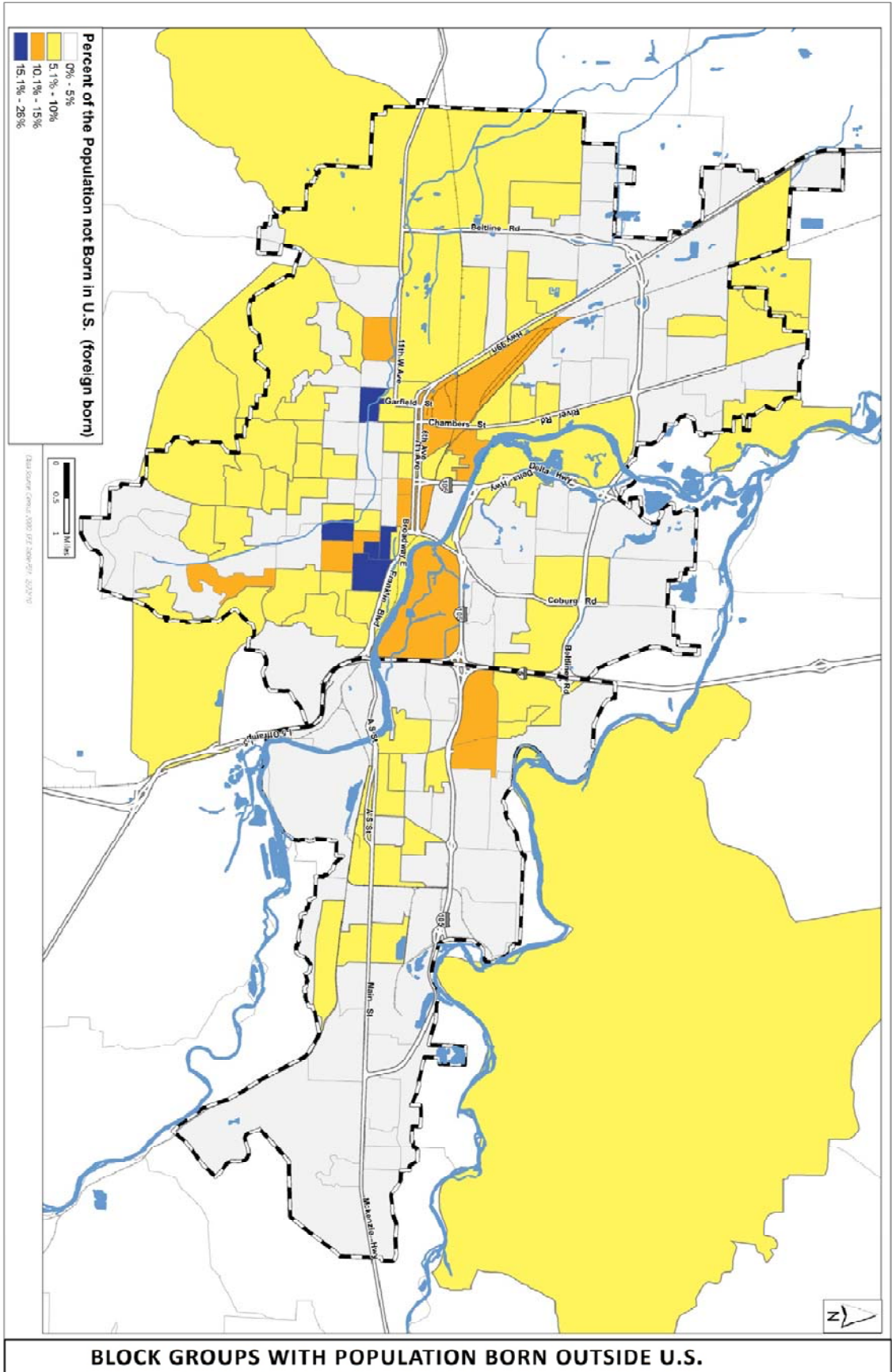
Data source: HUD SOCDs

The following map illustrates concentrations of populations born outside the United States, There are significant concentrations of non-English speakers and foreign-born in close proximity to the University of Oregon and in other locations where there is known to be student housing. There is also a concentration in West Eugene when, at the time the data was collected, there was a large Korean-owned manufacturing plant that included Korean's in its workforce.

Table 4c. , World Region Of Birth Of Foreign Born, 2006-2008 - City Of Eugene

Total Population	153,769	As A % Of Total Population
Foreign-Born Population, Excluding Population Born At Sea	11,770	7.7%
Europe	1,799	1.2%
Asia	5,492	3.6%
Africa	296	0.2%
Oceania	155	0.1%
Latin America	3,164	2.1%
Northern America	864	0.6%

Data Source: U.S. Census Bureau, 2006-2008 ACS, Social Profile



Poverty is a barrier to housing choice. 24% of residents who are foreign born are in poverty in Eugene Springfield. This is higher than those born in the state (20%), those born in another state (18%) and Natives born outside the United States (15%)

Table 5 Place of Birth and Poverty Status, 2006-2008 - Cities of Eugene and Springfield

	Cities of Eugene and Springfield	% of Total Population for Whom Poverty Status is Determined
Total Population for Whom Poverty Status is Determined	201,669	
Below 100 percent of the poverty level (14% of total)	38,838	19.3%
100 to 149 percent of the poverty level	20,414	10.1%
At or above 150 percent of the poverty level	142,417	70.6%
Born in state of residence:	87,781	43.5%
Below 100 percent of the poverty level (20% of born in state)	17,676	8.8%
100 to 149 percent of the poverty level	9,252	4.6%
At or above 150 percent of the poverty level	60,853	30.2%
Born in other state in the United States:	97,064	48.1%
Below 100 percent of the poverty level ((18% of born in another state)	17,378	8.6%
100 to 149 percent of the poverty level	9,303	4.6%
At or above 150 percent of the poverty level	70,383	34.9%
Native; born outside the United States:	2,589	1.3%
Below 100 percent of the poverty level (15% of Natives born outside USA)	386	0.2%
100 to 149 percent of the poverty level	189	0.1%
At or above 150 percent of the poverty level	2,014	1.0%
Foreign born:	14,235	7.1%
Below 100 percent of the poverty level (24% of foreign born)	3,398	1.7%
100 to 149 percent of the poverty level	1,670	0.8%
At or above 150 percent of the poverty level	9,167	4.5%

Data source: U.S. Census Bureau, 2006-2008 ACS, Table B6012

Cultural Hubs

The community has areas that stand out distinctly as “cultural hubs.” One long-standing hub is the University of Oregon campus area, which has a dynamic and diverse population brought together for academic pursuits. Another is the Blair Boulevard commercial area, which serves the Trainsong, Whiteaker, and northeast tip of the West Eugene neighborhoods. The central area of Springfield is a third hub, primarily for those who speak Spanish. Within these neighborhoods, there is a large concentration of racial and ethnic minorities. As a result these hubs include restaurants, grocery stores, lending institutions and other businesses that support the growing Latino/minority population.

