

City of Springfield

2020 Analysis of Impediments to Fair Housing Choice



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Introduction & Key Findings

The Federal Fair Housing Act of 1968 and subsequent amendments in 1974 and 1998 banned housing discrimination based on race, color, national origin, religion, sex, disability, or because of children in the household. State and local laws may expand upon these protected classes. The Department of Housing

and Urban Development (HUD) enforces the Fair Housing Act, and as such requires communities receiving HUD funds to take active steps in furthering fair housing opportunities for residents. Federal requirements acknowledge the historical role discrimination and segregation has played in shaping access to safe and affordable housing.

In order to certify that jurisdictions meet their fair housing obligations, HUD has required that communities complete an Analysis of Impediments to Fair Housing Choice (AI) to identify any potential barriers to fair housing that may exist. An AI is a review of a community’s laws, regulations, administrative policies, housing market, and housing practices to determine whether any barriers to fair and equal access to housing are present.

Identifying potential barriers to fair housing choice that Springfield residents may face can be used by Springfield to help inform future programs and partnerships.

Protected Classes in Springfield, OR and the jurisdiction that enforces each class

Federal	State	Local
<ul style="list-style-type: none"> • Race • Color • National Origin • Religion • Sex • Familial Status • Disability 	<ul style="list-style-type: none"> • Source of Income • Marital Status • Sexual Orientation • Gender Identity • Domestic Partnership • Victims of Domestic Violence* 	<ul style="list-style-type: none"> • Age (18 years of age or older and under 70 years of age)

*According to the Fair Housing Council of Oregon, Oregon effectively created another protected class for domestic violence survivors by adding language to the state’s Landlord Tenant Act found in ORS 90.449.

Potential impediments may affect any Springfield resident; however, the AI places emphasis on how potential impediments impact protected classes. It is also important to acknowledge the connection between these protected classes and household income. Minority households and households with a disability often earn less than other households, as is the case in Springfield (see Chart 3 and Chart 4). Thus, it is also helpful to look at barriers faced by households with lower incomes in accessing affordable housing and opportunities, rather than limiting the analysis to those impediments that can be directly linked to specific protected classes.

Summary of Key Findings

The AI focusses on impediments that households may face in the housing market. However, it is important to also highlight positive steps being taken to increase housing choices. Two key positive steps taken by Springfield include:

- Making changes to the Springfield Development Code around accessory dwellings units (ADUs) has greatly reduced the barriers in the development of ADUs; and
- leading regional efforts of the *Manufactured Home Park Solutions Collaborative* developing a toolkit to assist in the event of a manufactured home park closure and convincing the state legislature to provide funding to create a new manufactured home park

- Updating the Springfield Development Code to allow more housing types (triplexes, fourplexes, townhomes, and cottage clusters) as an outright allowed use in the Low Density Residential Zone and to make the residential development approval process efficient, timely, and clear.

While progress has been made, all cities have areas where improvements may be possible to increase fair housing choice among protected classes. The analysis identified a few areas of potential impediments to fair housing choice that would benefit from further investigation, including:

Limited Community Education

Local organizations partner with the FHCO to offer training and resources related to fair housing in the region. However, the City does not have a centralized program that focuses on educating residents and landlords of fair housing rights and obligations. As a result, there may be a knowledge gap among both landlords/property managers and residents of their housing rights and responsibilities. **Planning, Land Use, and Zoning Practices**

- The definition of “family” in the Development Code (6.1-110) as it pertains to single-family housing, establishes a maximum number of unrelated individuals in a dwelling unit at five . This may limit housing choice in some situations to a non-traditional family unit.
- The definition of “age” in the City Municipal Code (5.552) may exclude fair housing protection among elderly residents over the age of 70 in Springfield.

Potential Discrimination in Lending

- Lane County mortgage lending data from 2017 revealed that about 3% of all loan applications were submitted by Hispanic households, who represent 12% of Lane County’s population
- This does not necessarily indicate any discriminatory practices; however, it indicates a need for further investigation

Lack of Affordable Housing

- Lack of housing supply does not always equate to a fair housing issue. However, lack of affordable housing disproportionately impacts persons with disabilities and certain racial and ethnic minorities who have lower incomes and higher poverty rate, reducing choice and placing more vulnerable households at greater risk of housing instability.
- The cost of renting and purchasing a home has continued to rise in Springfield, creating increased risk of housing instability and reducing access to suitable, affordable housing to households with lower incomes.
- The City’s manufactured home parks offer lower-cost housing options for many Springfield residents. As elsewhere in Oregon, there are risks that these privately-owned parks may close, displacing low- and moderate-income residents.

Analysis of Impediments Overview

AI Purpose

All entitlement grantees receiving funds from HUD must also complete and periodically update an Analysis to Impediments to Fair Housing Choice (AI) document. The AI was updated concurrently with the development of the Springfield’s 2020-2024 Consolidated Plan to coordinate data collection and better align housing strategies.

The AI provides an opportunity to examine fair housing barriers—and progress made in overcoming them—through data analysis and community engagement. Section 808 of the Fair Housing Act requires that HUD operates expressly to affirmatively further fair housing as a requirement of its funding. To accept funding from HUD, Springfield must take actions to further the goals identified in this AI and to not take actions that are inconsistent with their obligation to affirmatively further fair housing. (24 CFR §91.225(a)(1)). The AI establishes goals and actions that can help eliminate illegal housing discrimination and provide current and future residents access to equal housing opportunities. When Springfield community takes meaningful action to achieve these goals, the community is “affirmatively furthering fair housing”.

The Community Development Block Grant (CDBG) program also requires jurisdictions to certify compliance with anti-discrimination laws found in Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations. 24 CFR §91.225(b)(6).

Fair Housing Laws

Federal Fair Housing Act

All municipalities are subject to the Fair Housing Act, administered and enforced by HUD. In 1968 the Civil Rights Act was signed into law to prohibit housing discrimination based on race, religion, color, sex, and national origin. Title VIII of the Act is also known as the Fair Housing Act. The law was passed after years of advocacy within the United States against overt race, gender, and religious-based discrimination and segregation in the sale and rental of housing. Additional protections were added for family status (women who are pregnant or the presence of children under 18) and disability in an amendment to the Fair Housing Act signed in 1988.

The Fair Housing Act applies to almost any person or group involved with housing in the United States including landlords, realtors, homeowners’ associations (HOAs), mortgage lenders, and homeowner’s insurance companies. These people or groups cannot discriminate against those classes of people protected under the Fair Housing Act.

It is illegal to take any of the following actions deliberately against a protected class:

- Refuse to rent or sell housing.
- Refuse to negotiate for housing.
- Set different terms, conditions, or privileges for sale or rental of a dwelling.

- Provide a person different housing services or facilities.
- Falsely deny that housing is available for inspection, sale, or rental.
- Make, print, or publish any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination.
- Impose different sales prices or rental charges for the sale or rental of a dwelling.
- Use different qualification criteria or applications, or sale/rental standards or procedures, such as income standards, application requirements, application fees, credit analyses, sale or rental approval procedures or other requirements.
- Evict a tenant or a tenant's guest.
- Harass a person.
- Fail or delay performance of maintenance or repairs.
- Limit privileges, services or facilities of a dwelling.
- Discourage the purchase or rental of a dwelling.
- Assign a person to a building or neighborhood or section of a building or neighborhood.
- Persuade, or try to persuade, homeowners to sell their homes by suggesting that people of a protected characteristic are about to move into the neighborhood (blockbusting).
- Refuse to provide—or discriminate in the terms or conditions of—homeowner's insurance because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling.
- Deny access to or membership in any multiple listing service or real estate brokers' organization.
- Refuse to make a mortgage loan or provide other financial assistance for a dwelling.
- Refuse to provide information regarding loans.
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees.
- Discriminate in appraising a dwelling.
- Condition the availability of a loan on a person's response to harassment.
- Refuse to purchase a loan.

It is also illegal to threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise the right, or retaliate against a person who has filed a fair housing complaint or assisted in a fair housing investigation.

Exempted from the federal law are owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without an agent, and housing operated by religious organizations or private clubs that is limited to members. State of Oregon or local laws can add additional protections but cannot take away Fair Housing Act protections.

Examples of illegal housing actions under the Fair Housing Act are:

- An apartment manager making only half of a property's units available to families with children.
- A landlord giving a \$10 application fee discount to housing applicants who attended the local high school.

- A realtor falsely declaring a house already has a purchase offer when showing a house to a couple who recently immigrated to the United States.
- An apartment manager running a credit check only on applicants under 30 years old.

Advertising

All types of housing advertising are governed by the Fair Housing Act including paper flyers, newspaper ads, advertising on websites, and lawn signs. Advertisements cannot show a preference, limitation, or discrimination based on protected class. Examples of illegal advertisements are:

- A lawn sign outside an apartment building that includes “sorry, no kids.”
- A realtor’s flyer for an open house only distributed in local churches.
- Website ads that claim an apartment is “perfect for young professionals.”

The National Fair Housing Alliance recommends that instead of focusing on ideal characteristics of a tenant, an advertisement for housing should focus on the property characteristics and the amenities. Advertisements should be available to be accessed by a broad number of people.

Additional Protections for Persons with Disabilities

Housing providers are required to make reasonable accommodations and modifications that allow persons with disabilities to enjoy their housing. Under the Fair Housing Act, a person with a disability includes: Individuals with a physical or mental impairment that substantially limits one or more major life activities; individuals who are regarded as having such an impairment; and individuals with a record of such an impairment. Major life activities include walking, seeing, hearing, speaking, breathing, and working.

An accommodation is a change in any rule, policy, procedure, or service needed for a person with a disability to have equal access to and enjoyment of their home. For example, allowing a service animal despite a “no pets” policy or allowing a tenant to mail in a rent check when others must physically deliver checks to a drop box.

A modification is a structural change made to the existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. A ramp installed into the front entrance of a house where there are only stairs, changing doorknobs to levers by someone with a mobility disability, or allowing a tenant with a sight impairment to install visual doorbells are all examples of reasonable modifications.

All HUD-funded housing programs are prohibited from discriminating based on sexual orientation, gender identity or marital status under the 2016 Equal Access Rule. While not law, the National Association of Realtors Code of Ethics prohibits licensed realtors from discriminating based on sexual orientation. This code of ethics applies to all members of the Oregon Association of Realtors.

State Laws

Oregon's housing discrimination statutes are purposefully similar to Federal statutes. States may grant more rights than federal laws, but not less. Oregon has several additions to federal law as expressed in Chapter 659A of the Oregon Revised Statutes (ORS).

Chapter 659A states that *"A person may not, because of race, color, religion, sex, sexual orientation, national origin, marital status, familial status or source of income of any person refuse to sell, lease or rent and real property to a purchaser."*

The "source of income" prohibits discrimination against any applicant that cites a public assistance program as their source of income, such as child support, social security, or any housing assistance voucher.

The Oregon Family Fairness Act (2007) grants domestic partners the same protections as married persons (ORS 106.340). The Oregon Equality Act (2007) prohibits discrimination based on sexual preference or gender identity (ORS 659A.421).

The 2019 Oregon State legislative session addressed affordable housing issues across the state, namely House Bill (HB) 2001. The bill, which is now law, requires cities with more than 10,000 residents to allow duplexes in lands zoned for single-family dwellings within their urban growth boundary.

As a result of the Chapter 659A provision, the Oregon Family Fairness Act, and the Oregon Equality Act, Oregon has expanded the list of protected classes. Those additions to protected classes under Oregon law are:

- Source of income
- Marital status
- Sexual orientation
- Gender identity
- Domestic partnership

The [ORS 90.449](#) effectively includes victims of domestic violence as a protected class regarding landlord/tenant issues. The regulation also offers explicit consequences to landlords should they violate ORS 90.449. The regulation states that a tenant or applicant "may recover up to two months' periodic rent or twice the actual damages sustained by the tenant or applicant, whichever is greater" should the statute be violated.

