



Eugene–Springfield HOME Consortium

HOME-ARP Allocation Plan



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HOME-ARP Allocation Plan June 21, 2022

Participating Jurisdiction: Eugene-Springfield HOME Consortium

Congress approved new funding for housing to serve people experiencing homelessness and at risk of homelessness through the American Rescue Plan Act of 2021. The HOME-ARP funds will be provided by the US Department of Housing and Urban Development (HUD) directly to HOME jurisdictions. The Eugene-Springfield HOME Consortium (the Consortium) will receive \$4,728,637 through the new program. HUD refers to the Consortium as a Participating Jurisdiction (PJ).

The Consortium must follow a process to access the HOME-ARP resources described in the HUD notice called '[CPD-21-10: Requirements for the Use of Funds in the HOME American Rescue Plan Program](#)' (The Notice). The Consortium was required to engage in consultation and public participation processes, develop a HOME-ARP Allocation Plan that meets the requirements of the Notice, and submit this plan to HUD as a Substantial Amendment to the federal program year 2021 Annual Action Plan. This allocation plan will summarize the following:

- The consultation process and results
- The comments received through public participation including a summary of comments or recommendations not accepted and the reasons why.
- A description of the HOME-ARP qualifying populations within the jurisdiction
- An assessment of unmet needs of qualifying populations
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system
- The planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations

- An estimate of the number of housing units for qualifying populations the Consortium will produce with its HOME-ARP allocation
- A description of preferences for individuals and families in a particular qualifying population or segment of a qualifying population

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its plan, at a minimum a PJ must consult with the Continuum of Care (CoC) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Local PJs must consult with all PHAs and CoCs serving the jurisdiction.

Consortium Consultation Process

The Consortium worked with a public outreach consultant, Cogito LLC to support the public outreach and consultation process. The Consortium conducted interviews with organizations associated with housing services and development, and an online survey of housing and social service providers. The Consortium consulted with the CoC serving Lane County, homeless and domestic violence service providers, veterans’ groups, the public housing authority (Homes for Good Housing Agency), public agencies that address the needs of the qualifying populations, and public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

The project held 12 online conversations involving 28 staff of organizations and groups. Conducted during January and February of 2022, the interviews were attended by one or two key staff, though in some cases several participants joined the conversation. Led by staff representing the cities of Eugene and Springfield, the one-hour discussions on Zoom began with a short PowerPoint presentation of the HOME-ARP regulations followed by questions regarding unmet needs and gaps, population preferences, and preferred eligible activities for use of HOME-ARP funds. The results of the consultations are in Table 1. The Type of Agency/ Organization column is coded with the following abbreviations:

CoC: Continuum of Care serving the jurisdiction’s geographic area

HS: Homeless service provider

DV: Domestic violence service provider

V: Groups serving or representing Veterans

PHA: Public housing agency

PA: Public agencies that address the needs of the qualifying populations

FCD: Public or private organizations that address fair housing, civil rights, and/or the needs of persons with disabilities.

OH: Organizations that develop low-income housing

O: Organizations/businesses that address the needs of the qualifying populations (not public agencies)

Table 1. Organizations Consulted and Feedback Received

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
1. Catholic Community Services	HS	Interview	Preferred Use: Develop permanent rental housing. Not enough housing available for families, seniors, Veterans. Also interested in non-congregate shelter (NCS)/ rental housing together in one development.
2. City of Eugene Equity Panel	FCD	Interview	Preferred Use: Develop non-congregate shelter. Consider the needs of victims of domestic violence and BIPOC communities. Provide operating assistance for non-profits.
3. Cornerstone Community Housing	OH	Interview	Preferred Use: Develop permanent rental housing. Not enough housing available for families, survivors of domestic violence, seniors, people at risk of homelessness.
4. DevNW	OH	Interview	Preferred Use: Develop non-congregate shelter. All the uses are needed but there are immediate needs for people who are houseless. NCS is faster to develop and more immediately addresses the problem than permanent rental housing. Services are also needed.
5. Homes for Good	PHA	Interview	Preferred use: Develop permanent rental housing. Not enough housing available for people without stable housing, especially for people experiencing homelessness. Maximize number of units, leverage funds as much as possible. Supportive services could be paired with rental housing developments.

6. Hope and Safety Alliance	DV, HS		Interview	Preferred Use: Develop non-congregate shelter. Shelter needed for people with children who are fleeing domestic violence with a 30-90 average stay, hotel model. Also need rental housing that allows master leases the agency could manage, and rental housing with very low rent.
7. Lane Council of Governments Senior and Disability Services	FCD, PA		Interview	Preferred Use: All the uses are needed, hard to have preference. Supportive services are needed for adults with disabilities and seniors to help find, secure, and sustain housing. Need for development of units that are accessible to people with disabilities (ADA units). There is a housing shortage overall, with more availability needed.
8. Lane County Human Services	CoC, PA, HS		Interview	Preferred Use: All the uses are needed but development of permanent rental housing is preferred. Maximize flexibility in RFP process to allow applicants to request support services funding if needed. Permanent supportive housing and providing opportunities beyond shelter is their focus. Non-profit capacity funding would help. Permanent shelter is also needed.
9. Saint Vincent De Paul	HS, V, OH		Interview	Preferred Use: Develop permanent rental housing (2/3) and supportive services (1/3). Maximize resources by providing permanent investment. Interest in model of individual units around centralized living/dining area, renting each room separately (like student housing) or a hotel model of rental housing. Services are critical to stabilization.
10. Sheltercare	HS		Interview	Preferred Use: Development. Both permanent rental housing, and non-congregate shelter are needed, permanent rental housing probably more important, but not sure the split of resources, (concern about operating funding for shelter). Use

			funds to invest in long term solutions. Support services for people experiencing disabilities and people in transition also needed. All uses are needed, but better to focus funding to maximize impact.
11. Springfield-Eugene Tenant Association	FCD	Interview	Preferred Use: Develop units. Both permanent rental housing and non-congregate shelter needed. Not enough units for people experiencing physical and mental disabilities (ADA units), families, and the BIPOC community. Lower cost units are needed. Services are also needed. Rent assistance is always needed, but may not be appropriate for one-time funds.
12. SquareOne Villages	HS, OH	Interview	Preferred Use: Develop non-congregate shelter. Not enough shelter for people who do not have a permanent home. Goal: shelter system of 1000+ units. Concern about where operating funds would come from, and the cost because NCS units would need to each have plumbing (tiny home model).

Following the interviews, the Consortium developed an online survey to distribute to organizations and agencies involved in affordable housing and social services for very low-income communities. The survey was initially distributed to 106 email contacts representing 72 groups, with the request to complete the survey and forward on to others. The final survey results represent the perspectives of 71 individuals affiliated with over 43 housing and social service agencies, organizations and businesses.

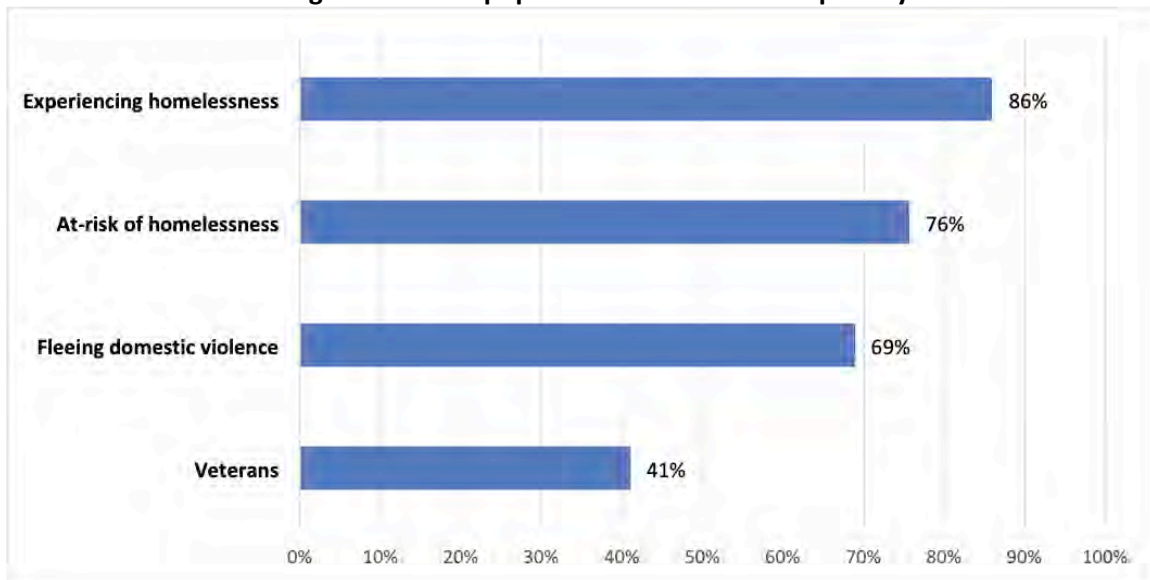
Most respondents worked at a non-profit organization (62%), a business relating to housing (23%), or an advocacy organization (21%). In addition, 35% were members of organizations related to social services or housing. In terms of geography, 49% of respondents were connected to Eugene, 21% were connected to Springfield, and 59% served all of Lane County. See page 10 for a full list of the 88 organizations that received and/or responded to the survey or attended a virtual open house event. Half of these organizations are affiliated with the 71 survey respondents. Please see the survey questions and figures showing results below.

Question: These federal funds focus on the following very low-income “qualifying populations.” In your opinion, which population(s) should receive priority? (check all that apply) (Figure 1)

- Individuals and families experiencing homelessness
- Individuals and families at-risk of homelessness
- Individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Veterans and families with a Veteran family member

Note: The bulleted lists of survey answers were randomized in the online survey.

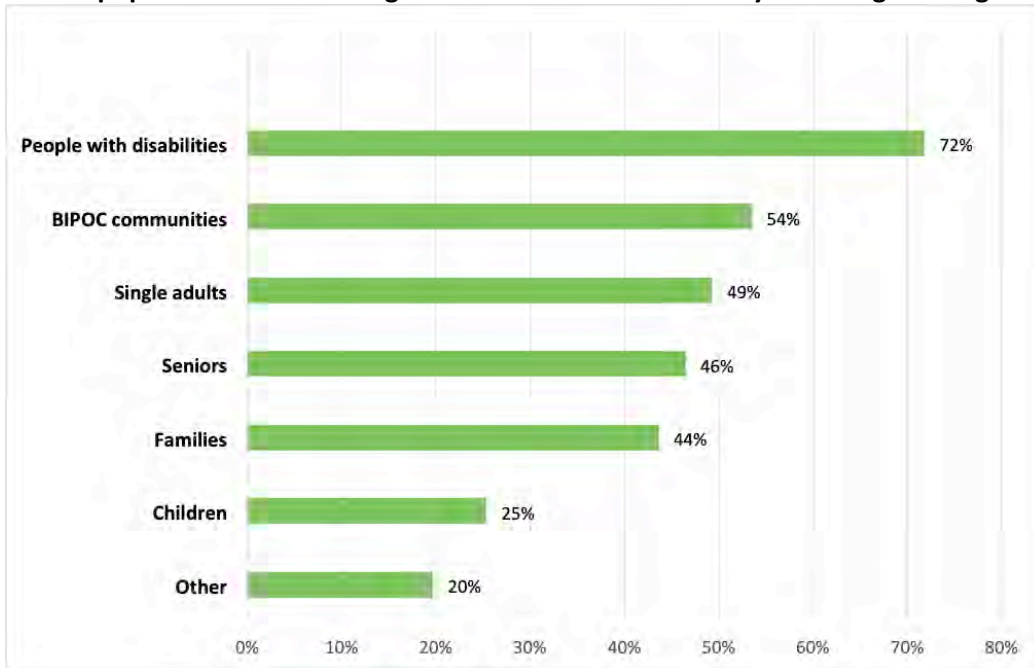
Figure 1. Which populations should receive priority?