Areas of Racial and Ethnic Concentration

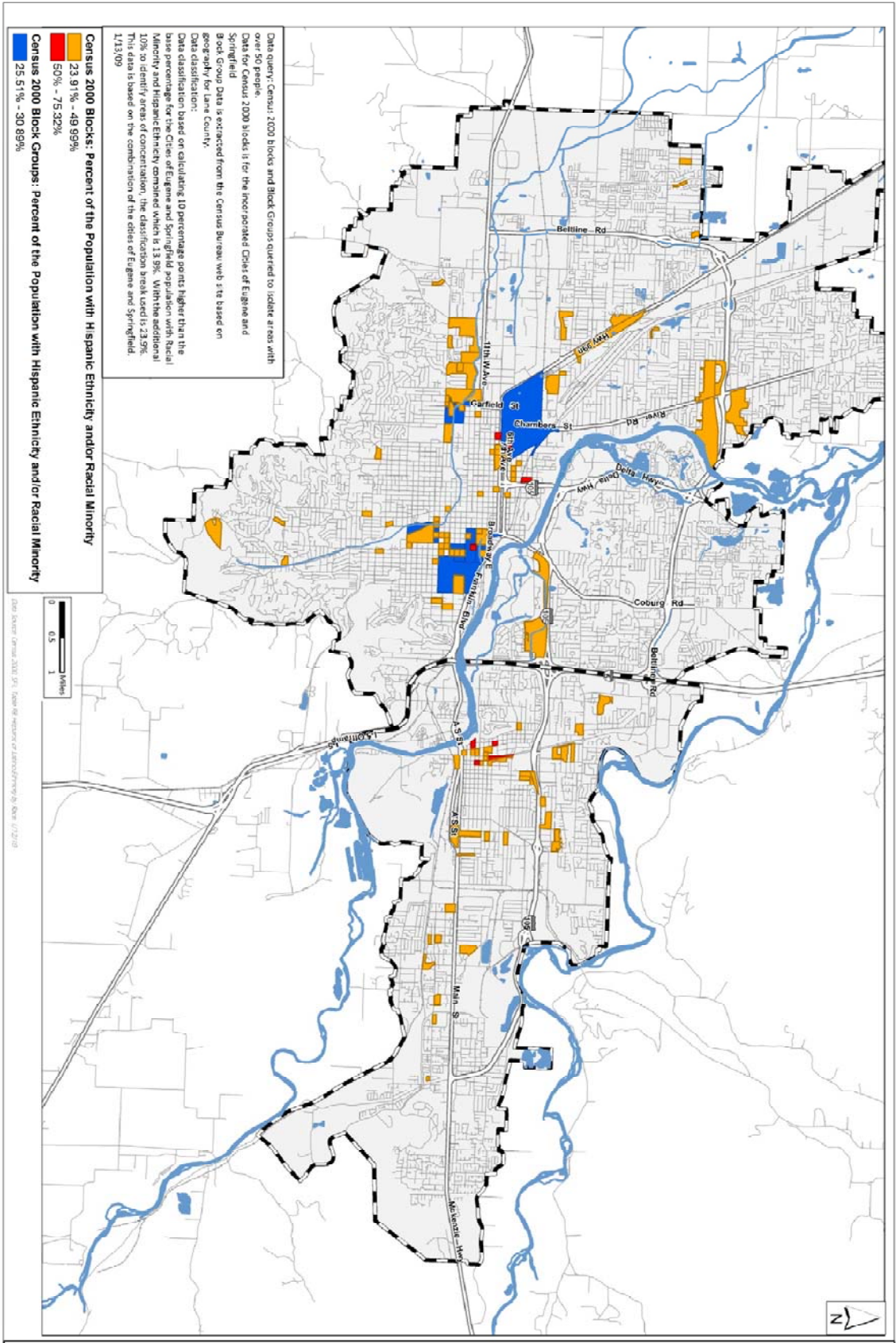
An ‘area of racial concentration’ is defined as an area where the percentage of persons of racial minority and/or Latino ethnicity is at least ten percentage points higher than the percentage of persons in the category as a whole. The cities of Eugene and Springfield had a combined Latino and minority population of 16.5% in 2007. However, at the time of writing this Plan, Census Bureau data for 2007 was not available for mapping purposes, so the Latino and minority percentage of 13.9% from 2000 was used. This percentage defined the threshold at which a disproportionate concentration existed and was calculated at 23.9%. There were numerous Census 2000 blocks and block groups in the cities of Eugene and Springfield where the percentage of Latinos and minorities was greater than 23.9%, as depicted on the Map. In 2000, there were 122 Census blocks where over 23.9% of the population identified with a racial minority and/or Latino ethnicity, and of those, eight Census blocks had populations with over 50% Latinos and minorities. There were seven Census block groups identified as having racial minority and Latino population concentrations.

Language

Spanish is the second most common language in Eugene and Springfield. The greatest concentrations are found in Eugene’s Whiteaker and Trainsong Neighborhoods and in central Springfield areas. In the area as a whole, over 5% of the community speaks a form of Spanish, and 28% of this population does not speak English well or at all.

There is also evidence that the Spanish-speaking population is dispersed throughout the community. This may suggest that while language is a barrier to housing, it is also overcome by many.

This increase in the population who do not speak English results in a language barrier and an impediment to fair housing.