Local Laws

Just as state law may grant additional protections, but not less, under federal law, a municipality may also grant additional protections. Under the Springfield Municipal Code *Chapter 5 Public Protection: Unlawful Discrimination Because of Race, Color, Religion, Sex, Sexual Orientation, Age, Marital Status or National Origin*, several protections are explicitly stated. The Declaration of Policy (Municipal Code 5.550) states:

The council declares it to be the public policy of the city that discrimination in employment, housing, and places of public accommodation because of race, color, religion, sex, sexual orientation, age, marital status, familial status, disability, or national origin not only deprives Springfield inhabitants of their rights and property privileges, but also menaces the institutions

and foundations of a free democratic society and threatens the peace, good order, health, safety and general welfare of the community.

It is further declared to be the public policy of the city to foster equal opportunity for all to obtain employment, housing, and public accommodations without regard to race, color, religion, sex, sexual orientation, age, marital status, familial status, disability, or national origin and strictly in accord with their individual merits as human beings.

The code reiterates many of the protections granted under both federal and state law, while adding “age.” The Municipal Code goes on to define “age” for the purposes of discrimination to be against an individual who is 18 years of age or older and under 70 years of age.

Demographic and Housing Market Analysis

Introduction

Understanding the community demographics helps provide context to potential impediments. This section analyzes demographic trends, incomes, and other variables that may impact fair housing choices. The data primarily draws from three sources:

American Community Survey (ACS)—This data is gathered and distributed by the Census Bureau annually. This data is reflected below in general population trends, and basic demographic characteristics. [<https://www.census.gov/programs-surveys/acs>]

Comprehensive Housing Affordability Strategy (CHAS)—This dataset is one that is specifically tabulated for HUD by the Census Bureau. This data is derived from ACS data and addresses low- and moderate-income households with a focus primarily on housing issues. [<https://www.huduser.gov/portal/datasets/cp.html>]

Zillow Data—This data comes from the Zillow Research Housing Data and provides details on the cost of both homeownership and rental by city. [<https://www.zillow.com/research/data/>]

Population Trends

With a population of 60,823 in 2017, the City of Springfield grew by just over 15% since 2010, outpacing Lane County. Like most of Oregon, the growth was fueled primarily through in-migration rather than births from Springfield residents. The Register-Guard reported that in 2019, 86% of Oregon’s growth was due to in-migration. Meaning that throughout Oregon, and also seemingly Lane County, the number of new residents moving in from out of state far outweighs the number of new births in the county.

Table 1. Population Growth—2010 to 2017

	2000	2017	% Change
Springfield	52,864	60,823	15.1%
Lane County	322,959	363,471	12.5%
Oregon	3,421,399	4,025,127	17.6%

Source: 2010 Census & 2017 ACS

The State of Oregon forecasts that Lane County will grow from 363,471 in 2017 to 410,247 by 2030. As of 2017, Springfield accounts for about 17% of the Lane County population. Similarly, the State of Oregon forecasts that the Springfield population will grow to 73,132 by 2030, accounting for 18.5% of the Lane County population. Growth in Lane County and Springfield are presumed to continue to be driven mostly from in-migration along with the rest of the Pacific Northwest.

The Springfield and Lane County populations remain predominately White and Non-Hispanic, where 80% of Springfield residents and 83% of Lane County residents identify as White Non-Hispanic (White alone) in the 2017 ACS data. However, the City is slowly becoming more diverse, with non-White and Hispanic populations growing at a moderately faster pace. Between 2010 and 2017, the Hispanic population grew by 8%, adding 553 households identifying as Hispanic. Over that same period, White-alone households grew by 2.3%, adding 1,138 new households.

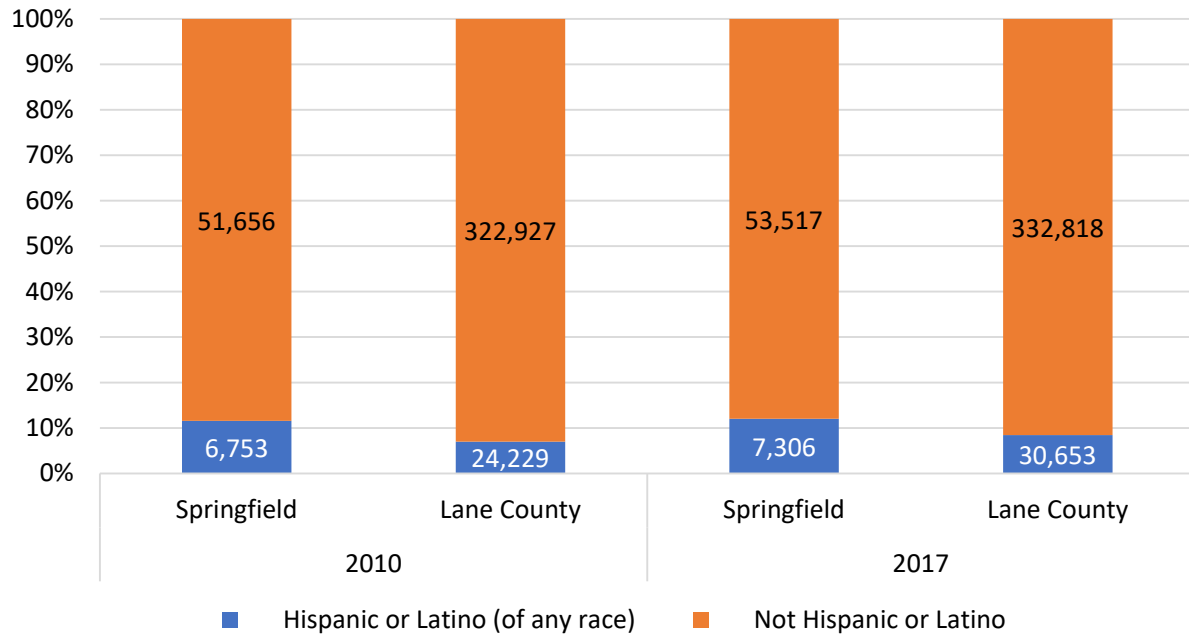
Table 2. Springfield Race and Ethnicity Demographics

	2017 Population	Percent of Population	Raw Change since 2010	% Change since 2010
Race (Non-Hispanic)				
Asian alone	849	1.4%	244	40.3%
American Indian and Alaska Native alone	791	1.3%	-394	-33.2%
Black or African American alone	319	0.5%	34	11.9%
Native Hawaiian and Other Pacific Islander alone	239	0.4%	116	94.3%
White alone	48,596	79.9%	1138	2.4%
Some other race alone	41	0.1%	-51	-55.4%
Two or more races	2,682	4.4%	774	40.6%
Ethnicity				
Hispanic or Latino (of any race)	7,306	12.0%	553	8.2%
Not Hispanic or Latino	53,517	88.0%	1861	3.6%

Source: 2010 & 2017 ACS

Table 2 above shows that much of the percentage growth in Springfield is among non-White and Hispanic populations. From 2010 to 2017, Springfield’s Hispanic population grew by 553 persons, or 8.2%, and now comprises 12% of the city’s population. The city’s Asian population grew by about 40% since 2010, although its population of 849 still only comprises 1.4% of the total Springfield population. The three other race cohorts that grew by more than 10% since 2010 are Black or African American (11.9%), Native Hawaiian and Other Pacific Islander (94.3%), and two or more races (40.6%). These three groups comprise about 5.3% of the city’s total population.

Chart 1. Springfield and Lane County Hispanic Populations



Source: 2010 & 2017 ACS

Age of Springfield Population

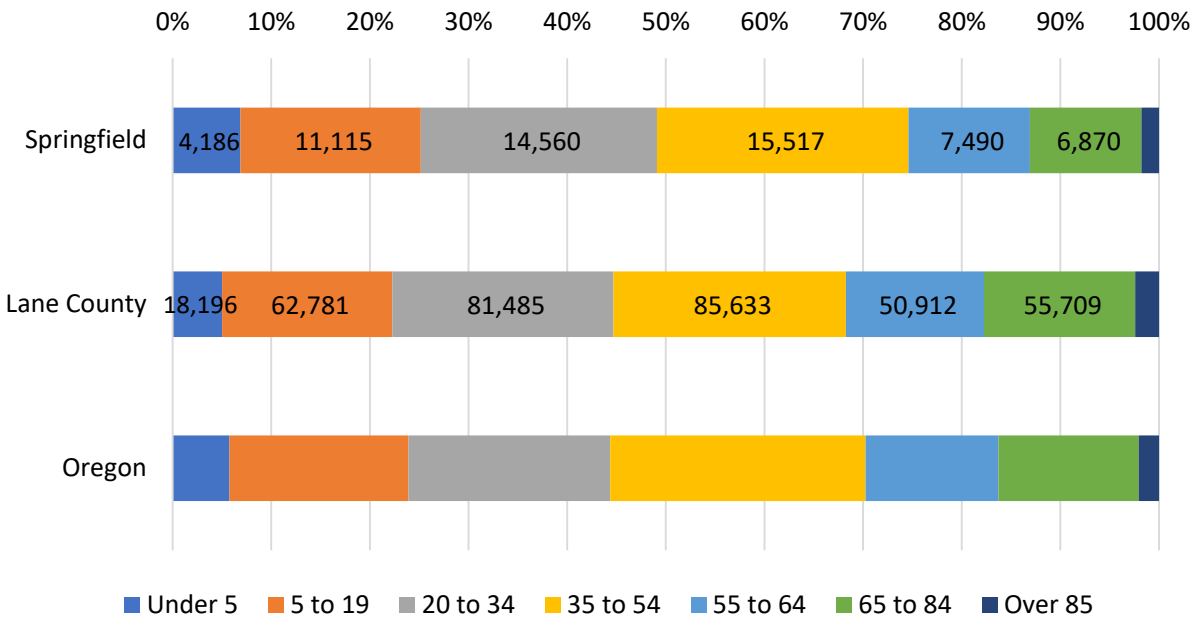
Population is aging in both Springfield and Lane County, where median age has increased by 3.7 years and 2.8 years respectively from 2000 to 2017. Still, Springfield’s median age of 35.8 years is younger than the county’s median age of 39.4 years. The age distribution of residents influences the types of access issues that may arise. A community with a slightly older population may have fair housing needs around reasonable accommodation requests or ensuring affordable housing siting considers accessibility.

Table 3. Median Age

	Springfield	Lane County
2000	32.1	36.6
2010	33.5	39.0
2017	35.8	39.4

Source: 2000 & 2010 Census, 2017 ACS

Chart 2. Population by Age



Source: 2017 ACS

With some exceptions, Springfield’s age composition is similar to Lane County. Springfield is somewhat younger than the rest of the county, with a larger cohort of youth under 19 and a smaller cohort 55 years and up. In 2017, residents over the age of 65 made up 13% of the city’s populations vs. 18% of the county. Generally, population in both jurisdictions are anticipated to trend towards those age groups above 65. The State of Oregon forecasts that 22.4% of the county’s population will be over the age of 65 by 2030.

