Eugene City Council
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EUGENE CITY COUNCIL AGENDA

October 28, 2026

12:00 p.m. CITY COUNCIL WORK SESSION

City Council Wednesday work sessions are held in hybrid format using in person and virtual meeting technology. Information about online or other options for access and participation will be available at https://www.eugene-or.gov/3360/Webcasts-and-Meeting-Materials

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Meeting of October 28, 2026;
Her Honor Mayor Kaarin Knudson Presiding

Councilors

Lyndsie Leech, President	Eliza Kashinsky, Vice President
Matt Keating	Randy Groves
Alan Zelenka	Jennifer Yeh
Greg Evans	Mike Clark

12:00 p.m. CITY COUNCIL WORK SESSION

1. **WORK SESSION AND POSSIBLE ACTION: An Ordinance Establishing a Residential Energy Performance Disclosure Requirement; Adding Sections 6.760, 6.765, 6.770, 6.775, 6.780, and 6.785 to the Eugene Code, 1971; and Providing an Effective Date**

2. **WORK SESSION: Voluntary Annexation Follow-up**

The Eugene City Council welcomes your interest in these agenda items. This meeting location is wheelchair-accessible. For the hearing impaired, an interpreter can be provided with 48 hours' notice prior to the meeting. Spanish-language interpretation will also be provided with 48 hours' notice. To arrange for these services, contact the City Manager's Office at 541-682-5010. City Council meetings are telecast live on Metro Television, Comcast channel 21, and rebroadcast later in the week.

El Consejo de la Ciudad de Eugene agradece su interés en estos puntos de la agenda. La sala de reuniones del ayuntamiento es accesible para sillas de ruedas. Para personas con dificultades auditivas, se puede proporcionar un intérprete con 48 horas de anticipación. También se puede proporcionar interpretación al español con 48 horas de aviso. Para organizar estos servicios, contacte a la Oficina del Gerente de la Ciudad al 541-682-5010. Las reuniones del Consejo de la Ciudad se transmiten en vivo por Metro Televisión, Canal 21 de Comcast y se vuelven a emitir durante la semana.

For more information, contact the Council Coordinator at 541-682-5010,
or visit us online at www.eugene-or.gov.

EUGENE CITY COUNCIL
AGENDA ITEM SUMMARY

Work Session and Possible Action: An Ordinance Establishing a Residential Energy Performance Disclosure Requirement; Adding Sections 6.760, 6.765, 6.770, 6.775, 6.780, and 6.785 to the Eugene Code, 1971; and Providing an Effective Date

Meeting Date: October 28, 2026
Department: Public Works
www.eugene-or.gov

Agenda Item Number: 1
Staff Contact: Danielle Klinkebiel
Phone: 541-731-0527

ISSUE STATEMENT

This work session is an opportunity for City Council to consider adoption of an ordinance establishing a residential energy performance disclosure requirement.

BACKGROUND

About 65 percent of homes in Eugene—roughly 49,222 residential units—were built before 1990, prior to the adoption of modern energy-efficiency standards. As a result, a large share of the community's housing stock has limited insulation, inefficient heating systems and ductwork, inefficient windows, leaky envelopes, and moisture-vulnerable wall assemblies. These conditions contribute to inefficient energy use, drive up energy costs, and reduce indoor air quality and comfort. At the same time, many residents are unaware of what can be done to improve their home's energy efficiency.

One tool that can provide information and guidance to residents is a Home Energy Score (HES)—a tool developed by the United States Department of Energy to assess a home's energy use. The assessment provides a numeric score of a home's energy efficiency on a scale of 1-10 and a report that includes estimated energy use and energy costs, recommended improvements, and available rebates to finance improvements. The score and report are based on an inspection by an energy assessor of a home's physical features that impact energy use. Many cities— including four in Oregon—have adopted an ordinance requiring disclosure of a HES at the time of listing a home for sale.

Action B4 in Eugene's Climate Action Plan 2.0 (CAP2.0) directs the City to explore a mandatory HES program at the time of listing a home for sale. In 2021, City Council directed the City Manager to further pursue this action by doing engagement and developing an implementation plan.

A broad round of community engagement on building decarbonization in 2024 found that many community members need and want more guidance on improving their home's energy efficiency. Additional engagement specific to the HES policy was conducted in 2025, which reinforced both the value of tools that help residents understand their home's energy performance and the community's support for greater transparency during the home buying process. Staff conducted research to evaluate outcomes and best practices in other cities where the policy is implemented.

Staff shared the results of engagement and research with City Council on February 23, 2026 and March 9, 2026, at which time Council directed the City Manager to prepare a draft ordinance. The draft ordinance was shared with City Council on June 24, 2026.

The ordinance would add sections to the Eugene Code requiring responsible parties to disclose a HES when a dwelling unit is listed for sale (Attachment A). The key components of the code provisions include: a general requirement for obtaining and disclosing an HES when a dwelling unit is listed for sale, conditions under which a dwelling unit is exempt, conditions under which the score expires, and the process for enforcement through an administrative civil penalty. The code provisions authorize the City Manager to adopt administrative rules for the implementation, administration, interpretation, and enforcement of the code and, to the extent that funds are available, to establish a financial assistance program to cover the cost of getting a HES for low-income sellers.

At the public hearing on September 21, 2026, 21 community members commented on the ordinance. Eleven comments have been submitted via email to the Mayor and City Council since the hearing was held. Of the comments received, 26 expressed support, 5 expressed opposition, and 1 was neutral. The themes from this input are consistent with what was heard throughout engagement: increased transparency and consumer protection, better connection to incentives and rebates, a better understanding of how to reduce energy bills, concern about adding a cost to selling a home, and the need for metrics to evaluate outcomes.

Staff have compiled answers to questions from City Council from the previous work sessions and have updated that document to respond to questions from the public hearing, in Attachment B. Results of community engagement are included as Attachment C. A research memo completed by Earth Advantage is included as Attachment D.

If Council decides to adopt the ordinance, it will take some time to develop administrative rules, and operational systems and processes needed to carry out the code requirements. This includes developing procedures to monitor compliance, developing a local workforce of assessors, conducting ongoing outreach to sellers and realtors, and tracking trends after the disclosure requirement goes into effect. For this reason, the draft ordinance includes a delayed effective date (six months from the date the ordinance is signed).

RELATED CITY POLICIES

City Council's 2026-2028 Strategic Framework: This item connects to the focus area "Thriving and Livable Community" and the strategy to advance community resilience, climate action, and environmental stewardship. The residential energy performance disclosure requirement would increase transparency and knowledge of energy performance, possible improvements, and available incentives. These outcomes would accelerate the adoption of energy efficient home improvements, which can reduce energy usage and GHG emissions, while increasing housing affordability and household resilience to extreme weather events.

The Climate Recovery Ordinance (CRO) is a City ordinance that establishes Eugene's climate goals, including both greenhouse gas emissions and fossil fuel use reduction targets for the Eugene community and for City operations.

The Climate Action Plan 2.0 (CAP 2.0) is a work plan that captures actions that City of Eugene and community partners are taking to reduce emissions and address climate risks. Action B4 states

"COE to research and report to City Council on funding and implementation strategies for a mandatory program Home Energy Score Program."

Envision Eugene Comprehensive Plan is the City's guiding policy document for land use planning in Eugene's urban growth boundary and is helping the City to grow more sustainably and reduce transportation-related emissions.

Housing Implementation Pipeline (HIP) is a five-year internal work plan (FY23-FY27) to coordinate housing goals and priorities. The HIP priorities of investing in housing preservation, energy-efficient new construction, and housing support services help to advance the City's sustainability goals.

PREVIOUS COUNCIL DIRECTION

January 16, 2019 Work Session

Staff presented an overview of HES and related programs.

July 29, 2020 Meeting

Council approved the CAP2.0 which includes Action B4, to establish a mandatory HES program.

> Councilor Semple, seconded by Councilor Yeh, moved to adopt a resolution approving the Community Climate Action Plan 2.0.
> Passed 7:0

November 17, 2021 Work Session

Staff presented the first CAP2.0 Implementation Plan. Council passed several motions related to HES.

> Councilor Yeh, seconded by Councilor Syrett, moved to direct the City Manager to complete a community engagement process and schedule a work session to share feedback from that process and develop a framework of a draft ordinance requiring sellers of residential, single-family homes to obtain and disclose an energy performance rating prior to publicly listing the home for sale and to include the rating in sale listings.
> Passed 8:0
>
> Councilor Yeh, seconded by Councilor Syrett, moved to direct the City Manager to bring back an implementation plan including potential funding sources for the mandatory Home Energy Score Program.
> Passed 8:0
>
> Councilor Yeh, seconded by Councilor Syrett, moved to direct the City Manager to develop additional Home Energy Score Program options for renters in alignment with CAP2.0 Action B3.
> Passed 8:0

July 27, 2022 Work Session

City Council discussed potential ways to advance building decarbonization work.

> Councilor Syrett, seconded by Councilor Keating, moved to direct the City Manager to

formalize as a City goal the decarbonization of residential and, as feasible, commercial buildings by 2035 and industrial buildings by 2050.
Passed 6:2 (Opposed by Councilors Clark and Groves)

Councilor Syrett, seconded by Councilor Keating, moved to direct the City Manager to return to Council in the Fall with a proposal for engaging the community in developing a plan for the transition of buildings to be decarbonized that has at its foundation social, environmental, and economic equity with the emphasis on engagement of historically marginalized communities and their representatives.
Passed 6:2 (Opposed by Councilors Clark and Groves)

July 17, 2024 Work Session

Staff presented the results of engagement on building decarbonization.

Councilor Leech, seconded by Councilor Zelenka, moved to direct the City Manager to return to Council prior to the end of 2024 to discuss a potential pathway forward and potential consequences for implementing strategies presented by staff to decarbonize homes and buildings in Eugene and monitoring regulatory actions being taken by other jurisdictions for possible local adoption.
Passed 7:0

Councilor Yeh, seconded by Councilor Zelenka, moved to direct the City Manager to return to Council prior to the end of 2024, for a discussion of the potential Revenue Sources that were identified by the Revenue Advisors for funding decarbonization and greenhouse gas emission reduction efforts with an emphasis on service low-income households, Black, Indigenous, and People of Color and other disadvantaged households.
Passed 7:0

December 9, 2024 Work Session

Staff identified potential pathways forward for implementing strategies to decarbonize homes and buildings in Eugene. Staff shared that exploration of a HES disclosure requirement would be a focus area.

Council also received additional information on potential funding sources for decarbonization and greenhouse gas reduction efforts in advance of broader discussions on the City's long-range financial planning.

February 23, 2026 Work Session

Staff presented the results of community engagement and research on a HES disclosure requirement.

March 9, 2026 Work Session

Staff shared key considerations for potential adoption of an HES disclosure requirement, including an implementation plan, a regulatory framework, cost estimates, and possible approaches to funding the program.

Council moved to direct the City Manager to prepare a draft ordinance to establish a Home Energy Score disclosure requirement as described in the AIS and to bring it for Council consideration at a future work session.
Passed 5:3 (Opposed by Councilors Clark, Groves, and Evans)

June 24, 2026 Work Session

Staff presented a draft ordinance for Council review.

Council moved to direct the City Manager to schedule a public hearing on the Ordinance Establishing a Residential Energy Performance Disclosure Requirement and to set a date for Council deliberations and possible action.
Passed 8:0

September 21, 2026 Public Hearing

21 members of the public shared testimony on the draft ordinance.

COUNCIL OPTIONS

1. Adopt the Ordinance Establishing a Residential Energy Performance Disclosure Requirement as proposed in Attachment A to the AIS.

OR

2. Adopt the Ordinance Establishing a Residential Energy Performance Disclosure Requirement in Attachment A to the AIS *with specific amendments*.

OR

3. Postpone action on an Ordinance Establishing a Residential Energy Performance Disclosure Requirement until there can be further discussion on this matter.

OR

4. Take no action at this time.

CITY MANAGER'S RECOMMENDATION

If Council wishes to establish a residential energy performance disclosure requirement at this time, the City Manager recommends Option/Motion No. 1.

POSSIBLE MOTIONS

1. Move to adopt the Ordinance Establishing a Residential Energy Performance Disclosure Requirement as proposed in Attachment A to the AIS.

OR

2. Move to adopt the Ordinance Establishing a Residential Energy Performance Disclosure Requirement in Attachment A to the AIS as amended.

OR

3. Postpone action on an Ordinance Establishing a Residential Energy Performance Disclosure Requirement until there can be further discussion on this matter.

ATTACHMENTS

A. Proposed Ordinance: An Ordinance Establishing a Residential Energy Performance Disclosure Requirement; Adding Sections 6.760, 6.765, 6.770, 6.775, and 6.780 to the Eugene Code, 1971; and Providing an Effective Date.

B. Responses to Council questions about the residential energy performance disclosure requirement

C. Final Report: Results of Engagement and Research on a Home Energy Score Disclosure Policy

D. Results from Research and Analysis of Home Energy Score Policies for the City of Eugene, Oregon, by Earth Advantage

FOR MORE INFORMATION

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ORDINANCE NO. _____

AN ORDINANCE ESTABLISHING A RESIDENTIAL ENERGY PERFORMANCE DISCLOSURE REQUIREMENT; ADDING SECTIONS 6.760, 6.765, 6.770, 6.775, 6.780 AND 6.785 TO THE EUGENE CODE, 1971; AND PROVIDING AN EFFECTIVE DATE.

THE CITY OF EUGENE DOES ORDAIN AS FOLLOWS:

Section 1. The heading titled "Residential Energy Performance Disclosure" and Sections 6.760, 6.765, 6.770, 6.775, 6.780 and 6.785 are added to the Eugene Code, 1971, to provide as follows:

Residential Energy Performance Disclosure

6.760 Residential Energy Performance Disclosure – Purpose.

The purpose of the Residential Energy Performance Disclosure program is to provide information to potential homebuyers about the energy performance of dwelling units listed for sale. This information is designed to enable more knowledgeable decisions about the full costs of operating a home and to motivate investments in home improvements that lower utility bills, reduce carbon emissions, and increase comfort, safety, and health for homeowners and occupants.

6.765 Residential Energy Performance Disclosure – Administration.

The city manager may adopt administrative rules pursuant to section 2.019 of this code for the implementation, administration, interpretation, and enforcement of sections 6.760 through 6.785, including but not limited to the process for seeking an exemption under section 6.780, the process for City enforcement pursuant to section 2.018 of this code and, to the extent that funds are available, the establishment of a financial assistance program for owners subject to section 6.775.

6.770 Residential Energy Performance Disclosure – Definitions.

For purposes of sections 6.760 through 6.785 of this code, the following words and phrases mean:

City manager. The City Manager of the City of Eugene or their designee.

Dwelling unit. A space that provides complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation. For example, one dwelling unit could encompass an entire detached stand-alone structure (such as a house or a detached accessory dwelling), one dwelling unit could be attached to one other dwelling unit (such as one half of a duplex or an attached accessory dwelling), and one dwelling

unit could be part of the same structure as several other dwelling units (such as one townhouse or rowhouse).

Home energy performance assessor. An individual who is certified as a home energy assessor by the Oregon Construction Contractors Board to prepare home energy performance reports and assign home energy performance scores for residential buildings.

Home energy performance report. A document that includes a dwelling unit's home energy performance score, the dwelling unit's estimated energy use and energy costs and recommended improvements, and that:

(1) Is prepared by a home energy performance assessor using the U.S. Department of Energy Home Energy Score scoring system;

(2) Complies with all home energy performance score reporting requirements adopted by the Oregon Department of Energy; and

(3) Includes the statement "This report meets Oregon's Home Energy Performance Score standard."

Home energy performance score. A numeric asset rating that is included in a home energy performance report prepared by a home energy performance assessor using the U.S. Department of Energy Home Energy Score scoring system. It is a representation of a dwelling unit's expected energy use under standardized weather and occupancy conditions that is based on a physical inspection of a dwelling unit or the design documents used for its construction.

Owner. Any individual or entity possessing title to a dwelling unit that is publicly listed for sale or their legal representative, including but not limited to a licensed real estate agent. For purposes of the imposition of penalties for violation of the Residential Energy Performance Disclosure requirements, an "owner" is a "responsible person."