Minority Homeownership

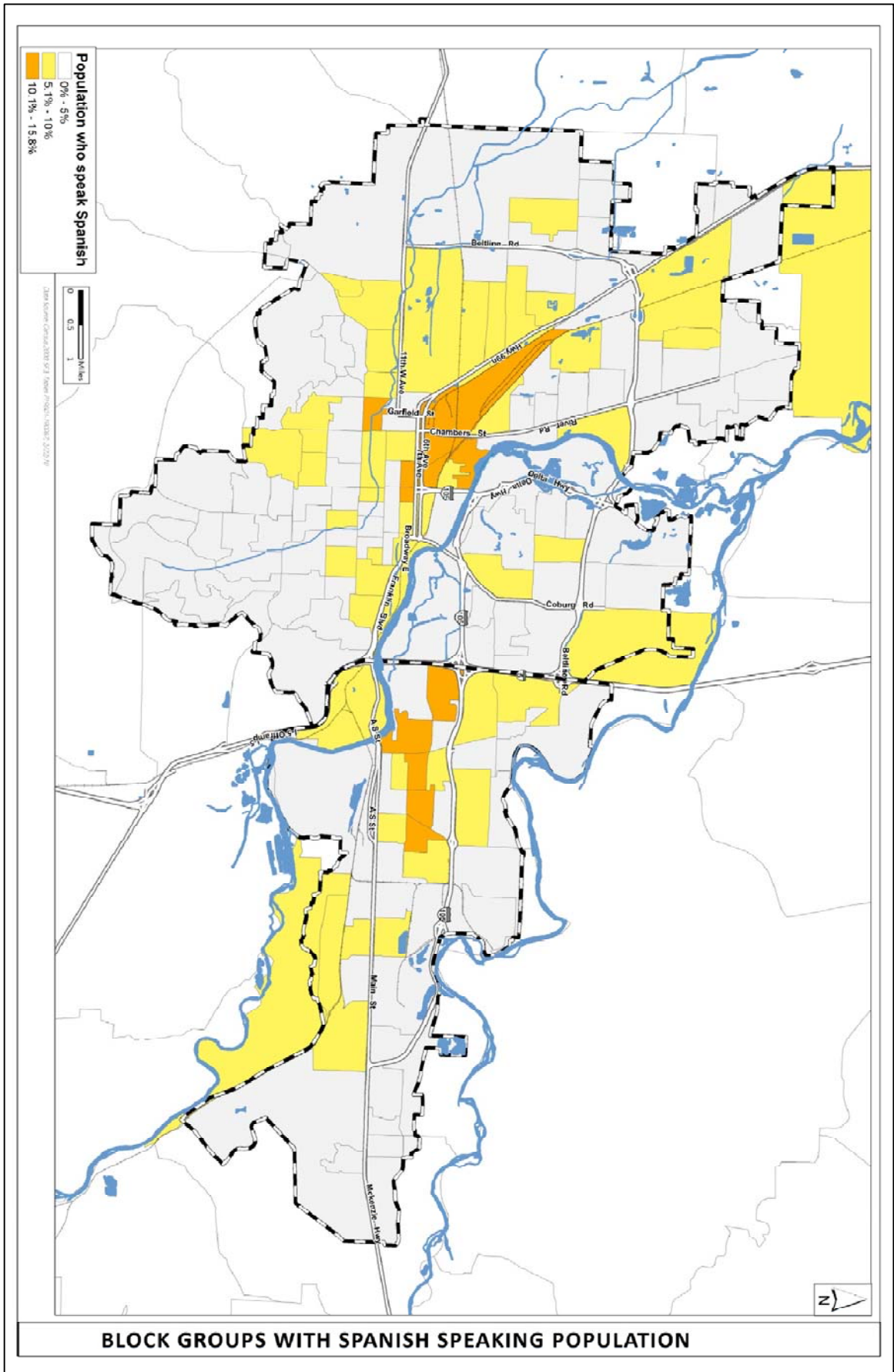
The number of minorities and Latinos who own their own homes is substantially lower than the majority population. The white population in Eugene and Springfield has a closer balance between the numbers of renters and homeowners, with 53% owning their own homes. 35.2 % of Latinos and 39.7% of racial minorities own homes.

The need to promote minority and Latino homeownership is important. Obstacles faced by the Latino and minority populations may include lower incomes, cultural, and language barriers. These obstacles inhibit access to successful homeownership.

Table 6 Tenure by Race and Latino Ethnicity, 2006-2008 - Cities of Eugene and Springfield

	Renter	<i>As a % of Housing Units</i>	Owner	<i>As a % of Housing Units</i>	Total Housing Units
Latino	3,131	64.8%	1,700	35.2%	4,831
Minority Race	5,175	60.3%	3,414	39.7%	8,589
Black*	433	62.9%	255	37.1%	688
American Indian, Alaska Native	603	47.7%	662	52.3%	1,265
Asian*	1,774	62.8%	1,053	37.2%	2,827
Native Hawaiian	N/A		N/A		N/A
Other Race	1,005	60.5%	657	39.5%	1,662
Two or More Races	1,360	63.3%	787	36.7%	2,147
White, Non-Latino	34,700	46.3%	40,271	53.7%	74,971
White	36,348	46.9%	41,113	53.1%	77,461

Data source: U.S. Census Bureau, 2006-2008 ACS, Table B25003 A-1; * Data only available for Eugene; N/A: data not available for both cities



Population with Disabilities

The Census Bureau defines a disability as a condition that lasts over six months. The Census Bureau classifies disabilities into a number of sub-categories including sensory, physical, mental, self-care, go-outside-home, and employment disabilities. People with a disability may have limited housing choices because of their disability, because they need assistance, or because their ability to earn an adequate income is limited by their disability.

Table 7 U.S. Census Bureau Classifications Of Disabilities

Sensory Disability	Severe vision or hearing loss, deafness, blindness.
Physical Disability	Limited physical activity, such as walking, climbing stairs, lifting, or reaching.
Mental Disability	Trouble learning, remembering, and concentrating
Self-Care Disability	Difficulty performing certain activities around home, such as dressing, bathing, or moving around.
Go-Outside-Home Disability	Difficulty leaving home alone to perform activities, such as grocery shopping or doctor visits. This question was reported for people over age 16.
Employment Disability	Disability that makes it hard to perform at a job or business. This question was reported for people over age 16.

In Eugene and Springfield, 31,708 people, nearly 17% of the population, has a disability.