Question: What very low-income populations do you think have the highest need and most difficulty in accessing housing or receiving services? (check all that apply) (Figure 2)

- Families
- Children
- People who identify as Black, Indigenous, or a person of color
- Seniors
- People experiencing disabilities
- Single adults
- Other

Figure 2. Which populations have the highest needs and most difficulty accessing housing and services



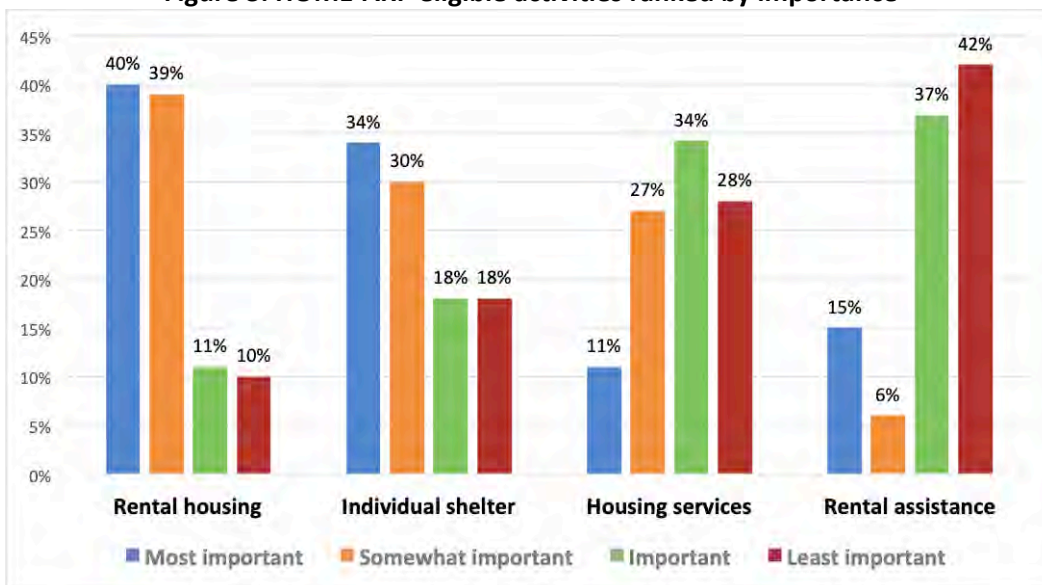
Regarding the “Other” category, the 14 open-ended responses were about the following topics:

- Addiction, mental health or behavioral health issues (5 comments)
- Individuals coming out of the prison system (1 comment)
- Youth and young adults (3 comments)
- Single parents, single fathers, single women over 50 with disabilities (3 comments)
- Working class people in low-income jobs (1 comment)

Question: The eligible activities of the federal funds are listed below. Please rank the importance of each activity: (1=most important, 4=least important) (Figure 3)

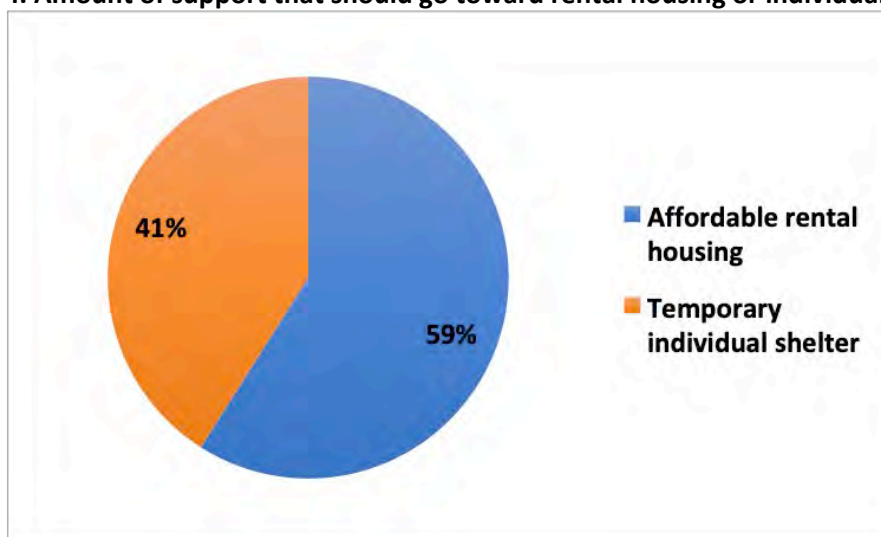
- Developing affordable permanent rental housing
- Assisting tenants with rent
- Developing individual permanent shelter for people experiencing homelessness (*for example, converted motels or buildings with individual living units*)
- Housing related services, such as help finding and maintaining housing

Figure 3. HOME-ARP eligible activities ranked by importance



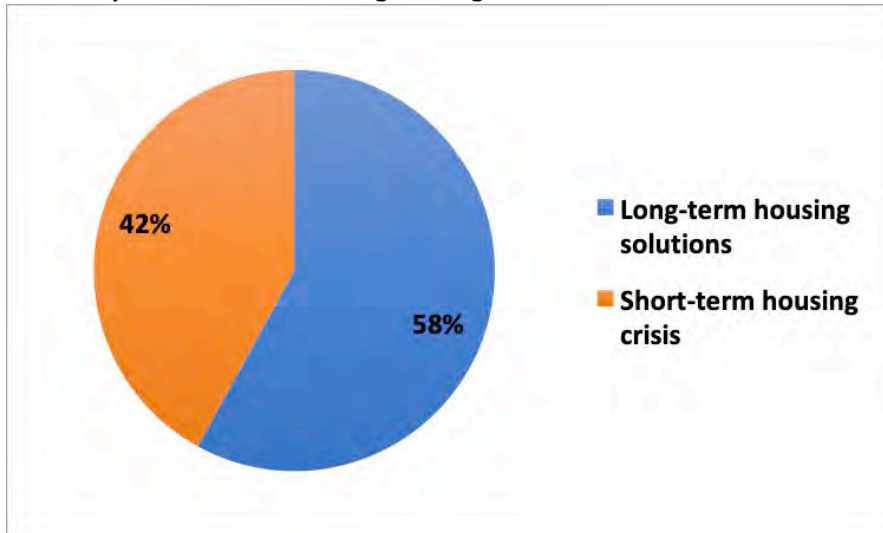
Question: How much support should go towards developing new affordable rental housing, and how much to develop new temporary individual shelter? (Figure 4)

Figure 4. Amount of support that should go toward rental housing or individual shelter



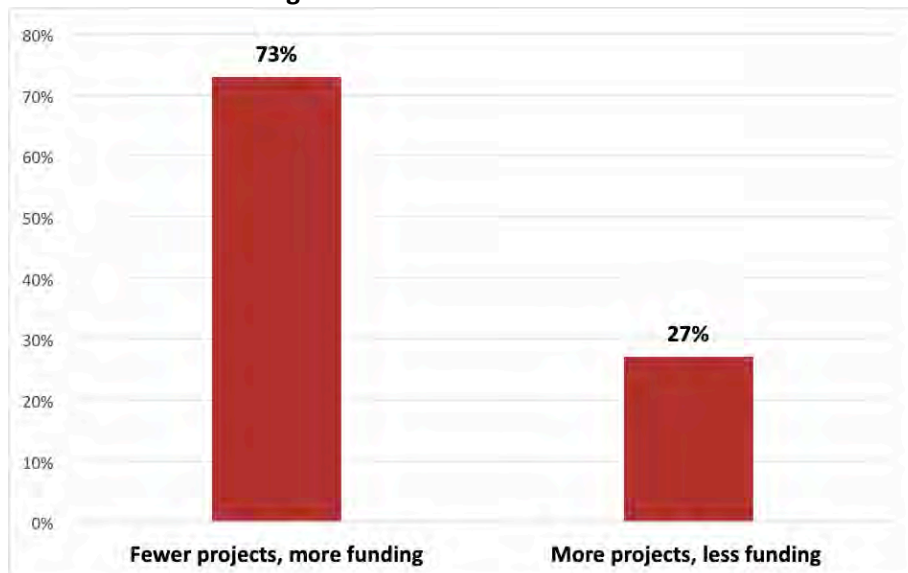
Question: What solution do you think is most important for the community to address with these funds? (Figure 5)

Figure 5. Level of importance in addressing of Long-term solutions and short-term housing crisis



Question: How do you think the federal funds should be distributed? (Figure 6)

Figure 6. HOME-ARP distribution



Survey recipients and respondents were affiliated with the following agencies, organizations, and businesses representing the required consultation categories and more (Table 2). The 71 survey respondents were affiliated with half of these groups.

The Type of Agency/Organization column is coded with the following abbreviations:

- CoC: Continuum of Care serving the jurisdiction’s geographic area
- HS: Homeless service provider
- DV: Domestic violence service provider
- V: Groups serving or representing Veterans
- PHA: Public housing agency
- PA: Public agencies that address the needs of the qualifying populations
- FCD: Public or private organizations that address fair housing, civil rights, and/or the needs of persons with disabilities.
- OH: Organizations that develop low-income housing
- O: Organizations/businesses that address the needs of the qualifying populations (not public agencies)

Table 2. HOME-ARP Survey recipients and respondents

Agency/Organization Business	Type of Agency/Organization
15th Night Youth Partnership	HS
4J School District	PA
90by30 Child Abuse Prevention	O
ARC of Lane County	FCD
Bethel Education Foundation	O
Bethel School District	PA
Better Housing Together	FDC
Burrito Brigade	O
Catholic Community Services of Lane County	HS
Center for Community Counseling	O
Centro Latino Americano	FDC
City of Eugene Community Development Block Grant Advisory Committee	PA
City of Eugene Equity Panel	FDC
City of Eugene Human Rights Commission	FDC
Columbia Care	O
Community Supported Shelters	HS
Confederated Tribes of Siletz Indians	O
Cornerstone Community Housing	OH
DevNW	OH

Eugene Chamber of Commerce	O
Eugene Mission	HS
Eugene Renters Protection Steering Committee	FDC
Eugene Tenant Alliance	FDC
Everyone Village	HS
Fair Housing Council of Oregon	FDC
First Place Family Center (SVDP)	HS
Florence Emergency Cold Weather Shelter Florence Food Share, First Step Florence	HS, O
Food for Lane County	O
Goodwill Industries of Lane and South Coast Counties	FDC, O
Habitat for Humanity of Central Lane	O
Headstart of Lane County	PA
HIV Alliance	O
Homeless Action	O
Homes for Good	PHA
Hope and Safety Alliance	DV
Hourglass Community Crisis Center	O
Housing Alliance	O
Housing Policy Board	PA
Human Rights Commission	FDC
Intergovernmental Housing Policy Board	PA
Lane Council of Governments Senior & Disability Services	FDC
Lane County Health and Human Services	CoC, PA
Lane County Legal Aid	FDC
Lane County Public Health	PA
Lane County Veterans Services	V
Lane Independent Living Alliance	FDC
Lane Kids	O
Lane Poverty and Homelessness Board	PA
Lane Transit District: Comprehensive and Accessible Transportation Committee	PA
Lane Workforce Partnership	O
Laurel Hill Center	O
Live Healthy Lane Steering Committee	O
Looking Glass	HS
Mainstream Housing	O
NAACP of Eugene-Springfield	FDC

National Alliance on Mental Illness (NAMI) Lane County	FDC
Nightingale Hosted Shelter	HS
Oregon Family Support Network	O
Oregon Law Center	FDC
Oregon Tenants Association	FDC
Pacificsource	O
Parenting Now	O
PeaceHealth	O
Pearl Buck Center	FDC
Planned Parenthood	O
Refugee Resettlement Coalition	O
Relief Nursery	O
Rent Control Now	FDC
Safe Shelter for Siuslaw Students	HS
Sexual Assault Support Services	DV
Sheltercare	HS
Sponsors, Inc.	HS
Springfield Chamber of Commerce	O
Springfield-Eugene Habitat for Humanity	O
Springfield-Eugene Tenant Association	FCD
SquareOne Villages	HS
St. Vincent De Paul, Egan Warming Center	HS
The Child Center	O
U.S. Department of Veterans Affairs	V
United Way of Lane County	O
University of Oregon: Lane Integration Network	O
University of Oregon: Nontraditional and Veteran Students and Financial Aid	V
Veterans Administration, Employment and HCHV Program	V
Whiteaker Neighbors	O
Whitebird Clinic	O
Willamette Family	O

Summary of feedback received and results of upfront consultation

HUD asked PJs to summarize feedback received and results of upfront consultation with the entities. The responses were similar in the interviews and survey. Overall, the respondents focused mostly on the need for development - more places to live. However, it was acknowledged that all the eligible activities could benefit people locally. Agencies were split about whether development of rental housing or development of non-congregate shelter was most critical, since both are very important, and lacking. Development of permanent rental housing was identified to be slightly more important than development of non-congregate shelter. Some agencies mentioned that supportive services funding should be paired with development projects, potentially to help with the first years of occupancy. Many agreed that operating assistance for non-profit organizations involved in the development project would also be helpful to increase capacity at those organizations.

The feedback was consistent that development is more important than rent assistance as a long-term permanent investment. Some people noted that rent assistance is an ongoing need and therefore not the best use of one-time funds. Some respondents noted that rent assistance doesn't have a guaranteed, lasting impact to prevent homelessness, since households could still become homeless after the rent assistance ended.

The result of upfront consultation was the clear direction that the Consortium would emphasize development in the proposed uses of HOME-ARP funds. The Consortium considered all the activities named by the respondents and whether HOME-ARP was the best resource to support the activity. The feedback helped to consider needs and preferences within the qualifying populations. Some agencies contributed data for the needs and gaps analysis.

Public Participation

In accordance with Section V.B. of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Consortium Public Participation Process

HUD asked the PJ to describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- *Date of public notice:* June 3, 2022
- *Public comment period:* June 3, 2022 – June 20, 2022
- *Date of public hearing:* June 21, 2022

See Attachment A for copies of the published public notices and affidavits of publication.