Publicly list. To advertise a dwelling unit for sale in printed media, an internet posting, a Regional Multiple Listing Service (RMLS) listing, or a publicly displayed sign.

Responsible person. See definition of "owner."

Sale. The conveyance of title to real property as a result of the execution of a real property sales contract. "Sale" does not include transfer of title pursuant to inheritance, marriage, divorce, condemnation, involuntary transfer of title resulting from default on an obligation secured by real property, or any other change of title affected by operation of law.

Scoring system. The online Home Energy Score tool offered by the U.S. Department of Energy.

6.775 Residential Energy Performance Disclosure – Requirements.

(1) Unless exempt pursuant to section 6.780, prior to publicly listing any dwelling unit, the owner shall obtain a home energy performance report and score for the dwelling unit from a home energy performance assessor.

(2) At all times while a dwelling unit is publicly listed for sale, the owner shall:

(a) Include a valid home energy performance report and score for the dwelling unit in all real estate listings that include the dwelling unit;

(b) Provide a copy of a valid home energy performance report and score for the dwelling unit to all licensed real estate agents working to sell the dwelling unit on the owner's behalf; and

(c) Provide a means for prospective buyers that are viewing the dwelling unit in person to immediately obtain a copy of a valid home energy performance report and score for the dwelling unit.

6.780 Residential Energy Performance Disclosure – Exemptions.

The city manager shall grant an exemption from the requirements of section 6.775 on any of the following bases:

(1) At the time of the dwelling unit's public listing, limitations on the applicability of the scoring system prevent the production of a report and score for the specific type of dwelling unit;

(2) The dwelling unit will be sold through:

(a) A trustee's sale;

(b) A deed-in-lieu of foreclosure sale; or

(c) A pre-foreclosure sale in which owner has reached an agreement with the mortgage holder to sell the property for an amount less than the amount owed on the mortgage;

(3) The dwelling unit qualifies for sale at public auction or acquisition by a public agency due to arrears for property taxes;

(4) A court appointed receiver is in control of the dwelling unit due to financial distress;

(5) The senior mortgage on the dwelling unit is subject to a notice of default;

(6) The dwelling unit has been approved for participation in Oregon Property Tax Deferral for Disabled and Senior Homeowners; or

(7) The dwelling unit has most recently been used for nonresidential commercial purposes and is being advertised solely for nonresidential commercial purposes.

6.785 Residential Energy Performance Disclosure – Invalidation / Expiration of Home Energy Performance Report and Score.

A home energy performance report and score shall be invalid after they have expired. The report and score expire for purposes of section 6.775 on the following date, whichever occurs first:

(1) The date on which a change is made to the square footage of the dwelling unit;

(2) The date on which a permanent improvement or alteration is made to the dwelling unit that affects its energy consumption, efficiency or generation, including but not limited to: changing the installed heating or cooling system, installing a new water heater, changing the windows, adding or changing insulation, adding a solar photovoltaic system; or

(3) Eight years after the date on which the home energy performance assessor performed the assessment on which the home energy report and score were based.

Section 2. The City Recorder, at the request of, or with the consent of the City Attorney, is authorized to administratively correct any reference errors contained herein, or in other provisions of the Eugene Code, 1971, to the provisions added, amended or repealed herein.

Section 3. Notwithstanding Section 32 of the Eugene Charter of 2002, this Ordinance shall take effect on *[six months from date Mayor signs]*.

Passed by the City Council this

___ day of _____, 2026

_____
City Recorder

Approved by the Mayor this

____ day of _____, 2026

_____
Mayor

Responses to Councilor questions about the residential energy performance disclosure requirement

The following table includes responses to questions about the residential energy performance disclosure requirement received from City Council at the February 23, 2026, March 9, 2026, and June 24, 2026 work sessions, and September 21, 2026 public hearing.

Question	Response
Questions about observed outcomes in other jurisdictions	
1. Which Oregon cities have implemented Home Energy Score policies? How many scores have been completed statewide?	Four other cities in Oregon have implemented a home energy score disclosure requirement: Portland (2017), Milwaukie (2020), Hillsboro (2021), and Bend (2023). By the end of 2025, nearly 60,000 scores have been delivered throughout Oregon, representing a little over 5% of the state's owner-occupied housing units.
2. What lessons were learned from other jurisdictions?	The City hired Earth Advantage to summarize existing research and understand the observed outcomes in other jurisdictions and best practices for implementation: • Research shows households receiving a HES are more likely to pursue energy-efficiency, take advantage of incentives, and complete home upgrades. • HES disclosure has had minimal impact on home sale prices and does not disadvantage lower-scoring homes or lower-income neighborhoods. • HES disclosure generally does not delay sales or duplicate other steps in the transaction process. • While HES disclosure alone results in modest GHG reductions, greater reductions occur when homes transition from natural gas to electricity. Other jurisdictions also shared best practices for how to support a smooth rollout, maximize compliance, and ensure equity. These best practices have been incorporated into the draft code, and staff would intend to apply them throughout implementation. Policy Research Memo, Earth Advantage
3. In other jurisdictions with this policy, has there been	Research shows that median home values, income, race, and zip code do not result in significant differences in HES results. There

any disparity noted between scores of older homes or homes owned by seniors and low-income households?	is no significant correlation among low-scoring homes and lower socioeconomic neighborhoods. Additionally, low-scoring homes do not see reduced sale prices. See pg. 14 of Earth Advantage's policy memo.
4. Have any of the four other communities noted a decrease in energy use as a result of this policy?	Several studies or existing data showed there was a decrease in energy usage for homes that got a HES. • One study in Portland showed that 8.8% of homes that received a HES report, saving on average 477 kWh and 29 therms per home per year. • Similar findings have also been found through Eugene's SCORE program: homes that got a score were 23% more likely to make a significant energy upgrade, resulting in more than 363,000 kWh and 17 MTCO2e saved annually. • Analysis in Portland shows that homes that have been rescored, either because the house is being resold or because the owner got a new HES report, are on average 1.1 points higher than their first score. See pg. 13-14 and pg. 20 of Earth Advantage's policy memo.
5. Were there energy reductions noted in the SCORE program? If so, this shows that voluntary programs work.	The SCORE program provided free scores to renters and low income homeowners through a partnership with EWEB, UO and COE. 187 homes (23% of participating households) completed a home improvement project after getting a score, resulting in more than 363,000 kWh and 17 MTCO2e saved annually. 800 homes participated in the SCORE program in 8 years. A mandatory program would be expected to reach roughly 1,600 to 2,000 households per year.
6. Does the research show pricing impacts or is there simply an absence of data?	The research shows that HES disclosure has minimal impact on home sale prices. When energy information is available, buyers value it in alignment with estimated home energy savings. For example, a one-point increase on the Home Energy Score 1-to-10 scale is associated with a 0.5% sales premium—about $2,370 for Eugene's median home price—and an average $200/year in energy cost savings. There is no evidence for irrational home price inflation among high-scoring homes and low-scoring homes do not see reduced sale prices. See pg. 12 of Earth Advantage's policy memo.

7. What data was used to conclude that impacts on sale prices are minimal?	The policy memo produced by Earth Advantage compiled all existing research related to home energy disclosure policies. The following research studies specifically contain information about the policy's impact on sales prices: • Pigman, Deason, Wallace, & Issler, 2022; • Breshears 2022; • Cassidy 2023; • Redfin 2025; • Myers, Puller, and West 2022; • Ou, Bailey, McArthur, & Zhao 2025; • Earth Advantage internal analysis 2025; • Nadel 2025; • Sussman, Kormos, and Cooper 2020; and • Sussman et. al. 2022.
Questions about the scoring methodology	
8. Why doesn't the score factor in the energy consumption per square foot? It seems like this wouldn't allow for useful comparison across homes that have very different characteristics, such as size and age.	The HES is an asset rating that quantifies the energy efficiency of the home based on a wide range of physical characteristics—such as insulation levels, air sealing, heating and cooling systems, overall building shell performance, and size—that together determine how much energy the home is likely to use. This approach creates a standardized way to compare homes, even when they differ significantly in size, age, or construction type. Larger homes have more surface area, which translates into greater energy requirements for heating and cooling. A home's score is based on estimated annual energy use, not energy per square foot; so, given all other things as equal, a larger home will score lower than a smaller home. The score rating is similar to a miles-per-gallon (MPG) rating for fuel efficiency. For example, a large, modern SUV or truck can have the same MPG as an older, vintage car, while a hybrid SUV might match the MPG of a small hatchback. The vehicles vary widely in age and size, but the MPG rating provides a consistent metric for comparing fuel use. U.S. Department of Energy Home Energy Score Scoring Methodology
Questions about administrative and funding needs	
9. What is included in the personnel/non-personnel costs?	It is estimated that a program would require a 0.5 full time equivalent (FTE) position to manage enforcement, respond to questions, conduct outreach and support data analysis, estimated at roughly $90,000.

	Non-personnel costs in the first year are estimated at $35,000, to launch and maintain the technical reporting system locally, to certify roughly 10 new assessors, and to establish a small fund to provide free Home Energy Scores to qualifying households. It's estimated there would be roughly $10,000 in non-personnel costs for years two and beyond.
10. Where will the program reside administratively? What level of staffing will be required to administer the program and evaluate effectiveness over time?	The program is currently set to reside in the Sustainability Program with support from various other divisions on specific administrative tasks. It is predicted the program will require 0.5 FTE.
11. What potential funding mechanisms would be most practical for the program?	Staff presented four possible funding pathways at the work session on March 9, 2026. The options include reprioritizing the existing program budget, allocating additional funding to the program through a budget process, pursuing grant and external funding opportunities, or pursuing one of the revenue options identified by the revenue advisors in 2024. The first three options are likely the most practical, secure, and right-sized for the funding needs of this policy.
12. What would reprioritizing the existing Sustainability Program budget entail?	The Sustainability Program is currently working at capacity, advancing sustainability projects across the community and tracking progress of the CAP2.0 and CRO. If this policy proceeds without additional funding, other work would be deprioritized.
13. Could the City use a portion of the fee for getting a Home Energy Score as a revenue source to fund the program?	This is possible but it would be administratively complex since individuals directly pay an assessor to get a HES. The City would need to charge the assessor a fee per assessment and establish the payment and administrative systems to collect and reconcile the fee. For a program this small, at roughly $100K, the administrative cost to set up a fee collection mechanism likely does not make sense.
14. Can the City collect unpaid civil penalties that have become a lien on the property as a revenue source for the program?	The administrative rules for a score disclosure requirement could require that an unpaid administrative civil penalty associated with the program be entered as a lien in the docket of city liens. However, lien revenue can be inconsistent and is not guaranteed. It is therefore not a reliable source of revenue to support an operational cost.

Questions about workforce	
15. How many assessors currently serve the area and how many would be needed if disclosure were required?	Earth Advantage provides a list of home energy assessors authorized in the State of Oregon. There are currently four assessors serving the Eugene area. Based on Eugene's housing market trends, it is predicted the region needs a total of 16-20 assessors to meet the demand created by a home energy score disclosure requirement.
16. How will workforce capacity be developed?	If Council passes the ordinance, staff recommend providing a training to fully certify additional assessors to ensure sufficient workforce capacity before it takes effect. Recruitment for participation would likely target individuals who are in related trades, including inspectors, appraisers, HVAC technicians, and residential contractors. The cost to train new assessors is included in the projected budget to administer the policy.
Questions about community engagement	
17. How many community members were engaged for this research and how did their engagement inform staff's approach?	632 community members were engaged through community events, group meetings, one-on-one interviews, mock debates and an online survey. Participants included homeowners including recent buyers and sellers, renters, realtors and individuals in the residential building and contractor trades. While research primarily focused on understanding impacts observed in other communities and local housing market trends, conducting engagement concurrently allowed staff to refine and expand the research scope as new questions and themes emerged from community members. Final Report: Results of Engagement and Research on a Home Energy Score Disclosure Policy
18. Has there been engagement with businesses such as solar installers, windows and siding companies, and heating ventilation and air conditioning firms? Do they support home energy score disclosure?	Yes, the City engaged a variety of home and building professionals, including residential general contractors, HVAC installers, architects, window installers, energy assessors, and others. Many of them viewed the disclosure requirement as a way to better educate their customers about the value of making energy efficiency upgrades. There were some concerns about adding additional regulation and that the home energy score methodology isn't comprehensive enough.

	Engagement summaries: Architects, NW Ecobuilders Guild, Interview with Architect and Builder, Interview with Lead Partners of Residential Contracting Firm
19. Were realtors engaged?	Yes, 15 realtors were engaged through a focus group. Full detail is available in the engagement summary, 2025.11.04 Eugene Realtor's Association.
Other	
20. Will individual home energy scores be scored in a database?	Once a home energy score is completed it becomes publicly available through the Green Building Registry, a tool developed by Earth Advantage to house data and connect available home information to the broader real estate market.
21. Why shouldn't getting a home energy score remain voluntary?	Voluntary programs do not generate significant participation. The City of Eugene had a voluntary program from 2017 to 2025 through a partnership with UO and EWEB in the SCORE program, which provided free home energy scores to renters and low-income homeowners. 800 households participated in 8 years. A mandatory program would be expected to reach roughly 1,600 to 2,000 households per year. Research also shows buyers are best positioned to make informed decisions and home energy features are more accurately valued when information is provided consistently across all listings, as it would be under a requirement. See pg. 13 of Earth Advantage's policy memo.
22. Would there be stipends to cover the cost of the score for low-income sellers?	Other cities have provided a process for income-qualifying households to get a free score. This is considered best practice. Eugene's draft code authorizes the City Manager to develop a similar process through administrative rules.
23. How would the policy be enforced for noncompliance? Who would be doing enforcement?	Other cities monitor compliance by regularly checking to confirm that home listings include a home energy score. If a listing is non-compliant, the seller and realtor would be notified and provided a grace period to comply. Repeated non-compliance after multiple notifications may result in a penalty. Typically the penalty is set at a level that notably exceeds the cost of getting an HES score.

24. What are best practices for score validity periods and re-scores over time?	Other cities establish an expiration date of between eight and ten years. This allows scores to remain reasonably accurate given that some of the outputs of the report are based on estimates of energy rates which change over time. Other cities also typically establish that the report becomes invalid if a major upgrade has been made, such as a change in the square footage of the home or an alteration which may affect the energy consumption of the home (e.g., a new HVAC system, insulation, windows, etc…). Eugene's draft code states that the score and report expire/become invalid after 8 years or if there has been a major alteration to the home.
25. If someone gets a Home Energy Score and then makes one of the recommended improvements, such as getting a new water heater, would they have to pay to get a new score before listing? How can we avoid penalizing them for doing the right thing?	Under the code as written, a home energy score becomes invalid if there has been an improvement or alteration that affects the energy consumption of the dwelling unit. This ensures the score and report remain accurate and reliable for both buyers and sellers. An existing score can be adjusted after improvements or alterations, within a certain time frame. While it is up to the vendor to determine what they would charge for this service, the adjustment typically requires only minor data changes rather than completing a whole new assessment. In talking with staff from other jurisdictions and assessors, this situation is very rare.
26. Are there any incentives for tenants to do a home energy score?	Tenants can voluntarily get a home energy score at any time. While tenants may be unlikely to make large investments in a home they do not own, they may be incentivized to still get a home energy score to see if there are smaller, lower cost opportunities to reduce energy usage. If the home already has a home energy score due to recently being sold, renters can view it in the Green Building Registry, and consider the information before signing a lease.
27. Is there a process to refute or dispute a score?	If someone thinks their score is inaccurate, they may follow up directly with the assessor who completed it, who may provide an updated report if a mistake is found. A seller may also report the issue directly to Earth Advantage, who will review the score and work with the assessor to adjust the score, if warranted.