Table 8. Population with a Disability, 2005-2007 - Cities of Eugene and Springfield

	Total Population Age 5 and over	Population with a Disability	Population with a disability as a % of Total Population Age 5 and over
5 to 15 years	24,604	2,035	8.3%
16 to 64 years	143,016	20,155	14.1%
65 years and over	22,311	9,518	42.7%
Total Population (5 years and over)	189,931	31,708	16.7%

*Source: U.S. Census Bureau, ACS 2005/07, Select Social Characteristics
Disability Status is of the civilian, non-institutionalized population*

Employment impacts on housing

The lack of an adequate income is a barrier to housing choice. The Eugene and Springfield area is currently experiencing a spike in unemployment (Table 9). In 2009 unemployment reached double digits. Many employed people are experiencing reduced hours or are in a job where they must adjust to earning a lower wage.

Table 9 Unemployment Rates, 2000 to 2009 - Lane County

	Jan	Apr	Jul	Oct	Annual
2000	5.1	5.1	5.6	5.5	5.4
2001	5.8	6.5	6.7	7.6	6.8
2002	7.6	7.3	6.9	6.9	7.1
2003	7.2	8.8	8.4	8.0	8.0
2004	7.6	7.4	7.3	7.1	7.3
2005	6.3	6.4	6.1	5.8	6.2
2006	5.5	5.5	5.6	5.2	5.4
2007	5.3	5.2	5.1	5.2	5.2
2008	5.2	5.3	6.5	8.1	6.6
2009	10.7	13.4	12.2	12.0	NA

Data source: State of Oregon Employment Department, www.qualityinfo.org; Seasonally Adjusted Data

Rental vacancy rates have remained low (estimated at 3-4%) particularly among the less expensive portion of the housing market. The result is households with reduced income are struggling to retain or obtain housing.

Households with children typically have greater expenses and, due to family size and potential illegal practices, experience greater challenges in securing affordable rental housing. 35.6% of the labor force has children under age 17 (Table 10).

Table 10 Labor Force Statistics, 2000 to 2009 - Lane County

Total Labor Force	111,567
Number of Females Age 16 and Over in Labor Force	53,087
Percent of Females age 16 and Over in Labor Force	47.6%
Number of People in Labor force with Children under age 6	13,208
Percent of Labor Force with Children under age 6	11.8%
Number of People in Labor force with Children age 6 to 17 Years	25,390
Percent of Labor Force with children age 6 to 17	22.8%
Number of People in Labor force with Children under age 17	38,598
Percent of Labor Force with children under age 17	34.6%

Data source: U.S. Census Bureau, 2006-2008 ACS Economic Profiles

Travel to Work

Transportation to employment can limit housing choice. Driving is the most common method of travel to work. For those who cannot drive or do not have cars, Eugene and Springfield are served by the Lane Transit District is one of the top-rated bus transit systems in the nation. All LTD busses are wheelchair accessible and also are fitted with racks for bicycles. The bicycle racks enable someone to ride to and from a bus stop if they live too far away. The 2007 American Community Survey provides data for Travel to Work.

Table 11 Travel to Work, 2007 – Cities of Eugene and Springfield

Transportation to Work	Eugene Population	Percent	Springfield Population	Percent
Workers age 16 and over	73,576	100	35,317	100
Drove Alone	49,194	66.7	20,137	79.5
Carpooled	5,370	7.3	2,581	10.2
Used Public Transit	3,993	5.4	491	2
Other means or worked from home	15,019	20.1	2108	8.3

Source: LCOG; American Community Survey, 2008

Income

The following table is adjusted for 2006 dollars. It illustrates consistent increases in gross rents over time and greater increases in the value of homes. It also illustrates that median incomes are not keeping up with housing costs. This limits housing choice.

Table 12 Median Income and Housing Costs, 1970 to 2007 - Cities of Eugene and Springfield (adjusted for 2006 dollars for rentals and 2005 dollars for ownership)

Year	City of Eugene				City of Springfield			
	Median Income		Median Housing Measures		Median Income		Median Housing Measures	
	Household	Family	Gross Rent	Owner's Value	Household	Family	Gross Rent	Owner's Value
1970	\$29,306	\$54,910	\$603	\$93,401	\$40,534	\$46,555	\$582	\$66,835
1980	\$41,539	\$56,554	\$609	\$164,412	\$41,245	\$46,946	\$636	\$122,085
1990	\$41,245	\$55,526	\$656	\$112,291	\$35,657	\$41,346	\$652	\$77,894
2000	\$43,382	\$58,722	\$727	\$177,951	\$39,970	\$46,466	\$681	\$137,561
2007	\$40,207	\$56,555	\$733	220,600	\$37,395	\$44,083	\$650	159,900
1970-2007 % Change	37.2%	3.0%	21.6%	136.2%	-7.7%	-5.3%	11.7%	139.2%

Data: HUD; U.S. Census Bureau ACS; Gross Rent: 1970-2000: HUD SOCDs; Gross Rent: 2005/07: Census ACS; HUD SOCDs Note: Household gross rent calculations exclude single-family rental units on 10 acres or more of land. Household owner's value calculations exclude housing units on 10 acres or more of land, housing units with a business or medical office on premises, housing units in multifamily buildings (i.e. condos), and mobile homes. Single family condo houses, however, are included only for 1990; For data 1970-2000: Household Gross Rent in 2006 dollars, Household Owners Value in 2005 dollars, Median Family Income in 2006 dollars and Median Household income in 2006 dollars

Table 13 Household Types, 2007, and Rate of Change, 2000-2007 - Cities of Eugene and Springfield

	Eugene		Springfield		Cities of Eugene and Springfield	
	2007	% Change 2000-2007	2007	% Change 2000-2007	2007	% Change 2000-2007
Family Households	32,453	3.7%	13,915	3.2%	46,368	3.6%
Non-Family	30,033	12.0%	8,438	19.9%	38,471	13.7%
Female householder, no husband present	5,898	4.1%	3,066	4.2%	8,964	4.1%
Single Person, Living Alone	21,089	14.4%	6,646	27.7%	27,735	17.4%
Householder 65 Years and older, living alone*	5,409	-0.7%	1,878	17.4%	7,287	3.4%
Occupied Households	62,486	7.5%	22,353	9.0%	84,839	7.9%

*Data sources: U.S. Census Bureau: Census 2000 DP1; ACS 2005-2007 Select Social Characteristics; *Census 2000& 2005/07 identifies the Householder as living alone for age 65+; HUD definition Elderly households: 1 or 2 person household, either person 62 years old or older.*

The median household income for Eugene is \$40,207 and for Springfield \$37,395. As shown in Table 15, the median incomes for the non-white populations are typically lower and indicate an imbalance in the community. The minority and Latino populations in Eugene have high poverty rates (Table 16), even though the median household incomes are so variable.