Description of Public Participation process

The Consortium provided a website on the City of Eugene webpages to summarize and publicize the HOME-ARP program, including the total award from HUD and the range of activities that the Consortium considered. The Consortium publicly noticed all Eugene-Springfield HOME Consortium Governing Board meetings at which the Governing Board discussed the HOME-ARP funds. All Governing Board meetings have the opportunity for public comment. The Consortium held a virtual open house May 26, 2022 to present the information received in the consultations and needs and gaps analysis, the amount of HOME-ARP awarded to the Consortium, and the range of activities the Consortium may undertake. The invitation was shared widely by email in English and Spanish and on the city website. Updates about all opportunities for input were emailed to organizations and individuals involved in the consultation and survey process. Over 35 individuals signed up for the open house event, and 29 people participated, representing 24 organizations and/or agencies serving the qualifying populations. After a 20-minute presentation, participants asked questions and commented on the Draft Allocation Plan.

The Draft Allocation Plan was approved by the Governing Board May 17, 2022. A 15-day written public comment period and public hearing was advertised in the Register Guard newspaper in English and Spanish and on the City of Eugene website. The public hearing was held at the Governing Board meeting June 21, 2022 before the Governing Board voted on the final Allocation Plan.

Efforts to broaden public participation

The Consortium proactively engaged with a full range of organizations and individuals with a stake in the outcome of the decision. Staff and the public outreach consultant Cogito LLC developed a comprehensive list of organizations and agencies that serve low-income individuals, veterans, and victims of domestic violence and called each one to invite them to engage with the project and share project information widely through their networks and with their constituencies. The resulting interested parties list of 120+ organizations received regular updates via email that could be easily shared via social media. The updates likely reached 1000+ individuals due to forwards and information included in organizational newsletters and social media posts.

The updates included a multitude of ways to engage in the decision process, including participation in the survey, open ended comments to the project, an invitation to the open house event in English and Spanish, and information about how to participate in the decision making process.

The Consortium included in outreach agencies serving and working with minority populations, non-English speaking populations and persons with disabilities. The advertisement of the Substantial Amendment and Draft Allocation Plan written comment period and public hearing was published in English and Spanish. The interviews, open house event and meetings of the decision-making body were held virtually with the option for attendees to call in using a telephone.

Public comments received

A PJ must consider any comments or views of residents received in writing or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summary of comments and recommendations received through the public participation process either in writing or orally or at a public hearing:

No written comments were received during the written comment period. No comments were received in the public hearing held by the HOME Consortium Governing Board at their meeting June 21, 2022 before approving the final Allocation Plan.

During the consultation process, including interviews, survey and open house event, various comments and recommendations were received and considered by the HOME Consortium Governing Board. The 'Rationale for funding eligible activities' section (page 41) summarizes those considerations.

Summary of comments or recommendations not accepted and the reasons why:

No written comments were received during the written comment period. No comments were received in the public hearing held by the HOME Consortium Governing Board at their meeting June 21, 2022 before approving the final Allocation Plan.

During the consultation process, including interviews, survey and open house event, various comments and recommendations were received and considered by the HOME Consortium Governing Board. The 'Rationale for funding eligible activities' section (page 41) summarizes those considerations.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), PJs must evaluate the size and demographic composition of all four qualifying populations within its boundaries and assess the unmet needs of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data including Point In Time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Primary sources used were the 2019 American Community Survey (ACS) 5-year estimates, 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, 2020 Point-in-Time Count (PIT Count), 2022 preliminary PIT Count, Lane County Homeless By Name List (HBNL) and 2020 Housing Inventory Count.

Size and Demographic Composition of Qualifying Populations

The Cities of Eugene and Springfield are the primary metropolitan areas in Lane County. The two cities form the HOME Consortium. Qualifying populations under the HOME-ARP program are individuals or families experiencing homelessness or at risk of homelessness; persons(s) fleeing or attempting to flee domestic/dating violence, sexual assault, stalking, or human trafficking; and those at greatest risk of housing instability, with attention to veterans and their families meeting one or more of those categories. HUD guidance for qualifying populations also highlighted unaccompanied youth under 25 years of age, families with children and youth, households with incomes below 30% of area median income (AMI) and households with incomes below 50% AMI experiencing severe cost burden.

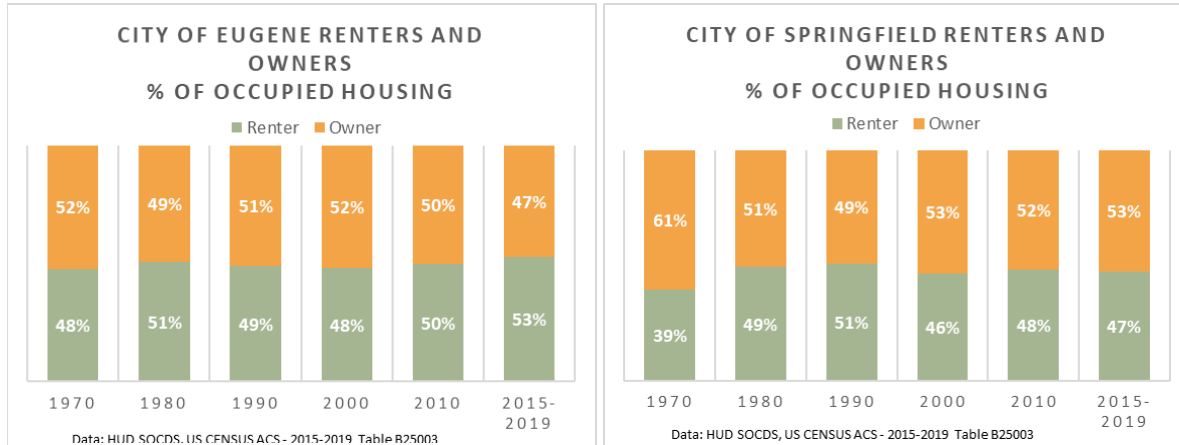
Overall Population

In 2020 there were 238,505 people counted in the Census with 176,654 in Eugene and 61,851 people in Springfield. To look at general demographics for qualifying populations for this report, we used U.S. Census 2020 and the U.S. Census ACS five-year data for 2015-2019. Based on the most recent ACS data, a total of 230,379 people lived in the cities of Eugene and Springfield, which closely mirrors the 2020 Census.

Housing Tenure

There are 94,910 occupied housing units in the cities of Eugene and Springfield combined, which is an almost 5% increase since 2010 (ACS). About 75% of those units are in Eugene. Renter housing has increased in Eugene to 53% of occupied housing. Springfield has maintained a level of approximately 47% renter occupied housing. Figure 7 below demonstrates the breakdown of tenure in Eugene and Springfield. Building permit data from the HUD State of the Cities Data System shows that 888 new permits were filed in 2020, with 81% (722) of these in Eugene, and 19% (166) in Springfield. In Eugene, 55% (400) permits were multi-family buildings, while in Springfield 54% (90) of permits were for single family dwellings.

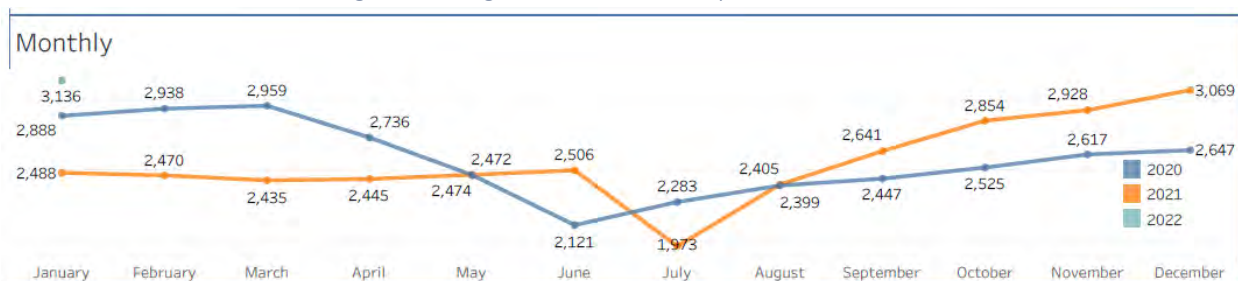
Figure 7. Eugene and Springfield Renter and Owner Occupied Housing



Qualifying Population 1. Homeless as defined in 24 CFR 91.5

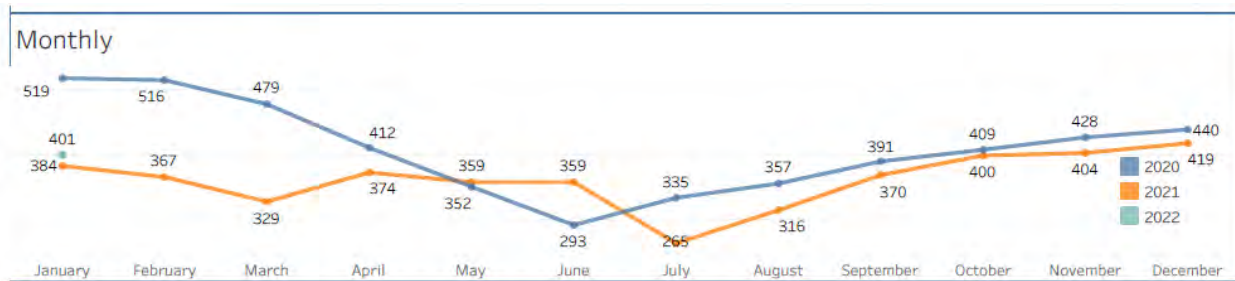
The Lane County Health and Human Services Department (HHS) manages the Homeless Management Information System (HMIS) and has created a new dashboard called the Homeless by Names List (HBNL). The HBNL displays demographic and other data for people experiencing homelessness for the area. For the two cities in January 2022, there were 3,537 people experiencing homelessness receiving services from local service providers. Individually Eugene saw its highest population served (3,136) in January 2022 compared to the other months of the last two years (2020 and 2021) (Figure 8). Figure 9 below shows the homeless population served in Springfield is lower in January 2022 with 401 people receiving services.

Figure 8. Eugene Homeless Population Served



Source: Lane County HBNL

Figure 9. Springfield Homeless Population Served



Source: Lane County HBNL

Household Composition

There are 88,427 households in the two cities, of which one-member households represent 32% (27,894) and family households with children represent 25% (22,327) of total households (ACS). The HBNL shows that adult households with children represent 24% (661) of homeless households receiving services. Households that were headed by youth (unaccompanied youth) and children represented only 1% (18) of households. Adults aged 25-64 were the largest population group receiving services in the community with 76% (2,690) of the population in this age group. Of these adults, 44% (1,182) are experiencing chronic homelessness (HBNL).

There are subpopulations that require specific and tailored services for their needs. While these subpopulations represent a smaller percentage of the overall populations that are housed, sheltered and/or unsheltered, they may have specific vulnerabilities and they may be a higher risk of dangers associated with homelessness.

Youth Under Age 25

Youth under age 25 represent 35% (80,237) of the total population in the two cities (ACS). The HBNL data system reports that in January 2022, 16% (572) of the population receiving services were youth under age 25. Of these youth, 8% (26) were chronically homeless, the majority of which (23) were age 6-17 years of age.

Older Populations

Populations over age 65 and those with a disability are considered at a higher risk for homelessness. People over the age of 65 make up 16% (35,709) of the total population and 9% of households are people over age 65 living alone (ACS). The Eugene-Springfield 2020 Consolidated Plan notes that the population of the area is aging, and older populations have increased over the years. About 8% (275) of the population in the HBNL for the two cities were over age 65, and 53% (145) of those were experiencing chronic homelessness.

Population with a Disability

Populations with a disability compose 14% (32,087) of the non-institutionalized population (ACS) in the two cities combined.

The HBNL data does not track the number of people receiving services that have physical or other disabilities. In calendar year 2021, 17% of the total population receiving services through CoC agencies reporting in HMIS (5,908 households) had a disability, and 26% of people had one or more disabilities. The most frequent conditions reported were mental health issues, chronic health conditions and physical disabilities. These conditions were also the most frequently reported for chronically homeless populations (HMIS).

In 2021, around 4% (1,466) of total people served in CoC organizations had a developmental or intellectual disability, and 13% (4,442) of the total population served had a physical disability (HMIS). About 10% of the total population served were people with physical disabilities in households without children.

Population with Mental Health Issues

In calendar year 2021, a total of 35,232 people received services through the Continuum of Care organizations (HMIS). Of the total, 16% (5,796) reported a mental health issue. Households without children made up 12% of the total population served (4,185), but that demographic makes up 72% of the population with reported mental health issues. Around 20% (1,144) of the population with mental health issues were households with children.

Population with drug and/or alcohol use disorder

Around 2.5% of the total population seeking services with Continuum of Care organizations in 2021 (870 households) reported having a drug and alcohol use disorder (HMIS). About 1% reported an alcohol use disorder (461) and 2% reported a drug use disorder (782) (HMIS). A majority of this population were in households without children.

Population with HIV/AIDS

According to HMIS, less than 1% (59) of the population seeking services 2021 reported having HIV/AIDS, however it is a medically vulnerable population requiring specialized services. A majority of this population were in households without children.