	The US DOE requires quality assurance on a minimum of 5% of all scores to ensure consistent scoring. Earth Advantage provides this service for all cities in Oregon with HES programs and conducts checks on randomly selected scores.
28. What is the difference between the proposed home energy disclosure requirement and the new appraisal requirements?	The new appraisal requirements under Uniform Appraisal Dataset ("UAD") 3.6 and Eugene's proposed HES disclosure requirement are not duplicative, they are complimentary. UAD 3.6, a summary of which is provided at the end of this table, requires appraisers to report energy-related information only if a home has specific efficient or green features. Also, it applies only to conventional mortgages secured by Fannie Mae/Freddie Mac, which represent roughly half of home sales in Eugene. Because appraisals occur late in the closing process, buyers will typically receive this information only after entering into contract. In contrast, the proposed home energy disclosure requirement would apply regardless of whether a home has efficient or green features and it would not be limited to homes sales secured by Fannie Mae/Freddie Mac. Also, Eugene's proposed disclosure requirement would apply at the time of listing, giving buyers full visibility before making an offer.
29. How many homes were scored through the SCORE program partnership with UO and EWEB?	800 homes were scored between 2017 to 2025 through a partnership between the City, UO and EWEB in the SCORE program, which provided free home energy scores to renters and low-income homeowners.
30. How many structures were built before 1990 and what were the typical building materials associated with construction at that time?	More than a third of Eugene's housing stock (34.5 percent) was built before 1970, when there were no energy-efficiency requirements for residential construction. Oregon introduced basic insulation requirements in the 1970s, but these early standards did not include modern requirements for air sealing, windows, or ductwork. Another 30 percent of homes were built in Eugene before 1990, which is when the first comprehensive energy codes established standards for energy-efficient building design. As a result, roughly 65% of homes in Eugene—approximately 49,222 residential units—were constructed without modern efficiency considerations. Typical construction features from these periods include little to no insulation in the floors, walls or

	attics; leaky building envelopes; inefficient electric resistance heating systems (such as ceiling, baseboard or radiant heat); ductwork in unconditioned crawlspaces or attics; inefficient windows, often single-pane with deteriorating frames and seals; and moisture-vulnerable siding and wall assemblies. Home Energy Score reports typically list the existing features of the home, which may include the presence of the features listed above. It also identifies possible improvements than can improve energy efficiency. See pg. 18, Decarbonization of Existing Buildings by 2045.

New Appraisal Requirements Compared to Home Energy Score Disclosure Requirements

Background:

Fannie Mae and Freddie Mac have updated their appraisal system to improve the quality and consistency of appraisal data. The previous, form-based appraisal reporting system[1] has been replaced with a new Uniform Appraisal Dataset 3.6[2] (UAD 3.6) that introduces expanded and standardized data fields and requires appraisers enter more detailed information about the energy features of homes. Beginning November 2, 2026, all mortgages backed by Fannie Mae and Freddie Mac must get appraisals that use this system.

Expanded Appraisal Requirements Related to Energy:

Under the previous system, appraisers included information about energy-related items in a narrative format under the "Additional features" section. Under the new system, appraisers will include this information under a new section, "Energy Efficient and Green Features". In this section, they will have to specifically identify if they are aware the property has obtained any of the following and if so, provide additional information:

- **Renewable energy components** (for example, geothermal, solar, wind turbines, or other components), their ownership status, and financing details;
- **Building certifications** (any green, health, or wellness certifications, for example, Leadership in Energy and Environmental Design (LEED), National Green Building Standard (NGBS Green), etc.); or
- **Green efficiency ratings** (for example, Home Energy Score (HES), Home Energy Rating System (HERS), Water Sense, etc.), and what the rating is.

If the features are present, the appraiser must assess their impacts to value and/or marketability of the home.

If none of the features are present, the appraiser does not enter any information. Many appraisal institutes are expected to expand training for appraisers on energy and green features in homes so that they can complete the form accurately.

Key Differences with Home Energy Score Disclosure Requirements:

There are key differences between the new appraisal requirements and home energy score (HES) disclosure requirements.

[1] Uniform Residential Appraisal Report

[2] Getting Started with UAD 3.6

- **Content**: Appraisals will only contain information about energy usage if there are energy-efficient and green features present. A HES report contains expanded information about a home's energy usage—regardless of efficiency—as well as estimated energy costs, recommended improvements, and available rebates.
- **Timing**: Appraisals are typically completed before closing a sale, once a buyer is under contract. Sometimes a seller will order an appraisal before listing. Under a HES disclosure requirement, the HES is completed before a home is listed.
- **Purpose:** Appraisals are typically used to evaluate the market value of a home against the requested loan amount. Sometimes they are used to help determine a list price. A HES is intended to increase understanding of the home's energy usage and opportunities for improvement.
- **Intended user**: Appraisals primarily serve the lender to support underwriting and are provided to the buyer with closing documents. A HES is designed for prospective buyers so they can compare homes before making an offer. Under a disclosure requirement, the HES is also publicly available on Green Building Registry, enabling broader analysis of the condition of local housing stock.
- **Applicability:** The new appraisal rules only apply to conventional mortgages secured by Fannie Mae and Freddy Mac. It is estimated over half of home sales in Eugene—including FHA, VA, USDA, jumbo loans, chattel loans, and cash purchases[3]—would not be covered by the new appraisal rules. The proposed HES disclosure requirement would apply to all homes listed for sale within the City of Eugene.

In Summary:

The new appraisal requirements under UAD 3.6 and Eugene's proposed HES disclosure requirement are not duplicative, they are complimentary. UAD 3.6, requires appraisers to report energy-related information only if a home has specific efficient or green features. Also, it applies only to conventional mortgages secured by Fannie Mae/Freddie Mac, which represent roughly half of home sales in Eugene. Because appraisals occur late in the closing process, buyers will typically receive this information only after entering into contract. In contrast, the proposed home energy disclosure requirement would apply regardless of whether a home has efficient or green features and it would not be limited to homes sales secured by Fannie Mae/Freddie Mac. Also, Eugene's proposed disclosure requirement would apply at the time of listing, giving buyers full visibility before making an offer.

[3] US Department of Veteran Affairs, VA Home Loans Volume by County;
FUS Department of Housing and Urban Development, FHA Single Family Portfolio Snapshot;
Realtor.com, Cash is King

Eugene Sustainability

Final Report: Results of Engagement and Research on a Home Energy Score Disclosure Policy

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Executive Summary

65% of homes in Eugene were built before 1990, prior to modern energy efficiency standards. This means that many homes in the region have inadequate insulation, inefficient heating systems, and outdated appliances. These conditions drive up energy costs, reduce indoor air quality and comfort and contribute to inefficient energy use—disproportionately impacting low-income households. Additionally, many residents are unaware of what can be done to improve their home's energy efficiency.

A Home Energy Score (HES) is an energy assessment tool developed by the United States Department of Energy (U.S. DOE) that provides information about a home's energy performance and identifies cost-effective opportunities for improvement.

City Council has directed staff to explore a policy requiring disclosure of a HES when a home is listed for sale. A HES disclosure requirement is intended to increase transparency about home energy features and costs to educate buyers about energy efficiency opportunities and connect them to available resources and incentives that can help finance energy improvements. Four Oregon cities—Portland, Hillsboro, Milwaukie and Bend—have already implemented a requirement to disclose a HES when a home is listed for sale, providing relevant lessons learned.

This report summarizes the community engagement and research completed in response to Council's direction. Staff engaged 632 community members throughout 2025 at community events, group meetings, one-on-one interviews, mock debates and an online survey. Staff also contracted with Earth Advantage, a national expert on HES policies, to summarize research on best practices and policy outcomes in jurisdictions which have implemented the policy.

Engagement results show that roughly two thirds of the community supports or strongly supports an HES disclosure requirement. Community members expressed a desire to know about the energy efficiency of a home, the energy costs and improvement opportunities at the point of purchase. Many housing and energy trades professionals view the policy as tool to educate clients about the benefits of making energy efficiency improvements. Concerns included potential negative impacts on the housing market, minimal climate benefits and questions about how the policy would be implemented.

Much of the community feedback about policy outcomes was examined in jurisdictions that have implemented an HES disclosure requirement. This research shows that HES disclosure is associated with modest price differences for higher-scoring homes, generally proportional to projected energy cost savings. Homes with HES ratings access energy efficiency incentives at higher rates to make energy improvements, which can reduce long-term costs. While HES disclosure alone is unlikely to deliver significant GHG reductions, it provides more granular data on the local housing stock and increases awareness of home energy use, creating a foundation for future climate initiatives.

Policy Context

Approximately 65% of homes in Eugene were built before 1990—prior to modern energy efficiency standards—resulting in widespread issues such as poor insulation, inefficient heating systems and outdated appliances. These conditions increase household energy costs, degrade indoor air quality and contribute to inefficient energy use, disproportionately impacting low-income households. While the average Eugene household spends about 2% of its income on home energy costs, many low-income households spend 6% or more of their income on energy costs, meaning that energy burden disproportionately impacts low-income households.

Community engagement conducted in 2024 revealed that many residents are unaware of how their homes use energy, which improvements to prioritize and what incentives and rebates are available. The lack of straightforward and reliable information about homes' energy use is a key barrier to homeowner investment in home energy upgrades and improvements. Key strategies for addressing this challenge are summarized in the Final Report: Results of Engagement and Strategies for Building Decarbonization, and include priorities to expand awareness of available incentives and to increase education on how to improve energy efficiency.

Many cities, including four in Oregon (Hillsboro, Milwaukie, Bend and Portland), require HES disclosure when selling a home. This requirement is intended to help buyers understand a home's energy use and identify cost-effective energy improvements.

In Eugene, obtaining an HES is currently voluntary. In the past, a partnership between the University of Oregon (UO), Eugene Water & Electric Board (EWEB) and the City through the Score program provided free HES assessments to renters and low-income homeowners, delivering roughly 800 scores to households. While it was a valuable service to those households, it shows that there is very little participation in HES when it is voluntary. In response, City Council has directed staff to explore a policy that would require HES disclosure at the time a home is listed for sale through the following motions:

- Councilor Yeh, seconded by Councilor Syrett, moved to direct the City Manager to complete a community engagement process and schedule a work session to share feedback from that process and develop a framework of a draft ordinance requiring sellers of residential, single-family homes to obtain and disclose an energy performance rating prior to publicly listing the home for sale and to include the rating in sale listings. Passed 8:0 (Nov 17, 2021)
- Councilor Yeh, seconded by Councilor Syrett, moved to direct the City Manager to bring back an implementation plan including potential funding sources for the mandatory HES Program. Passed 8:0 (Nov 17, 2021)

What is a Home Energy Score?

The HES is a standardized, energy assessment tool developed by the U.S. Department of Energy to help homeowners and homebuyers understand a home's energy performance and how it compares to other homes. An in-home assessment is conducted by a licensed energy assessor and can typically be completed in less than an hour.

During the assessment, the assessor collects information on the home's physical and mechanical systems that affect energy use. These include data related to the building envelope, insulation levels, heating and cooling systems, conditioned space, windows, doors and water heater. Using this information, the HES provides an estimate of overall energy efficiency, expected energy costs and

associated emissions. The goal is to give prospective buyers insight into how energy costs factor into overall homeownership expenses.

The HES uses a simple 1-to-10 scale, where a 10 represents the most energy-efficient homes, similar to a miles-per-gallon rating for a car. The score serves as a proxy for expected energy costs for a given home, normalized for local climate. Homes with a score of 10 are expected to use less energy and have lower energy costs than 90% of U.S. homes, while homes with a score of 1 are expected to use more energy and have higher energy costs than 85% of U.S. homes.

The HES report is designed to be clear, visual and easy to understand. It includes recommendations for cost-effective upgrades with a ten-year payback period that can improve the home's score. Typically, cities opt to include information on available rebates and incentives in the report. View a sample HES report.

A HES is different from a home inspection and utility bills. The score is an objective rating of the home's energy efficiency based on mechanical and physical features in the home. A utility bill reflects *actual* energy use, which depends heavily on occupant behavior like appliance use or thermostat settings. A home inspection evaluates the home's overall condition and safety but doesn't specifically assess or recommend energy improvements.

Proposed HES Disclosure Policy

Under a HES disclosure policy, the seller of a home would:

1. Get a HES from a licensed home energy assessor before advertising a home for sale. The cost of obtaining an HES typically ranges from $150 to $300, and assessments can usually be scheduled within a week or less.
2. Include the HES report in the Regional Multiple Listing Service (RMLS) database and all other public online sale listings (e.g., Zillow, Redfin, etc.).
3. Allow prospective buyers to view the HES as they look at homes.

A HES disclosure requirement **does not require** sellers or buyers to make energy improvements—it simply provides information to support informed decision-making.

Goals of the Policy

There are three primary goals of an HES disclosure policy:

1. **Increase transparency about home energy features and costs:** Provide standardized, accessible information about a home's energy features and costs so buyers can understand and compare prospective homes before purchasing a home.
2. **Educate homeowners and buyers about energy efficiency opportunities:** Offer guidance on potential improvements to help residents prioritize actions that can increase efficiency and reduce energy costs.
3. **Connect homeowners to resources and incentives:** Link residents to available rebates and incentives to help finance energy improvements.

Engagement Overview

Staff used a variety of engagement tactics to engage 630 people from a wide range of perspectives:

Engagement Tactic and Audience	# of People
Policy Debate with the Youth Advisory Council	14
Policy Debate with UO, Summit for Sustainable Organizations	13
Intercept Survey at the Beat the Heat Workshop	30
Intercept Survey at Dino Day with Friends of Gilbert Park	27
Intercept Survey at the Tuesday Farmer's Market	50
Meeting with the Neighborhood Leaders Council	18
Intercept Survey at Sun Day	30
Interview with Owner of Design-Build Firm	1
Meeting with the Eugene Realtors Association	15
Meeting with Architects	4
Interview with Lead Partners of Contractor Firm	2
Meeting with the Sustainability Commission	9
Meeting with Environmental Advocates	16
Meeting with the Northwest EcoBuilding Guild	15
Meeting with the Chamber's Government Affairs Council	17
Online Survey	369
Total Number of People Engaged:	630

Mock Debates

Staff kicked off engagement by holding two "mock debates"—one with the Youth Advisory Council and another at the University of Oregon's Summit for Sustainable Organizations, an event organized by University of Oregon Masters in Business Administration (MBA) students. After learning about the proposed HES disclosure policy, participants were assigned a character and asked to construct an argument based on the potential impacts of the policy. ++++++++

- Engagement Summary: Policy Debate with the Youth Advisory Council
- Engagement Summary: Policy Debate at the UO MBA Summit for Sustainable Organizations

Intercept Surveys at Community Events

Staff reached 137 community members by attending local events throughout Eugene. Staff created an intercept survey and enticed people to participate by helping them make door snakes. Participants were provided with a brief overview of the HES disclosure policy and asked to place a dot on a poster on a scale of 1 to 5 for how supportive they were. This phase of engagement was successful at reaching a huge diversity of community members, including renters, homeowners, buyers and sellers at a variety of socioeconomic and income levels and throughout many different wards—many of whom do not typically participate in public policy initiatives.

- Engagement Summary: Intercept Survey at Beat the Heat Workshop
- Engagement Summary: Intercept Survey at Dino Day with Friends of Gilbert Park
- Engagement Summary: Intercept Survey at Tuesday Farmer's Market
- Engagement Summary: Intercept Survey at Sun Day

Group Meetings

Staff held six meetings with different groups, ranging in size from three people up to 20. Staff began by providing an in-depth presentation about the proposed HES disclosure policy, including background, goals and intended outcomes, policy requirements and next steps. Staff then prompted discussion to understand the wide range of perspectives. This format allowed for more in-depth discussion about the concerns and benefits.

- Engagement Summary: Meeting with the Neighborhood Leaders' Council
- Engagement Summary: Meeting with the Eugene Realtors Association
- Engagement Summary: Meeting with Architects
- Engagement Summary: Meeting with Sustainability Commission
- Engagement Summary: Meeting with Environmental Organizations
- Engagement Summary: Meeting with the NW EcoBuilder's Guild
- Engagement Summary: Meeting with the Chamber's Lane Government Affairs Council

Interviews

Staff conducted interviews with contractors and home builders to understand their perspective on the policy. These conversations provided insight into how they discuss energy efficiency with their clients, challenges and opportunities within the local home building workforce and how the policy would function in practice.