Racial/Ethnic Concentrations

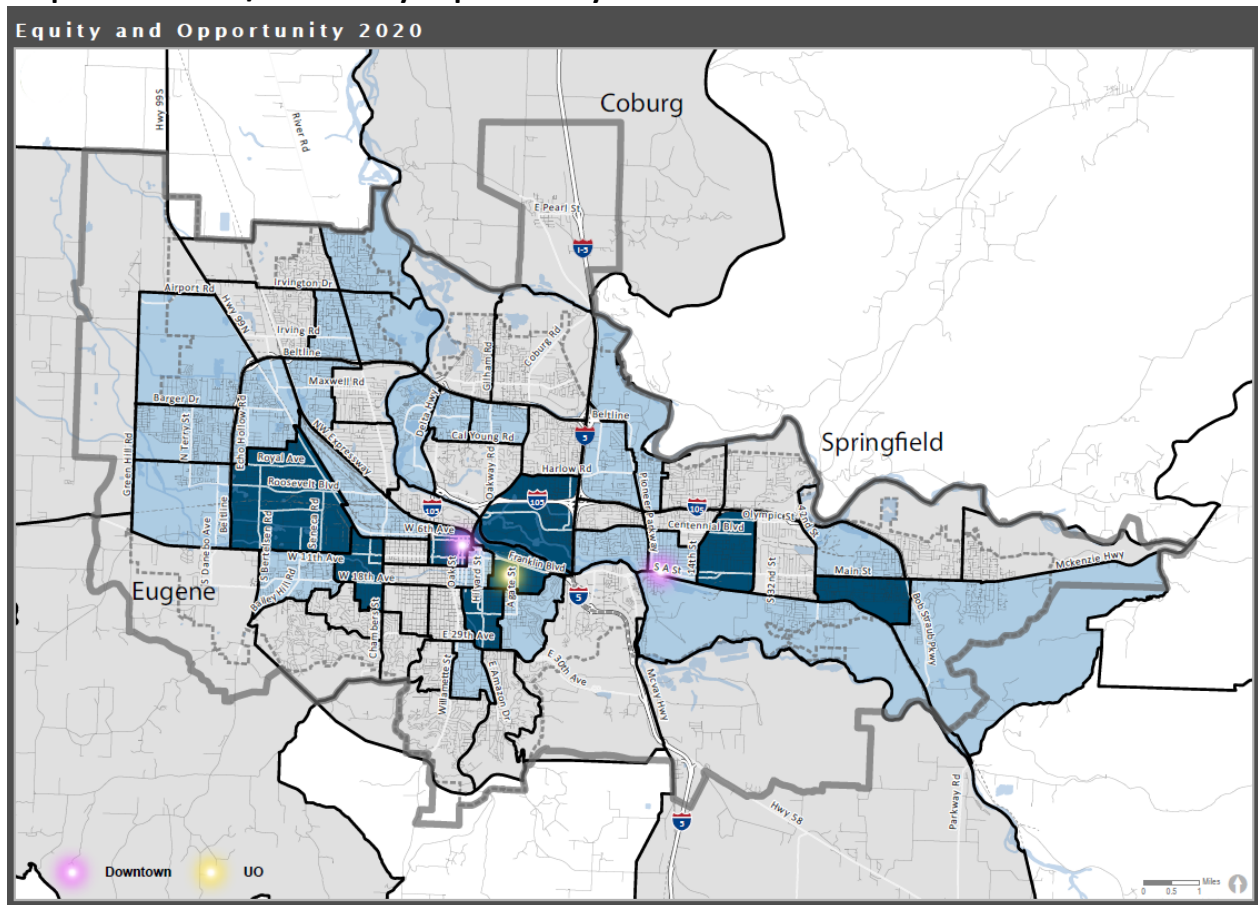
HUD defines a racially/ethnically concentrated area of poverty (R/ECAP) as, “Areas where the total non-White population is greater than 50% AND the poverty rate is greater than 40% OR three (3) times the average poverty rate for the metropolitan area.”

These baseline thresholds for defining R/ECAPs were developed to serve as a starting point for communities investigating these issues across the nation. HUD encourages communities to modify these thresholds if they do not necessarily match the expectations based on local demographics.

There are no HUD-defined Racial/Ethnic Concentrated Areas of Poverty (R/ECAP) in Springfield or within Lane County. Having no R/ECAPs throughout the county, and specifically within Springfield, indicates a dispersion of households of diverse backgrounds and incomes. The City may consider continuing efforts in housing policies to limit the concentration of certain types of households in certain parts of the city.

As seen in Map 1, census tracts throughout the western and southern parts of Springfield are home to greater shares (over 21%) of Latino and/or racial minority populations. There are two census tracts— one just east of downtown and one further east and just south of Main Street—in which Latino and/or a minority population is greater than 33%.

Map 1. Latino and/or Minority Population by Census Tract 2017



Map: 12/13/2019
 Data: US Census Bureau, ACS 2013-2017 Table B03002; LCOG Regional GIS & COE GIS.
 Caution: This map is based on imprecise source data, subject to change, and for general reference only.

MPO Boundary
 2018 Census Tracts
 Urban growth boundaries

Percent of population that are Latino and/or minority
 Low: 9.3% - 21.2%
 Medium: 21.3% - 33.1%
 High: 33.2% - 44.9%

Source: Lane County Equity and Opportunity Assessment 2020

Income Trends

Together, the combination of low income and the high housing costs contribute to a household's inability to secure affordable housing. This section will look at household and individual income trends in Springfield, identifying income trends of specific subgroups that may be more vulnerable to an increasingly expensive housing market.

Disability and Income

Those living with a disability typically have a narrower choice of housing due to the need for units that are accessible for their specific needs. As Table 4 below indicates, those living with a disability in Springfield are also more likely to be elderly, potentially compounding housing vulnerability issues should the household have a fixed income or require certain, sometimes costly medical and health care services.

Disability status is determined by the Census Bureau using the following six categories:

- Hearing difficulty – Deaf or serious difficulty hearing

- Vision difficulty – Blind or serious difficulty seeing even when wearing glasses
- Cognitive difficulty – Due to physical, mental, or emotional condition, have serious difficulty remembering, concentrating, or making decisions
- Ambulatory difficulty – Serious difficulty walking or climbing stairs
- Self-care difficulty – Difficulty dressing or bathing
- Independent living difficulty – Difficulty doing errands alone such as visiting a doctor’s office or shopping

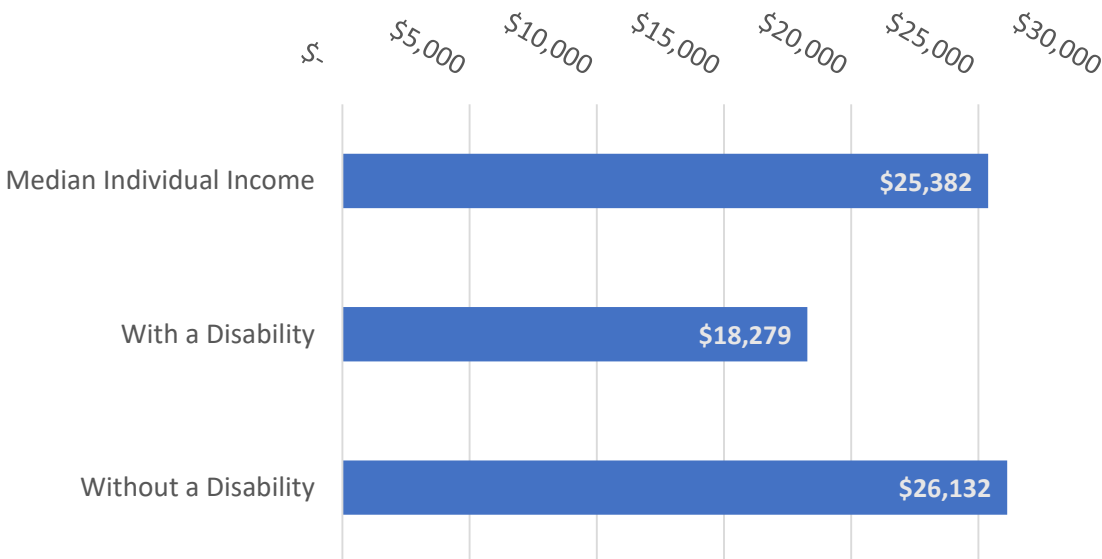
Table 4. Disability by Type in Springfield

Individual Disability by Type						
	Under 5	5-17	18-64	65 & Over	Total Population	% of Total Population
Hearing Difficulty	0	86	1,467	1,668	3,221	5.3%
Vision Difficulty	0	284	1,031	603	1,918	3.2%
	Under 18		18-64	65 & Over	Total Population	Total Population
Cognitive Difficulty	620		3,625	924	5,169	9.2%
Ambulatory	76		2,984	2,402	5,462	9.7%
Self-Care	218		1,120	974	2,312	4.1%
Independent Living			2,301	1,382	3,683	7.8%

Source: 2017 ACS

Those living with a disability generally earn less income than households without a disability. As illustrated in Chart 3, the median income of a person with a disability is about two-thirds of those without a disability. This lower income further limits housing choice beyond the added need to find housing that accommodates their specific disability.

Chart 3. Median Individual Annual Income by Disability in Springfield

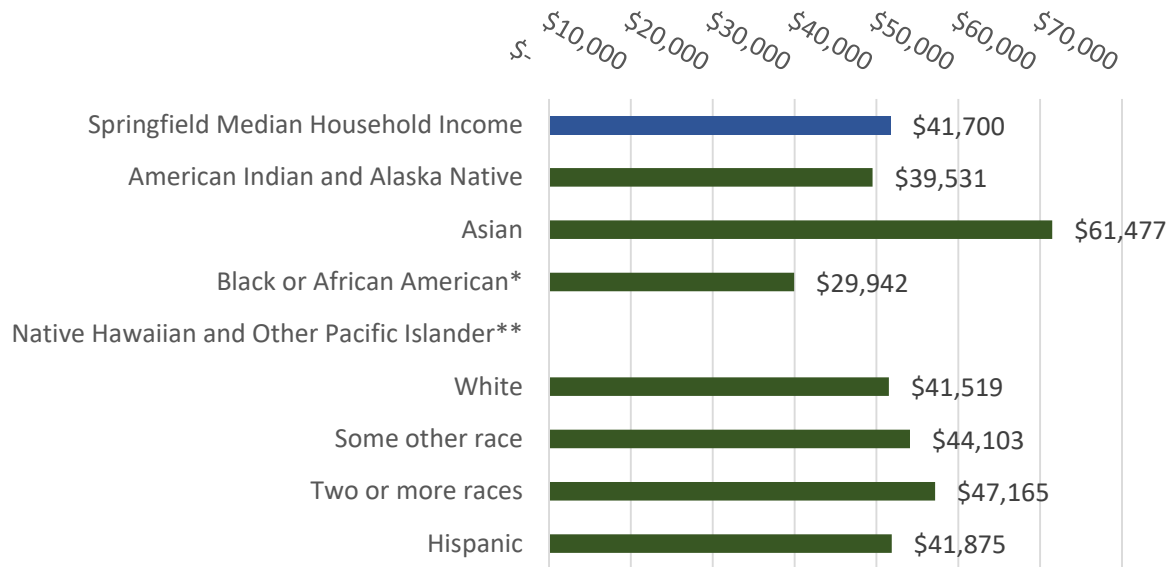


Source: 2017 ACS

Income by Race/Ethnicity

In 2017, the median household income in Springfield was \$41,700. Chart 4 shows the median income for each race/ethnicity (2017 ACS).