People with histories of conviction

The local nonprofit organization that provides supportive housing and reentry services to individuals returning to the community post-incarceration is Sponsors, Inc. According to Sponsors, approximately 500-600 individuals are released to Lane County from incarceration annually and are homeless with very few belongings. Background checks and rules for histories of incarceration is a barrier to finding

housing. Sponsors provides transitional housing programs and case management with employment support, behavioral health services, mentorship and other specialized supports as well as basic needs like food and clothing. It is very difficult to find permanent housing opportunities after transitional housing programs. The low vacancy rate of rental housing means that individuals who otherwise meet eligibility requirements may be denied access based on their past convictions.

Veterans

In the cities of Eugene and Springfield, around 10% (17,424) of the population over age 18 are veterans. Veterans represented 7% (244) of the population receiving services in HBNL in January 2022. The majority of the veterans were over age 25 and 55% (134) experience chronic homelessness. The preliminary PIT Count data from January 2022 shows that on that day, 61 veterans were sheltered in emergency shelter and transitional housing, and 142 were unsheltered.

Black, Indigenous, and People of Color (BIPOC) populations

Another critical part of our community's demographic make-up we need to look at is the race and ethnicity of people served. Around 10% (329) of the population experiencing homelessness served were Latino/Hispanic, which is a little lower than the overall percentage of Latino/Hispanic population in Eugene and Springfield at 12% (27,667). HBNL data on race shows that BIPOC populations represent 18% of the population experiencing homelessness or at-risk of homelessness. This percentage is significantly higher when compared to the overall community, where BIPOC individuals represent 14% of the population.

Gender

In the cities of Eugene and Springfield 51% of the population is female and 49% is male (ACS). Around 18% are male and 17% female are youth under age 25 and around 31% (male) and 34% (female) are over age 25 for the two cities (ACS).

Information from the HBNL however shows that two-thirds of the adult population served in the two cities were male, over half (54%) of adult headed households were headed by a male, and males also represented the highest chronically homeless numbers (HBNL). The HBNL system is also collecting information on non-conforming and transgender populations, in order to better track at-risk members of the community both adult and youth. Currently only 3% (9) youth and 1% (38) of adults reported a non-conforming or transgender identity, but this population has specific needs that must be considered in services for populations experiencing homelessness.

(Data: U.S. Census 2020, Table P2; U.S. Census ACS 2015-2019 Tables DP02, B01001; Lane County Health and Human Services Homeless by Names List (HBNL) and Homeless Management Information System (HMIS); Eugene-Springfield 2020 Consolidated Plan)

Qualifying Population 2. At risk of homelessness as defined in 24 CFR 91.5

Using Comprehensive Housing Affordability Strategy (CHAS) data from 2014-2018 we can determine households at risk of homelessness through income and housing problems. In the cities of Eugene and Springfield, 13% (12,480) of total households and 22% (10,370) of renters have incomes at or below 30% AMI, increasing their risk of homelessness. The low vacancy rate of rental housing units also contributes to the lack of options for people at lower income levels. The ACS data showed the vacancy rate at 2.8% in Eugene and at 1.7% for Springfield.

As shown in Figure 10 below, in the City of Springfield, 11% of total households and 17% of renters have incomes below 30% AMI (CHAS). In Eugene the percentages are a little higher, showing 14% of total households and 23% of renters with incomes below 30% AMI (CHAS).

Figure 10. Households with incomes under 30% AMI

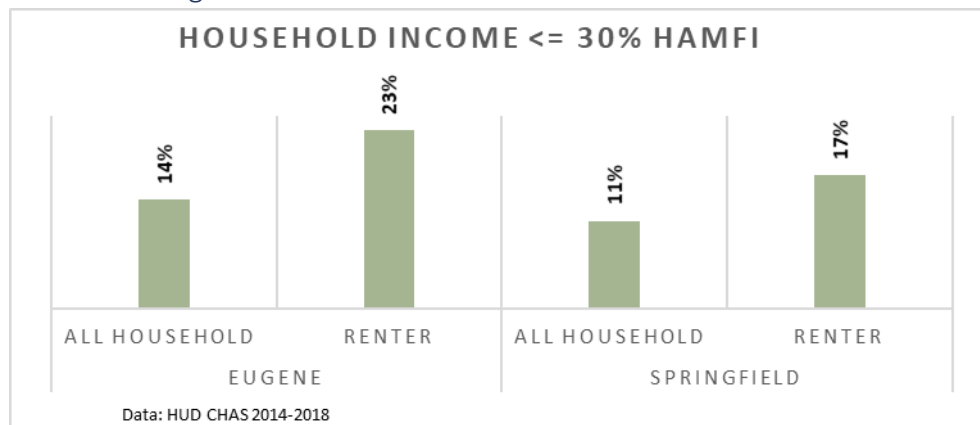


Figure 11 shows housing cost burden for owner-occupied and renter-occupied households in Eugene and Springfield. In Eugene, 63% of owner-occupied households and 37% of renter households have a housing cost burden. In Springfield, the percentages are similar with 60% of owner-occupied households and 40% of renter households experiencing a housing cost burden.

Figure 11. Housing Cost Burden 30%

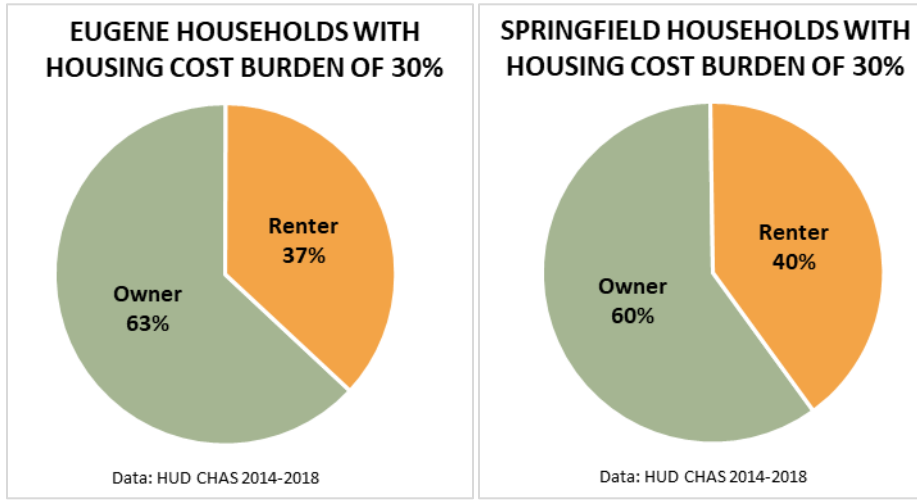
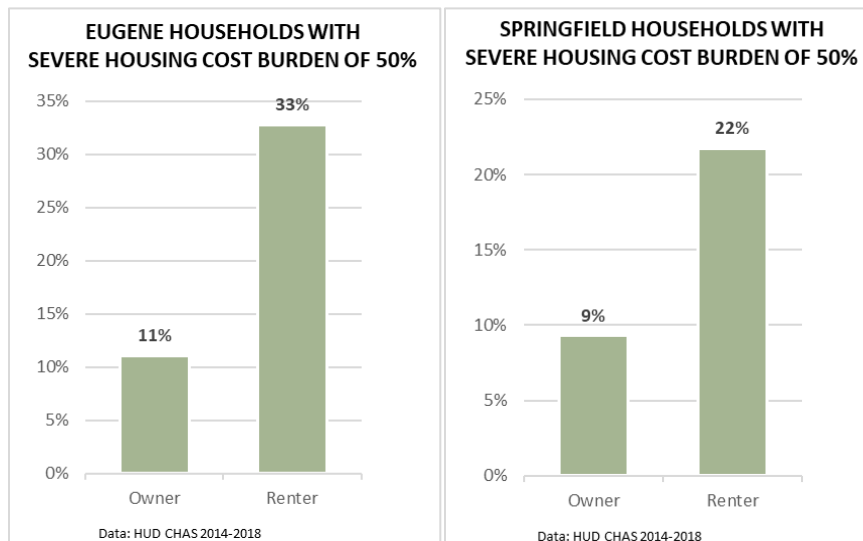


Figure 12 shows severe housing cost burden for owner-occupied and renter-occupied households in Eugene and Springfield. In Eugene, 33% (11,770) of renter-occupied households and 11% (3,645) of owner-occupied households spend more than 50% of income on housing costs (CHAS). In Springfield, 22% (2,605) of renter-occupied households and 9% (1,165) of owner-occupied households have a severe cost burden (CHAS). There was no data available related specifically to the number of veterans or veteran households experiencing a housing cost burden.

Figure 12. Severe Housing Cost Burden 50%



Qualifying Population 3. Survivors of Domestic Violence

The qualifying population includes people fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined in the Notice. It is difficult to obtain a complete count of people meeting this definition especially among unsheltered populations due to risk of increased violence if people report the violence. Two different data sets from Lane County HHS were used to analyze the number of people who are experiencing domestic violence in Lane County. Information was not available at the city level, and information about dating violence, stalking and human trafficking were not available at the county or city level.

A total of 61 unsheltered people experiencing domestic violence were counted in the one-day 2022 preliminary PIT Counts.

For the calendar year 2021, of all adults without children and unaccompanied youth receiving services, around 12% (3,063) had reported experiencing domestic violence in their lives and 22% (681) were currently fleeing a domestic violence situation (HMIS). These counts do not include adults with children. Hope and Safety Alliance is the local non-profit services provider for this qualifying population. The agency does not collect data points for HMIS about demographics and whether their clients are sheltered, unsheltered, in transition, etc. The agency reported that they responded to over 9,000 crisis calls in 2021 and had over 20,000 contacts with people in Lane County. They supported hundreds of clients with direct aid through shelter, rental assistance, basic needs, food assistance as well as safety planning and advocacy. No data was available about number of veterans meeting this qualifying population.

Qualifying Population 4. Other populations requiring services or housing assistance to prevent homelessness

Data above shows the number of households in Eugene and Springfield earning no more than 30% AMI. Households with incomes less than 30% AMI that experience a housing cost burden have an increased risk of housing instability. Based on CHAS data, In the two cities of Eugene and Springfield, 10% (9,080) of all households and 16% (7,645) of renter households have incomes below 30% AMI and a severe cost burden.

In Eugene, 11% (7,720) of all households and 17% (6,260) of renter households have both incomes below 30% AMI and a severe housing cost burden (CHAS). In Springfield, 7% (1,810) of all households and 12% (1,385) of renters have lower (30% AMI) incomes and severe cost burdens (CHAS).

In the cities of Eugene and Springfield, 25% (23,015) of total households and 38% (18,120) of renters have incomes at or below 50% AMI. In Springfield, 23% (5,635) of total households and 33% (3,945) of

renters have incomes at or below 50% AMI (CHAS). In Eugene the percentages are a little higher, showing 25% (17,380) of total households and 39% (14,175) of renters with incomes at or below 50% AMI (CHAS).

Households with incomes less than 50% AMI that experience a housing cost burden have an increased risk of housing instability. Based on CHAS data, in the two cities of Eugene and Springfield, 16% (15,110) of all households and 26% (12,280) of renter households have incomes at or below 50% AMI and a severe cost burden.

In Eugene, 17% (11,920) of all households and 27% (9,865) of renter households have both incomes below 50% AMI and a severe housing cost burden (CHAS). In Springfield, 13% (3,190) of all households and 20% (2,415) renters have low (50% AMI) incomes and severe cost burdens (CHAS).

Cost Burden and Housing Problems

Housing cost burden (paying over 30% of income for housing) has a large influence on people's risk for losing housing. Based on HUD CHAS data for Eugene and Springfield, around 58% (54,555) of all households and 44% (21,275) of renters experience a housing cost burden. An even greater risk for households is severe housing cost burden (paying more than 50% of their income on housing). In Eugene and Springfield 21% (19,185) of all households and 30% (14,375) of renters have severe housing cost burden. When a household spends over 50% of their income on housing costs, there is little funds remaining for other living expenses or necessities.

Housing problems are characteristics associated with housing instability. When housing problems are compounded, the risk for housing instability increases. Around 42% (39,090) of all households in the area and 56% (26,775) of renters have at least one housing problem such as lacking complete plumbing or kitchen facilities, more than one person in a room, or a housing cost burden (CHAS). In the two cities, 23% (21,885) of all households and 34% (16,370) of renter households reported at least one *severe* housing problem (inadequate plumbing or kitchen, severe housing cost burden, more than one person per room) (CHAS). CHAS data shows 6,970 households with incomes 30% to 50% AMI and a housing problem.

There was no data available related specifically to the number of veterans or veteran households experiencing a housing cost burden and housing problem.

Current Resources available to assist the population

A list of resources available to assist qualifying populations is below. The HOME Consortium uses annual HOME funds primarily for the development of rental housing, which includes permanent supportive

housing and transitional housing for the qualifying populations. The cities of Eugene and Springfield use the maximum allowable amount of annual Community Development Block Grant (CDBG) funds for human services provided for various supportive services through the Lane County Human Services Commission (HSC). The two cities also use general funds each year for supportive services and support of housing and homeless services providers through HSC.

The cities and Lane County have identified significant resources and housing providers to help move people out of homelessness or to prevent people from falling into homelessness. Despite the efforts, the community still experiences extensive homelessness. The community has developed various programs to move people into more stable living environments. Temporary shelter programs, such as Conestoga huts, tiny homes, sanctioned car camping, and monitored camping sites are small steps but people in those programs are still considered unsheltered by HUD.