- Engagement Summary: Interview with Owner of Design-Build Firm
- Engagement Summary: Interview with Lead Partners of Contractor Firm

Online Survey

The online survey was open for five months and was advertised through the City's newsletter channels, KVAL media coverage and community networks. There were 368 responses. Respondent demographics include the following: 72% of respondents were between the ages of 35 and 74, 50% reported household incomes over $75,000 and 90% identified as white.

- Online Survey Results

Meetings with Partners

The City met regularly with partners, including other jurisdictions where the policy is implemented, regional partners such as EWEB and UO and state and national partners including Earth Advantage and Oregon Department of Energy. These conversations were not documented through formal engagement summaries, but are reflected throughout research and engagement analysis, as they helped to inform policy development work. Earth Advantage was formally contracted to summarize existing policy research. Their policy memo includes analysis of other jurisdictions with HES disclosure requirements, observed impacts and best practices for policy implementation in Eugene.

The following sections summarize engagement results and research findings related to a potential Home Energy Score (HES) disclosure requirement in Eugene. Eugene has the advantage of considering a policy that has been implemented in many other jurisdictions for over a decade, allowing the opportunity to observe outcomes and learn from best practices in determining the pathway forward.

Primary Themes from Engagement

In summary, the results of the survey show that 65.4% support or strongly support the policy, 28.6% oppose or strongly oppose the policy and 6% have no opinion or are unsure. This shows that while there

are mixed views across stakeholder groups, approximately two-thirds of participants are in favor of Eugene adopting a HES disclosure requirement.

The following sections outline the primary themes heard consistently throughout engagement. Within each theme, a summary of community feedback is presented first, followed by relevant research and evidence from jurisdictions with existing HES disclosure requirements. This serves to highlight how community perceptions align or diverge from documented outcomes. Each theme concludes with key takeaways that synthesize the most relevant findings from engagement and research to help Council determine whether to proceed with HES disclosure.

Theme #1: Transparency of home energy information

What we heard:

- Many reported limited understanding of home energy features and energy costs when they bought a home.
- 75% of survey respondents said it is important or extremely important to understand a home's energy features and costs before purchasing.
- 61% identified increased awareness of a home's energy features and costs as the primary benefit of an HES disclosure requirement.
- Buyers shared that while other factors (e.g., location, school district, home layout, etc.) often drive purchase decisions, a HES would help them better anticipate future costs and avoid unexpected expenses.
- Realtors reported that buyers rarely ask about energy efficiency during the home buying process

> *"I just bought a house, and it would have been helpful to know these things before. Now I'm paying to fix things like my water heater and adding insulation which has cost me thousands of dollars."*
> -Community Member
>
> *"I would definitely support something like this. We need to be able to know how much things are going to cost. Energy costs can sometimes come as a surprise—and it is a significant part of our overall monthly costs."*
> -Community Member

What the research shows:

Many of the comments heard throughout engagement about buyer interest in energy were examined in jurisdictions with existing HES disclosure requirements. Relevant research findings include:

- Research confirms that buyers often lack critical information about home energy performance during the purchase decision.
- Required HES disclosure increases awareness and demand for energy efficiency, and allows a consistent way for buyers to compare across listings.
- Research shows voluntary programs result in incomplete information, as higher-performing homes are more likely to be rated.

Key takeaway for decision-making:

Buyers are often buying a home without knowing about the energy costs or features of the home. HES disclosure primarily functions to close this information gap, by improving a buyer's understanding of home energy performance and costs.

Theme #2: Impact on completing energy efficiency upgrades

What we heard:

- Many participants shared that increasing transparency of home energy use would create market value for energy efficiency upgrades and encourage homeowners to make improvements.
- Some viewed this as putting negative pressure on sellers to make costly upgrades, while others viewed this as a market mechanism to encourage voluntary upgrades.
- Many shared that the cost of upgrades is so high, and that the return on investment in energy cost savings is not always worth it.

> *"If this information was valued as part of the real estate transaction, this could help the customer see value in making upgrades."*
> -Design-builder
>
> *"It's not about the $125 cost to get the score, it is about the costly improvements that sellers will be pressured to make."*
> -Realtor

What the research shows:

Many of the comments heard throughout engagement about the impact of HES disclosure on completing energy improvements were examined in other jurisdictions. Relevant research findings include:

- Analysis of utility data shows that HES recipients are more likely to pursue energy efficiency incentives. In Portland, 8.8% of homes that received a HES also received an incentive for an energy efficiency improvement. Data from Eugene's Score program shows that 23% of homes that got a HES completed an energy efficiency project[1]. In both data sets, most of the home upgrades that occurred were significant projects, such as attic insulation and heat pump systems.
- Additional research in Portland shows that homes scored a second time improve by an average of 1.1 points, suggesting that energy-efficiency improvements were made since the home was first scored.
- Property owners leverage additional financing when they take advantage of incentives: participants in Eugene's Score program have received $190,940 in rebates and grants from EWEB, in addition to nearly $100,000 in 0% interest loan dollars.
- The HES methodology is designed to identify improvements that have a ten year payback period.

Key takeaway for decision-making:

Households receiving a HES are more likely to pursue energy efficiency incentives and complete home energy improvement projects.

Theme #3: Impact on housing prices

What we heard:

- 25% were concerned that a disclosure requirement would affect housing prices.
- Some worried it would increase home sale prices.
- Others worried that low-scoring homes would be stigmatized, and therefore harder to sell—disproportionately impacting low-income residents and neighborhoods.

> *"The requirement would lower long-term costs for homeowners but would raise costs at the buying stage."*
> -Realtor
>
> *"I'm worried that Eugene's older housing stock will receive low scores, creating stigma and potential devaluation for low-income neighborhoods."*
> -Architect

What the research shows:

[1] 2023-2024 SCORE Annual Report

The impact of HES disclosure on housing prices has been examined in jurisdictions with existing HES disclosure requirements. Relevant research findings include:

- Disclosure does not cause irrational home price inflation among high-scoring homes; however, studies show that buyers value energy information in proportion to projected energy cost savings. For example, a one-point increase on the Home Energy Score 1-to-10 scale is associated with a 0.5% sales premium—about $2,370 for Eugene's median home price—and an average $200/year in energy cost savings.
- HES disclosure supports more accurate valuation of energy efficiency: price change reflects actual investments in energy performance, not market distortion, enabling sellers to recover costs and occupants to benefit from lower energy expenses over time.
- Low-scoring homes do not see reduced sale prices. There is no evidence that buyers avoid low-scoring homes.
- Analysis of scores by census tract shows no significant correlation among low-scoring homes and lower socioeconomic neighborhoods.

Key takeaway for decision-making:
HES disclosure has minimal impact on home sale prices and does not disadvantage low-scoring homes or lower-income neighborhoods.

Theme #4: Operational impacts on the real estate market

What we heard:

- Realtors expressed concern that adding a new requirement to the home selling process could further delay and complicate the process.
- Others felt the policy is not overly complex and that the market would be able to adapt.
- Several participants noted that an HES may be redundant to a home inspection, energy bills or energy efficiency standards already required by the building code.
- Some noted that the policy should be scaled overtime to avoid creating delays for sellers while the workforce of HES assessors ramps up.

> *"This requirement will make homes harder to sell, even if upgrades are not required."*
> -Realtor
>
> *"I support the idea of having this kind of information available, it seems useful, but this feels like just one more thing I would need to do to sell a house and would not want it to delay a sale."*
> - Community member

What the research shows:
The policy's operational impacts on the real estate market were examined in other jurisdictions with existing HES disclosure requirements. Relevant research findings include:

- Research shows that HES disclosure has not slowed home sales; in fact, energy-efficient homes often spend less time on the market due to increased buyer demand.
- A HES provides different information that is found in a home inspection or energy bills.
- Jurisdictions with effective enforcement help create a stable and predictable environment for assessors, thereby ensuring a reliable pool of assessors who can respond quickly when a house is being listed. In discussions with realtors in Portland and energy assessors in Eugene area, HES assessments can take up to a week to schedule and complete.

Key takeaway for decision-making:
HES disclosure generally does not delay home sales or duplicate other steps in the process.

Theme #5: Impact on climate and emissions

What we heard:

- Several pointed out there is unlikely to be significant GHG reductions with a disclosure-only policy.
- Several groups believe the HES report should recommend that homes electrify and switch away from natural gas, in addition to recommending energy efficiency.
- It is worth noting that a small subset of participants (25%) believe the City should require sellers to make upgrades that would raise the score.

> *"The report should provide education about moving away from natural gas, since that is the largest source of fossil fuels in our community and a big health concern."*
> -Environmental organization
>
> *"This being a policy that is fuel neutral does not help the City reach its greenhouse gas goals."*
> -Business owner

What the research shows:

The policy's climate benefits were researched in other jurisdictions with HES disclosure policies. Relevant research findings include:

- In Eugene, GHG emissions from residential buildings come overwhelmingly from natural gas use in single-unit detached homes. Modest emissions reductions are observed in homes that make only energy efficiency upgrades. More significant GHG reductions can be achieved if these homes switch from natural gas to electricity.
- Eugene's Score program has resulted in a reduction of 363,862 kWh per year from improvements in 187 homes. Since 2017, GHG savings from the energy efficiency improvements are 26.9 MTCO2e, and the GHG savings from electrification from fossil fuels are 44.1 MTCO2e, for a total of 70.9 MTCO2e.
- Jurisdictions with policies that encourage fuel switching and electrification[2] or that require sellers to make upgrades[3] are more likely to have significant climate impact.
- HES disclosure can provide a foundation for implementing other priority decarbonization strategies. More widespread uptake of HES expands availability of data on the local housing stock and increases community-wide education about energy efficiency can help inform strategies to expand incentives, address energy burden and scale clean energy supply.

Key takeaway for decision-making:

HES disclosure alone produces modest GHG reductions, with greater reductions observed when homes switch from natural gas to electricity. The policy can provide a foundation on which to develop future climate initiatives.

Theme #6: Implementation considerations

The following elements summarize community feedback and best practices related to program design and administration. These are lessons for staff to address if the policy is passed. Community feedback on these elements generally did not reflect opposition to the policy, but rather questions and concerns related to how the requirement would be implemented.

Enforcement

[2] Ashland, OR has implemented a voluntary HES program, with recommendations that encourage fuel switching.
[3] Berkeley, CA and Boulder, CO have HES policies that require small or large upgrades to a home.

- **What we heard:** There were many questions from the community about how the policy would be enforced. Some shared that without enforcement the policy would not be very effective. Some believed that there should be a penalty fine for non-compliance.
- **Best practice:** Research indicates that effective enforcement is critical to achieve high compliance rates. Enforcement tends to be most successful when the compliance window is shorter than the typical home sale timeline, the penalty fine is notably higher than the cost of getting an HES report, and compliance is monitored consistently.

Exemptions

- **What we heard:** There were comments that certain housing types would present complications, such as manufactured homes and condominiums where features like walls and roofs might be shared ownership. Several suggested creating exemptions for foreclosures and other distressed sale situations.
- **Best practice:** Exemptions are typically granted to avoid undue burden on distressed home sales, which include foreclosure, trustee sale, title change due to inheritance, marriage, divorce, or condemnation, financial distress resulting in a court appointed receiver, sale due to arrears for property taxes, participation in a property tax deferral program and other hardships. HES disclosure requirements typically do not apply to accessory dwelling units (ADUs), manufactured homes, mobile homes, residential retailers or stacked condominiums.

Subsidies

- **What we heard:** Many shared that an HES disclosure policy could be burdensome to low-income households looking to sell. 64% of survey respondents believed there should be a way to provide free scores to low-income sellers.
- **Best practice** to support equitable access is for jurisdictions to establish a small fund for home sellers with incomes at or below 80% Area Median Income (AMI) to receive no cost HES reports. Based on comparable jurisdictions, it is estimated Eugene should budget $5,000/year for free home energy scores.

Trigger Event:

- **What we heard:** Some believed that triggering the policy at time-of-sale would allow the buyer to bear the cost and better align with other tasks such as the inspection. Others believed triggering the policy at time-of-listing would be more useful because buyers could compare prospective homes.
- **Best practice:** Best practice is to have the launch of a home's internet-based real estate listing (e.g., on the MLS) serve as the trigger point to comply with the policy. This supports more effective consumer education, helps prospective homebuyers make better decisions and eases compliance monitoring and enforcement.

Workforce Capacity

- **What we heard:** There were concerns that there are not enough assessors to serve this policy. Others, including folks in the building trades, shared that doing HES assessments would be a desirable job. It would be an easy additional service for existing businesses, such as home inspectors, to offer.
- **Best practice:** There are currently 2-4 assessors serving the Eugene area who can respond in under a week. It's estimated that 16-20 HES assessors would be needed in Eugene to meet peak demand for HES reports under a disclosure policy. Effective enforcement helps create a stable and predictable policy environment, thereby ensuring a reliable pool of assessors who

can respond quickly when a house is being listed. Some cities have offered training to ramp up the workforce as the policy gets implemented, with an emphasis on recruiting home inspectors and others for whom HES assessments can be an add-on service.

Additional Feedback

A range of additional comments also emerged during engagement. While these comments are not presented in a weighted manner, collectively they provide a more complete picture of community input. Relevant research is referenced if it is available, and the absence of research does not imply validation or dismissal of a concern.

1. **Benefits for economic development, workforce development and local businesses:** Many in the building industry shared that this policy would lead to an increased demand for handyman and contractor services who install home energy improvements—and that the local workforce is well positioned to meet that demand.
   Research suggests that an HES disclosure requirement can support workforce development and stimulate local economic activity. Implementation of the requirement is expected to increase demand for HES assessments, contributing to job growth among energy assessors. Expanding the assessor pool would support skills development and capacity building across the construction and energy efficiency workforce.
   In addition, increased homeowner participation in energy efficiency upgrades may drive additional residential contracting activity. Data shows that property owners who participated in Eugene's HES program have invested a total of $1,260,653 in home energy improvement projects, with an additional $290,940 invested from EWEB through the program.

2. **Concern about HES methodology and adequacy:** Many participants expressed confusion about how the score is calculated and what the score means. Industry professionals noted that a blower door test—while more expensive—is essential to have a complete picture of a home's energy performance.

3. **View that HES tool is affordable and accessible:** Many participants highlighted the benefits of the tool's affordability and simplicity, viewing it as an effective entry point for homeowner energy education and an accessible alternative to more in-depth assessments.
   Research shows that HES has become the preferred assessment methodology in public policy spaces because it is a nationally standardized tool and is relatively accessible compared to other energy assessments.

4. **Concern that HES disclosure could limit mortgage lending**: Some real estate professionals were concerned that lenders may consider utility cost projections in prequalification calculations, potentially reducing buyer purchasing power.
   Available research shows energy data is not used punitively in underwriting. Research indicates that borrowers living in energy efficient homes experience lower mortgage delinquency and default rates.

5. **Recognition that HES disclosure could help unlock additional financing tools:** Other professionals in the trades and construction industries noted that a HES should expand access

to financing for energy upgrades, such as a larger loan, because lenders would see these investments as reducing energy costs.

Research related to green financing shows that some mortgage loan products support borrowers in accessing higher debt-to-income ratios for higher scoring homes – or for improvement loans that increase a home's score – under the premise that efficient homes have lower and more stable energy bills.

6. **Opposition to additional requirements or regulations:** Several individuals viewed additional requirements or regulations as burdensome. They suggested this should be voluntary.

   Research indicates that voluntary HES programs tend to have low participation, with more efficient homes being more likely to participate. Mandatory disclosures are more effective at providing buyers with consistent information and support more accurate valuation of energy features in property values.

7. **Cost to Implement:** Some raised concerns about the potential staff capacity and budgetary resources required to implement and enforce the policy.

   It is predicted that in Eugene it would take roughly 0.5 FTE for program management and general administration, with $35,000 to launch the program and $10,000 annually after that. In other jurisdictions, this has typically been absorbed within existing Sustainability Program budgets, or funded through general fund, permit fees, solid waste fund or stormwater fund.

8. **Need for additional guidance to make energy improvements:** Participants continue to share a need for more tailored guidance to assist people in completing upgrades, navigating incentive programs, and working with contractors. Ideas included setting up a navigator program and including additional resources as part of the HES report.