Table 14 Median Household Income, 2000 and 2007- Cities of Eugene and Springfield

	City of Eugene	City of Springfield
<i>Median Household Income</i>	\$40,207	\$37,395

Data source: U.S. Census ACS 2005-2007

Table 15 Median Household Income by Race and Ethnicity 2000 and 2007- Cities of Eugene and Springfield

	Eugene		Springfield	
	2000	2005/07	2000	2005/07
American Indian and Alaska Native Alone	\$30,699	\$26,385	\$40,368	\$44,722
Asian	\$12,010	\$35,689	\$26,477	\$39,777
Black or African American	\$26,875	\$45,337	\$33,542	\$0
Hispanic /Latino	\$26,961	\$24,022	\$30,787	\$23,834
Native Hawaiian and other Pacific Islander	\$27,083	\$0	\$33,250	\$0
Other Race	\$26,449	\$25,000	\$29,458	\$25,086
Two or more races	\$25,804	\$34,141	\$25,278	\$0
White Alone	\$37,197	\$40,947	\$33,427	\$37,387
White, not Latino	\$37,195	\$41,213	\$33,423	\$37,810

Source: Census 2000, Summary File 3, Table P152

Source: American Community Survey, 2005/07, 3-Year Estimates, Table 19013

The data in Table 16 illustrates that minority populations are more likely to be in poverty.

Table 16 Poverty Rates, Populations & Subgroups 2007 - Cities of Eugene and Springfield

	Eugene				Springfield			
	Total Population*	As a % of Total Population*	Below Poverty Level	% in Poverty	Total Population*	As a % of Total Population*	Below Poverty Level	% in Poverty
White	121,071	85.5%	21,760	18.0%	47,993	87.6%	8,468	17.6%
Black or African American	2,014	1.4%	346	17.2%	_**	_**	_**	_**
American Indian and Alaska Native	2,115	1.5%	1,015	48.0%	1,398	2.6%	90	6.4%
Asian	7,262	5.1%	2,052	28.3%	_**	_**	_**	_**
Native Hawaiian	_**	_**	_**	_**	_**	_**	_**	_**
Other Race	4,006	2.8%	1,436	35.8%	2,604	4.8%	634	24.3%
Two or More Races	4,995	3.5%	1,250	25.0%	1,453	2.7%	397	27.3%
<hr/>								
White Alone, Not Latino	117,576	83.0%	20,941	17.8%	46,218	84.3%	7,773	16.8%
Latino	9,279	6.6%	3,078	33.2%	4,815	8.8%	1,380	28.7%
Total Population	141,588	100.0%	27,859	19.7%	54,800	100.0%	10,137	18.5%

*Total population is the population for whom poverty status is determined. This is the population that is included in poverty status counts. Not included are populations in dorms, group quarters, and other group living arrangements; ** Sample size too small; Data sources: U.S. Census Bureau, ACS 2005-07, Table C17020, B3002

IV. Fair Housing Complaints

The fair housing data used in this analysis was obtained from a variety of local, Federal, and State sources along with information from the Fair Housing Council of Oregon's hotline. Disabilities, race, ethnicity, and familial status were the primary basis for the complaints filed officially and received on the fair housing hotline.

Bureau of Labor and Industries and HUD

The State of Oregon Bureau of Labor and Industries (BOLI) Civil Rights Division handles fair housing discrimination complaints. Since 2008 BOLI has had a cooperative agreement with HUD to accept complaints. In 2008-09 11 complaints were filed from Eugene and Springfield. One involved race, three involved national origin and seven involved disabilities.

Status: Two complaints were settled. Six were dismissed because there was no substantial evidence and two are still open.

Fair Housing Council of Oregon (FHCO)

Eugene and Springfield contract with the Fair Housing Council of Oregon (FHCO), which provides a fair housing hotline service. The hotline provides information and referrals, and receives complaints about housing and possible violations of fair housing rights. The hotline is a method for the Cities to work with residents facing potential housing discrimination, even if a formal complaint is not filed. The Fair Housing Council provides periodic fair housing trainings which are open to government staff, nonprofits and the public. The most recent occurred at the Eugene Public Library in February 2010.

The FHCO works as an advocacy and educational organization for fair housing rights in Oregon. When they receive complaints on possible housing discrimination they investigate to determine validity. After the investigation, the FHCO refers the case to the appropriate agency for enforcement, if necessary. FHCO uses several different methods in this determination of the validity of discrimination claims. If it is possible, the FHCO will "test" the claim. This involves sending someone to the property who matches the characteristics of the complainant, except for the characteristic being tested for. This method of testing allows the FHCO to see if discrimination is present. Another method of testing is "audit tests." These are used when a property has received several complaints, even if there are no present claims. If the claim is one that cannot be tested, such as accommodation for populations with disabilities, then the FHCO might refer the complaint to the appropriate agency.

City of Eugene Human Rights Commission (HRC)

The HRC works to preserve and protect the civil rights of Eugene's residents. They provide an additional avenue to hear concerns related to discrimination.

The FHCO reported that in Eugene in 2008-2009 they received 33 complaints related to Fair Housing issues. These were primarily related to accommodation for people with disabilities. Most were resolved with information to the tenant or the landlord.

Home Mortgage Disclosure Act (HMDA) Analysis

In 1975, Congress enacted the Home Mortgage Disclosure Act (HMDA) and the Federal Financial Institutions Examination Council (FFIEC) provides this information. The data contains information from local financial institutions to track lending patterns which may indicate if housing discrimination is taking place.

Loans are described as "originated" and "not originated" in this analysis. A loan that is originated has been approved and closed. A loan that is not originated may have faced several reasons for not closing. These can include denial, the application file was incomplete and closed, the loan application was accepted, but not approved, or the loan was withdrawn.