Funds used to assist qualifying populations for activities not eligible under HOME-ARP:

- Eugene and Springfield CDBG and general funds are used annually for housing related and non-housing related human services serving people experiencing homelessness and at risk of homelessness.
- Eugene and Lane County used various resources to fund Safe Sleep sites for people experiencing homelessness, which include temporary emergency shelter (tent camping sites, vehicle camping sites, and temporary housing like pallet shelters and conestoga huts) and supportive services for the shelters. The Safe Sleep site program uses Eugene ARPA, Lane County ARPA, CARES Act funds, Community Safety Initiative funds generated from the payroll tax, Lane County Emergency Solutions Grant – CARES Act (ESG-CV) funds, and State funds. Development of this type of shelter is not an eligible activity with HOME-ARP funds, and would be complimentary to HOME-ARP development activities to serve the population.
- The Navigation Center, a new 75-bed Lane County congregate shelter under construction in Eugene, received State resources to convert the former Veteran’s Administration clinic to the shelter. Lane County ARPA funds, Eugene ARPA funds and County ESG-CV will be used for operations and supportive services.
- Eugene and Springfield Community Development Block Grant coronavirus (CDBG-CV) funds from the CARES Act funded food assistance programs for people at risk of homelessness.
- Springfield Emergency Operations Center and Federal Emergency Management Administration (FEMA) dollars were used toward supplies for people experiencing homelessness.

Funds used for HOME-ARP eligible activities:

Table 3 below shows the funds used for activities that are eligible under the HOME-ARP program. Below the table is a more detailed description of each funding source.

Table 3. Funding sources used for HOME-ARP eligible activities

Funding sources supporting the activity	HOME-ARP eligible activities				
	Development of Rental Housing	Development of NCS	Housing Social Services	Tenant Based Rent Assistance	Non-profit Operating Support
Eugene/Springfield HOME funds					
Eugene ARPA City Fee Assistance					
Lane County ARPA					
OHCS prioritization LIHTC					
OEM, ODHS, Lane County CARES and FEMA wildfire \$					
State ARPA					
Eugene CDBG-CV					
Springfield CDBG-CV					
Federal ARPA, Oregon Emergency Rent Assistance					

- Annual HOME funds support **development of rental housing** for qualifying populations. The Eugene-Springfield HOME Consortium Governing Board awarded HOME funds for the development of 2 permanent supportive housing projects through the 2021 Housing Request for Proposals (Polk 2.0 and The Coleman).
- Eugene ARPA resources were identified for City Fee Assistance (including Systems Development Charge grants) to support affordable homeownership and **rental housing development**. These resources were identified for two HOME funded rental housing projects that needed the

resources in addition to the HOME funds. It is expected that any future Eugene ARPA resources identified for the same purpose would not replace HOME-ARP funds needed for development.

- Lane County provided ARPA funds toward the **development of permanent supportive housing** (rental housing) for specific development projects.
- Oregon Housing and Community Services (OHCS), the state housing agency, is again prioritizing **development of Permanent Supportive Housing (PSH)** and family-size units through its 3-year Qualified Allocation Plan (QAP) approved in January 2022, which identifies funding priorities for 9% Low-Income Housing Tax Credit developments for 2022-2024. OHCS has also prioritized additional funds for PSH developers that participate in a training program.
- Oregon Office of Emergency Management (OEM) and Department of Human Services (ODHS) provided Lane County federal CARES Act and FEMA resources to **develop non-congregate shelter** for victims of the 2020 wildfires through Project Turnkey. Homes for Good is operating a former hotel as a shelter.
- State ARPA funds can be used to help Ann’s Heart non-profit acquire a building in Springfield to **develop non-congregate shelter** to house women experiencing homelessness.
- Lane County provided ARPA funds for **non-profit assistance** including homeless service provider network capacity building, non-profit capacity building, and awards for support to specific non-profits for capacity and staff retention.
- Eugene and Springfield CDBG-CV funds from the CARES Act were provided for **supportive housing related services**. Funds were used for services preventing homelessness (such as assistance with emergency resources, Springfield Eugene Tenant Association tenant hotline support, and legal assistance to prevent homelessness due to the pandemic), and services for people experiencing homelessness (at day access centers and emergency temporary overnight shelters).
- Federal ARPA funds, Oregon Emergency Rental Assistance Program funds, and Springfield CDBG-CV resources were provided to Lane County to administer for **rent assistance** due to economic distress caused by the pandemic. Lane County Human Services reported in 2021 that federal and state rent assistance resources they manage was over \$34 million and would last through FY24; they did not want additional resources for rent assistance. In the interview with Lane County staff, tenant based rent assistance was not a recommended HOME-ARP activity.

- Eugene and Springfield were awarded \$1 million each in State resources to address homelessness, affordable housing, and/or housing insecurity but the uses have not yet been determined.

Unmet Housing and Services Needs of Qualifying Populations

Qualified Population 1. Homeless as defined in 24 CFR 91.5

Data from Lane County shows that there is significant unmet need for housing for people experiencing homelessness and people experiencing chronic homelessness. The Lane County Shelter Feasibility Study developed by Technical Assistance Collaborative, also referred to as “the TAC report” (2018) determined that more shelter beds were needed and more permanent housing for people moving out of emergency shelter. See the ‘Gaps within the current shelter and housing inventory’ section below (page 33) for specific data about gaps in beds and units for this qualifying population. Eugene and Springfield have worked to provide forms of shelter and safe places to sleep for people experiencing homelessness that do not meet HUD’s definition of shelter. Pallet shelters, conestoga huts, and safe locations for vehicle and tent camping are emergency and temporary options for people experiencing homelessness to stay. Development of those housing types is not an eligible use of HOME-ARP funds, but the faster to implement, less expensive forms of secure shelter are needed.

During the COVID19 pandemic, the number of emergency and temporary shelter beds were reduced because of social distancing requirements. The need for more congregate and non-congregate shelter was identified, but there is a lack of resources for operating shelters. Local service providers do not have the capacity needed to leverage resources, develop and operate new shelters. Permanent Supportive Housing developments also have experienced challenges funding the services needed to support the populations. Recent Permanent Supportive Housing developments have noted that because of extra staffing and services needs, this type of housing development is more expensive than affordable housing for people at risk of homelessness, or low-income households earning up to 60% AMI.

The 2020 Consolidated Plan identified this qualifying population has a significant need for supportive services assisting with basic needs such as emergency food/meals, bus passes, showers, identification, storage of personal belongings, telephone and internet access, and laundry services. In addition there is need for supportive services to find and maintain housing, physical and mental health services, drug and alcohol addiction services, obtaining public benefits, increasing income, and more. The TAC Report was a significant work in Lane County to identify how the local services system works for people experiencing homelessness. While some of the recommendations were based on creating more places to live, such as congregate shelter and permanent supportive housing, some of the needs identified

were related to housing services. Expanding services in these areas requires resources and expanded capacity for service providers. Two identified recommendations were the following:

- Expanding outreach to people who are living outside on in places not meant for human habitation (cars, tents, etc.) and connecting them to services.
- Increase effectiveness of the coordinated entry system to better connect people experiencing homelessness with interventions to end their homelessness.

Qualifying Population 2. At risk of homelessness as defined in 24 CFR 91.5

Data demonstrates that there is significant unmet need for housing for people meeting the definition of being at risk of homelessness. See the 'Gaps within the current shelter and housing inventory' section below (page 33) for specific data about gaps in units for this qualifying population. More permanent rental units with very low rents are needed for the lowest income households in the community. Data demonstrates a significant portion of the housed population earning no more than 30% AMI experiencing housing cost burden, which contributes to housing instability.

Waiting Lists

The public housing agency, Homes for Good, provided data that the Housing Choice Voucher (tenant based long-term rent assistance program) waitlist has 572 households on it, with over 360 households who would need a 1-bedroom, over 120 households who would need a 2-bedroom, and over 80 households who would need a 3- or 4- bedroom housing unit.

The vacancy rate is so low for permanent rental housing, it is difficult to re-house people who are evicted or foreclosed or otherwise lose their housing. The ACS data showed the vacancy rate at 2.8% in Eugene and at 1.7% for Springfield. Homes for Good and other agencies have said that some households with Section 8 Housing Choice Vouchers and other rental assistance vouchers have difficulty finding units where they can utilize the vouchers. In addition to low vacancy rates, poor credit history, history of conviction, lack of rental history, and lack of funds for rent deposits may be reasons for non-use of Housing Choice Vouchers.

Homes for Good provided waiting list data for their existing rental housing developments. Over 7,000 households are on the wait lists for their housing developments in Eugene and Springfield, including over 5,000 households waiting for opportunities to live in developments in Eugene and over 2,000 households waiting for opportunities to live in developments in Springfield. There is high demand for 1-bedroom units (2249 households), 2-bedroom units (3151 households) and 3-bedroom units (1739 households), but the demand for 4-bedroom units is also significant (133 households).

St. Vincent de Paul is a Community Housing Development Organization and the second largest owner/developer of affordable rental housing in Eugene and Springfield. St. Vincent de Paul provided waiting list data for their existing rental housing developments. Over 2,600 households are on the wait lists for developments in Eugene and Springfield including almost 2,000 households on the waitlist for Eugene developments and about 600 households for Springfield developments. The demand is highest for 1-bedroom units (940 households) and 2-bedroom units (889 households). Over 500 households are waiting for 3-bedroom units.

Cornerstone Community Housing is a Community Housing Development Organization and the third largest owner/developer of affordable rental housing in Eugene. Cornerstone provided waiting list data for their existing rental housing developments. Almost 2,000 households are on the wait lists for developments in Eugene. The demand is highest for studios (572 households), 1-bedroom units (695 households) and 2-bedroom units (526 households). Nearly 200 households are waiting for 3-bedroom units.

Rent Assistance

Lane County provides rental assistance funding to help people with limited incomes to stay in their housing. The demand for rental assistance is more than the available resources, and the rent assistance is limited. Without raising household incomes or otherwise increasing housing stability, a household would still be at risk of homelessness after the rent assistance ends. More permanent rent assistance programs like the Section 8 Housing Choice Voucher program would help sustain the housing stability for the lowest income households.

Supportive Services

The TAC report identified some unmet needs for supports to this qualifying population. Expanding services in these areas requires resources and expanded capacity for service providers. It is important to provide services that are specialized for each individual and household's needs, and specialized services need sustained funding.

- Expand and increase supportive services and tenancy supports for residents to ensure people can maintain their housing permanently. Resident services can help prevent eviction.
- Expand services of how to navigate the rental housing process and those connecting residents to landlords and housing partners.
- Provide training and staff capacity to service agencies to ensure implementation of best practices, that will help with the overall need for specialized services.

Qualifying Population 3. Survivors of Domestic Violence

The qualifying population includes people fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined in the Notice. Hope and Safety Alliance,

the local services provider for the population, participated in a one-day survey in September 2021 (the Annual Domestic Violence Counts Report) through the National Network to End Domestic Violence to document services provided during the 24-hour survey period. Information shared about the one-day survey showed that services providers in Oregon received requests for services related to emergency shelter, housing, transportation, childcare, legal representation and other support needs that the programs could not provide because of lack of resources. The results of the survey estimated that in Oregon 80% of the unmet requests were for housing and emergency shelter, compared with 64% of unmet requests in the United States overall were for housing and emergency shelter. Increased services funding and increased service provider capacity is needed to support their needs. This information could not be provided for the local level.

There are unmet needs for emergency shelter, transitional housing programs, and permanent rental housing. Hope and Safety Alliance noted that an immediate need is more non-congregate emergency shelter for immediate occupancy that is safe for people with children, transgender people, and others who have experienced violence. Because of large University of Oregon events such as football games and graduations, the hotel and motel availability is sometimes lacking for people who are fleeing domestic violence. There are not available hotels and motels to convert into non-congregate shelter, and no operating resources identified for a new shelter. The lack of operating funds has been identified as one of the biggest barriers to providing non-congregate shelter. Some transitional housing programs do not provide enough time for people fleeing domestic violence to stabilize and find permanent housing. More transitional housing programs are needed with 30 – 90-day average stays.

Because of the low vacancy rate for permanent rental housing, there is not enough rental housing available for individuals and households seeking housing. There are rental assistance vouchers available for people fleeing domestic violence, but there is difficulty finding housing to use the vouchers. Waiting lists are too long for subsidized rental housing, and even with a rental assistance voucher, the intake process takes too long for people who are fleeing. Master leases within rental housing would be beneficial because the agency would qualify eligible residents within their program. Master leases are eligible under HOME-ARP for the Rental Housing activity.

Qualifying Population 4. Other populations requiring services or housing assistance to prevent homelessness

This qualifying population includes other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice. There are not enough lower cost rental housing units for people earning less than 30% AMI and less than 50% AMI in the community. It is difficult for individuals and households with limited rent assistance or limited time in a transitional housing program to find permanent rental housing if they are currently in a shelter or transitional housing program. The ACS data showed the vacancy rate at 2.8% in

Eugene and at 1.7% for Springfield. See the 'Gaps within the current shelter and housing inventory' section below (page 33) for specific data about gaps in units for this qualifying population.