9. **Need for expanded incentives to help finance upgrades:** Participants continue to express a need for more financial support in making upgrades through expanded rebates and incentives. Many agreed that the HES report itself could be used to highlight existing incentives.

10. **Feedback that the policy should be extended to rentals**: Although this engagement effort explicitly focused on HES in the home *sale* process, the topic of rentals arose frequently. In the survey, 54% said the policy should also apply to rental homes, with many pointing out that rental homes tend to have higher energy costs, and property owners are less likely to invest in upgrades than owner-occupied homes. Many viewed the HES disclosure for home sales as a good starting point and a policy that could be replicated for rentals.

Conclusion

A HES disclosure policy is meant to increase transparency about home energy features in the real estate process, increase education about improvement opportunities, and connect homeowners to existing resources to complete upgrades. Engagement results demonstrate strong support for a HES disclosure policy when a home is listed for sale. Research shows that the policy primarily serves to improve buyer and homeowner understanding of home energy use. If Council decides to proceed, best practices observed in other jurisdictions would help staff design and administer the program. This policy can provide a foundation for future work to advance Council's housing and climate goals to decarbonize existing buildings and to preserve and improve the quality of existing housing stock.

POLICY MEMO

TO: Ian Penn and Danielle Klinkebiel, City of Eugene, Oregon
Public Works Administration & Sustainability Staff, City of Eugene, Oregon

FROM: Madeline Salzman, Associate Director of Market Solutions, Earth Advantage
MacKenzie Winchel, Senior Manager of Programs, Earth Advantage

DATE: January 11, 2025

SUBJECT: RESULTS FROM RESEARCH AND ANALYSIS OF HOME ENERGY SCORE POLICIES FOR THE CITY OF EUGENE, OREGON

Dear Ian Penn, Danielle Klinkebiel, and other City of Eugene Public Works Administration Staff,

This policy memo is the deliverable associated with Contract 2026-00332 between the City of Eugene (henceforth, "Eugene") and Earth Advantage. Our work has focused on (1) reviewing existing Home Energy Score (HES) policies in other jurisdictions, (2) identifying best practices from existing HES policies, (3) estimating needs to successfully implement such a policy in Eugene, and (4) summarizing observed impacts from existing HES policies. The overall goal of this work is to support Eugene residents and staff in researching, consolidating, and summarizing information about HES policies to support policy development in Eugene.

Most of this work was conducted through literature review of information published online about existing HES policies, as well as research about the existing housing market in Eugene as of December 2025. Earth Advantage staff reviewed more than two dozen research papers, draft analyses, policy memos, and annual program reports to inform the findings included in this memo. In addition, staff communicated with representatives from the Eugene Water and Electric Board (EWEB) and Oregon Employment Department (OED) to better understand local energy efficiency programs and employment trends. Finally, Earth Advantage also utilized data and staff perspectives from HES policies in Portland, Hillsboro, Milwaukie, and Bend, Oregon to inform identification of existing policy impacts. Through this analysis, our summary findings include:

- Existing HES policies already cover more than 800,000 Oregonians and have generated more than 60,000 HES reports statewide, representing more than 5% of the state's owner-occupied housing units (Earth Advantage 2025, OED 2025, Salzman 2024).
- Analyses consistently find that when HES reports are made available, homebuyers value gaining access to information about home energy features, costs, and opportunities for savings, which they use to make more informed home investment decisions.
- Analyses have found that higher HES ratings are associated with higher sales prices, lower

mortgage delinquency risk, and accessing energy efficiency incentives at higher rates (Pigman et. al. 2022; Breshears 2022; Cassidy 2023; Myers, Puller, and West 2022; Nadel 2025; Earth Advantage internal analysis 2025).

- Analyses of HES data suggest that homes in less wealthy and more diverse zip codes in Portland, Oregon are more likely to receive more energy-saving recommendations in their HES reports but are not more likely to have lower ratings on the HES scale. We have only found weak correlations between HES rating and socioeconomic factors available by zip-code or Census-tract (Earth Advantage internal analysis 2025).
- To support equitable policy impacts, other jurisdictions have offered subsidized HES reports for low-income home sellers and have customized HES reports to offer information about locally available incentive programs that can make upgrades more affordable.
- Eugene can benefit from learning from HES policy experiences around the country to support an equitable policy design that results in high compliance rates and delivers real benefits to Eugene households. Elements of policy designs in Portland, Milwaukie, Hillsboro, and Bend, Oregon can all serve as models for Eugene.
- Based on analyzing needs in other Oregon cities with HES policies, a similar policy in Eugene could support 16-20 Home Energy Score Assessors delivering 1,600 - 2,000 HES reports each year. Best practices from other cities suggest Eugene could support the policy with 0.5 FTE to administer the program and establish a fund to provide free HES reports for low-income homeowners.

We hope this policy memo serves as a useful resource for the City of Eugene when considering potential next steps in a HES policy.

Best,

Maddy Salzman
Associate Director of Market Solutions
Earth Advantage

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Introduction

This policy memo provides results from research and analysis of Home Energy Score (HES) policies for City of Eugene, Oregon staff. The goal of this work is to support Eugene residents and staff in researching, consolidating, and summarizing information about HES policies to support policy development in Eugene. This memo provides (1) review of existing HES policies in other jurisdictions, (2) identification of best practices from existing HES policies, (3) estimation of needs to successfully implement such a policy in Eugene, and (4) summary impacts that have been observed from existing HES policies.

Key Terms

- **Disclosure policy.** An ordinance or other requirement establishing that information be communicated in standard format(s) to specific parties under certain conditions. In this document we explore disclosure policies with the following elements:
    - ***Required information:*** U.S. Department of Energy HES report
    - ***Standard format:*** Digital report included in real estate listings
    - ***Specific parties:*** The public (homeowners, buyers)
    - ***Certain condition:*** Covered building is listed publicly for sale

  While there is no statewide disclosure requirement in the State of Oregon, Oregon Administrative Rules require that energy performance scores for residential buildings in the state must include a U.S. DOE HES (Oregon Secretary of State n.d.).
- **Home Energy Score (HES).** A standard software system provided by the U.S. Department of Energy (DOE) that enables delivery of HES reports. HES reports include for each home a 1-to-10 score, documentation of various home features, and recommendations for home energy upgrades to improve the home's score. The HES 1-to-10 score is designed to serve as a proxy for overall energy costs that may be expected for a given housing unit (DOE, 2021). The intention is for the score – as well as estimated energy costs and emissions – to provide prospective home buyers with information to understand how energy costs contribute to overall homeownership costs. Homes that score a 10 are expected to use less energy and have lower energy costs than 90% of U.S. homes after normalizing for local climate, while homes that score a 1 are expected to use more energy and have higher energy costs than 85% of U.S. homes after normalizing for local climate.
- **Time of listing requirement.** A policy that stipulates something must take place when the home is listed publicly for sale (e.g., on the local multiple listing service (MLS) or other real estate listing websites). Time of listing requirements place stipulations on the listing, which can be viewed by any prospective homebuyer and tracked digitally.
- **Time of sale requirement.** A policy that stipulates something that must take place prior to completion of a home sale (e.g., prior to signing of final documents). Typically, these requirements take place during the escrow period after a buyer's offer has been accepted. Time of sale policies do not inherently place stipulations on home listing information, and often only require information be made available to the buyer under contract.

Policy Goals

The primary goal of any HES disclosure policy is to provide prospective home buyers with better transparency about home energy features, costs, and opportunities. Much like a miles-per-gallon rating or nutrition facts label, HES disclosure allows consumers to better understand the products they are purchasing and better compare their options with more complete, standardized information. Home features documented in HES reports impact overall household costs, comfort, health, and emissions. In most cases, however, home buyers, sellers, and real estate professionals lack access to clear and consistent information across listed homes. HES provides homeowners and buyers with energy information they would not otherwise have to better understand home features and total cost of homeownership. Jurisdictions with HES disclosure policies offer more transparency about home energy use and costs, which helps reduce uncertainty in the real estate market and support consumers in making investments more confidently.

Existing HES Disclosure Policies

Over the last decade, cities in Oregon have become national leaders in home energy labeling by enacting real estate disclosure policies. By the end of 2025, nearly 60,000 scores have been delivered throughout Oregon, representing more than 5% of the state's owner-occupied housing units (Salzman 2024, Earth Advantage 2025, OED 2025). Between the Cities of Bend, Hillsboro, Milwaukie, and Portland, more than 20% of Oregon residents live in a jurisdiction with a HES disclosure requirement in home real estate listings. Beyond Oregon, the Cities of Berkeley, California; Piedmont, California, and Ann Arbor, Michigan also have similar policies, meaning that more than 1.1 million Americans live in a jurisdiction with a HES real estate disclosure requirement (Nadel 2025). These existing policies serve as great examples for any other jurisdiction to review for best practices and lessons learned. The table below summarizes key features of the existing HES disclosure policies.

Table 1 on the next page identifies cities with existing HES disclosure policies and compares key factors between these program designs and contexts. In the following section, we identify best practices that have emerged through review of the above policies. These best practices were identified through discussions with city staff implementing HES policies and review of published literature about policy impacts.

Table 1. Key Features of Existing HES Disclosure Policies.

City	Population (est.)	Policy Type & Link	Scores / Yr (est.)	Compliance Window	Fines for Noncompliance	Compliance Rate (est.)
Portland, OR	635,000	Time of Listing Disclosure Policy	4,400	90 days	Up to $500; not issued since April 2020	55%
Milwaukie, OR	21,000	Time of Listing Disclosure Policy	150	30 days	Up to $1,000 if noncompliance continues for 120 days	Unknown
Hillsboro, OR	107,000	Time of Listing Disclosure Policy	1,000	Not explicit in ordinance	$500 initial fine, $500 for every 90-day period of noncompliance	75%
Bend, OR	100,000	Time of Listing Disclosure Policy	1,700	30 days	$750 for initial 30 days, $750 for every 45-day period of noncompliance	83%
Berkeley, CA	120,000	Time of Listing Disclosure Policy	400	Not explicit in ordinance	$100 for first infraction, plus administrative late fees	88%
Piedmont, CA	11,000	Time of Sale Disclosure Policy	150	Required not less than 10 days before close of escrow	Not explicit in ordinance	Unknown
Ann Arbor, MI	122,000	Time of Listing Disclosure Policy	1,000	Not explicit in ordinance	$500 for first offense, $1,000 for second or subsequent offense	85%

Identified Best Practices

HES disclosure policy best practices are informed by years of learning from policies in other cities and tailored for housing and economic conditions in Eugene (summarized in Appendix A). The following components are likely to deliver best results in terms of overall policy clarity, compliance, and equity. In general, a policy like the ones adopted by Portland, Milwaukie, Hillsboro, and Bend will help to achieve similar outcomes and support consistency across Oregon markets.

- **Covered housing.** Across Oregon jurisdictions, best practice has been to apply HES disclosure requirements to all existing and new construction single-unit homes listed for sale

within city limits. In existing policies, the "covered housing" definition typically includes the following residential structures: single-unit detached homes, single-unit attached homes, rowhomes, townhomes, common-wall homes, duplexes, and condos in non-stacked configurations. These definitions typically do not include detached accessory dwelling units (ADUs), manufactured homes, mobile homes, residential trailers, or stacked condominiums.

This approach has been effective for building consumer understanding through consistent metrics that minimize ambiguity. If necessary, preconstruction HES reports can be delivered for home listings when the structure is still under construction. As of December 2025, HES can deliver reports for individual apartment units as well, which may spur some jurisdictions to consider expanding policies to cover multi-unit housing units within HES disclosure policies (Pacific Northwest National Laboratory 2025).

- **Exemptions.** To avoid undue burden on distressed home sales, best practice is to identify exemptions for home sellers that submit documentation for waiver approval from the city manager. Other jurisdictions exempt homes experiencing involuntary title change and sales where compliance may present undue hardship to the seller. Examples of these exemptions include:
    - Title changes due to inheritance, default, marriage, divorce, or condemnation
    - Trustee sale
    - Foreclosure sale
    - Sale due to arrears for property taxes
    - Financial distress resulting in a court appointed receiver
    - Home seller participation in a property tax deferral program
    - Other hardships as approved by the city manager

  Jurisdictions with policies have adopted processes where sellers may submit documentation to the city that identify which exemptions they are seeking to obtain a compliance waiver. The city manager may oversee issuance of waivers.
- **Report Requirements.** Best practice established in Oregon is to adopt basic requirements that are consistent with Oregon Administrative Rules for voluntary building energy performance systems. These rules identify various elements that must be included in a home energy performance score system, including minimum standards for report contents, data types, assessor training, and quality assurance. Adopting these state rules in local jurisdictions supports alignment across the state, minimizes participant confusion, and eases implementation burdens.
- **Policy Triggers.** Across jurisdictions, best practice is to have the launch of a home's internet-based real estate listing (e.g., on the Multiple Listing Service (MLS)) serve as the trigger point and location of proof for covered housing to comply with the policy. Using the real estate listing in this way supports more effective consumer education, helps prospective homebuyers make better decisions, and eases compliance monitoring and enforcement.
- **Assessor Workforce.** Oregon cities with HES disclosure policies have not reported challenges related to HES assessor shortages. When policies are enforced, scoring presents a relatively stable income stream for housing professionals interested in offering energy-

related services. Best practice includes offering free HES assessor training for some housing professionals within three months of policy launch, as well as additional training for HES assessors during the first year of implementation. In other cities, most HES assessors are home inspectors, appraisers, or other real estate professionals that offer HES reports as an additional service.

- **Policy Implementation & Administration.** After policy adoption, the most consistent administrative needs are for compliance monitoring and policy enforcement. Other cities in Oregon support a staff member and/or contracted support person to spend between 5-10 hours per week (0.13 - 0.25 FTE) conducting compliance monitoring through reviewing MLS listings and issuing warning letters and/or penalties. In addition, other Oregon jurisdictions have dedicated city staff personnel to:
    - Operate a "help desk" to answer questions from the public
    - Conduct outreach to real estate professionals, housing counselors, and community-based organizations (CBOs)
    - Analyze HES data to better understand housing stock conditions and opportunities for energy efficiency incentives
- **Compliance & Enforcement.** So far, Hillsboro and Bend have been able to sustain high compliance rates and represent current best practice for enforcement policy design. Key activities include reviewing the MLS to monitor compliance, issuing warning notices to noncompliant sellers that inform them of compliance pathways and risks of penalties, and issuing of penalty fines when violations persist. Most existing policies issue violation penalties to the home seller. Jurisdiction practices that are most successful:
    - Set a shorter amount of time for the compliance window than it takes for most homes to sell in the jurisdiction
    - Set the penalty fine notably higher than the cost of getting an HES report
    - Conduct consistent compliance monitoring throughout policy implementation
- **Equitable Access through Subsidized Scores.** To support equitable access to HES reports that does not overly burden low-income households, best practice is for jurisdictions to establish a small fund for home sellers with incomes at or below 80% Area Median Income (AMI) to receive no cost HES reports. Many jurisdictions operationalized this by granting funds to a local CBO to generate these reports when a homeowner applies for a free HES report. So far, no existing city policies have reported exhausting their funds for free scores; some only report a handful of free scores funded annually. In addition, many jurisdictions include information about locally available rebates and incentives directly in their HES reports to help homeowners access energy upgrades more affordably. Including information about income-eligible incentives can help lower-income households overcome financial barriers to home improvements.
- **Policy Evaluation.** Best practice is to launch a policy with a plan to evaluate outcomes. HES disclosure policies provide a wealth of data to program managers to better understand overall housing and energy trends that impact affordability and environmental impacts. Jurisdictions that regularly monitor compliance collect feedback from the market, review HES

data for trends, and work with researchers to understand housing, economic, and energy impacts. Annual policy evaluation activities can include review of HES results by geography, including the following datapoints: score today, score with upgrades, estimated energy cost, estimated carbon emissions, upgrade recommendation rates, and HVAC equipment types and efficiencies. Staff can also evaluate how HES reports may influence uptake of residential energy incentives through analysis in coordination with local utilities and other incentive providers.