The information for Eugene and Springfield was obtained in two different ways from the FFEIC website and is mapped below. The data at the census tract level are inconclusive in determining if discrimination is present in institutional lending practices. The geographical distribution of loans does not translate to discrimination because of the different variables involved in loan approval. The data does illustrate that there are fewer applications for loans in areas that where over 20% of the population are minorities. Even in the census tracts with higher concentrations of minorities, the concentrations are not high. Additionally, while there are higher concentrations of minorities in some locations, most of the housing in those locations are renter occupied and lower-income. These variables contribute to a lower loan application rate due to lack of homeowner housing and lower income levels.

Table 17 Mortgage Loan Detail by Census Tract, 2008 – Eugene –Springfield MSA

Data table sorted based on if a tract had over 15% minority population, a median income between 80% and 120% of the MSA, and over 30% of loans not originated.

Highlighted tracts met all three conditions.

Census 2000 Tracts	% Minority	Med Income as % of MSA Median	Total Applications	Total Not Originated	Total Originated	% Not Originated
000200	7	121	64	34	30	53.1%
000404	10	103	28	14	14	50.0%
001001	5	123	33	17	16	51.5%
001002	8	122	38	19	19	50.0%
001101	11	107	174	97	77	55.7%
001700	6	113	73	34	39	46.6%
001801	8	129	202	85	117	42.1%
001803	7	103	48	20	28	41.7%
001804	6	122	54	24	30	44.4%
001902	14	78	58	22	36	37.9%
001903	12	75	42	16	26	38.1%
001904	10	82	51	25	26	49.0%
002001	6	112	39	16	23	41.0%
002002	11	94	50	19	31	38.0%
002101	13	76	25	9	16	36.0%
002102	17	68	98	59	39	60.2%
002201	7	114	50	25	25	50.0%
002202	9	145	112	41	71	36.6%
002300	9	112	140	61	79	43.6%
002401	10	144	61	16	45	26.2%
002403	9	127	72	28	44	38.9%
002404	8	108	68	36	32	52.9%
002501	14	99	99	44	55	44.4%
002502	10	94	271	125	146	46.1%
002600	12	91	82	30	52	36.6%
002700	14	98	58	21	37	36.2%
002800	13	91	49	20	29	40.8%
002901	15	125	58	21	37	36.2%
002902	9	104	51	16	35	31.4%
003000	11	149	54	20	34	37.0%
003101	11	125	208	142	66	68.3%
003102	17	113	68	27	41	39.7%
003201	14	67	45	26	19	57.8%
003202	17	100	43	18	25	41.9%
003300	16	84	91	44	47	48.4%
003400	15	72	74	26	48	35.1%
003500	9	109	91	40	51	44.0%
003600	11	100	45	21	24	46.7%
003700	20	98	8	5	3	62.5%
003800	25	49	7	4	3	57.1%

Table 17 Mortgage Loan Detail by Census Tract, 2008 – Eugene –Springfield MSA

Data table sorted based on if a tract had over 15% minority population, a median income between 80% and 120% of the MSA, and over 30% of loans not originated.

Highlighted tracts met all three conditions.

Census 2000 Tracts	% Minority	Med Income as % of MSA Median	Total Applications	Total Not Originated	Total Originated	% Not Originated
003900	14	60	11	6	5	54.5%
004000	16	69	13	6	7	46.2%
004100	13	86	38	14	24	36.8%
004200	26	50	24	13	11	54.2%
004300	13	85	125	62	63	49.6%
004401	18	87	79	32	47	40.5%
004402	11	169	135	42	93	31.1%
004403	24	61	80	31	49	38.8%
004500	16	89	80	30	50	37.5%
004600	10	109	43	17	26	39.5%
004700	8	118	40	18	22	45.0%
004800	18	60	32	17	15	53.1%
004900	9	164	40	10	30	25.0%
005000	11	113	74	25	49	33.8%
005100	12	95	41	12	29	29.3%
005200	9	118	24	11	13	45.8%
005300	11	135	40	16	24	40.0%
005400	10	140	74	27	47	36.5%

Data source: FFEIC HMDA Aggregate Table 4-2, Report Date: 6/19/2009

Loan Type by Race and Income Level

Analysis of loans based on race shows that white and combined white/minority populations have a higher loan origination rate compared to minorities alone. The loans that were originated for the white and white/minority population were on average 70% of loan applications, while minority population loan completion and non-origination percentages fluctuate.

Table 16 Conventional Home-Purchase Loans, 1-4 Family and Manufactured Homes, 2008

	Number of Applications Received	Number of Applications Originated	Percent of Loans Originated
Ethnicity, Gender and Income			
Latino	128	51	39.8%
Not Latino	3295	1783	54.1%
Joint (Latino/ Not Latino)	53	26	49.1%
Ethnicity Not Available	305	149	48.9%
Minority Status			
White Non-Latino	3083	1682	54.6%
Others, Including Latino	359	163	45.4%

Data source: FFEIC HMDA Aggregate Table 4-2, Report Date: 6/19/2009

Table 17, Conventional Home-Purchase Loans, 1-4 Family and Manufactured Homes, 2008

	Number of Applications Received	Number of Applications Originated	Percent of Loans Originated
American Indian, Alaska Native	12	3	25.0%
Asian	70	32	45.7%
African American, Black	16	4	25.0%
Native Hawaiian, Pacific Islander	10	1	10.0%
White	3276	1758	53.7%
Two or More Minority Races	2	2	100.0%
Joint, White/Minority Race	83	51	61.4%
Race Not available	312	158	50.6%
TOTAL	3781	2009	53.1%