Vulnerable populations are at greatest risk of housing instability including those experiencing severe cost burden or other housing problems. Compounding problems increase housing instability for people. Housing with supportive services included would help people at greatest risk for housing instability to maintain housing.

The population has similar unmet needs as qualifying population 2, people at risk of homelessness. Expanding services for the population requires resources and expanded capacity for service providers. There is a need for specialized services for specific populations within this category. There is a need for more housing navigation services to help people find and maintain housing, and assistance with public benefits, job search, credit repair, and other ways to reach financial stability.

Gaps within the current shelter and housing inventory and service delivery system

Shelters

Data from Lane County in the Inventory Gaps Table for people experiencing homelessness for January 2022 (Table 4) demonstrates the gaps in housing and service needs of sheltered and unsheltered homeless populations. Some data points to note are:

- The last line of the table demonstrates a significant gap for shelter and housing serving this population.
- Adult households and individuals make up a large percentage of the homeless population (both sheltered and unsheltered).
- A large percentage 28% (467) of people who are unsheltered are adults with children.
- Child-only households account for a small number (14) of the total and less than 2% of the sheltered homeless population (but they are an extremely high-risk population).
- Veterans represent 8% and 9% of the sheltered and unsheltered populations, indicating a large need of services for veterans in our community.
- People who are fleeing domestic violence also represent 8% of the sheltered population, indicating another population that are in need of tailored services.

Table 4. Inventory Gaps Table for People Experiencing Homelessness, Eugene and Springfield

	Homeless													
	Inventory Date: 2022/01/26						Homeless Population							
	HHS with Adult(s) and Child(ren)		Adult Only HHS		Child (<18) Only HHS		HHS with Adult(s) and Child(ren)		Adult Only HHS		Child (<18) Only HHS		Veterans	Fleeing DV
	# Beds	# Units	# Beds	# Units	# Beds	# Units	Individuals	Households	Individuals	Households	Individuals	Households		
Total Inventory														
Emergency Shelter	178	48	532	510	6	6								
Transitional Housing	0	0	61	61	9	9								
Rapid-Rehousing	253	84	81	70	1	1								
Permanent Supportive Housing	264	76	694	646	0	0								
Total Inventory	695	209	1368	1287	16	16								
Sheltered Homeless (ES and TH)							80	27	676	671	14	14	61	61
Unsheltered Homeless							467	92	1195	1115	0	0	142	142
Utilized Inventory														
Emergency Shelter	80	27	604	601	7	7								
Transitional Housing	0	0	72	70	7	7								
Rapid-Rehousing	169	53	62	58	0	0								
Permanent Supportive Housing	226	71	650	597	0	0								
Total Utilized Inventory	475	151	1388	1326	14	14								
GAP														
Need (unsheltered persons on PIT/HBNL)	467	92	1195	1115	0	0								
(-) Total Available Inventory (vacancies)	220	58	0	0	2	2								
GAP	247	34	1195	1115	0	0								

Sources: 2022 Lane County PIT/HBNL and 2022 HIC (Night of Jan 26, 2022) - presubmittal (which means that the numbers may be adjusted slightly during analysis)
 *a - DV status is not collected consistently for unsheltered clients. Hope & Safety Alliance's advised that asking the question may lead to additional violence by the offender

Use of emergency shelters and transitional housing in the community shows both unsheltered adults (no children) and unsheltered children are in need of housing. Using the Inventory Gaps Table (Table 4 above) provided by Lane County HHS, both single adults and unaccompanied youth utilized emergency shelters over 114%. Transitional housing reached over 118% (beds) and 115% (units) utilization for unsheltered adults (no children). Children who are alone used permanent supportive housing at 86% (beds) - 93% (units). The Inventory Gaps Table shows that there is need in the community for Emergency Shelter for both unaccompanied youth and adults without children. The TAC Report identified that Lane County has a larger unsheltered adult (no children) population than other comparative areas and that the gap for emergency beds for single adults is significant at over 1,000 beds.

Supportive Services

Lane County has several non-profit service providers dedicated to serving people experiencing homelessness and at risk of homelessness. The services provided daily in the community are critical to the qualifying populations. The TAC report identified strategies to improve the local response to the unhoused crisis. While some of the recommendations were based on creating more places to live, such as congregate shelter and permanent supportive housing, some of the needs identified were related to housing services. Expanding services in these areas requires resources and expanded capacity for service providers.

- Expanding outreach to people who are living outside on in places not meant for human habitation (cars, tents, etc.) and connecting them to services.
- Expand and increase supportive services and tenancy supports for residents to ensure people can maintain their housing permanently.
- Increase effectiveness of the coordinated entry system to better connect people experiencing homelessness with interventions to end their homelessness.
- Expand services of housing navigators and those connecting residents to landlords and housing partners.
- Provide training and staff capacity to service agencies to ensure implementation of best practices, that will help with the overall need for specialized services.

Rental Housing

Eugene and Springfield have made significant investment in affordable rental housing developments for decades with around 156 developments with 4,579 affordable units. There are currently 355 affordable rental units under construction or in the pipeline for development, including 102 permanent supportive housing units. In recent years there was an increase in development of housing for veterans including 8 single family homes and 5 multi-unit developments, some of which focus on alcohol and drug rehabilitation services for veterans and the inclusion of housing specifically for veterans. Even with all of these developments there is still a significant housing gap for the qualifying populations.

Table 5 below shows that the Eugene and Springfield area has a significant gap in housing for lower income households and those at-risk of homelessness. The Inventory Gaps Table (Table 4 above) and CHAS 2014-2018 data identified that 5% (2,595) of rental housing units are affordable to households with incomes less than 30% AMI yet there are 10,370 households with incomes less than 30% AMI in the two cities. About 8% (3,935) of rental housing units are affordable to households with incomes between 30% and 50% AMI, yet there are 7,750 households with incomes in the same range. These households can be considered at-risk of homelessness and housing instability, especially when combined with another risk factor or housing problem.

Table 5. Housing Needs Inventory and Gaps Analysis Table

	# of Units	# of Households	# of Households
Total Rental Units	49,520		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,595		
Rental Units Affordable to HH at 50% AMI (Other Populations)*	3,935		
0%-30% AMI Renter HH w/1 or more severe housing problems (At-Risk Homelessness)		8,335	
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		6,970	
Current Gaps			8,775
CHAS 2014-2018, Tables 14B, 15C CHAS 2014-2018			
*units affordable to hh with income <30% AMI and > 50% AMI			

There are 8,335 households with 30% AMI and a housing problem putting them at risk for homelessness, and 6,970 households with incomes 30% to 50% AMI and a housing problem. Comparing rental units affordable to households at up to 50% AMI and renter households at those income levels with housing problems shows a gap of 8,775 housing units for renters in the region.

Additional analysis of CHAS data shows that while there are rental units affordable to households earning up to 30% AMI, 45% (1,170) of those are occupied by households earning more than 30% AMI. Similarly, 30% of rental units affordable to households earning between 30% and 50% AMI are occupied by households earning higher incomes. When housing units are occupied by people with higher incomes, housing choices for lower income households decrease, putting them at risk of homelessness.

Characteristics of instability and an increased risk of homelessness

Under Section IV.4.2.ii.G of the Notice, PJs may provide additional characteristics associated with instability and an increased risk of homelessness in their HOME-ARP allocation plan. These characteristics further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the Notice. This section has a definition that people earning up to 50% of

the area median income meets the definition of a qualified population if they meet one of the conditions from paragraph (iii) of the “at risk of homelessness” definition established at 24 CFR 91.5. The last condition of that section for households earning no more than 50% of area median income is that they “otherwise live in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the PJ’s approved Consolidated Plan.”

[The 2020 Eugene Springfield Consolidated Plan](#) (on page 68) names specific housing characteristics that have been linked with instability and an increased risk of homelessness. The first characteristic named is a household’s financial circumstance leading to cost burden and severe cost burden. This places households in a situation where unexpected expenses or sheer time of deficit spending may cause a household to become homelessness.

The Consolidated Plan listed cost of childcare as a barrier for working families that place a household in a vulnerable financial position. Other factors that contribute to instable financial condition are experiencing frequent moves, the loss of a job, a death, a health event or another adverse circumstance. Households with members that are elderly, have a disability or require regular supportive services are also at greater risk, because they often spend more financial resources on care for these individuals. Another concern named was that low-income elderly individuals living alone may be admitted to temporary stay service-oriented facilities and may not have a home to return to when services are complete. Some conditions named as housing problems in the Consolidated Plan were the same as those listed in the definition of “at risk of homelessness” in the HOME-ARP Notice such as over-crowding and substandard housing condition.

Priority needs for qualifying populations

Based on the data, Eugene and Springfield has significant needs for housing and services for all qualifying populations identified in the HOME-ARP program. The community has a significant population of people experiencing homelessness and at risk of homelessness, and the shelter and housing available has a significant gap.

The Consortium has interest in prioritizing the most vulnerable members of the community for housing opportunities. The qualifying populations that may be prioritized are:

- Qualifying Population 1. Homeless as defined in 24 CFR 91.5
- Qualifying Population 3. Survivors of Domestic Violence, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking as defined by HUD in the Notice.

The community relies on affordable housing developers to create housing proposals to meet the needs. Because there are needs for all qualified populations, project proposals for any of the qualifying populations would be eligible and considered when seeking development proposals. Individual housing development proposals may choose to focus on one of these prioritized qualifying populations identified. See the Preferences section below (page 45) related to how preferences will be addressed through the Request for Proposals process.

The community has an excellent network of service providers, but the providers struggle for resources and staff to have enough capacity to serve all the people in need of services. The HOME-ARP funds will provide a needed resource to create more places to live and provide social services to the residents.

How the level of needs and gaps in the shelter and housing inventory and service delivery systems were determined

Data was used from a variety of sources: Lane County Health and Human Services Homeless Management Information System (HMIS) data, the Lane County Health and Human Services Point in Time counts, the Homeless Names by List (HBNL) dashboard (which consumes HMIS data), US Census data (2020 and ACS 2015-2019), and HUD CHAS 2004-2018 data. The Consortium also considered work done through the TAC report in 2018 which was a shelter feasibility study and homeless service system analysis. The TAC report specifically analyzed the community's system wide needs and gaps and recommendations about actions and investments to make the provision of services more effective to move people out of homelessness.

The HOME-ARP data used the definitions in the notice and identified demographic information, numbers of individuals and households experiencing homelessness, and households at risk of homelessness. The information also identified the shelter and housing inventory to address the qualified population. The difference between households in need and inventory determined the gap for shelter beds and rental housing units serving very low and extremely low-income households. The data analysis is combined with the qualitative approach of consulting with housing providers and services agencies that work with the qualifying population to identify the known needs of their clients. Through consultations and a survey, more information was gathered about needs and gaps in housing and services in the community. This multi-stepped approach allowed the Consortium to use data to help determine the best use of HOME-ARP dollars to meet the needs.

HOME-ARP Activities

Method for soliciting applications for funding and/or selecting developers and service providers

The Consortium will use a Request for Proposals (RFP) process to solicit applications for funding and select developers and service providers. The HOME-ARP program will follow a similar RFP process as the regular HOME program. A Request for Proposals will be released to support affordable housing development projects in Eugene and Springfield and supportive services within the developments. The project proposals would serve any of the qualifying populations eligible under the HOME-ARP program. Please see the Priority Needs section (page 37) for the qualifying populations that may be prioritized within development proposals and see the Preferences section (page 45) for populations that will be considered for preference through the RFP. Non-profit operating assistance would be provided to non-profit housing developers or supportive services providers that receive a direct allocation of HOME-ARP.

Administration of eligible activities

The Consortium will be responsible for administering and operating the HOME -ARP program to comply with program regulations. The Consortium will not implement eligible activities directly but will contract with housing providers to develop housing and will contract with service providers to deliver services.

The Consortium will lead the RFP process to select projects and will comply with program regulations to enter into agreements to provide the resources to developers and services providers, and to monitor compliance with the program regulations.

Subrecipients and contractors

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, HUD asked the Consortium to identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program.

This is not applicable to the Consortium. The Consortium used a portion of the HOME-ARP administrative funds to hire Cogito LLC, a public outreach consulting firm, to assist with the consultations and survey of required agencies, and public outreach. Cogito LLC will not be responsible for any further work under the HOME-ARP program.

Cogito provided strategic guidance for the public process, as well as logistical and organizational support. For example, Cogito developed a public involvement plan, reached out to providers to schedule interviews, provided technical support for online meetings, generated meeting summaries, drafted and sent email updates to the interested parties list, and promoted the online Open House. Consortium staff were the public lead of the project, conducting all presentations, answering public questions, and reviewing summary reports.

Use of HOME-ARP Funding

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building and administrative costs is within HOME-ARP limits. Table 6 below demonstrates the use of funding.