Chart 4. 2017 Median Household Income by Race/Ethnicity in Springfield



Source: 2017 ACS

* Indicates 2015 data adjusted for inflation to reflect 2017 income; data was not available for years 2017 or 2016

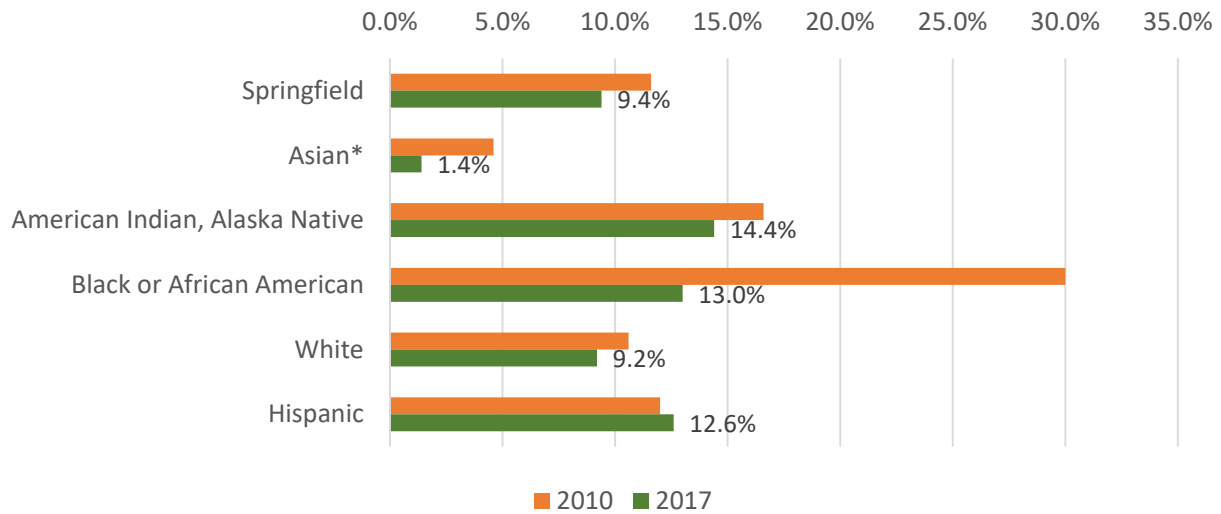
** Indicates data was not available for years 2017, 2016, and 2015. Years 2010 through 2014 were highly variable, reflecting data inconsistency

As the chart indicates, Asian households, Hispanic households, and those households that identify as “some other race” or “two or more races” all earn more than the median household income in Springfield. White and American Indian and Alaska Native households both earn 95% or more of the median household income. Black or African American households earn an estimated 72% of Springfield’s median household income. It is important to keep in mind that making income comparisons for race and ethnicity groups that are very small as a percentage of the overall populations may be challenging, where 80% of the city’s population is White.

Employment Trends

Lack of income is a fundamental barrier to access quality housing in Springfield. Unemployment rates reached well into double digits during the financial crisis in 2009. Regional jobs growth has been steady, and unemployment rates have remained relatively low during recent years. However, although wages have risen, the service jobs that have replaced many of the manufacturing jobs have resulted in slow overall wage growth in the region.

Chart 5. Springfield Unemployment Rate by Race/Ethnicity



Source: 2010 & 2017 ACS

* The '2010' data is 2009 data due to an anomaly in the 2010 data

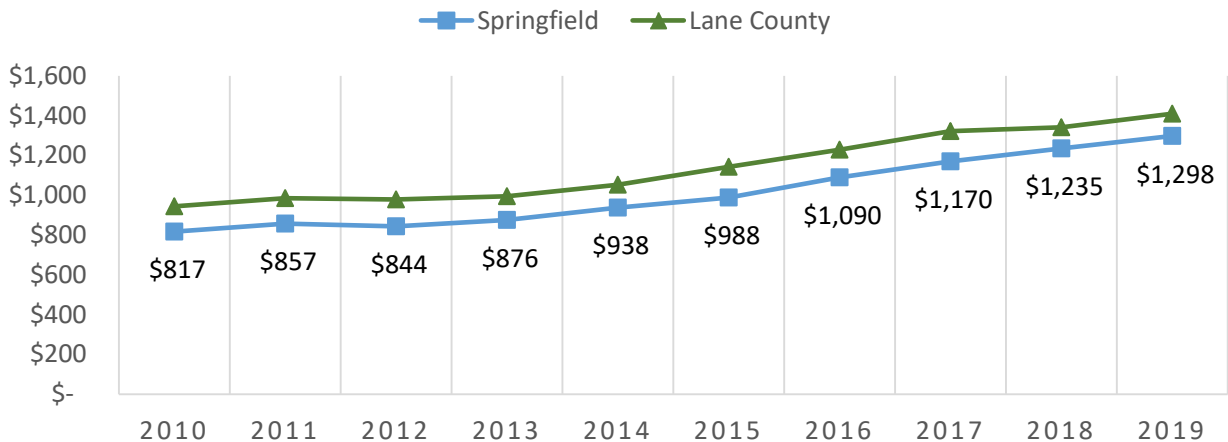
** Due to the very low population count for Native Hawaiian and Other Pacific Islander populations, unemployment data is highly variable between 2017 and 2011, and therefore omitted

Unemployment rates have declined for nearly all demographics (where calculated) between 2010 and 2017. Only Hispanic households in Springfield experienced a slight increase in unemployment in that time span, rising from 12.0% to 12.6%.

Housing Costs

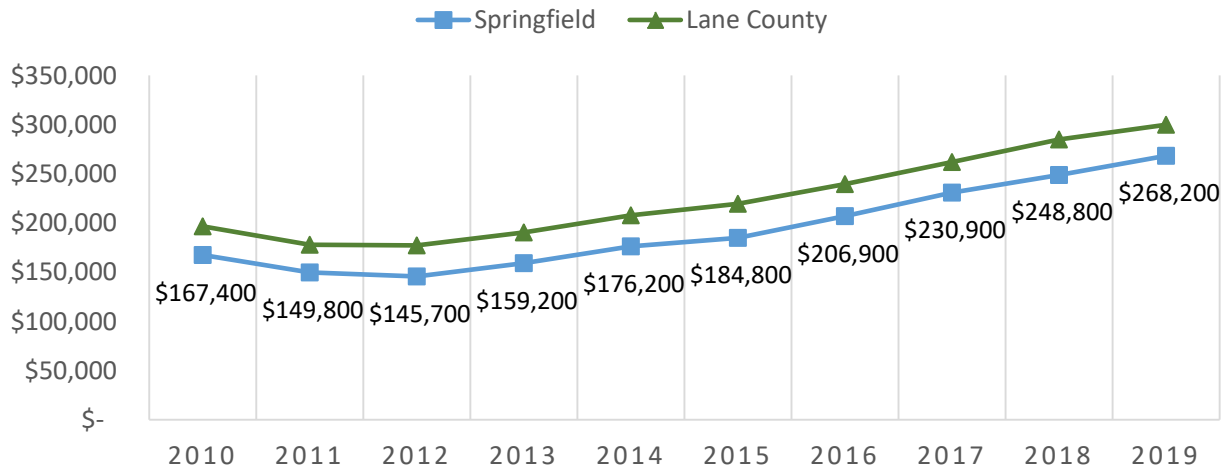
Following the housing crisis of the late 2000's, housing costs for renters hit a low in 2010, while the low for owners came in 2012.

Chart 6. Springfield Median Rental Rates



Source: Zillow Economic Research Data, 2010 to 2019

Chart 7. Springfield Median Home Values



Source: Zillow Economic Research Data, 2010 to 2019

Rising housing costs in Springfield has put many housing options out of reach for low- and moderate-income households. The City utilizes HUD funds and partnerships with developers and the Lane County Housing Authority to preserve and develop affordable housing opportunities in support of low- and moderate-income households. The City also encourages housing development through review and adjusting regulatory codes that may inhibit development. This aspect of affordable housing development is covered further in the section below. Limited resources have meant that an increasing number of both owner and rental households find paying for housing a burden that limits their ability to maintain a stable and healthy life, or to invest in other opportunities.

Housing Trends

Just over half of Springfield households (51%) are homeowners. Renter households have significantly lower income than owner households. For instance, 4,325 renter households earn less than 50% of area median income compared to 2,030 owner households.

Many of the charts in this section will reference income brackets with a data source of 2016 CHAS. The income brackets by household size for the Eugene/Springfield Metropolitan Statistical Area (MSA) in 2019 were as follows:

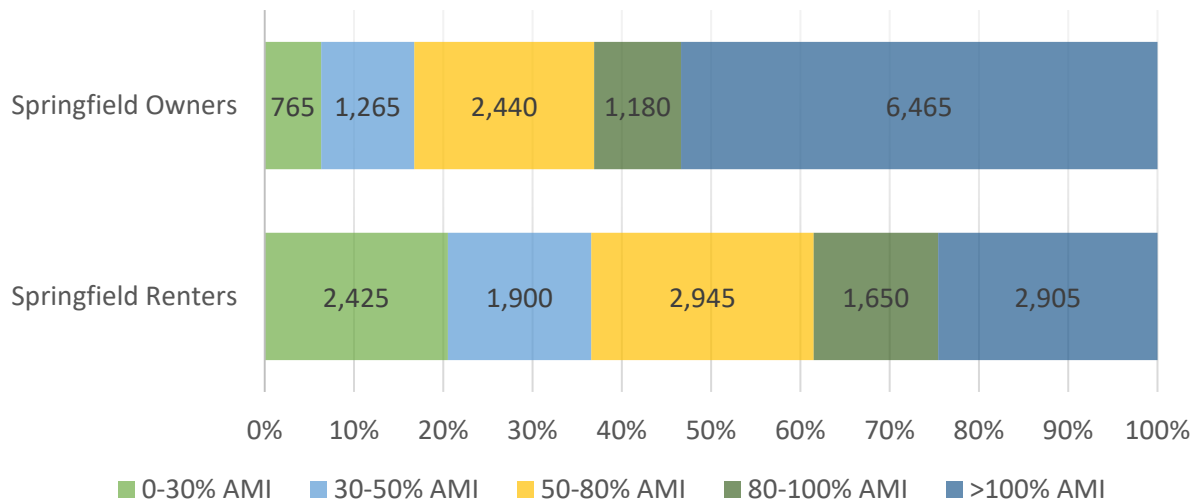
Table 5. 2019 HUD Income Limits: Eugene/Springfield MSA, OR

Household Size	30% of Median Very Low Income	50% of Median Low Income	80% of Median Moderate Income	100% of Median
1	\$13,650	\$22,750	\$36,350	\$45,500
2	\$16,910	\$26,000	\$41,550	\$52,000
3	\$21,330	\$29,250	\$46,750	\$58,500
4	\$25,750	\$32,450	\$51,900	\$64,900
5	\$30,170	\$35,050	\$56,100	\$70,100

6	\$34,590	\$37,650	\$60,250	\$75,300
7	\$39,010	\$40,250	\$64,400	\$80,500
8	\$42,850	\$42,850	\$68,550	\$85,700

Source: huduser.gov

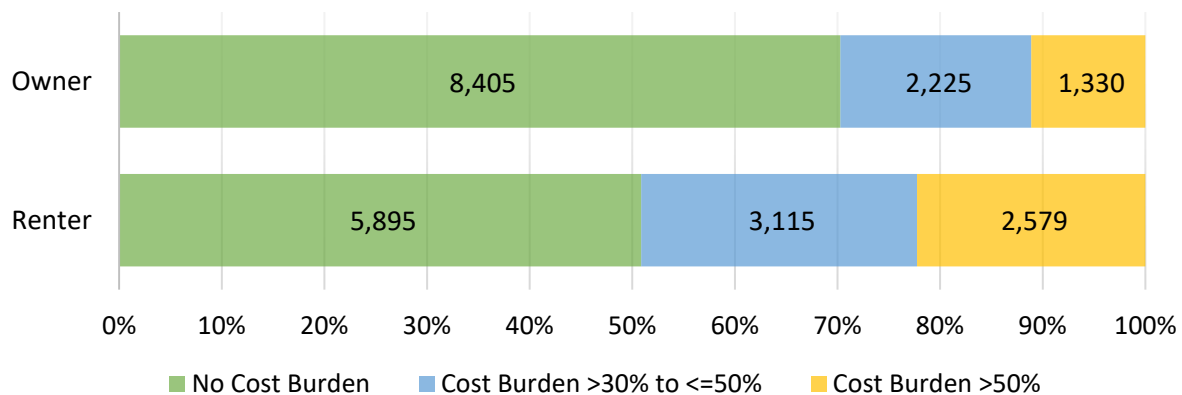
Chart 8. Households by Tenure and Income



Source: 2012-2016 CHAS

As illustrated in Chart 8 above, 75% of renter households earn less than the household median income for the city. About 61% of renters, or 7,270 households, earn less than 80% of the area median income (AMI), while approximately 37% of owner households (4,470) earn less than 80% AMI. A cost burdened household typically has fewer resources for other needs such as healthcare, education, food, and transportation. Cost burden is defined as a household that pays 30%-50% of monthly income towards housing expenses. Similarly, severe cost burden is defined as a household that pays greater than 50% of their monthly income towards housing costs.