Data source: FFEIC HMDA Aggregate Table 4-2, Report Date: 6/19/2009

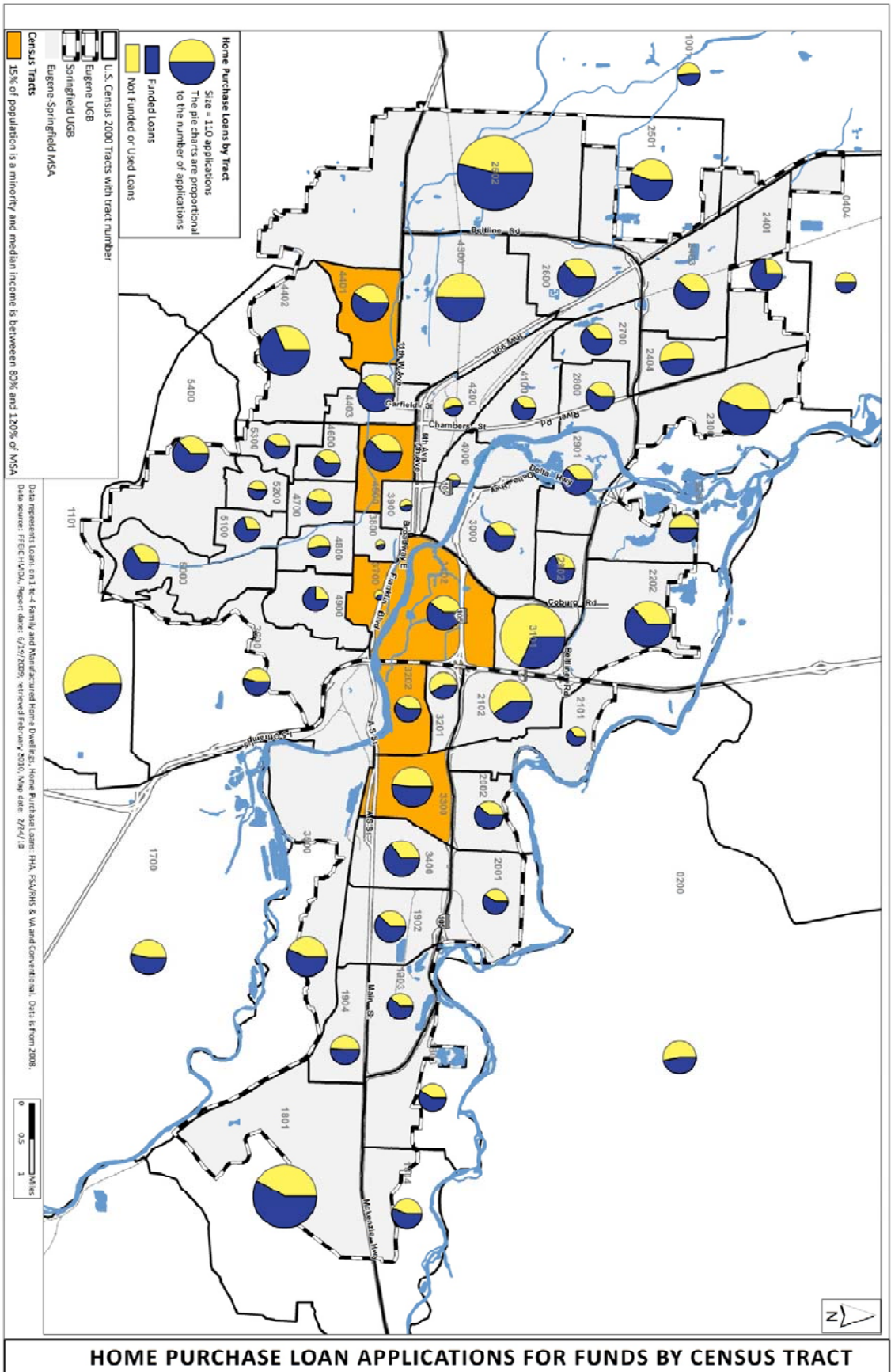
The conclusion in the analysis of the HMDA data for Eugene and Springfield is that there are no patterns in lending by institutions which translate into discrimination. However, the indication that minority populations have lower loan non-origination rate combined with the concentrations of minorities in areas

where there are few, if any, loan applications, indicates a need in the community for the identification of and removal of the barriers to homeownership for minorities.

Table 18 Income Of Loan Applicants , 2008

Less Than 50% Of Msa/Md Median	193	72	37.3%
50-79% Of Msa/Md Median	675	308	45.6%
80-99% Of Msa/Md Median	496	266	53.6%
100-119% Of Msa/Md Median	457	258	56.5%
120% Or More Of Msa/Md Median	1897	1080	56.9%
Income Not Available 6	63	25	39.7%

Data source: FFEIC HMDA Aggregate Table 4-2, Report Date: 6/19/2009



V. Identification of Impediments to Fair Housing Choice

Impediments to Fair Housing Choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that have an effect of restricting housing choice or the availability of housing choice. The Analysis reviews 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.

Eugene and Springfield recognize that there are many obstacles that prevent residents from attaining or retaining housing. The costs of housing and the incentives to develop, maintain or rehabilitate housing are affected by both public and private sector policies. Public sector policies may include taxation, land use regulations, zoning ordinances, building codes, fees and urban growth boundaries. Private sector practices may include the tightening of lending standards and practices, housing discrimination and other issues that directly or indirectly affect an individual's housing choice.

Conduct of the Analysis

This analysis builds on the Impediments Analysis that was completed by each jurisdiction, separately in 2005. It considers information, strategies, and goals contained in the 2010 Consolidated Plan. Staff from Eugene and Springfield reviewed documents and information from the following sources and agencies to inform this analysis.

- Fair Housing Council of Oregon
- Lane Council of Governments
- Eugene Human Rights Commission
- US Census Bureau
- HUD
- Consolidated Plan 2010

Impediments to Fair Housing

Impediment: *There is an inadequate supply of affordable housing.*

Nearly 50% of renter households and over 25% of owner households are cost-burdened by their housing (they spend over 30% of their income for housing). This is due to a combination of factors including inadequate income, a shortage of subsidized housing, and an array of factors that add to housing costs including taxes, utility costs, interest rates, special fees and assessments.

Strategy: Continue to aggressively pursue additions to the supply of affordable housing through the use of government subsidies and incentives. Continue to leverage available resources to the extent feasible in order to create additional affordable housing units. Continue to work with governmental and community partners to identify job creation opportunities and other programs that provide income support.

Impediment: Suitable sites for future low-income housing construction are difficult to find, are expensive to acquire, and some may have constraints that limit development opportunities.

The availability of affordably developable land has diminished within the Eugene and Springfield Urban Growth Boundaries as the population has grown. Eugene is currently in the midst of land assessments to determine if an adequate supply of buildable residential land is available for the next 20 years. Springfield has recently completed an assessment and found that land is available. The availability of existing land for building housing presents several obstacles. These are defined in four criteria: (1) Is the land serviced? (2) Is the land available? (3) Is the land properly zoned? (4) Is the land affordable?