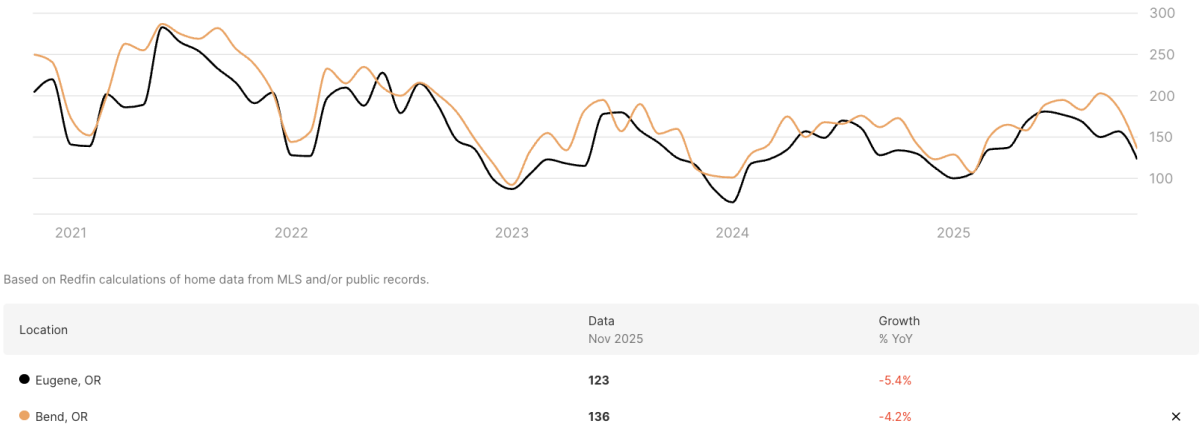
In the next section, we apply the above policy design best practices to estimate implementation needs for an HES disclosure policy in Eugene.

Implementation Estimates for Eugene

Implementing an HES disclosure policy requires investments to support assessor training, communication with the real estate community, subsidized scores for low-income households, and compliance monitoring that are rightsized to meet local market needs. We estimate the volume of score generation in Eugene based on the current housing market and then calculate the number of HES assessors and program costs based on estimated HES report demand.

Scores Per Year. The number of HES reports demanded by the real estate market per year depends on the housing market size as well as estimated compliance rates overall. Housing market trends available from Redfin show that over the last 5 years, Eugene has had a similar rate of home sales as Bend, despite a significantly larger population (Redfin 2025). Eugene's significantly larger renter population may play a role in reducing the frequency of home sales as compared to Bend (US Census 2024). The figure below shows the number of homes sold in Eugene (black) and Bend (orange) monthly between from 2021 through 2025.

Figure 1. Number of Homes Sold Monthly in Eugene versus Bend, 2021-2025.
Eugene home sales in black, Bend home sales in orange (Redfin 2025).



In the City of Eugene, every year around 1,800 homes are sold, ranging from roughly 100 to 180 home sales per month. On average, homes in Eugene sell after about 50 days on the market, with more than 50% becoming under contract within 30 days (Realtor.com 2025, Romito 2025). Eugene is currently characterized as a seller's market, with a median home selling price of about $475,000 and an inventory of 2-3 months of homes listed for sale (Redfin 2025, Realtor.com 2025).

Assuming Eugene's home sales rates continue along similar trends, based on scoring in Bend, we estimate a policy in Eugene would generate ***between 1,600 and 2,000 Home Energy Scores each year*** for an average of 130-160 new home listings each month. Eugene may expect to see the upper end of these ranges in cases where the number of homes listed for sale increases, and/or if the City of Eugene regularly checks compliance and quickly communicates with non-compliant listings.

Assessor Training. A HES disclosure policy would increase demand for HES assessor jobs and could increase employment among residential contractors and trades completing home energy upgrades. A full time HES assessor can generate as many as 70 scores in the busiest listing months, but most actively-scoring assessors in other jurisdictions generate on average 5 to 15 per month (Earth Advantage internal analysis 2025). This suggests that for many assessors, scoring is one of a few income streams for their business. Many HES assessors in other cities work as home inspectors, appraisers, or other real estate service providers beyond generating scores.

In Eugene's most active months for home listing, assessors would need to generate roughly 250 scores – enough work for 3.5 HES assessors working full-time on scoring that month. Assuming HES assessors in Eugene generate 15 scores per month in the busiest months, an ***estimated 16-20 HES assessors are needed*** to meet peak demand for HES reports. If Eugene launched a policy starting January 1, the City could offer free assessor training for 10-12 individuals prior to program launch and then continue to enroll some assessors to ramp up supply alongside growing home listing demand in the summer and fall.

Program Management Personnel. Based on best practices for program management and general administration identified in other Oregon cities, Eugene may plan to dedicate 0.5 FTE of either City staff personnel or contracted support to conduct the following activities:

- Review of MLS listings and issuance of noncompliance notices and/or penalties (~0.2 FTE).
- Respond to help desk requests regarding policy implementation (~0.1 FTE).
- Conduct outreach and engagement with real estate professionals, housing counselors, and other housing professionals to build general awareness of the policy (~0.15 FTE).
- Support analysis of HES data and provide summary information to policymakers or others as needed (~0.05 FTE).

During the program launch phase, additional staffing support may be needed to:

- Identify any local customizations to the standard state of Oregon HES report, like customizing report recommendations to align with EWEB incentives.

- Establish overall messaging for the City website and other public-facing materials.
- Recruit individuals to become HES assessors.
- Coordinate messaging about recommended incentive programs with EWEB, CBOs, etc.
- Determine if any additional program quality assurance practices are desired beyond the minimum requirements established by the U.S. DOE and State of Oregon. For example, HES programs in California fund quality assurance review of HES data beyond the minimum quality assurance requirement established by the U.S. DOE to rescore at least 5% of HES reports for quality assurance purposes (Home Energy Score California 2025; DOE 2025a).

Non-personnel Implementation Costs. To meet the various needs of a new HES policy, the City of Eugene may consider the following cost estimates as benchmarks to inform annual budgets. These cost estimates exclude costs associated with 0.5 FTE to support the program and include the following assumptions:

- Fees that are generally aligned with those experienced by other cities in Oregon (e.g., cost of HES assessor training, and technical system maintenance). We also assume that fees will be issued to the market to support program implementation at the same level as other Oregon cities (e.g., $35 fee per HES report to cover costs associated with federally required quality assurance).
- A higher estimated cost associated with subsidizing HES reports for lower-income or distressed households. We assume a rate of $250 per HES report, roughly aligned with rates in other jurisdictions. The market price of HES reports is not set and typically ranges from $150-$250 for most market-rate homes.
- Need for subsidizing HES reports at an estimated rate of 1% of home listings per year. This amount is informed by reported demand in other Oregon cities with disclosure policies.

Table 2 below summarizes the above non-personnel cost estimates for one-time program start-up costs as well as ongoing costs for years two and beyond.

Table 2. Estimated Non-Personnel Costs for Launch and Policy Administration.

Item	Unit Cost	Units	Cost Estimate
Technical Start Up (One-Time)	$10,000	1	$10,000
Assessor Training (One-Time)	$1,500 / assessor	10	$15,000
Technical System Maintenance	$5,000 / year	1	$5,000 / year
Free Home Energy Score Fund	$250 / HES report	20	$5,000 / year
		Estimated Year 1 Cost	**$35,000**
		Estimated Year 2+ Cost	**$10,000**

Research Findings of Existing HES Policy Impacts

Over the last five years or so, analyses of HES disclosure policies have begun to document associated housing, economic, energy, and climate benefits. HES report data from Portland, OR has proven particularly fruitful for researchers, with about 30% of single-unit housing scored since policy launch in 2018. Most published literature exploring the impacts of home energy information disclosure policies – including HES time-of-listing policies – focus on identifying if homes with higher efficiency features and lower energy costs sell for more money (a price premium), at faster rates (fewer days on the market), or with lower mortgage delinquency risks. Highlights from various research papers, summary reports, prior policy memos, and analysis of existing HES data are summarized in the subsections below.

HES disclosure has not slowed home sales. Jurisdictions with policies that support a marketplace of HES assessors offering reports have not reported challenges with meeting real estate market demand for assessments. Ensuring the demand for HES reports is a stable environment for workers through consistent compliance monitoring and enforcement of the policy helps drive this outcome. Some studies have also suggested that energy efficient homes spend less time on the market due to increased buyer demand (Zillow 2022; Carroll, Denny, Lyons, & Petrov 2024; Nadel 2025).

Home buyers value homes with higher efficiency. When home energy information is available, homebuyers use it to make more informed home purchase decisions and value the information in alignment with estimated home energy savings. Studies have shown that a one-point increase on the Home Energy Score 1-to-10 scale is associated with a 0.5% sales premium – equivalent to $2,370 for Eugene's median home price (Pigman, Deason, Wallace, & Issler, 2022; Breshears 2022; Cassidy 2023; Redfin 2025). In Oregon, a 1-point score increase is also associated with an average $200 in household energy cost savings each year (Earth Advantage internal analysis 2025). These results generally align with studies of similar policies in other regions (Myers, Puller, and West 2022; Ou, Bailey, McArthur, & Zhao 2025). Studies have not suggested that homebuyers over-value this information by either wholly avoiding low-scoring homes or causing irrational home price inflation among high-scoring homes.

Borrowers living in efficient homes experience lower mortgage delinquency and default rates. Studies suggest that, particularly for higher debt-to-income (DTI) ratio borrowers, more efficient homes are less likely to experience 30- or 60-day mortgage delinquency than lower rated or not rated homes (Pigman, Deason, Wallace, & Issler, 2022; Argento, Bak, & Brown, n.d.). Researchers hypothesize that increased transparency into energy costs for all homes, as well as lower energy bills associated with higher rated homes, may contribute to these findings. Some mortgage loan products have supported borrowers in accessing higher debt-to-income ratios for higher scoring homes – or for improvement loans that increase a home's score – under the premise that efficient homes have lower and more stable energy bills.

Disclosure requirements better help home energy features be properly valued than voluntary programs. By providing home buyers with comparable information across home listings through standardized disclosure, buyers are in the best position to make informed decisions and support valuation of home energy features, resulting in more differentiation of energy efficient properties from inefficient ones. Homebuyers express a higher willingness to pay for improved energy performance when home energy information is provided consistently across home listings, rather than when only high efficiency homes are promoted (Nadel 2025; Sussman, Kormos, and Cooper 2020; Sussman et. al. 2022). Disclosure policies also enable home appraisers to access HES reports across comparable homes to more easily and properly value these features.

Earth Advantage's Green Building Registry (GBR) collects green home verification data from more than 20 different programs around the country. Within the City of Eugene, GBR identifies 225 buildings with at least one green verification, representing about 0.3% of the local housing supply – a substantially lower rate than Oregon overall (about 3.7%) or GBR's national rate of green home verification data (about 2.6% of all US housing). The most common green verification programs among Eugene households are HERS ratings (100+ homes), EPS (50+ homes) and ENERGY STAR (50+ homes). GBR does not currently hold the roughly 800 scores delivered through the EWEB program.

HES recipients are more likely to obtain energy efficiency incentives. Analysis conducted on behalf of the City of Portland examined homes that complied with the HES requirement and then completed an upgrade associated with a program rebate during a five-month period in 2023. Out of 2,331 homes that received a HES report during this period, 8.8% (207 homes) also received an Energy Trust of Oregon incentive for a measure recommended in the HES report. The most common incentives were for attic insulation and heat pump systems. On average, these 207 homes received $490 in incentives for upgrades that saved 477 kWh and 29 therms per year. By comparison, only 0.8% of homes that did not receive a HES report had obtained an efficiency measure incentive over a three-year period. Thus, incentives were obtained at an 11-times higher rate among homes that had received HES reports than those who had not. More research is needed to identify any causal relationship between these variables.

Similar findings have also been found in Eugene through the SCORE Program. EWEB, in partnership with the University of Oregon and City of Eugene, operates the SCORE program, which offers free HES assessments to renters and low-income EWEB customers. Since the program launched in 2017, student HES assessors have delivered over 800 HES reports to program participants, 585 of which were requested by renter tenants (EWEB 2024). In the 2023-24 SCORE Program Annual Report, EWEB reported since receiving an HES report, 187 homes, or 23.4%, had received 263 home improvement projects – 126 of which were conversions from electric resistance heating to ductless heat pump systems (EWEB 2024). Energy upgrades deployed through this program have resulted in more than 363,000 kWh and 17 Metric Tons of CO_2-equivalent saved annually (EWEB 2024).

Homes that have been rescored in Portland are, on average, 1.1 points higher than their first score. Earth Advantage identified 2,574 homes in Oregon that received at least two separate HES assessments (internal analysis 2025). Additional analysis is needed to identify why households received updated assessments, but it could possibly be due to the house being resold or the owner participating in a program that provided a new HES report. Within this sample, the average change in score was an increase of 1.1 points – a change associated with an average annual energy bill savings of more than $200. In addition, 23% of the homes in this sample – about 600 homes – had increased their scores by 3 or more points.

Analyses in Portland show that HES score results do not correlate to neighborhood socioeconomic factors. In one analysis, researchers reviewed more than 38,000 scores on behalf of the City of Portland to identify any correlations that may exist between HES results and Census tracts that are coded as "DEI"[1] (memo to City of Portland 2024). This analysis showed that while homes in Portland's "DEI" Census tracts have median home values more than $150,000 less those of "non-DEI" coded Census tracts, differences in resultant score were not significant: the average score in DEI Census tracts was 4.8, versus 4.5 in non-DEI Census tracts (memo to City of Portland 2024).

In addition, Earth Advantage analyzed 50,000 HES reports in Portland through a regression analysis comparing average score values with income and race statistics available for each of Portland's 27 zip codes. There was no strong observable correlation between zip code demographics and HES data results, including score today, estimated energy cost, estimated carbon emissions, year built, or air conditioning SEER rating. Across 24 different variable correlations tested, the strongest observed relationships between variables are still weak, with R^2 values all below 0.3.

When reviewing over 1,200 HES reports in Portland delivered by CBOs that typically support low-income households, the average home scored 4.15, about 0.34 points lower than other homes in Portland. These CBO-served homes were slightly more likely to score a 1 out of 10 (19.2% versus 16.6%, respectively) and slightly less likely to score a 10 out of 10 (2.0% versus 3.6%, respectively), however the spread of scores across both groups reflect similar distributions. These slight distribution differences may be driven by lower-income households typically having less access to more efficient equipment and potentially more deferred maintenance issues. HES reports help lower-income homeowners and buyers understand energy costs, identify cost-effective upgrades, and link them to incentive programs that make energy upgrades more affordable.

Investment gaps in high-efficiency equipment suggest households can benefit from better energy information to improve energy literacy and understanding of upgrade benefits. Preliminary analyses of HES data in Portland suggest that total home energy use, costs, and score are not cleanly determined by or correlated to income. For example, while households in higher

[1] For this analysis, DEI census tracts are defined based on having a racial/ethnic diversity index score of 5 or higher, as defined by the US Census.

income zip codes in Portland may have greater access to higher cost efficiency features, they are also more likely to have larger homes and be equipped with air conditioning – two features that contribute to higher estimated annual energy usage. While higher income households generally face fewer financial barriers to purchasing high-efficiency equipment, the available data does not show a strong relationship between neighborhood income levels and actual investment rates in high-efficiency equipment. HES reports can help these homeowners and buyers better understand the benefits of high-efficiency equipment and which upgrades make the most sense for their home.

Households across neighborhoods and demographic groups benefit from improved access to actionable home energy information. As more households feel the strain of rising housing and energy costs, access to better information about these costs and how to impact them can benefit everyone. HES disclosure can close information gaps felt across socioeconomic groups that lead to underinvestment in energy efficient features in higher income households as well as under-enrollment in income-eligible efficiency upgrade programs among lower income households. HES reports designed to include actionable recommendations for home energy upgrades as well as information about available incentives and programs can support greater and more equitable access to energy efficient housing.