Chart 9. Springfield Households Cost Burden by Type



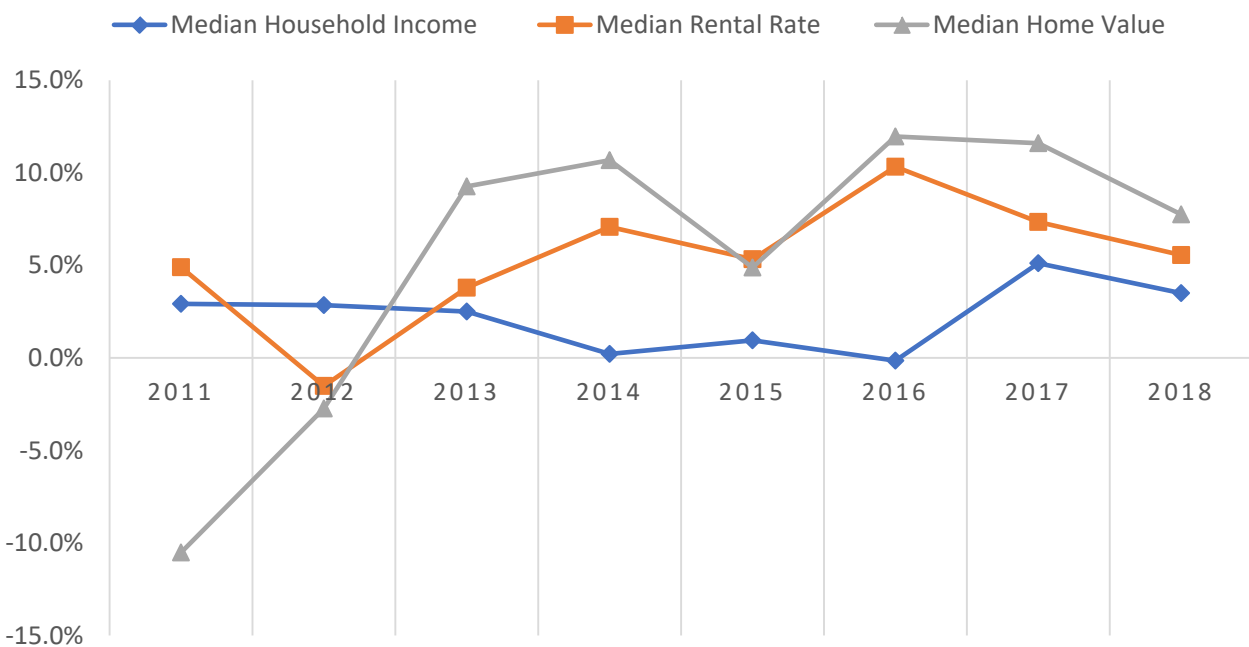
Source: 2012-2016 CHAS

About 49% of renter households and about 30% of owner households are cost burdened. Those cost burdened households are often at increased risk of housing instability. Similarly, housing cost burden is a significant barrier in a household's ability to address financial emergencies or pursue educational and/or economic opportunities.

Housing Costs and Wage Growth

Wage growth has not kept pace with the increasing housing costs in Springfield. High housing costs limit housing options for households, especially those low- and moderate-income households. Chart 10 displays the annual percent change in median household income, median rental rate, and median home value. While the housing market has recovered from the 2008 recession, the household income growth lags. Both rental rates and home values have shown steady growth rates, reaching above 5% annual growth rate in four of the latest five years represented in the chart. The household income annual growth rate reached 5.1% in 2017 and has remained nearer to 3% for the remaining years.

Chart 10. Annual Percent Change in Springfield



Source: 5-yr ACS estimates, Zillow Economic Data

Evidence of Housing Discrimination

Fair Housing Complaints

The Fair Housing Council of Oregon (FHCO) serves as the primary organization tasked with fair housing education, conducting assessments, and mediation of fair housing complaints in Springfield and Lane County. Fair housing complaints may begin through various channels; however, all valid claims will ultimately end with involvement of FHCO. FHCO keeps records of all client intakes as well as allegations of discrimination made where they are involved.

The FHCO collected data for sixteen fair housing allegations in Springfield between 2015 and 2019. Among those sixteen allegations, disability was the most commonly cited basis for the allegation. Source of income, familial status, and age were also identified as the basis for several allegations. This is a

relatively low volume of fair housing complaints given Springfield’s population. It is important to note that fair housing complaints may go unreported for a variety of reasons such as landlord retaliation, no trust in complaint follow-up process, and/or not understanding how to file a complaint. Similarly, residents may be initially unaware that an action from a landlord may violate fair housing law.

Public Sector Policy Review

Public policies developed and enforced at the local and regional levels may significantly impact housing development, as well as accessibility to affordable housing. Fair housing laws have a primary purpose of ensuring equitable access to the community.

The assessment of public policies and practices can help determine potential impediments to housing opportunities for a specific sub-population or residents at-large. This section will provide an overview of those policies and practices enacted by Springfield, in coordination with regional plans and Oregon law, which may impact fair housing choice.

Comprehensive Plan

A Comprehensive Plan is a municipal planning document that serves as a framework to establish a community vision and contains maps and policies to guide land use, transportation, infrastructure, and other investments. In response to 2007 legislation, Springfield began transitioning from relying solely on the regional comprehensive plan—the Eugene-Springfield Metropolitan Area General Plan (Metro Plan)—to a city-specific Springfield Comprehensive Plan. Springfield has developed Springfield 2030 Comprehensive Plan¹ policies that will guide growth and development for the City of Springfield through the 2010-2030 planning period.

Adopted in 2011, the Springfield 2030 Refinement Plan Residential Land Use and Housing Element addresses Statewide Planning Goal 10²: Housing stating, “To provide for the housing needs of the citizens of the state.” This element includes goals, objectives, policies and implementation actions that are consistent with and carry out the Eugene-Springfield Metropolitan Plan Residential Land Use and Housing Element, which demonstrates the City’s ongoing commitment to increasing housing choice and residential densities within Springfield’s separate Urban Growth Boundary (UGB).

The Comprehensive Plan states that policies and implementation actions support a 20% increase in density by facilitating more dense development patterns. Through the Plan and neighborhood-specific refinement plans, residential and mixed-use districts were determined to provide sufficient land base to meet anticipated housing demand and offer a range of housing choices through 2030. The Comprehensive Plan includes districts that would accommodate moderate- and high-density multifamily apartments it recognizes are needed to meet the goals.

The Comprehensive Plan includes a series of 17 policies and corresponding implementation actions for many, but not all, of these policies. The policies and actions identified include those that increase density for both single-family and multi-family housing, designate an area for high-density multi-family

¹ Creating a city-specific comprehensive plan followed a multi-year, multi-part timeline as detailed in the preface to the Springfield Comprehensive Plan.

² Together, Goal 10 and Oregon’s “needed housing” statutes require that Springfield provide a 20-year buildable land supply within a separate Urban Growth Boundary (UGB) to meet the housing needs of current and future residents.

housing (Glenwood), remove regulatory barriers to siting and constructing for higher-density housing, and encourage locating housing with access to transportation and services. Actions also include establishing a land-banking program and evaluating public property for affordable housing development, both of which are included in the City Council’s Housing Strategy.

These policies and implementation actions identified in the Comprehensive Plan provide a solid foundation for updating relevant zoning and development regulations to address the community’s housing needs, and for developing and updating incentives to encourage and facilitate development of more housing. Together, they can help the City improve access to greater housing choices that include affordable units.

Planning and Zoning

The City of Springfield has two regulatory documents: The Springfield Development Code, and a Municipal Code. Programs to incentivize housing development, like property tax exemptions for low-income housing, are found in the Municipal Code. All other regulations governing the density, type, and design of different land uses, including the types of housing allowed in specific zoning districts, are contained in the Development Code. The Development Code identifies permitted uses as well as applicable development and standards for the protection of public health, safety, and welfare.

The Springfield Development Code is a comprehensive land use and development document that governs all the land within Springfield’s city limits and its urban services area. The current code was adopted in 1987 and other than general housekeeping updates has only been revised to comply with state and federal laws or as directed by Springfield City Council in response to a specific issue or objective. With this in mind, the Springfield Council directed staff to complete a full Development Code update over approximately three years, from 2019 to 2022. The objective of the Development Code Update Project is to make the development review process more efficient, timely, and clear. City Council approved the release of Phase 1—Housing for public input in February 2020 and the project is now in Phase 2—Employment Lands. When completed, the Development Code is intended to support Springfield’s housing goals promote economic development priorities, and honor Springfield’s culture.

Zoning ordinances or development codes can influence housing development, access to housing, and housing choice by placing restrictions on the local supply or form of housing units. These regulations and land use policies from which they are derived can also have the effect of excluding or otherwise discriminating against protected groups, whether intentionally or unintentionally. The Federal Fair Housing Act does not pre-empt local zoning ordinances. It does, however, prohibit a jurisdiction from enacting and implementing land use policies that have the effect of excluding or otherwise discriminating against protected classes of persons. Further, some policies may be deemed as “neutral” in their language, in that the ordinance may apply to all persons. Land-use policies such as density or design requirements that make residential development prohibitively expensive, limit development of multi-family housing. Household occupancy standards may be considered discriminatory if it can be proven that these policies have a disproportionate impact on minorities, families with children, or people with disabilities.

An example of such a policy that courts have ruled as having a disparate impact on persons with disabilities is the definition of “family.” Disparate impact refers to practices that adversely affect one group of people of a protected characteristic more than another, even though rules applied by landlords should remain neutral. Traditionally, a jurisdiction may allow any number of related persons to live

together while limiting the number of non-related persons living together. Applicable to all persons, defining the term “family” could appear to be neutral impact. However, this narrower definition of “family” may cause a negative impact by further limiting housing options for any non-traditional family unit.

Definition of “Family” in Springfield

As noted earlier, Springfield is currently in the process of updating its Development Code. The definition of “family” will likely be adequately addressed in the Development Code update. The Springfield City Council recognizes that the current Development Code is difficult to use, understand, and implement; thus, resolving the complexities and outdated nature of the code will help achieve the economic and housing goals for the community. However, currently, Development Code Section 6.1-110 defines family as, “Two or more persons related by blood, legal adoption, guardianship or marriage living together; or unless modified by the Federal Fair Housing Law as it relates to handicapped persons, a group of not more than 5 persons who need not be related (as above) living together in a dwelling unit.” The City’s definition of “family” does not stand in opposition to the Fair Housing Act.

Fair Housing Act Definition:

Familial Status: Includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under 18.

Although relatively broad in nature, the definition does place an arbitrarily specific number among those persons living in a single household unit that may be unrelated. The definition does demonstrate efforts to be inclusive. However, by defining the number of people and types of relationships, it may offer justification to a landlord or property company to discriminate based on household size

or type. A key concept of defining family within development codes is “formal family” vs. “functional family.” “Formal family” definitions are often termed as traditional and place restrictions on what may demonstrate a family. “Functional family” posits that a self-selecting and functional family may not necessarily consist of a specific number of unrelated members. Consequently, regulating the structure of a family unit may in fact be discriminatory and should be considered in the revised code language of the updated Development Code.

Definition of “Disabled Person” in Springfield

In sections 5.550 to 5.574 of the Springfield Municipal Code, disability is defined as, “the condition of being disabled or a disabled person as defined in ORS 659.400(1) and (2)”, which is a very comprehensive definition of disability. The City’s Municipal Code definition of “disabled person” does not stand in opposition to the Fair Housing Act. While not providing a specific definition, the Development Code makes several references to disabled persons. Where referenced in the Development Code, the term does not narrowly describe a person with a disability in a way that is more limiting than the Fair Housing Act definition.