Table 6. Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$500,000		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rent Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$3,282,910		
Non-Profit Operating	\$236,431	5%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$709,296	15%	15%
Total HOME ARP Allocation	\$4,728,637		

Distribution of HOME-ARP in accordance with priority needs

HUD asks PJs to describe how it will distribute HOME-ARP in accordance with its priority needs identified in its needs assessment and gaps analysis. In the needs assessment and gaps analysis (page 16), the Consortium found that there are significant needs for housing and services for all qualifying populations identified in the HOME-ARP program. The community has a significant population of people experiencing homelessness and at risk of homelessness, and the shelter and housing available has a significant gap. As explained in the Priority Needs section above (page 37), the Consortium has interest

in prioritizing the most vulnerable members of the community for housing opportunities, and has selected qualifying populations 1 (homeless as defined in the Notice) and 3 (fleeing or attempting to flee domestic violence as defined in the Notice) as priority needs.

The community relies on affordable housing developers to create housing proposals to meet the needs. Because there are needs for all qualified populations, project proposals for any of the qualifying populations would be eligible and considered when seeking development proposals. Individual housing development proposals may choose to focus on one or more of these prioritized qualifying populations identified.

The proposals meeting the priority needs will be prioritized or awarded extra points through the RFP scoring process. The Consortium expects to award more than one development project, so not just one qualifying population would be served. See the Preferences section below (page 45) related to how preferences will be addressed through the Request for Proposals process.

Rationale for funding eligible activities

HUD requires PJs to explain how the characteristics of the shelter and housing inventory, service delivery system, and needs identified in the gap analysis provided the rationale for the plan to fund eligible activities.

In the consultations with housing and services providers and in the survey, respondents thought that all the eligible HOME-ARP activities were important and needed, but the biggest need was to create more places to live. Development of permanent rental housing was identified to be slightly more important than development of non-congregate shelter. Housing services and non-profit operating assistance were also thought to be important, but less so than development.

The data analysis results were already well understood in the community. There is a significant population of people experiencing homelessness and at risk of homelessness, and the shelter and housing available has a significant gap.

Participants in the consultations noted that rent assistance is a constant need in the community and therefore not the best use of one-time funds, and rent assistance for a certain period of time does not guarantee housing stability over the long term. Currently there are resources in the community supporting rent assistance needs.

With the information received through the outreach and Needs and Gaps Analysis, the Consortium developed potential strategies to meet the needs using HOME-ARP resources. The proposed uses of HOME-ARP funds are in the following categories:

- Supportive Services. There was expressed support for housing supportive services funding. Interview participants had noted that it was important to include services in development projects to support the population, especially in the first years of occupancy, and that services funding was difficult to get. Agencies consulted also indicated that supportive services should be awarded in connection to development projects to best support the developments. Funding the supportive services activity would provide more opportunity to award non-profit operating resources, since a non-profit is only eligible for operating funds if they receive a direct allocation of HOME-ARP.
- Rental Housing Development. The needs analysis showed a demonstrated need for development of both rental housing and non-congregate shelter, with interview and survey respondents somewhat favoring prioritizing permanent rental housing. The Consortium considered whether to spend some resources on Development of Non-Congregate Shelter, or to use all development funds for Development of Rental Housing for qualifying populations. The draft allocation uses the resources for Development of Rental Housing. Some points considered were the following.

Affordable & Permanent Supportive Housing Discussion Points:

- The cities have a significant deficit of rental housing. More units are needed to move people on from temporary and emergency shelter, and more units are needed for people with severe cost burden paying more than half their incomes for housing expenses. The need for more permanent low-cost rental housing is cited often by agencies that work with the qualifying populations.
- Funding for Rental Housing and Permanent Supportive Housing for people experiencing homelessness is being prioritized at the State level. The HOME-ARP funds could be used to significantly leverage resources for a larger construction project.
- Eugene set a goal of Permanent Supportive Housing units (for people experiencing homelessness) to be created by 2025 through local policy documents, the TAC Report and the Housing Implementation Pipeline. The HOME-ARP funds were identified as a resource to support that goal.

Non-Congregate Shelter Discussion Points:

- Economical Non-Congregate Shelter options being implemented in Eugene and Springfield such as pallet shelters and conestoga huts do not meet the physical condition standards required by the HOME program. Non-Congregate shelter under HOME-ARP is required to be a permanent structure with the same physical standards as rental housing, and each unit must include in-unit sanitary facilities (a bathroom).
 - HOME-ARP cannot be used for Non-Congregate Shelter ongoing operations, and a challenge in the community is funding ongoing shelter operations. It seemed risky to fund development of a shelter without knowing the long-term operations funding source.
 - The Consortium does not know of resources to leverage to build Non-Congregate Shelter that meets the HUD definition, which means financing would be difficult or possibly infeasible, or projects would be smaller if they were mostly financed by HARP.
 - The cities are not aware of an entity that is working to develop a Non-Congregate Shelter and would apply for the federal resources. One agency did say they were working on plans for a combined Non-Congregate Shelter and Permanent Supportive Housing development, but when asked, HUD said combining HOME-ARP Rental Housing development and Non-Congregate Shelter development is not recommended in a single project because of the different regulations for each activity.
-
- Non-Profit Operating Assistance. The non-profit operating assistance funds are calculated at the maximum allowable amount, 5% of the total. In the outreach process, many people expressed that non-profits are stretched to capacity and that any additional resources to support their work with projects would be helpful. The resources could only be provided to non-profits that receive a direct allocation of HOME-ARP funds, for development or supportive services.
 - HOME Administration and Planning. The administrative funds are calculated at the maximum allowable amount, 15% of the total. Administration funds will cover staff time to support projects.

HOME-ARP Housing Production Goals

Housing units HOME-ARP will produce or support

HUD asked PJs to estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP Allocation. The Consortium has used regular HOME funds to support rental housing development that supports qualifying populations. Local developers have used HOME funds to build permanent supportive housing and transitional housing for people experiencing homelessness, so there are many examples of the amount of subsidy needed to support the developments. Typically, the developments have used Low Income Housing Tax Credits (LIHTC) and other state funding sources, and private bank loans to complete their financing.

The Consortium relies on developers to propose projects to serve the populations, so it is difficult to predict exactly how many units will be proposed. According to the Housing Production Goal Calculation Worksheet, the HOME-ARP funds may produce approximately **150 units** with the HOME-ARP allocation if all supported projects are able to leverage LIHTC and other development resources through the State. There is some difficulty with the competitiveness of LIHTC. There is a need to use regular HOME resources to produce housing and leverage state development resources too. Fewer units would be produced if the only funds leveraged could be a private bank loan.

Rental Housing production goal

HUD asked PJs to describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs. The Consortium relies on developers to propose projects to serve the populations, so it is difficult to predict exactly how many units will be proposed.

According to the Housing Production Goal Calculation Worksheet, the HOME-ARP funds may produce approximately 150 units with the HOME-ARP allocation if all supported projects are able to leverage LIHTC and other resources through the State. The State of Oregon is currently prioritizing resources for development of permanent supportive housing for people experiencing homelessness, so those priorities should align well with HOME-ARP. The 150 units specifically for qualifying populations will be a significant benefit to the overall housing supply. For example, if the 150 units addressed the priority need of housing for people experiencing homelessness under the definition in the Notice, approximately 10% of the 1,400 beds identified in the gaps analysis for people experiencing homelessness could be addressed.

If development proposals do not leverage State development resources, they could still benefit the overall housing supply and meet a significant community need, especially if they address especially vulnerable special needs populations identified in the Preferences section below.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific qualifying population or category (e.g., elderly or persons with disabilities) within a qualifying population (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible applicants meeting one or more of the qualifying populations are selected in chronological order for a HOME-ARP rental project except that eligible qualifying population applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in Continuum of Care Coordinated Entry as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the Continuum of Care with input from all community stakeholders and must ensure that Emergency Solutions Grant projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a Coordinated Entry system for selecting applicants that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences.

These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Preference for one or more qualifying population or a subpopulation

HUD asked PJs to identify whether they intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The Consortium may prioritize two qualifying populations when considering eligible activities or projects:

- Qualifying Population 1. Homeless as defined in 24 CFR 91.5
- Qualifying Population 3. Survivors of Domestic Violence, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking as defined by HUD in the Notice.

In addition, the following vulnerable subpopulations within all the qualifying populations would be given preference for eligible activities and projects. These are priority special needs populations identified in the Consortium's 2020 Consolidated Plan.

- People with physical and mental disabilities
- Seniors
- Youth, unaccompanied youth, and youth aging out of foster care and other system-engaged youth
- Veterans
- Families with children
- People with drug and alcohol addictions
- People with HIV/AIDS
- People with histories of conviction (ex-offenders)
- People who are evicted or foreclosed

In addition, people on Lane County's Frequent User System Engagement (FUSE) list may be prioritized, as a subpopulation of the homeless qualifying population. The FUSE list are the people who use hospitals, jails, police and other crisis services most often. The people on the FUSE list are considered chronically homeless.

People experiencing chronic homelessness may be prioritized as a subpopulation of the homeless qualifying population. Lane County's Coordinated Entry program (Central Wait List) prioritizes chronically homeless households. [Lane County follows the HUD definition of chronic homelessness](#) at 24 CFR Parts 91 and 578. The definition includes people and households with a disability; people and households living in an emergency shelter, outdoors, in a vehicle, or other situation not meant for human habitation; for a period of 12 consecutive months, or 12 months over a 3 year period. The use of the Coordinated Entry list can only be used with other referral methods because it does not include all HOME-ARP qualifying populations and will not be expanded to include all HOME-ARP qualifying populations.

Although the needs analysis found that BIPOC individuals and households represent a disproportionate share of the population experiencing homelessness, fair housing laws do not allow the Consortium to create a preference based on race or ethnicity. The Consortium will follow fair housing laws in affirmatively marketing the housing and services opportunities to people who are least likely to apply to ensure equal opportunity.

In addition, fair housing law does not allow the Consortium to create a preference based on gender, gender identity, sexual orientation, or any other protected class.

How the preference addresses unmet needs

HUD asks PJs to explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gaps analysis.

The needs assessment and gaps analysis results above (page 16) showed there are unmet needs for all the qualifying populations. The data demonstrates that the qualifying populations and subpopulations in the preferences list have particular documented needs that cause disparate impacts in their ability to secure and maintain housing. Specialized supportive services may be required to assist these populations to achieve housing stability. The number of people experiencing homelessness who fall into the subpopulations in the preferences list demonstrates the need for more permanent housing developments to meet their needs.

The preferences help to identify the most vulnerable members of the community who are especially susceptible to physical or emotional attack or harm in their current conditions. The preferences identified are persons in need of special care, support or protection. By expressing a preference to serve these populations through development of rental housing and supportive services, developers may create housing and services opportunities that reduce the needs of these vulnerable members of the community. Housing proposals that focus on the preference populations would be prioritized through the Request for Proposals process or given extra points in scoring.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ must include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Referral Methods

HUD asks PJs to identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJs may use multiple referral methods in its HOME-ARP program. The Consortium would like to be as flexible as possible with housing proposals that are submitted through the Request for Proposals process, for which qualifying populations to serve and which referral method to use for the development. Applicants for HOME-ARP funds will be allowed to propose the use the following referral methods:

- Lane County Coordinated Entry with Other Referral Methods. The Consortium will allow developments to use the Continuum of Care Coordinated Entry referral as long as it is paired with additional referrals from outside organization or project-specific waiting lists consistent with the HOME-ARP requirements.
- Use of a Project/Activity Waiting List. The Consortium will allow developments to establish a waiting list for each HOME-ARP project or activity consistent with the HOME-ARP requirements.

Coordinated Entry referral method

HUD asked PJs if the PJ intends to use the coordinated entry process established by the Continuum of Care, to describe whether all qualifying populations eligible for a project or activity will be included in the coordinated entry process, or the method by which all qualifying populations eligible for the project or activity will be covered.

The Consortium will not allow projects or activities to use only the Coordinated Entry process established by the Continuum of Care as a referral method.

The Consortium will only allow applicants for HOME-ARP funds to propose to use the Lane County Coordinated Entry with other referral methods for housing and services opportunities. Applicants will not be able to propose the use of only Coordinated Entry as a referral method because the Lane County Coordinated Entry system will not be expanded to include all qualifying populations. The Lane County Coordinated Entry system prioritizes people experiencing homelessness and chronic homelessness.

Using both a Coordinated Entry referral method and another referral method

HUD asked PJs to describe, if the PJ will allow an applicant for HOME-ARP funds to propose using the Lane County Coordinated Entry process as a referral method and another referral method for a project or activity, any method of prioritization between the two referral methods. The Consortium would want to keep the referral method as flexible as possible for future projects or activities being proposed, and

would not determine a method of prioritization between the Coordinated Entry referral method and another referral method for a project or activity.

Limitations in HOME-ARP rental housing

Limiting eligibility for a HOME-ARP rental housing development is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing to households who need the specialized supportive services that are provided in such housing. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

HOME-ARP rental housing eligibility limitations

HUD asked PJs to describe whether eligibility may be limited to a particular qualifying population or specific subpopulation of a qualifying populations in a HOME-ARP rental housing development, as identified in Section IV.A of the Notice.