Many factors contribute to a home's score. HES assessors collect about 60 data points per home to generate each HES report, and each of these data points influence the HES building energy model that estimates home energy use. Home size is one, often noted data point that contributes to a home's overall energy use, as more floor area requires more energy to heat and cool interior spaces. Other features that contribute to higher home energy use and therefore lower scores include: above-average ceiling height, large window areas, little insulation, poorly sealed construction, inefficient ducts, low efficiency HVAC, central air conditioning, and/or no solar PV. The complete HES report – with identified home features and recommendations for cost-effective upgrades – helps residents distinguish these factors beyond just the score result itself. Ensuring prospective buyers have access to the complete report and not just the score metric is important to properly inform consumers. Earth Advantage analyzed HES data in Portland, Oregon to better understand how floor area contributes to home score, which is shown below.

Table 3. Home Energy Scores in Portland, Oregon by Conditioned Floor Area

Conditioned Floor Area	Portland Sample Size	Average Floor Area	Initial Score Today			Score with Recommended Improvements Completed		
			Average Score	Score of 1 (%)	Score of 10 (%)	Average Score	Score of 1 (%)	Score of 10 (%)
501 - 1,500 ft^2	18,168	1,116 ft^2	5.2	9.1%	5.6%	8.1	0%	28%
1,501 - 2,500 ft^2	20,444	1,889 ft^2	4.5	15%	3.0%	6.7	0.4%	8.1%
2,501 - 5,000 ft^2	10,326	3,125 ft^2	3.3	31%	1.2%	4.9	5.9%	2.0%

HES disclosure policies support local jobs and small businesses. Few studies have analyzed the local economic impacts of home energy information disclosure policies. Potential economic impacts include job growth associated with conducting HES assessments (e.g., among construction and building inspectors or similar occupations), as well as increased residential contracting activity as more homeowners choose to complete home energy upgrades. In 2025, about 6,800 HES reports were generated in Oregon's mandatory markets, roughly translating to $1.2 million[2] in revenue for HES assessor companies. Based on review of HES data in Oregon, a full-time HES assessor can complete an estimated 70 HES assessments in a month, suggesting that scoring in Oregon's mandatory markets generates enough activity to support more than 8 full-time equivalent (FTE) HES assessor jobs. Across these same four markets, more than 60 HES Assessors from 50 companies provide these scores, supporting greater attainment of home energy efficiency skills and industry-recognized credentials.

As the City of Eugene continues to consider policy design and implementation options, this policy memo can serve as a resource. Identifying and building upon these best practices will help more homeowners and buyers understand how their homes use energy, and how that energy use impacts their wallets, health, and overall comfort. When homeowners better understand these elements through increased transparency, they can make more informed decisions that help them save money, improve air quality, and live more comfortably.

[2] Based estimated HES prices in Oregon markets as reported to Earth Advantage by HES assessors.

References

American Community Survey. 2024a. Eugene city, Oregon Populations and People (DP05). U.S. Census. https://data.census.gov/table/ACSDP1Y2024.DP05?g=160XX00US4123850

American Community Survey. 2024b. Eugene city, Oregon Select Housing Characteristics (DP04). U.S. Census. https://data.census.gov/table?q=Eugene+city,+Oregon&t=Heating+and+Air+Conditioning+(HVAC):Physical+Characteristics:Types+of+Rooms:Units+and+Stories+in+Structure:Year+Structure+Built

Argento, R., X. F. Bak, & L. Brown. n.d. Energy Efficiency: Value Added to Properties & Loan Performance. Freddie Mac. https://sf.freddiemac.com/docs/pdf/fact-sheet/energy_efficiency_white_paper.pdf

Breshears, E. 2022. Is Mandatory Disclosure Really Mandatory? An Evaluation of the Home Energy Score Program. https://elisebreshears.github.io/website/Breshears_JMP_2022_11_28.pdf

Carroll, J., E. Denny, R. Lyons, & I. Petrov. November 2024. Better Energy Cost Information Changes Household Property Investment Decisions: Evidence from a Nationwide Experiment. Energy Economics, Volume 139. https://www.sciencedirect.com/science/article/pii/S0140988324006170

Cassidy, A. 2023. How Does Mandatory Energy Efficiency Disclosure Affect Housing Prices? Journal of the Association of Environmental and Resource Economists, Volume 10, Number 3, May 2023. https://www.journals.uchicago.edu/doi/abs/10.1086/722262

City of Eugene 2025a. Housing Development – Quantity and Housing Mix. https://www.eugene-or.gov/5048/Housing-Development---Quantity-and-Housi

City of Eugene. 2025b. Building Activity Reports. City of Eugene Planning and Development. https://pdd.eugene-or.gov/BuildingPermits/PermitReports

U.S. Department of Energy (DOE). 2025a. Home Energy Score Partner Implementation Plan. https://betterbuildingssolutioncenter.energy.gov/sites/default/files/attachments/HES_Partner_Implementation_Plan_Template.pdf

U.S. Department of Energy (DOE). 2025b. Low Income Energy Affordability Data (LEAD) Tool. https://www.energy.gov/scep/slsc/lead-tool

U.S. Department of Energy (DOE) 2021. Home Energy Score Methodology. https://betterbuildingssolutioncenter.energy.gov/sites/default/files/attachments/Home_Energy_Score_Methodology_Paper.pdf

Earth Advantage. 2025. Green Building Registry. https://us.greenbuildingregistry.com/green-homes

Energy Trust of Oregon. 2025. Eugene City Report.

Eugene Water and Electric Board (EWEB). 2024. SCORE Program Annual Report 2023-24.

Good Company. October 2022. City of Eugene Community Decarbonization by 2045 for Existing Residential, Commercial, and Industrial Buildings Energy Use: Policy and Program Best Practices Review and Recommended Roadmap - Existing Building Stock. City of Eugene. https://www.eugene-or.gov/DocumentCenter/View/70633/Good-Company-Decarbonization-Report

Home Energy Score California. 2025. Implementation Plan. CEDARS. California Energy Data and Reporting System. https://cedars.cpuc.ca.gov/programs/BAY_SW_HESC/details/

Myers, E., S. Puller, and J. West. November 2022. Mandatory Energy Efficiency Disclosure in Housing Markets. American Economic Association. American Economic Journal: Economic Policy vol. 14, no. 4, (pp. 453–87). https://www.aeaweb.org/articles?id=10.1257/pol.20200539

Nadel, S. July 2025. Energy Ratings for Home Sales. American Council for an Energy Efficiency Economy (ACEEE). https://www.aceee.org/sites/default/files/pdfs/energy_ratings_for_home_sales.pdf

Oregon Employment Department (OED). 2025a. Characteristics of Home Ownership and Renting in Oregon. U.S. Census American Community Survey. https://www.qualityinfo.org/-/characteristics-of-home-ownership-and-renting-in-oregon

Oregon Employment Department (OED). 2025b. Per capita personal income. https://www.qualityinfo.org/-/characteristics-of-home-ownership-and-renting-in-oregon

Oregon Housing and Community Services (OHCS). 2022. Energy Dashboard. Tableau. https://public.tableau.com/app/profile/oregon.housing.and.community.services/viz/EnergyDashboard_16117046261640/LandingPage

Oregon Secretary of State. N.d. Voluntary Building Energy Performance Score Systems. Oregon Administrative Rules. Division 63. https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=1091

Ou, Y., N. Bailey, D. McArthur, & Q. Zhao. April 2025. The price premium of residential energy performance certificates: A scoping review of European literature. Energy and Buildings, Volume 332. https://www.sciencedirect.com/science/article/pii/S0378778825001070

Ownwell 2025. Eugene, Lane County, Oregon Property Taxes. https://www.ownwell.com/trends/oregon/lane-county/eugene

Pacific Northwest National Laboratory. 2025. Change Log. Home Energy Score Engineering Documentation. https://hescore-documentation.labworks.org/home/change-log

Pigman, M., J. Deason, N. Wallace, P. Issler. August 2022. How does Home Energy Score Affect Home Value and Mortgage Performance? Lawrence Berkeley National Laboratory. ACEEE Summer Study pre-print. https://eta-publications.lbl.gov/sites/default/files/pigman_aceee_summer_study_2022_preprint.pdf

Realtor.com. 2025. Eugene, OR housing market overview. https://www.realtor.com/local/market/oregon/lane-county/eugene

Redfin. 2025. Eugene, OR Housing Market. https://www.redfin.com/city/6142/OR/Eugene/housing-market

Romito. 2025. Eugene Housing Market Data: 2025. Lane County Homes. https://www.lanecountyhomes.net/blog/eugene-or-housing-market/

RMLS. 2025. RMLS. https://rmlscentral.com/

Salzman, M. 2024. Mending the Split: Pathways for Home Energy Score Disclosure for Rental Housing in Oregon. Earth Advantage. https://d1o0i0v5q5lp8h.cloudfront.net/earadv/live/assets/documents/2024/OR_hes%20FINAL.pdf

Sussman, R., C. Kormos, C. Park, and E. Cooper. 2020. Valuing Efficiency By Clicking on Energy Efficient Real Estate Listings: A Controlled Experiment. https://www.aceee.org/research-report/b2002

Sussman, R., H. Bastian, S. Conrad, E. Cooper, E. Tong, A. Sherpa, and S. Pourfalatoun. 2022. Energy Labels Affect Behavior on Rental Listing Websites: A Controlled Experiment. ACEEE. www.aceee.org/research-report/b2204

US News & World Report. 2025. Best Homeowners Insurance in Oregon 2025. https://www.usnews.com/insurance/homeowners-insurance/local/oregon

Zillow. 2022. Eco-friendly features help homes sell up to 10 days faster. https://zillow.mediaroom.com/2022-04-18-Eco-friendly-features-help-homes-sell-up-to-10-days-faster

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Appendix A. Policy Context in the City of Eugene, Oregon

The following sections provide supplemental data about Eugene's housing and demographics which helped inform the estimated needs identified in this report.

Housing Market. According to the U.S. Census's 1-year American Community Survey (ACS), Eugene, Oregon, is the third largest city in Oregon behind Portland and Salem, with an estimated population of 178,789 people in 2024 (ACS 2024a). This population occupies an estimated 82,143 households, with an additional 5,385 vacant housing units (coming to an average vacancy rate of 6.6%) (ACS 2024b). Driven in-part by the large student population at the University of Oregon, Eugene has a relatively low homeownership rate of 48% (compared to 63% homeownership statewide). About 60% of Eugene's occupied housing units are either single-unit attached or detached homes, while 27% of Eugene's housing units are in buildings with 5 or more housing units present (ACS 2024b). The first residential energy conservation requirement went into effect in Oregon in 1980; about 52% of Eugene's current housing stock was built in 1979 or earlier (ACS 2024b).

From 2021 through 2024, the City of Eugene permitted more than 4,200 new housing units (City of Eugene 2025a, City of Eugene 2025b). About 14% of these units were single-unit detached dwellings, 7.6% were middle housing units (duplexes, triplexes, fourplexes, townhouses/rowhouses or cottage clusters), and the remaining 78.4% were multi-unit dwellings (City of Eugene 2025b).

In Eugene, the median home has a selling price of about $475,000, and as of December 2025, there are 783 homes listed for sale (Realtor.com 2025). A local blog reports that 341 of the homes listed for sale in October 2025 were single-unit detached homes[3] (Romito 2025). On average, homes in Eugene sell after about 50 days on the market, with more than 50% becoming under contract within 30 days (Realtor.com 2025, Romito 2025). Eugene is currently characterized as a seller's market, with more interested buyers than sellers, and nearly 25% of homes selling for above asking price in the last year (Realtor.com 2025, Romito 2025). In recent months, 58% of homebuyers used conventional loans, 22% bought homes with cash, while FHA/VA/other loans – often issued to lower credit borrowers – made up the remaining 20% of buyers (Romito 2025). The primary multiple listing service (MLS) servicing Eugene is RMLS, which also services the Portland metropolitan area market and has IT systems established to upload HES report links directly into listings (RMLS 2025).

Home Energy Use. Across Eugene, the average household experiences a 2% energy burden, meaning that average households spend 2% of their incomes on home energy costs (DOE 2025b). This rate is in alignment with Oregon overall. The average annual energy cost is about $1,580 across all Eugene households, however this average cost increases to about $1,990 for households living in single-unit dwellings and to about $1,830 for households with incomes at or below 100% the area median income (AMI) (DOE 2025b). Eugene households at or below 100% AMI experience an average

[3] The blog states that its data excludes land without dwellings, condos, townhomes, and mobile homes.

energy burden of 5% (DOE 2025b). Roughly half of Eugene households are at or below the 100% AMI. For the average Eugene household living in a single-unit dwelling, estimated household energy bills come to about 50% the average property tax bills and about 124% the average home insurance bill (Ownwell 2025, US News & World Report 2025). Compared to the rest of Oregon, more homes in Eugene use electricity for heating at 75% of households versus 53% statewide.

Local Residential Energy Efficiency Programs. Between 2017-2022, EWEB served more than 6,600 households with income-eligible energy services with funding made available through the Low-Income Household Energy Assistance Program (LIHEAP) and Oregon Energy Assistance Program (OEAP). The average household served through these programs had an income of $15,574 and received a one-time payment of $323 to support energy bills (OHCS 2022). Almost 80% of households served by EWEB in these programs were renters. In addition, EWEB in partnership with UO and the City has operated a voluntary Home Energy Scoring program, which delivered more than 800 HES reports to mostly rented households in Eugene. In 2023-2024, 187 of homes that received a HES report (23%) completed 263 home improvement projects, saving more than 363 MWh annually (EWEB 2025).

A report on the Energy Trust of Oregon's activity in Eugene from 2002 through 2024 shows that the Energy Trust has served 9,900 residential buildings with programs to improve energy efficiency of residential natural gas systems (Energy Trust 2025). Installed measures include water heaters, space heating systems, HVAC controls, and weatherization upgrades.

Economy & Employment in Relevant Industries. According to DOE's Low-income Energy Affordability Data (LEAD) Tool, the average household income in the City of Eugene is $84,803, while the average income of households living in single-unit detached, attached, and 2-unit housing is higher at $107,611 (DOE 2025b). In 2023, per capita personal income reached $61,634 across Lane County, slightly below Oregon's statewide per capita personal income of $67,838 (OED 2025). Since hitting an unemployment low of 3.7% in May 2023, unemployment in Lane County has since climbed to 4.9% as of August 2025 (OED 2025).

According to the Oregon Employment Department (OED), within the construction sector, Lane County is aligned with the rest of Oregon in projecting 11% employment growth in residential building construction (OED 2025). The table below shows that for specific employers in residential building and construction contracting, employment in the last ten years has significantly outpaced the overall economy in Lane County and statewide overall; yet employment has grown less rapidly in Lane County than other parts of Oregon.

Table 4. Employment in Lane County for Select Residential Building Construction and Related Industries.

Area	Employment in Select NAICS[5]			Overall Area Employment Growth 2015-2024
	2015	2024	2015-2024 Growth	
Lane County	3,022	4,113	36%	7%
Multnomah County	9,627	13,939	45%	4%
Washington County	6,860	10,563	54%	12%
Deschutes County	2,521	4,077	62%	30%
Oregon Overall	39,887	61,612	54%	12%

[5] 2361: Residential Building Construction; 23816: Roofing Contractors; 23821: Electrical and Other Wiring Contractors; 23822: Plumbing and HVAC Contractors; 23831: Drywall and Insulation Contractors. Jobs are reported by employers as covered by unemployment insurance.
Source: Oregon Employment Department, Quarterly Census of Employment and Wages

Through 2033, Lane County is estimated to increase total employment by 7%, slightly below projections for the state of Oregon (8%), but with the construction industry projected at the highest growth of all industries at 14% (OED 2025). Within the construction sector, Lane County has projected 11% growth in residential building construction employment, 17% growth in building equipment contractor employment, and 18% growth in building finishing contractor employment, generally in alignment with state projections (OED 2025). Employment of construction and building inspectors is projected to grow by 5.7% through 2033 in Lane County, but by 7.4% across Oregon over the same period (OED 2025).

EUGENE CITY COUNCIL
AGENDA ITEM SUMMARY

Work Session: Voluntary Annexation Follow-up

Meeting Date: October 28, 2026
Department: Planning and Development
www.eugene-or.gov

Agenda Item Number: 2
Staff Contact: Jeff Gepper
Phone: 541-682-5282

ISSUE STATEMENT

At this work session, City Council will be provided with follow-up information in response to Council questions as well as updated options on potential incentives for encouraging voluntary annexations, including financial implications of the incentives and of annexation in general. This work session was requested by City Council as a follow-up to two previous work sessions on the topic in 2024 and 2025. Staff are seeking feedback and direction from Council on the proposed incentives discussed in this Agenda Item Summary.