Some of the land use obstacles experienced in multi-family developments include:

- Infill developments experience challenges that add cost and difficulty when required to meet the same standards as suburban style “green-field” developments. These include the higher cost of construction when staging on a constrained site, the expense of vertical construction, constraints from setbacks and existing neighboring buildings. In Eugene’s bicycle parking requirements can be difficult to meet on smaller sites. There is also the loss of economy of scale that is often available with larger developments.
- Parking standards typically require up to one parking space for each unit. This requirement may inhibit the development of housing due to the larger land requirement. This can be a major obstacle in the redevelopment of existing land. Some options to reduce parking for public-benefit housing in Eugene were eliminated during the 2001 code revisions. In 2009 they were partially recovered in land use code amendments, particularly for elderly and subsidized housing.

Strategies: As land supply policies are debated, consider the impacts on cost, which could impact Fair Housing choice.

In Eugene, continue the City's landbank program, which acquires sites for future low-income housing. Identify Land Use Code provisions that may have a negative impact on the development of low-income housing as some problems may be identified in the course of reviewing land use actions. Build on the efforts of Eugene's proposals for Opportunity Siting, which is intended encourage quality in-fill housing. Work towards modifying infrastructures standards or authorizing the use of new technologies to significantly reduce the cost of housing. Consider expedited or "fast track" permitting and approvals for all affordable housing projects.

In Springfield consider explicit parking requirement waivers for affordable housing developments, fast track permitting for affordable housing developments and as-of-right density bonuses. Additional proposals include reducing or waiving system development charges, and exemptions from property taxes.

Impediment: *There is a limited awareness of fair housing policies in the broader community*

There will consistently be a need to increase the level of knowledge in the community regarding fair housing rights due to the growth of protected class populations in the Eugene and Springfield area.

Strategy: *Increase fair housing education and expand outreach to protected classes*

More fair housing education and resources in the community will increase awareness. This strategy includes providing information that will target landlords, protected classes, involve agencies that serve these protected classes, and encourage greater citizen participation through better education and advertising. The following examples would aid in this regional educational effort.

- *Supply bilingual and alternative-format fair housing materials in locations where there are higher concentrations of protected classes.*
- *Promote fair housing policies and resources through public service announcements and advertisements (radio, TV, newspaper, and bus advertisements).*
- *Provide educational materials to all landlords through the annual Eugene billing that is tied to the Eugene Rental Housing Code fee*
- *Supply community education materials to protected class organizations.*
- *Supply protected class service organizations with fair housing information so they can disseminate it to their target population.*
- *Schedule educational meetings for property managers on fair housing rights.*

Impediment: *There are market conditions and housing industry practices that increase housing costs or decrease housing choice.*

The local rental vacancy rate for Eugene and Springfield has been low for over 20 years and is currently estimated to be between 3% and 4%. [This estimate is based on interviews in February 2010 with several large property management companies and an appraisal firm]. Many existing vacancies are found among the most expensive units and also reflect the inevitable vacancies that occur as housing transitions from one tenant to the next. Regionally, new construction of multi-family housing has primarily occurred in the neighborhoods close to the University of Oregon because they are able to command higher rental rates, making the construction economically feasible.

Because tenants compete for housing, landlords often charge application fees and costly move-in charges, such as expensive deposits, in addition to first and last month rents. Over 40% of renters are low-income. Many landlords now use credit reports as part of their screening. Fair housing complaint data has historically indicated circumstances where housing was denied due to past history, regardless of credit rehabilitation.

Another practice that limits choice includes either industry standards or codes which place occupancy restrictions on extended or large families. Populations with disabilities also encounter resistance to accommodation.

Strategies:

Use federal ARRA, Homeless Prevention and Rapid Re-housing (HPRP) funds and help homeless or at-risk households with move in costs. Funds for this type of assistance are also allocated through private donations, the City of Eugene, and the federal Emergency Food and Shelter Fund.

Work with community agencies, such as St. Vincent dePaul's Renter Rehabilitation Program and NEDCO's ABC's of Home Buying Program, to train renters to repair their credit and learn how to succeed and stabilize in housing.

Eugene adopted an incentive program (MUPTTE) which offers a ten-year property tax exemption for new construction of multi-family housing within a targeted geographic area. The boundary was expanded in 2008 to include some traditionally low-income neighborhoods in a mass-transit oriented area. Eugene also offers a 20 year Low-income Housing Tax Exemption (LITE).

Impediment: *There are cultural differences and language barriers which inhibit access to fair housing.*

Cultural differences and language barriers are impediments to fair housing. Even though language itself is not a protected class, it parallels with national origin, ethnicity, and/or race in housing discrimination. As Eugene and Springfield's minority populations continue to grow and become a more significant percentage of the community, increasing cultural differences and language barriers become an impediment to Fair Housing. Additionally, large families and households with low-incomes are

challenged to find suitable affordable housing. In some cultures, including some Asian and Latino, large households are common and it is not uncommon for more than one family to live together.

Strategy: Strengthen communication with organizations that provide services to racial and ethnic minority populations. Cultural and language barriers in this community may be most evident in the Latino population because of its increasing size, but there are also other populations, including Asian and African-American, who may face discrimination based on ethnicity, race, or their national origin. There are resources in the community that can be utilized as a platform to begin a dialogue with ethnic and racial minorities. Examples include the NAACP, CentroLatino Americano, and the Eugene Human Rights and Equity office. Outreach can provide the foundation for strategies to address this impediment. A step in responding to this impediment is to recognize that when adequate communication is absent due to language barriers, discrimination can easily arise intentionally or unintentionally. Therefore, organizations that are involved with populations that speak languages other than English are encouraged to seek translation services related to tenant and landlord communication.

Communicating with organizations that advocate for protected classes can result in people learning about fair housing rights, and provides government staff with a valuable network within the community to help in gauging the extent of fair housing violations.

Impediment: *E-mail and the Internet have become vital to access housing opportunities and subsidy programs, providing a barrier for those without computer access at home.*

Strategy: Eugene and Springfield provide free Internet access at their public libraries and other City facilities. Eugene, through the use of a telecom grant, is placing computers and providing high-speed Internet service at the twelve locations of social services that serve homeless and very-low-income populations.

Impediment: *People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.*

Strategy: Eugene and Springfield have housing rehabilitation loan programs and also programs targeted to the removal of architectural barriers. Additionally, both jurisdictions support the acquisition and creation of affordable housing which includes homes designed with special features for people with disabilities. The Fair Housing Council of Oregon provides information on all aspects of Fair Housing, including information for people with disabilities.