The Consortium would allow applicants for HOME-ARP funds to propose limiting eligibility of specific housing units within a housing development or a whole housing development to a particular qualifying population or specific subpopulation of a qualifying population in a HOME-ARP rental housing development as listed in the Preferences section above (page 45). This would allow a development to specialize services and housing opportunities for populations that have been determined to have particular vulnerability among the qualifying populations.

Reasons for allowing eligibility limitations in rental housing

HUD asks PJs to explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulations of qualifying population consistent with the PJ's needs assessment and gap analysis.

The Consortium has identified two of the qualifying populations to have a significant level of vulnerability and particular need for housing and services: people experiencing homelessness and people fleeing or attempting to flee domestic violence. Eugene and Springfield have a significant population of people who are unsheltered in the community. Living outside and in places not fit for human habitation causes danger for those individuals and families. By allowing applicants for HOME-ARP funds to propose developments that limit eligibility to those qualifying populations as identified in the Preferences section of the allocation plan (page 45), more people without living without shelter would gain shelter.

Similarly, the Preferences section identifies the subpopulations of qualifying populations that have a significant level of vulnerability and particular need for specialized services and housing. By allowing applicants for HOME-ARP funds to propose developments that limit eligibility to vulnerable special needs populations, it will reduce the housing instability for people in those particular populations and reduce the gap in housing opportunities and supportive services.

Unmet Needs for populations not included in Preferences

HUD asks PJs to describe, if a limitation was identified, how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds.

The Consortium plans to fund three development proposals with the HOME-ARP resources, and all three development proposals could potentially serve different qualifying populations and/or subpopulations of qualifying populations. The Request for Proposals process would not require proposed developments to limit eligibility in rental housing developments to serve the populations identified in the Preferences, and the developments could serve the preferred populations along with other qualifying populations.

Eugene and Springfield also dedicate other resources to assisting the qualifying populations with rental housing development and services. Regular HOME funds produce rental housing that makes progress toward reducing the needs of the qualifying populations. Annual CDBG funds are used for supportive services for the populations. See the section called Current Resources (page 25) for the different funding available to assist the qualifying populations.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines. The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project.

The Consortium will not use HOME-ARP funds to refinance existing debt, so this is not applicable.

Eugene-Springfield Consortium
Proposed Substantial Amendment to Annual Action Plan for use of
HOME Investment Partnership Program-American Rescue Plan
15-Day Notice of Public Hearing and Written Comment Period

The Cities of Eugene and Springfield are proposing the following use of federal HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) funds. The HOME-ARP funds will be added to the 2021 Annual Action Plan.

Sources	
New HOME-ARP Entitlement Allocation	4,728,637
TOTAL	\$4,728,637
Uses	
Rental Housing Development	3,282,910
Supportive Services	\$500,000
Non-profit Operating Assistance	\$236,431
Administration and Planning (15% maximum)	\$709,296
TOTAL	\$4,728,637

Additional information is available on the City of Eugene’s website – <https://www.eugene-or.gov/4897/HOME-American-Rescue-Plan> . A public hearing on use of HOME-ARP funds will be held during the virtual HOME Consortium Governing Board meeting on Tuesday June 21, 2022 at 4:00 pm. Connect via Zoom at: <https://eugene-or-gov.zoom.us/j/82684539294>, webinar ID#: 826 8453 9294, Passcode HOME2022 , or by telephone at 1-833-548-0282 (toll free). If interpretation services and/or special accommodations are needed, please notify us 48 hours in advance of the meeting.

Written comments on these recommendations may be submitted until 5:00 pm Monday June 20,2022 to Erin Fifield (efifield@springfield-or.gov) or 541-726-2302. Comments may also be mailed to: Erin Fifield, Springfield City Hall, 225 5th Street, Springfield, OR 97477.

Consortio Eugene-Springfield
Rectificación Importante a la Propuesta de Plan de Acción Anual para el uso de los fondos del
programa HOME Investment Partnership Program-American Rescue Plan
Aviso de 15 días de anticipación de audiencia pública y periodo de comentarios por escrito

Las ciudades de Eugene y Springfield están considerando el uso de los fondos federales del programa HOME-ARP (Programa de Asociación para la Inversión en Viviendas – Plan de Rescate). Los fondos del programa HOME-ARP serán añadidos al Plan de Acción Anual del año 2021.

¿De dónde viene el dinero?	
Fondos nuevos del program HOME-ARP	4,728,637
TOTAL	\$4,728,637
Propósito	
Desarrollo de Viviendas de Alquiler	3,282,910
Servicios de Apoyo	\$500,000
Asistencia al Funcionamiento sin Ánimo de Lucro	\$236,431
Administración y Planificación (Máximo 15%)	\$709,296
TOTAL	\$4,728,637

Hay información adicional disponible en el sitio web de la ciudad de Eugene - <https://www.eugene-or.gov/4897/HOME-American-Rescue-Plan>. Una audiencia pública sobre el uso de los fondos HOME-ARP se llevará a cabo durante la reunión virtual de la Junta de Gobierno del Consorcio HOME el martes 21 de junio del 2022 a las 4:00 de la tarde. Conéctese a través de Zoom en, <https://eugene-or-gov.zoom.us/j/82684539294>, webinar ID# 826 8453 9294, código de acceso HOME2022, o por teléfono al 1-833-54- 0282 (gratuito). Si necesita servicios de interpretación y/o adaptaciones especiales, favor de notificarnos con 48 horas de antelación a la reunión.

Los comentarios por escrito sobre estas recomendaciones pueden enviarse hasta las 5:00 de la tarde del lunes 20 de junio a Erin Fifield (efifield@springfield-or.gov) o llamando al 541-726-2302. Los comentarios también se pueden enviar por correo a: Erin Fifield, Springfield City Hall, 225 5th Street, Springfield, OR 97477.

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AFFIDAVIT OF PUBLICATION

STATE OF OREGON, }
COUNTY OF LANE, } ss.

I, Robert Jackson being first duly affirmed, depose and say that I am the Advertising Manager, or the principal clerk, of The Register-Guard, a newspaper of general circulation as defined in ORS 193.010 and 193.020; published at Eugene in the aforesaid county and state; that the Ad for HARP printed copy of which is hereto annexed, is publishing in the entire issue of said newspaper in the following issues:

June 03, 2022

Consorcio Eugene-Springfield
Rectificación Importante a la Propuesta de Plan de Acción Anual para el uso de los fondos del programa HOME Investment Partnership Program-American Rescue Plan
Aviso de 15 días de anticipación de audiencia pública y periodo de comentarios por escrito
Las ciudades de Eugene y Springfield están considerando el uso de los fondos federales del programa HOME-ARP (Programa de Asociación para la Inversión en Viviendas - Plan de Rescate). Los fondos del programa HOME-ARP serán añadidos al Plan de Acción Anual del año 2021.

¿De dónde viene el dinero?	
Fondos nuevos del program HOME-ARP	4,728,637
TOTAL	\$4,728,637

Propósito:	
Desarrollo de Viviendas de Alquiler	3,282,910
Servicios de Apoyo	\$500,000
Asistencia al Funcionamiento sin Ánimo de Lucro	\$236,431
Administración y Planificación (Máximo 15%)	\$709,296
TOTAL	\$4,728,637

Hay información adicional disponible en el sitio web de la ciudad de Eugene - <https://www.eugene-or.gov/46827/HOME-American-Rescue-Plan>. Una audiencia pública sobre el uso de los fondos HOME-ARP se llevará a cabo durante la reunión virtual de la Junta de Gobierno del Consorcio HOME el martes 21 de junio del 2022 a las 4:00 de la tarde. Conéctese a través de Zoom en, <https://eugene-or.gov/zoom/join/82684539294>, webinar ID# 826 8453 9294, código de acceso HOME2022, o por teléfono al 1-833-54-0282 (gratuito). Los comentarios por escrito sobre estas recomendaciones pueden enviarse hasta las 5:00 de la tarde del lunes 20 de junio a Erin Fifield (erinfifield@springfield-or.gov) o llamando al 541-726-2302. Los comentarios también se pueden enviar por correo a: Erin Fifield, Springfield City Hall, 225 5th Street, Springfield, OR 97477.

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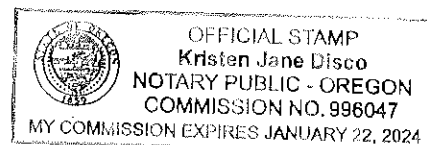
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Robert Jackson

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Kristen Jane Disco
Notary Public of Oregon

Account #: 16200
INVOICE: 0000275418
Case:
Ad Price: \$825.00



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COUNTY OF LANE, } ss.

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June 03, 2022

Eugene-Springfield Consortium
Proposed Substantial Amendment to Annual Action Plan for use of HOME Investment Partnership Program-American Rescue Plan 15-Day Notice of Public Hearing and Written Comment Period

The Cities of Eugene and Springfield are proposing the following use of federal HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) funds. The HOME-ARP funds will be added to the 2021 Annual Action Plan.

Sources	
New HOME-ARP Entitlement Allocation	4,728,637
TOTAL	\$4,728,637
Uses	
Rental Housing Development	3,282,910
Supportive Services	\$500,000
Non-profit Operating Assistance	\$236,431
Administration and Planning (15% maximum)	\$709,296
TOTAL	\$4,728,637

Additional Information is available on the City of Eugene's website – <https://www.eugene-or.gov/4897/HOME-American-Rescue-Plan>. A public hearing on use of HOME-ARP funds will be held during the virtual HOME Consortium Governing Board meeting on Tuesday June 21, 2022 at 4:00 pm. Connect via Zoom at: <https://eugene-or.gov/zoom.us/j/82684539294>, webinar ID#: 826 8453 9294, Passcode HOME2022, or by telephone at 1-833-548-0282 (toll free). Written comments on these recommendations may be submitted until 5:00 pm Monday June 20, 2022 to Erin Fifield (efifield@springfield-or.gov) or 541-726-2302. Comments may also be mailed to: Erin Fifield, Springfield City Hall, 225 5th Street, Springfield, OR 97477.

Robert Jackson

Subscribed and affirmed to before me this June 03, 2022

Kristen Jane Disco
Notary Public of Oregon

Account #: 16200
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Case:
Ad Price: \$825.00



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Eugene-Springfield Consortium
Proposed Substantial Amendment to Annual Action Plan for use of
HOME Investment Partnership Program-American Rescue Plan
15-Day Notice of Public Hearing and Written Comment Period

AFFIDAVIT OF PUBLICATION

STATE OF OREGON, }
COUNTY OF LANE, } ss.

I, Robert Jackson, being first duly affirmed, depose and say that I am the Advertising Manager, or the principal clerk, of The Register-Guard, a newspaper of general circulation as defined in ORS 193.010 and 193.020; published at Eugene in the aforesaid county and state; that the **Proposed Substantial Amendment to Annual Action Plan** printed copy of which is hereto annexed, is publishing in the entire issue of said newspaper in the following issues:

June 08, 2022

The Cities of Eugene and Springfield are proposing the following use of federal HOME Investment Partnership Program - American Rescue Plan (HOME-ARP) funds. The HOME-ARP funds will be added to the 2021 Annual Action Plan.

Sources	
New HOME-ARP Entitlement Allocation	4,728,637
TOTAL	\$4,728,637

Uses	
Rental Housing Development	3,282,910
Supportive Services	\$500,000
Non-profit Operating Assistance	\$236,431
Administration and Planning (15% maximum)	\$709,296
TOTAL	\$4,728,637

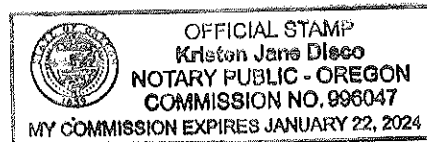
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Written comments on these recommendations may be submitted until 5:00 pm Monday June 20, 2022 to Erin Fifield (efifield@springfield-or.gov) or 541-726-2302. Comments may also be mailed to: Erin Fifield, Springfield City Hall, 225 5th Street, Springfield, OR 97477.
275807 - June 8, 2022

Robert Jackson

Subscribed and affirmed to before me this June 10, 2022

Kriston Jane Disco
Notary Public of Oregon



Account #: 16200
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Ad Price: \$166.30

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June 08, 2022

Robert Jackson

Subscribed and affirmed to before me this June 10, 2022

Kristen Jane Eliseo
Notary Public of Oregon

Consortio Eugene-Springfield

Rectificación importante a la Propuesta de Plan de Acción Anual para el uso de los fondos del programa HOME Investment Partnership Program-American Rescue Plan
Aviso de 15 días de anticipación de audiencia pública y periodo de comentarios por escrito

Las ciudades de Eugene y Springfield están considerando el uso de los fondos federales del programa HOME-ARP (Programa de Asociación para la Inversión en Viviendas - Plan de Rescate). Los fondos del programa HOME-ARP serán añadidos al Plan de Acción Anual del año 2021.

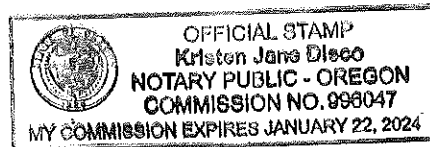
De dónde viene el dinero?

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TOTAL	\$4,728,637

Propósito	
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275808 - June 8, 2022



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