Fair Housing Act Definition:

Disabled Person: Individuals with mental or physical impairments (including hearing, mobility and visual impairments, cancer, chronic mental illness, HIV/AIDS, or mental retardation) that substantially limit one or more major life activities.

Permitted Residential Densities by Zone

The housing market is influenced by many variables, both governmental and non-governmental. One of the ways in which government affects the housing market significantly is through the restriction and/or allowance of development of only certain residential density types. In general, higher density housing units allow developers to take advantage of economies of scale, reducing the cost per unit associated with new construction. Effective density standards ensure the opportunity that development of higher density units may take place, potentially increasing the number of affordable housing units in the city. Similarly, varying densities in multi-family zones ensure that land zoned for multi-family use will be developed as efficiently as possible. The less restrictive the zoning, the more creative solutions may be explored to meet the community’s unique needs.

About ten years ago, Springfield expanded its UGB. As part of that process, the City demonstrated that it had an adequate 20-year supply of buildable land within a separate UGB to meet the housing needs of current and future residents. Springfield’s residential and mixed-use districts were determined to provide a residential land base with sufficient capacity for the market to develop adequate numbers of needed housing units to meet expected demand through 2030. The following districts are established where the minimum level of urban services is provided:

Residential and Mixed-Use Zoning Districts		
Zoning District	Applies within	Description of Designation
Low Density Residential District (LDR)	LDR Designation	Establishes sites for residential development where primarily detached single-family dwellings and duplexes are permitted with a density range of six to 14 dwelling units per net acre. Density fraction will be rounded up to the next whole number. Provides for a limited range of neighborhood uses that provide services for residents.
Small Lot Residential (SLR) District	SLR District (within the LDR Designation)/ Refinement Plan and/or Master Plan approval	Establishes sites for residential development where a mix of attached and detached single-family dwellings are permitted on small lots/parcels with a density range of eight to 14 dwelling units per net acre. Density fractions will be rounded up to the next whole number. Provides for a limited range of neighborhood uses that provide services for residents.
Medium Density Residential (MDR) District	MDR District	Establishes sites for residential development where primarily multi-family dwellings are permitted and the density range is 14 to 28 dwelling units per net acre. Density fractions will be rounded up to the next whole number. As specified in Section 3.2-215, Footnote 15, MDR lot area and dimension standards may be reduced through the subdivision application process in order to meet density standards. Provides for a limited range of neighborhood uses that provide services for residents.

High Density Residential (HDR)	HDR District	Establishes sites for residential development where primarily multi-family dwellings are permitted and the density range is 28 to 42 dwelling units per net acre. Density fractions will be rounded up to the next whole number. As specified in Section 3.2-215, Footnote 15, HDR lot area and dimension standards may be reduced through the subdivision application process in order to meet density standards. Provides for a limited range of neighborhood uses that provide services for residents. Exception: The minimum and/or maximum density may be increased in the Nodal Development Overlay District and transit corridors as determined through the Refinement Plan and/or Master Plan process.
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Source: Section 3.2-205 Establishment of Residential Zoning Districts, Springfield Development Code

The existing 62-page Residential Zoning Districts (3.2-200) section of the Springfield Development Code is proposed to be completely removed and replaced with a more streamlined, clearer (current draft is 12 pages) Residential Districts section³. The updates also respond to new state legislation (HB 2001) that requires cities to allow middle housing⁴; some of the changes in HB 2001 include allowing all middle housing types: duplexes, triplexes, fourplexes, cottage clusters, and townhouses.

As of the writing of this Analysis of Impediments, the proposed changes maintain the existing density ranges allowed in each Residential Zoning District, creating flexibility and removing barriers to permit a range of housing types that meets the existing density allowed (i.e. duplexes, triplexes, and fourplexes). For instance, duplexes are proposed to be allowed on every lot or parcel on which a single-unit dwelling is allowed, which will change design standards for duplexes to be treated the same as single-unit dwellings. Multi-units (up to four units) are proposed to have minimal clear objective standards for approval to help reduce barriers provide more flexibility to developers. The new draft multi-unit housing standards has been simplified to provide for more flexibility and has removed barriers to development.

Accessory Dwelling Units

An Accessory Dwelling Units (ADU) is a secondary, self-contained dwelling that may be allowed in conjunction with a detached single-family dwelling. An ADU has its own entrance. It may be located within, attached to, or detached from the primary dwelling. It has a kitchen, bathroom, living, and sleeping area that are completely independent from the primary dwelling. ADUs add accessible and affordable units to the housing stock, provide flexibility for changes in household size, allow for intergenerational living and onsite caretakers, make efficient use of land, and maintain neighborhood stability, property values, and residential appearance.

³ See project webpage for more information: <https://www.springfield-or.gov/city/development-public-works/springfield-development-code-update-project/>

⁴ Middle housing provides diverse housing options such as duplexes, fourplexes, and bungalow courts, that provide solutions along a spectrum of affordability to address the growing demand for walkable urban living.

ADUs were initially intended to allow families to live on the same property while in separate housing units. ADUs are sometimes referred to as “granny flats” or “in-law units.” Although the terms for ADUs give the notion that their intention is for family members, access to such properties are available for much wider audiences. As housing markets in many areas have become tighter, the adoption of ADU policy and development of such units has been more geared toward increasing the overall housing stock with hopes of offering additional affordable housing options.

Springfield is seeking to be a family-friendly community for all people in every phase of life. In 2016, the Springfield City Council directed staff to evaluate housing needs and to build on strategies to increase both the supply of housing and the accessibility of affordable housing. Council strategies to address housing needs include:

- Expand Overnight Parking Program.
- Contribute to income-qualified housing development.
- Encourage construction of ADUs.
- Secure property for Targeted Residential Development.
- Assist homeowners with CDBG funds.
- Promote housing of diverse types.

As part of City Council’s Housing Strategy, Springfield is encouraging the construction of ADUs by making the development requirements more flexible, and by providing a financial incentive for development. Springfield promotes ADUs as a valuable source of income where a property owner could live in either the main or accessory dwelling while collecting rental income from the other. Amendments to the Springfield Development Code have also allowed ADUs, previously only allowed in Low-Density Residential zones, in all residential districts (including in the Washburne Historic District).

Resolution No 2019-06 extends the temporary waiver for the City’s Systems Development Charges for newly permitted ADUs. SDC is the fee charged for connecting new developments to the wastewater system or the sewer system in Springfield. The City is seeking to further modify ADU provisions through the Development Code Update. The change in code will include deleting the ADU parking requirement, the articulation requirement, and a height limit. As a result, this will remove a barrier to development and implement HB 2001.

Parking Requirements

The City of Springfield updated its Transportation System Plan (TSP) in 2014. The plan has a system management goal that incorporates the on-street and off-street parking system with the objective of preserving adequate capacity and turnover for surrounding land use while assuring that major activity centers meet their parking demand. In January 2020, amendments to the Development Code were adopted to implement the TSP, including parking requirements adjustments.⁵

The number of parking spaces required for housing development increases housing construction costs. However, there are times when financial institutions impose greater parking minimums than the local jurisdiction and affordable housing developers.

⁵ More info can be found on the project webpage: <https://www.springfield-or.gov/city/development-public-works/transportation-system-plan/>

Springfield has approached parking differently in areas of the city. In the Downtown Exception Area, residential properties are exempt from the off-street parking requirements established in the Code. In certain cases, the Institute of Transportation Engineering (ITE) Parking Generation Report may be commissioned to determine appropriate parking requirements. The minimum residential parking requirements in Mixed Use District Zones may be reduced when it is demonstrated that proposed housing is located along a frequent service transit line. In 2012, in the Glenwood Riverfront Mixed-Use Plan District, the City designated nearly 30 acres of land to meet the identified deficit of High Density Residential from the Residential Lands and Housing Needs Analysis and piloted parking maximums in lieu of parking minimums.

Mobile and Manufactured Home Requirements

Manufactured homes can play a role in providing safe and affordable housing. They offer an option for some lower-income households and/or households living on a fixed income. State and local codes often have the objective of holding manufactured dwelling parks to a standard that ensures safety and wellbeing of households while making it possible to maintain. The Oregon legislature has established regulations and standards related to manufactured homes (including mobile homes).

A variety of factors put park residents at risk of being displaced and Springfield is aware of potential impact of residents requiring housing assistance due to housing instability. Many mobile home parks are distressed, beyond their designed life, and are facing infrastructure failure, park overcrowding, informal agreements between park owners and structure owners and renters and impacts of redevelopment where the park is on non-conforming industrially-zoned and/or privately-owned land. There are approximately 22 manufactured home parks within city limits with an estimate of 1,887 homes (ACS data).

In 2016, Springfield took the lead of the Manufactured Home Park Solutions Collaborative, working with local, state, and federal partners in developing a coordinated housing and social service assistance response to serve these vulnerable Oregon populations. Governor Brown designated the Manufactured Home Park Closure and Tenant Displacement Project an Oregon Solutions Project, resulting in the creation of a Local Agency Toolkit⁶ intended to serve as a model for use by other communities facing similar challenges. The City organized stakeholder meetings to identify how to assist residents, owners, and renters living in mobile home parks who may be living in substandard conditions and/or who face being evicted as result of redevelopment pressures. The Mayor of Springfield served as co-convener of the project.

Recently, the State has invested in the efforts to preserve mobile home parks as a housing option for some households. In 2019, the state allocated \$15 million to support manufactured dwelling park preservation and affordability for tenants. This included \$9.5 million to encourage nonprofits to preserve mobile home parks by purchasing parks and replacing substandard-quality mobile homes. The state also allocated \$3 million specifically to create a new manufactured dwelling park in Springfield. Future closures of manufactured dwelling parks remain a risk in Springfield, potentially displacing residents and reducing affordable housing options.

⁶ The full Toolkit can be found on the state webpage:

<https://www.oregon.gov/ohcs/CRD/mcrc/docs/Manufacture-Home-Park-Solutions-Collaborative-Local-Agency-Toolkit.pdf>

Shelter and Supportive Housing Requirements

Analysis of land use as it pertains to sheltering and supportive housing has the goal of identifying concentrations of shelters or regulatory barriers that may limit shelter development to a single area of a community. Springfield's Development Code supports development of emergency shelters and supportive housing throughout the city in residential zones.

Emergency Shelter

Emergency shelters include the use of a church, school, motel, hotel, or other approved structure operated by public or nonprofit agencies that provide short-term accommodations for individuals and families experiencing homelessness or other crises such as natural disasters or fleeing domestic violence situations. These facilities usually offer temporary shelter (for up to six months) and meals for residents. Homeless shelters are permitted by right in the Booth-Kelley Mixed Use Plan District and, following development review, in all Heavy and Light-Medium Industrial zones. They are also permitted in churches and buildings owned or leased by a governmental entity, subject to the review of the City building official.

Supportive Housing

Springfield's Development Code and Municipal Code do not explicitly address transitional housing or supportive housing. However, there is code language that adequately addresses Single-Room Occupancy (SRO), a unit type that would be effective in meeting the unique needs of the vulnerable population. An SRO facility provides living units that have separate sleeping areas and some combination of shared bath or toilet facilities. The building may or may not have separate or shared cooking facilities for the residents. There is a definition for SRO that states that SRO facilities are considered a multi-family dwelling, are permitted in Moderate- and High-Density Residential Zones, and are subject to site plan review. For the purposes of determining residential density, four SRO rooms equal one dwelling. Fractional dwellings will be rounded to the next higher number, e.g., five SRO rooms equal two dwellings. SROs include, but are not limited to, residential hotels and rooming houses.

