

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

The City's 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) seeks to understand potential barriers to fair housing choice and provide guidance on actionable strategies to address those barriers. The table below summarizes the impediments and suggested actions to consider.

The AI focusses on "protected classes" and access to housing and opportunities. The protected classes in Eugene are:

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status
- Disability
- Source of Income
- Marital Status
- Sexual Orientation
- Gender Identity
- Domestic Partnership
- Ethnicity
- Age

The Analysis of Impediments also looks at general barriers to affordable housing for low-and moderate-income households. While "low-income" is not a protected class, those protected classes are disproportionately represented among low- and moderate-income households in Eugene. As this analysis is being finalized in spring 2020, the coronavirus pandemic has already started to dramatically affect the entire community. It is also clear that the economic retraction will most severely destabilize lower income residents, exacerbating housing stability among protected classes. Households in protected classes may need additional support to access rental assistance and foreclosure support, technology needed when social distancing and stay-home orders are active, and federal support contingent on an individual providing a Social Security Number. Even after rebounding from the pandemic, these communities will remain more vulnerable to any future natural disaster.

### **Expanding Fair Housing Choice and Dispersion of Affordable Housing**

In recent years the City has stepped up long-standing efforts to remove barriers to affordable housing and address inequities throughout the city, expanding fair and quality housing choices for residents. To this end, the City has actively engaged stakeholders and worked closely with partners. For instance, the City was a key partner in the 2014 Lane County Equity and Opportunity Assessment, which solicited resident input to identify and analyze the issues of equity, access, and opportunity within the region and to consider how the findings could inform agency plans, policies, and major investments. In 2018, the Housing Tools and Strategies (HTS) Working Group was formed and one aspect of their work was to develop actions to address the supply of affordable housing for lower income residents, including protected classes.

The City has taken concrete steps to encourage expansion of affordable housing, including dispersion of affordable housing throughout the city. Specific policies or actions that have been completed or are underway include:

- Regular review of land use and zoning policy to support development of additional housing choices for low-income households.
- Policies are informed by Eugene's Housing Dispersal Policy, which encourages dispersal of low-income households and subsidized housing throughout city
- Implementation of House Bill 2001 to expand opportunities for a variety of housing types in traditionally single-family neighborhoods.
- Implementation of a construction excise tax (CET) and formation of the Affordable Housing Trust Fund to support affordable housing development and housing programs.

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- Regulatory changes to encourage development of accessory dwelling units (ADUs) in Eugene.

### **Community and Landlord Education**

The City has taken an active role educating residents, property managers, landlords, and service providers on fair housing requirements. The City partners with the Fair Housing Council of Oregon (FHCO) to facilitate trainings and workshops on fair housing obligations and protections to audiences with different perspectives on fair housing. These Eugene sponsored sessions educate service providers, landlords and residents, and are well attended by University of Oregon students.

### **Impediment and Strategy Summary**

The City is encouraged to continue to carry out these existing initiatives and to assess its policies and identify opportunities to expand affordable housing options for all residents. There is a recognized connection housing and location play into a household's ability to access opportunities such as schools, safe and quality public spaces, transportation, and employment hubs. The City currently has no Racial/Ethnic Concentrations of Poverty (R/ECAP) as defined by HUD. Concentrations of poverty and segregation of communities is costly; financially, socially, and culturally. The City is encouraged to continue to consider impacts on lower income households when proposing policy and regulatory changes and continue utilizing equity assessments when considering policy impacts.

Eugene has demonstrated the desire to create an equitable community, integrating the needs of vulnerable populations into planning processes. However, there is always room for improvement. The purpose of the AI is to identify those places where improvements could reasonably be made that would benefit protected classes. Those impediments and associated strategies to overcome the impediments are outlined in the following table.

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Impediment	Strategies				
Lack of Affordable Housing	<p>The City recognizes the impact of high housing costs on residents, working on several initiatives expanding affordable housing stock throughout the City and is taking multiple actions including creation of the Affordable Housing Trust Fund and retooling the ADU policy to increase development.</p> <p>The City should continue to monitor and promote these and other activities that support development of additional affordable housing options. Continue to allocate and further leverage Federal grants to preserve affordable housing.</p>				
Community Education	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #e8f5e9; width: 50%;">Resident Education</th> <th style="background-color: #e8f5e9; width: 50%;">Provider Education</th> </tr> </thead> <tbody> <tr> <td style="background-color: #e8f5e9;"> <p>Both the <i>Renters Experience Survey</i> and the survey conducted for the development of the AI indicate that many residents are not aware of the fair housing protections provided to them. The City should continue to partner with the Fair Housing Council of Oregon (FHCO) in facilitating trainings and workshops marketed to residents, which provide education on fair housing issues.</p> </td> <td style="background-color: #e8f5e9;"> <p>Service providers that directly interact with any individual from a protected class (to include low-income in this instance) should be knowledgeable on fair housing policies that impact the communities they serve. Providers need not deeply understand fair housing regulation but should be able to facilitate the process with a client or community they believe to be impacted.</p> </td> </tr> </tbody> </table>	Resident Education	Provider Education	<p>Both the <i>Renters Experience Survey</i> and the survey conducted for the development of the AI indicate that many residents are not aware of the fair housing protections provided to them. The City should continue to partner with the Fair Housing Council of Oregon (FHCO) in facilitating trainings and workshops marketed to residents, which provide education on fair housing issues.</p>	<p>Service providers that directly interact with any individual from a protected class (to include low-income in this instance) should be knowledgeable on fair housing policies that impact the communities they serve. Providers need not deeply understand fair housing regulation but should be able to facilitate the process with a client or community they believe to be impacted.</p>
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Landlord Education	<p>Ensure landlords with limited portfolios fully understand their fair housing obligations. The City is encouraged to research feasibility of developing a policy mechanism, such as an annual certification, that would ensure that landlords understand their role. Similarly, the City can help ensure that large property management companies understand their fair housing obligations.</p>				
Discrimination in Renting	<p>Continue to work with FHCO on enforcement of fair housing allegations. Consider supporting FHCO to conduct regular fair housing testing throughout the community; both administrative and audit testing. Administrative testing is a review of a landlord's or property management company's lease agreement terms. Audit testing is having someone from a protected class go through the process of renting a unit with the purpose of identifying potentially problematic procedures.</p>				
Planning, Land Use, and Zoning Practices	<p>Review definition of "family" in the City's Municipal Code related to number of persons living in a single housekeeping unit. The City is encouraged to continue to integrate equity and impact assessments into the policy and planning process; particularly how proposed changes or regulatory efforts will impact protected classes (to include low-income in this instance).</p>				
Lending/Sale Discrimination	<p>The current lending and mortgage data are limited in scope and has small sample sizes of protected classes. The City is encouraged to consider outreach to local banks and lending institutions to review their practices and acquire data that could supplement the data within the AI. Data within the AI suggests Hispanic populations originate loans at a lesser rate than do White households. The State of Oregon has established the Task Force on Addressing Racial Disparities in Home Ownership, the City is encouraged to consider dedicating staff time/resources to identify a point of contact for this task force, staying abreast of key findings and associated actions/strategies.</p>				