Development Incentives

Fee exemptions, reductions or application waivers are used by many communities to incentivize affordable or accessible housing development. In Springfield, low-income fee reduction is extended to any application fee related to the development of low-income housing or facilities, which may be reduced pursuant to the criteria of Section 1.070(4) of the Springfield Development Code. Applicable land use application fees for affordable housing may be waived in order to encourage their construction. the construction of affordable housing. Applicants must show that the proposed housing units meet appropriate standards regarding household income, rent levels, sales price, location, and number of units. The Low-Income Rental Housing Property Tax Exemption is an incentive enabled by state statute that encourages the development of rental housing for low-income households earning 60% of the AMI. The incentive offers a 20-year exemption for rental properties constructed or owned by 501c(3) nonprofits. Low Income Rental Housing Property Tax Exemption forms are publicly accessible on the city's Housing and Block Grant Programs website. The Exemption is codified in the city's Municipal Code in Section 3.500.

Public Housing and Voucher Programs

Homes for Good, the housing authority for Lane County, manages 695 public housing units and administers 3,065 Housing Choice Vouchers ("Section 8") throughout the county. The housing is

targeted towards low- and moderate-income households, including members of protected classes. The housing authority works closely with local agencies and stakeholders to ensure that properties meet quality standards and are offered in a variety of sizes and locations to meet the needs of residents. Of the public housing units, 37 units are available to persons with disabilities—they are 504 accessible, in reference to Section 504 of the Rehabilitation Act of 1973, to ensure housing is readily accessible by persons with disabilities. In January 2020, there was one household waiting for a 504-accessible unit.

Homes for Good’s site-based public housing waitlists throughout the county currently have a total of 1,016 households. Two public housing developments from Homes for Good are in Springfield: McKenzie Village and Pengra Court. McKenzie Village has 52 one-bedroom units, 90 two-bedroom units, and 30 three-bedroom units serving seniors, persons with disabilities, and families. Pengra Court has 17 two-bedroom units and 5 three-bedroom units. The 17 public housing scattered site homes throughout Springfield range in size from two-bedroom to four-bedroom homes. One-bedroom units are in the highest demand among those looking for housing through Homes for Good—most frequently from households on a fixed income who are unable to afford market rent.

Private Sector Policy Review

This section reviews the lending practices of financial institutions serving Lane County and analyzes lending outcomes and their implications on access to financing across different household types. The analysis explores discrepancies in outcomes across applicant households, including low-income and minority households, to identify potential concerns in mortgage lending.

Legislation Protection

Financial institutions have historically not always employed fair lending practices. Credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from gaining equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending.

Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower- and moderate-income households that may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below-market-rate interests and are insured by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

Mortgage Lending

Community Reinvestment Act and Home Mortgage Disclosure Act

The CRA is intended to encourage regulated financial institutions to help meet the credit needs of their entire communities, including low- and moderate-income neighborhoods. However, the CRA rating is an

overall rating for an institution and does not provide insights regarding the lending performance at specific locations by the institution.

Home Mortgage Disclosure Act

In tandem with the CRA, the HMDA requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications based on race/ethnicity and annual income of loan applicants. This section examines 2017 HMDA data for the Eugene-Springfield Metropolitan Statistical Area (MSA) which encompasses all of Lane County. HMDA data provide some insight into the lending patterns that exist within a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definitively that redlining or discrimination is occurring due to the lack of detailed information on loan terms or specific reasons for denial.

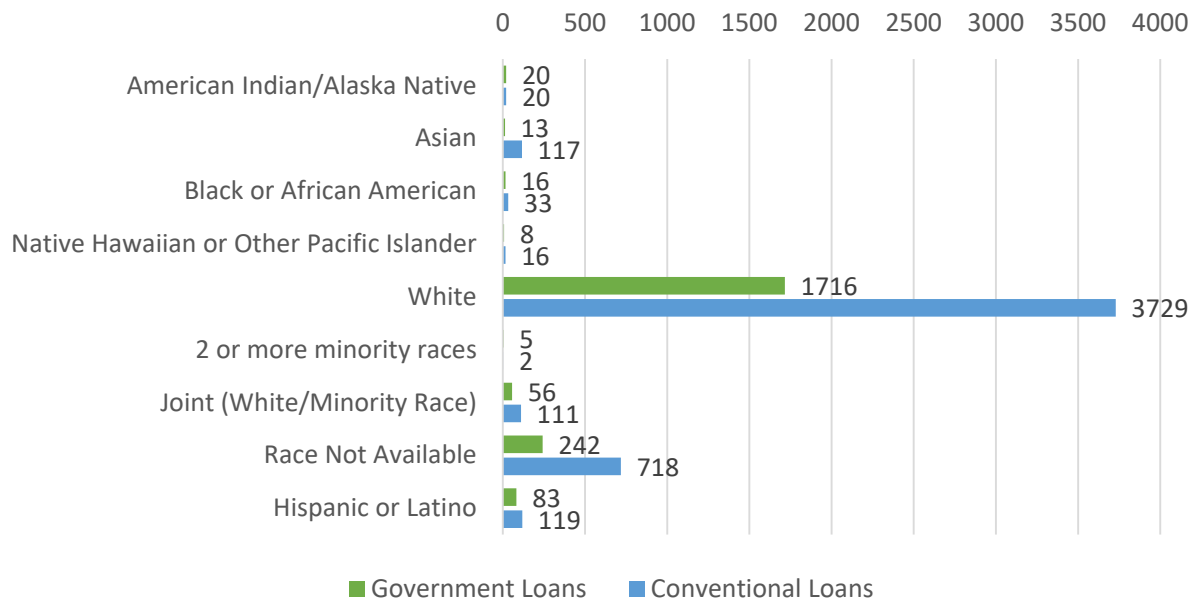
Table 6. Percent of Loan Applications in Lane County Received by Race/Ethnicity

	American Indian/Alaska Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White	2 or more races	Race not available	Hispanic or Latino
Conventional Loans	0.4*	2.5	0.7	0.3*	78.6	2.3	15.1	2.5
Government Loans	1.0*	0.6*	0.8*	0.4*	82.7	2.9	11.7	4.0

Source: HMDA; 2017

* Indicates where the total applications received were less than thirty (30)

Chart 11. 2017 Loan Applications by Race/Ethnicity



Source: HMDA; 2017

Chart 12. 2017 Total Loan Application by Race/Ethnicity

American Indian/Alaska Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White	2 or more minority races	Joint White/m inority race)	Race Not Available	Hispanic or Latino
0.6%	1.9%	0.7%	0.4%	79.8%	0.1%	2.4%	14.1%	3.0%

Source: HMDA; 2017

Loan Applications

The race and ethnicity demographics of Lane County and Springfield should be considered when looking at the loan rates depicted in the charts above. In 2017, Lane County was 85% White and non-Hispanic and Springfield was 80% White and non-Hispanic. Applications in Lane County for most race categories reflect their share of total population. Hispanic households, which make up 12% of all households in Lane County, submitted about 3% of loan applications. This indicates Hispanic households submitted loan applications at a much lower rate than non-Hispanic households in Lane County. Caution should be exercised in drawing conclusions due to the small size of population race categories in the county, however. While the HMDA data does not necessarily conclude the rate is due to discrimination, there are sufficient discrepancies to suggest that further investigation may be of value.

Loan Denial Rates

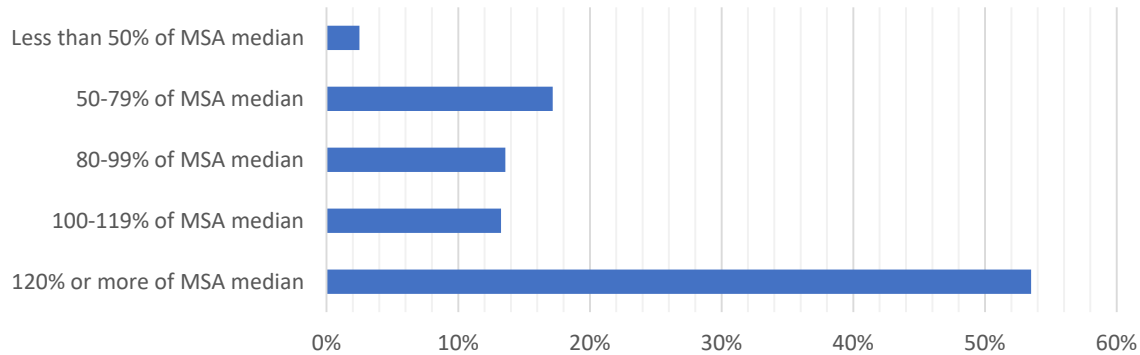
Table 7 outlines the application denial rate for each race/ethnicity group where data is kept. A denial rate of greater than 10 percentage points may determine a disproportionate amount of denials for a certain race or ethnic group. Those groups with a denial rate of 10 percentage points higher than the jurisdiction as a whole are highlighted in yellow.

It is important to note that because White households make up a large majority of the Eugene-Springfield MSA, it may be difficult to truly determine if a certain group is experiencing discrimination in the application process. Therefore, the data below should inform but not act as a tool in confirming or alleging discrimination.

Among conventional loan applications, the Eugene-Springfield MSA saw an 8% denial rate in 2017. American Indian, Alaska Native households had 20% of their loan applications denied. The HMDA shows that a total of 20 applications from American Indian, Alaska Native households were received and 4 of them were denied. For government loans, the Eugene-Springfield MSA saw an 8.6% denial rate of loan applications in 2017. Asian households had 23.1% of their loan applications denied. The HMDA data shows 13 Asian households applied for a government loan and 3 of them were denied.

Chart 13 shows the number of loan applications by income bracket, while Table 7 shows loan denial rates by race and income bracket.

Chart 13. 2017 Total Loan Applications by Income Bracket



Source: Home Mortgage Disclosure Act; 2017

Just over half of all loan applications are submitted from households that earn more than 120% (\$57,252) of the AMI for Lane County (\$47,710).

Table 7. Loan Application Denial Rate by Income Category & Race/Ethnicity

	All Race and Ethnicity	American Indian/Alaska Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White	Hispanic or Latino	Not Hispanic or Latino
Conventional Loans	8.0	20.0*	11.1	9.1	6.3	7.8	16.0	7.8
< 50% Median Income	27.8	66.7*	60.0*	-	-	24.8	20.9	25.9
50-79% Median Income	13.0	20.0	9.1	40.0*	0.0	12.3	38.5*	12.1
80-99% Median Income	8.1	33.3*	21.1*	16.7	0.0	7.0	5.0	8.3
100-119% Median Income	6.2	0.0	0.0	0.0	0.0	6.1	11.1	6.1
>120% Median Income	6.1	0.0	6.6	0.0	14.3	6.3	10.0	6.1
Government Loans	8.6	5.0	23.1*	0.0	0.0	7.9	7.2	8.3
< 50% Median Income	37.8	-	0.0	-	-	40.6	33.3	40.6
50-79% Median Income	13.5	50.0*	0.0	0.0	0.0	13.3	3.0	14.2
80-99% Median Income	8.3	0.0	33.0*	0.0	0.0	7.2	15.4	6.8
100-119% Median Income	6.0	0.0	-	0.0	0.0	4.9	15.4	5.4
>120% Median Income	5.8	0.0	28.6*	0.0	0.0	4.9	0.0	5.5

Source: HMDA; 2017

* = The category has less than 30 total applications

Table 7 above indicates there is disparate impact for several types of households. Most notably are American Indian/Alaska Native and Asian households, both of which experience disproportionately high denial rates in three or four different income brackets. This data presents a potential concern and

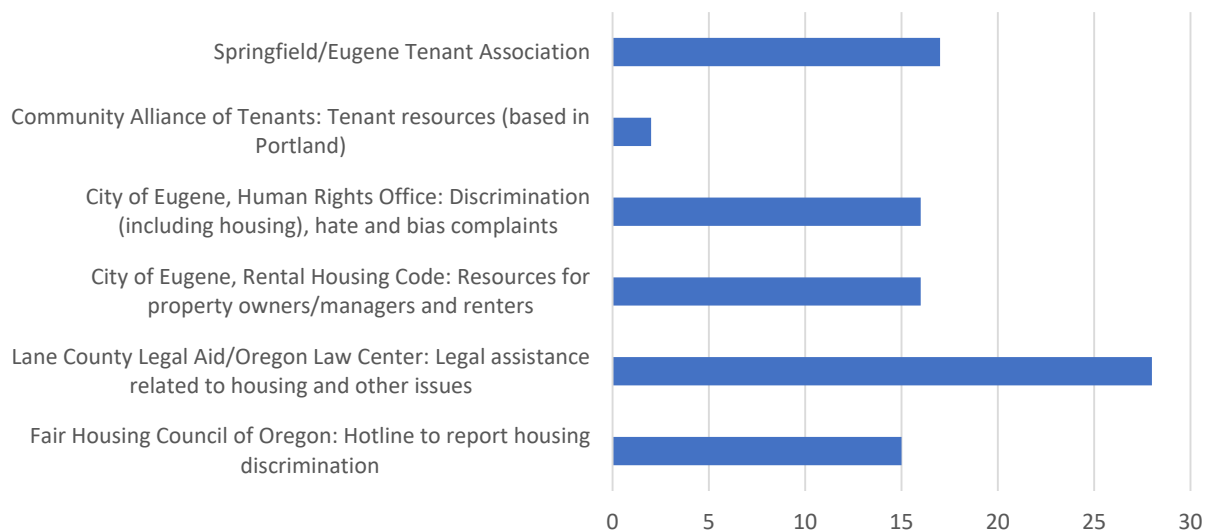
impediment to fair housing for these race/ethnicity groups. However, it is also important to note that of all those rates of denial that are 10 percentage points above the denial rate of all race/ethnicity groups, there are less than 30 applications in each instance.

Survey Results

As part of this analysis, in conjunction with the consolidated planning process undertaken jointly by Springfield and Eugene, residents were invited to participate in a community survey. There were 50 responses to the community survey from Springfield residents. Of those responses, most indicated that people were satisfied with their living situation and neighborhood, and affordability was their top concern.

Chart 14 below shows the resources that a respondent was aware of. The results show few respondents knew of all the fair housing resources made available to them.

Chart 14: Fair Housing Resource Awareness Survey Results



Impediments to Fair Housing Choice

Progress Since Previous AI

The AI conducted in 2010 identified impediments to fair housing choice in Springfield. This section addresses the impediments and summarizes progress made in overcoming them.

There is an inadequate supply of affordable housing.

The City has worked with partners to increase the supply of affordable housing and is making updates to codes and policies to support more housing development. However, rising housing costs have outpaced wage growth, and demand for affordable housing has grown faster than availability of residential units accessible to households, especially those with low- and moderate-income. In 2016, Springfield City Council created a Housing Strategy to focus on creating new units across the housing continuum; however, the City continues to rely mostly on limited federal funds for new housing development.

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

Finding suitable sites for low-income housing construction has continued to prove challenging. Sites without infrastructure or access to sewer, which are expensive to install, are not being developed. An anticipated update to the waste-water master plan will provide an opportunity to look at where to prioritize new infrastructure for new housing.

There is a limited awareness of fair housing policies in the broader community.

Some Springfield residents have taken advantage of trainings offered nearby by the FHCO. Recently, a local non-profit was formed—Springfield Eugene Tenants Association—which works with the Oregon Law Center to focus on tenants' rights. The Springfield Eugene Tenants Association may serve as a resource for fair housing education.

There are market conditions and housing industry practices that increase housing costs or decrease housing choice

The tight housing market, together with increased wages and costs associated with building new housing, are continued challenges to increasing the supply of affordable housing and providing greater choices for Springfield residents, including those in protected classes. Labor, land, and materials costs rival those in Portland, but developers' lower return on investment in the Springfield market reduce the incentive to build affordable housing. Low-vacancy rates and rising rents and home values continue to limit housing choice, but to date have not spurred the level of new housing development needed to meet the demand.

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

While there are organizations that maintain housing units for persons with disabilities, funds are limited to develop such housing. Homes for Good maintains units available for persons with disabilities. Mainstream Housing is a local developer focused on creating affordable housing for people with disabilities. Springfield's building code requires compliance with Americans with Disabilities Act (ADA) and Fair Housing Act per Oregon Revised Statute [447.220](#). Chapter 11 of the Structural Specialty Code delineates building code requirements for ADA access nationally.

2020 Impediments and Strategies

The following tables list the impediments as well as the corresponding strategies and possible action items to address each impediment.

Need for Community Education	
Basis for Impediment	Strategies and Action
<p>The City’s website has a page that provides basic information outlining protected classes and how to file a complaint. It directs users to the Fair Housing Council of Oregon (FHCO) website and hotline for further information.</p> <p>However, the City lacks a centralized program that focuses on fair housing issues. There is also currently no organization explicitly tasked to carry out the Municipal Code’s Declaration of Policy related to discrimination (5.550). The City relies on state/federal and regional partners, particularly the Fair Housing Council of Oregon (FHCO), to address needs related to fair housing.</p> <p>As a result, community members—including residents, landlords and service providers—may not be aware of their rights and obligations related to housing discrimination. According to the community survey conducted during the AI, most respondents were not aware of the fair housing resources available to them.</p>	<ul style="list-style-type: none"> • Recognizing that Springfield annual allocation of CDBG funds is relatively small, the City is encouraged to seek ways to strengthen community outreach and education, including working with existing partners and exploring opportunities with new partners such as the Springfield Eugene Tenant Association (SETA). • The City can encourage residents and stakeholders to participate in fair housing trainings and workshops conducted in the region through FHCO or Homes for Good (the public housing authority for Eugene, Springfield, and Lane County). Stakeholders include social service agencies providing support to low- and moderate-income households and members of protected classes. • Through education and improving access to fair housing information, the City can help ensure that renters and prospective homebuyers are aware of the fair housing laws that protect them. Similarly, the City can ensure that property owners and landlords are aware of their fair housing obligations. • The City should consider gathering a better understanding of the specific fair housing issues faced by renters and homebuyers in Springfield, particularly those belonging to protected classes and any limited English speakers.

Planning, Land Use, and Zoning Practices

Basis for Impediment

The Development Code's (6.1-110) definition of family, as it relates to single-family housing, establishes a maximum number of unrelated individuals in a dwelling unit at five. Although the definition provides an exception for persons with disabilities per Federal Fair Housing Law, it may also limit housing choice among non-traditional family units.

The City Municipal Code (5.552) defines "age" as a basis for protection from discrimination to be someone older than 18 years of age and under 70 years of age. This definition of "age" may exclude fair housing protection among elderly residents over 70 in Springfield.

Strategies and Action

- The City is encouraged to investigate changing the definition of "family" in the Development Code by removing the specific maximum number of unrelated individuals in a dwelling unit.
- The City is encouraged to research the impact of eliminating the upper limit of 70 years of age as a basis for discrimination by age to extend protection to more elderly residents.

Fair Housing Discrimination and Enforcement

Basis for Impediment

There are not significant reports of fair housing violations in Springfield. However, there are risks that such violations go unreported, and there is no evidence of fair housing testing being conducted in the City. The FHCO, which provides these services throughout the state, has very limited presence in Springfield. The FHCO provides services free of charge to non-entitlement cities throughout the state. However, as a community receiving relatively little HUD funding, Springfield does not fund the FHCO.

Despite partnership limitations, Springfield relies on the FHCO for implementation of fair housing policies. Without increased communication and coordination among Springfield and fair housing stakeholders (FHCO, SETA, etc.) there is a greater risk for members of protected classes to face discriminatory practices in renting, purchasing a home, and bank lending. Similarly, without fair housing testing results and the consistent dedicated presence of a fair housing organization, there may be limited understanding of the fair housing issues protected classes are facing in Springfield.

Strategies and Action

- The city is encouraged to further develop the partnership with the FHCO and with the recently formed SETA.
- The city may consider investigating ways to formalize the partnership with FHCO or SETA to promote greater engagement directly in Springfield.
- Look for opportunities to conduct fair housing auditing and/or testing within the City
 - Fair housing audits are administrative reviews of policies and procedures of property management companies or landlords.
 - Fair housing testing is when an individual from a protected class acts as though they intend to rent or purchase a home and goes through the steps of that process with the intention of identifying any potential discriminatory acts or policies.

Potential Discrimination in Lending

Basis for Impediment

Hispanic/Latino households submitted loan applications at a much lower rate than non-Hispanic households in Lane County. Hispanic households, which make up 12% of all households in Lane County, submitted about 3% of loan applications according to the 2017 HMDA data.

In Lane County, the small size of protected population classes warrant caution in drawing conclusions. Further, HMDA data does not conclusively identify discriminatory practices, but rather may point to areas where further outreach may be conducted to gather more information. For instance, a city may investigate if a protected class is experiencing lack of access to loaning institutions.

Strategies and Action

- The State of Oregon has established a task force that will target this impediment throughout the state. The Task Force on Addressing Racial Disparities in Home Ownership was formed in September 2019 and has established several recommendations for further policy review. Some of those recommendations are:
 - Improve education and training required of and provided to mortgage and real estate professionals;
 - Develop pilot programs to address racial disparities in homeownership; and
 - Increase funding for down payment assistance and Individual Development Account (IDA) to support homeownership by people of color.
- The City is encouraged to stay informed of the task force's recommendations and to share updates and opportunities for education with stakeholders.

For all preliminary recommendations from the state task force please see: [Phase II Preliminary Recommendations](#)

For the report from the State of Oregon's Joint Task Force Addressing Racial Disparities in Home Ownership please see: [Report on Addressing Barriers to Home Ownership for People of Color in Oregon](#)

Lack of Affordable Housing

Basis for Impediment

The cost of renting and purchasing a home has continued to rise in Springfield, creating increased risk of housing instability and reducing access to suitable, affordable housing to households with lower incomes. In Springfield, about 49% of renter households and 30% of owner households are considered cost burdened (paying more than 30% of monthly income on housing).

High housing costs are not necessarily an impediment to fair housing choice. However, lack of affordable housing disproportionately impacts persons with disabilities, certain racial and ethnic minorities, and other protected classes. Often protected classes have lower incomes and experience poverty at relatively higher rates, reducing choice and placing more vulnerable households at greater risk of housing instability.

The City has manufactured home parks that offer lower-cost housing options for Springfield residents. The City has recognized risks that park owners may choose to sell or otherwise convert these parks away from their current use, potentially displacing those residents. The City has taken proactive measures to develop the *Local Agency Toolkit* with regional and state partners to develop steps to mitigate the potential impact of manufactured home park closures. The city has contacted manufactured home park owners, identified those parks at greatest risk of closure, and recognized those owners inclined to coordinate with the city in the event of a closure. However, risks remain that, without intervention, closures of manufactured home parks may result in residents facing housing instability and reduction of available lower-cost housing options in Springfield.

Strategies and Action

- The City is encouraged to implement the proposed updates to the Development Code that streamline, reduce costs, and encourage development of new housing in Springfield. In particular, the City is encouraged to implement policies that promote the expansion of diverse housing options available to lower income residents and members of protected classes. In addition, the City may consider scheduling periodic reviews to assess how well the Development Code updates are advancing the city's housing goals.
- The City is encouraged to continue to allocate CDBG and (share of) HOME Consortium funds to leverage state/federal resources and partnerships to maximize the creation and preservation of affordable housing.
- The City is working closely with the State to establish a new manufactured home park, and to align local policies and resources to mitigate the risk of manufactured home park closure and tenant displacement. The City is encouraged to continue to communicate with park owners and residents, and to pursue options to preserve these parks. The City is also encouraged to evaluate whether current code enforcement requirements and practices will ensure the park maintains critical utilities and other infrastructures needed to maintain safety standards.