BACKGROUND

At a previous work session in October 2024, City Council received an overview of various issues related to voluntary annexations, including policy context, triggers, process, approval criteria, aspects unique to the River Road/Santa Clara area, street annexations, and the benefits and challenges of annexation. Staff also provided background on the Urban Growth Strategies project, and actions proposed as part of that work to support housing production through encouraging voluntary annexations. During the October 2024 work session, Councilors expressed interest in encouraging voluntary annexations for a variety of reasons, including housing production, consistent governance, efficient and orderly service provision and property tax revenue. City Council ended that work session by passing a motion requesting more information on potential incentives for encouraging voluntary annexations, the financial implications of potential incentives and the financial implications of annexations.

A second work session was held on this topic in November 2025, where staff presented the City Council with four options for incentivizing voluntary annexations (targeted outreach and education; ability for property owners to join in on street and/or public property annexations initiated by the City; waiver of application fees, and the grant of property tax differentials). Staff also presented the potential financial implications of each incentive proposal. Following the presentation, Councilors requested additional information regarding the incentive options, such as: can annexation incentives, like application fee waivers, be targeted to achieve specific goals; what is the long term projection for tax revenue from voluntary annexation when compared to the cost of providing city services; how would the presented incentives impact the budget; and what other data is available to shed light on the types of properties that are being annexed as well as general trends in voluntary annexations. An update to the previously provided “Annexation Facts and Figures” document is provided as Attachment A to this AIS and contains a deeper dive into annexation trends and cost over the last 10 years.

In November of 2025, staff also provided information about potential state legislation impacting annexations, but at the time it was unclear how the legislation would evolve or if it would move forward. This legislation did move forward, and the Oregon Legislature passed House Bill 4108 (2026), which expands annexation eligibility within Eugene's Urban Growth Boundary.

Recent Annexation Legislation

During the 2026 Oregon legislative session, the legislature passed House Bill 4108 (2026) which removes the state law requirement that a property be contiguous to Eugene's city limits to be eligible for annexation. State law generally requires properties to be contiguous to (or across street or a body of water from) the city limits to be eligible for annexation. HB 4108, which only applies to Eugene, allows non-contiguous properties located within Eugene's urban growth boundary to be eligible for annexation, so long as they meet the following criteria:

1. The property is designated for residential or mixed-use development; and
2. The property is connected to and receives urban water, wastewater, and stormwater services; and
3. The property is accessible by public road.

This new allowance in state law greatly expands the number of properties within Eugene's urban growth boundary that are eligible for voluntary annexation. This is especially true in the River Road and Santa Clara neighborhoods, where many unannexed properties are currently served by urban water and wastewater infrastructure. Due to limited records on older connections to the public systems, it is not possible to provide Council with an exact number of properties eligible for annexation under this new legislation. However, based on available data, it is estimated that approximately 4,000 properties in the River Road and Santa Clara area are potentially eligible for annexation under HB 4108.

Owners of non-contiguous properties interested in voluntary annexation will be eligible to apply for annexation beginning January 1, 2027. In anticipation of this change, the City is preparing for focused outreach to owners of potentially eligible properties to inform them of this change in state law and the removal of this barrier to annexation.

Potential Incentives, Feasibility, and Financial Implications

As part of the November 2025 work session, after reviewing a number of possible incentives to encourage voluntary annexation, especially as it pertained to residential properties, staff presented the four actions identified below for City Council consideration.

1. Targeted Outreach and Education
2. Street/Public Property Annexations
3. Annexation Application Fee Waivers
4. Property Tax Differentials

These actions, which could be undertaken independently or bundled together, are intended to encourage voluntary annexation for the purpose of increasing housing production. As explained in greater detail below, a basic calculation yields that the financial benefits to the City from voluntary annexation likely will not result in property tax revenues that surpass the cost to serve the residential property following annexation. However, the calculation cannot take into account the specific context and nuances of each property seeking annexation, which means each annexed

property will likely have a different financial impact. It is also important to consider that there are other tangible and meaningful benefits of annexation including facilitating housing production, consistent governance over similarly situated properties, and efficient and orderly service provision.

While each incentive includes different tools to help facilitate more voluntary annexations, it is challenging to estimate how many annexations would result from each incentive. The multitude of variables that impact a property owner's decision to annex make it nearly impossible to forecast the potential return on each incentive in the form of new annexation applications. Each incentive is discussed below, with additional details about the feasibility and financial impacts.

1. Targeted Outreach and Education: This action could include: proactively sending information to property owners in targeted areas (such as River Road and Santa Clara) outlining annexation benefits and any incentives; creating interactive online maps showing annexation-eligible parcels and urban service availability; partnering with local builders/developers to explain how annexation facilitates housing development; and attending neighborhood meetings to discuss the benefits of annexation and any available incentives. Additionally, staff plan targeted outreach to properties that are potentially eligible for annexation under House Bill 4108.

   This incentive would have the least financial impact on the City, as it would likely only require staff time and mailing costs.

   This incentive option is feasible to implement with the existing resources allocated to the Planning Division, though extensive mapping and broader outreach efforts over an extended period of time would require evaluation and possibly additional resources.

2. Street/Public Property Annexations: The City of Eugene has already piloted an approach to encourage and assist neighboring property owners to annex at the same time the City annexes adjacent street right-of-way or other public land. Examples include the City's annexation of the rights-of-way of Crow Road and Old Coburg Road, and the annexation of Golden Gardens Park. In those cases, the City prepared the annexation application materials including property surveys and legal descriptions, for both the right-of-way and/or park property and the adjacent properties that wished to annex, at no cost to the private property owners.

   In other cases, the City has annexed street right-of-way only, which is also supportive of voluntary annexation because annexation of right-of-way means that all the properties abutting that annexed right-of-way become contiguous to city limits, which is necessary for annexation of properties that are not eligible under House Bill 4108. As a practice, the City has notified adjacent property owners of the upcoming right-of-way annexation and provided information about the benefits of contiguity.

   The financial implications of this incentive are generally staff time and are dependent on the number of street or public property annexations planned by the City per year, along with the number and size of private properties interested in joining the annexation application.

   This incentive option is feasible to implement with the existing resources allocated to the Planning Division, though the cost of annexation material preparation and fees are born by the City department seeking the annexation (typically Public Works), which, in turn, impacts the budget for individual projects or teams pursuing the annexation.

3. Annexation Application Fee Waivers: A property owner seeking to annex property must

submit a $5,155.70 annexation application fee to the City. The application fee covers a portion of staff time and notice costs necessary to process the application. Staff time spent on annexation applications includes reviewing an application for completeness, mailing public notice, responding to public and applicant comments and inquiries, coordinating with service providers, drafting findings of compliance with the Eugene Code, drafting a resolution, preparation of a City Council Agenda Item Summary, and coordinating with the State, Lane County and special districts upon approval.

Annexation fee waivers could be targeted toward a specific goal, such as housing production. For example, waiver of the annexation application fee for properties that are zoned or designated for residential uses could incentivize future opportunities for housing production. Another example would include the waiver of fees for residential properties near transit stations or transit lines to help facilitate the development of housing near frequent transit service. This incentive could constitute a waiver of the entire application fee, or a percentage of the fee.

Over the past ten years, an average of 10 annexation applications have been submitted to the City annually. This equates to a total of $51,557 in general fund revenue annually. Although there is not an accurate way to determine how many new applications a fee waiver might generate, a doubling or tripling in the number of applications submitted would result in $103,114 or $154,671 worth of application fees not being collected. Based on property tax collections from an average single unit dwelling in River Road or Santa Clara it would take three to four years' worth of property taxes from the annexed property to recoup the fee for a single annexation application, if no additional housing was produced as a result of the annexation.

Planning staff are preparing a proposal to update and modernize land use application fees, including annexation application fees, for consideration and potential action in 2027. Staff is planning to incorporate an annexation application fee waiver for properties that are zoned or designated for residential uses. This incentive is feasible to implement with the existing resources allocated to the Planning Division given that the project is scheduled for next year, but further investigation into the scale of the incentive can be discussed during the fee modernization project. Considerations related to this incentive will include the loss of revenue to the general fund, and adjustment of the Planning Division budget for these losses, while also recognizing the potential increase in staff resources needed to process the additional applications.

4. **Property Tax Differentials:** This incentive, which is authorized by state law, allows the City to approve phasing in the City's property tax rate for an annexed property over a period not to exceed 10 years.

   This incentive would have the greatest financial implications due to the loss of new property tax revenue for up to ten years. However, it may also be the most attractive incentive for property owners, as the increase in property taxes has been highlighted as an issue that deters owners of already developed properties from pursuing annexation. In the River Road area, the owner of a typical annexable residential property developed with a detached single-unit dwelling would see approximately a 16 percent increase in the total property tax bill following annexation, whereas in Santa Clara, the owner of a similar property would experience a roughly 52 percent property tax increase following annexation. The differences in percentage increases in property taxes between the two areas are due to the differences

in the tax rates for special districts in each area.

In an effort to understand the long-term tax revenue benefits of voluntary annexation, staff conducted an analysis of the projected potential revenue compared to the expected cost of serving said properties. A summary of the analysis of financial impact on the City from annexations, which uses the River Road and Santa Clara areas as a case study, is included as Attachment B to this AIS. The estimated cost of services considers operating expenses, but does not include the potential cost and impacts of infrastructure, such as street and utility improvements. Staff analysis continues to show that the estimated cost to serve these properties would outweigh the potential property tax revenue. Further long-term forecasting identifies that there would likely be a net deficit over time when comparing the anticipated cost to provide services and the tax differential incentive. Since the November 2025 work session, staff have conducted an updated analysis which projects that the estimated deficit is greater than previously expected due to ongoing trends of expenses growing faster than revenues.

Even if the entirety of the River Road and Santa Clara neighborhoods were to annex, the City would still experience a net financial deficit; that is, the cost to provide service to the annexed properties would exceed the amount of property tax revenue collected, even without granting a tax differential incentive. While reducing the patchwork nature of annexed and unannexed properties would certainly produce some efficiencies related to the provision of operational services, such as police and fire service, the estimated cost of services focuses on operating expenses and does not include the potential cost and impacts of infrastructure, such as streets and physical improvements.

It is important to consider that this is a high-level financial analysis and the nuanced differences between varying annexation scenarios may have different property tax implications. For example, the calculation does not consider whether service costs could be reduced in the future or whether a property is currently receiving City services due to its proximity to other annexed properties. Additionally, the calculation includes an assumed amount of development, but it is possible that development, and the resulting tax revenue, could occur at a greater intensity or rate than predicted.

If the Council were to approve tax differentials to incentive voluntary annexation, in addition to the loss of new property tax revenue for the City, there would also be administrative costs associated with tracking and processing tax differentials. Those costs would vary based on the number of applications and could include staff and legal time spent preparing agreements, calculating tax rates, coordinating with the Lane County Tax Assessor, and annual tracking.

Given these considerations, this tax differential incentive is currently outside the scope and resources of the Planning Division and therefore implementing this option would require the allocation of additional resources. However, the tax differential incentive option is included as a future action the City could take in the state required Housing Production Strategy, which will be brought to Council in 2027 as part of Urban Growth Strategies. If Council is interested in pursuing the tax differential incentive and allocating resources to the project, implementing a pilot project of 2 to 3 years to better understand the feasibility and outcomes of the property tax differential incentive would provide data to determine the long-term viability and financial impact of such an incentive program.

As outlined above, each incentive presents a potential impact to the City's overall General Fund budget. Incentive 1: Targeted Outreach and Education could advance the soonest and with the least impact on existing resources. Incentive 2: Street/Public Property Annexations can likely continue to occur on a project-by-project basis as opportunities continue to arise.

While incentives 1 and 2 could likely be achieved utilizing existing operations and resources, incentives 3 (Annexation Application Fee Waivers) and 4 (Property Tax Differentials) require consideration of the loss of either fees or property tax revenue. The fee waiver offers a smaller impact to the overall budget but potentially carries less incentive for voluntary annexation than property tax differentials. However, while financial challenges exist, there are other tangible and meaningful benefits of incentivizing annexation including facilitating housing production, consistent governance, and efficient and orderly service provision.

Annexation of properties also has financial implications for the special districts that currently serve the properties outside the city limits, as it results in a loss of property tax revenue after the properties are annexed.

Next Steps

Planning staff intend to move forward with targeted outreach and education, and Public Works staff are continuing with their efforts around street and public property annexations. Planning staff also intend to continue to research and consider annexation application fee waivers as part of the upcoming land use fee update. At this work session, staff is requesting feedback and direction from the Council on the potential action related to property tax differentials.

RELATED CITY POLICIES

This work session item directly supports the Housing and Homelessness focus area of the City of Eugene 2026-2028 Strategic Plan Framework by advancing the strategy to "increase and accelerate production of diverse housing types." By identifying and implementing incentives to facilitate and incentivize annexation of residential lands, the annexed land will further efforts to increase housing production within Eugene's Urban Growth Boundary.

This work session item directly supports the Housing and Homelessness focus area by advancing the following tactic.

- Strategy: Remove Barriers to Housing Production
    - Tactic 1. Implement land use, financial, and infrastructure changes to encourage housing production near community assets, including Downtown, and address regulatory and other barriers in specific areas around the city.

Additionally, there are numerous policies related to annexation in the Eugene-Springfield Metropolitan General Plan (Metro Plan), the Eugene 2035 Transportation System Plan, and the River Road Santa Clara Neighborhood Plan. These are provided in Attachment C.

PREVIOUS COUNCIL DIRECTION

April 22, 2024 Work Session

Councilor Keating, seconded by Councilor Groves, moved to hold a work session before January 1, 2025, to discuss possible options for addressing on-street parking issues in the River Road and

Santa Clara areas and a separate work session to discuss voluntary annexations.
Passed 7:1 (Opposed by Councilor Clark)

October 30, 2024 Work Session

Councilor Clark, seconded by Councilor Keating, moved to hold a follow up work session to today's work session to discuss incentives for encouraging voluntary annexations and the financial implications of the incentives and the annexations.
Passed 7:0

November 12, 2025 Work Session

Councilors Kashinsky, Zelenka, Yeh, Clark, Leech, and Groves, expressed general support for staff investigating the incentives further and returning with more information pertaining to Councilors' specific questions and options for implementing the voluntary annexations incentives.

COUNCIL OPTIONS

If Council is interested in implementation of a property tax differential program, Council could direct the City Manager to bring back a specific proposal, options, and estimated cost to establish a property tax differential pilot program and a schedule for assessing the program's outcomes and actual and projected financial impacts.

CITY MANAGER'S RECOMMENDATION

If Council is interested in implementation of a property tax differential program, the City Manager recommends Council direct the City Manager bring back a specific proposal, options, and estimated cost to establish a property tax differential pilot program and a schedule for assessing the program's outcomes and actual and projected financial impacts.

POSSIBLE MOTIONS

Move to direct the City Manager to bring back a proposal, options, and cost to establish a property tax differential pilot program for voluntary annexation incentive that would operate for 2-3 years, followed by an assessment of the program's viability and outcomes.

ATTACHMENTS

A. Annexation Facts and Figures – October 2026 Update
B. Financial Impact on City from Annexations – October 2026 Update
C. Related City Policies

FOR MORE INFORMATION

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Annexation Facts and Figures – October 2026 Update

How much of land within Eugene's Urban Growth Boundary is within the City Limits?
As of 2024, within Eugene's urban growth boundary (UGB), approximately 80 percent of the land is within the city limits. Within the River Road and Santa Clara neighborhoods (inside the UGB), approximately 44 percent of the land is within the city limits. Approximately 87 percent of street miles within the Eugene UGB are within the city limits.

What percentage of the City's buildable land inventory is not annexed?
As of 2021, 40 percent (833 acres) of the Low and Medium Density Residential land identified as vacant or partially vacant in Eugene's buildable land supply is unannexed, which likely means that a large portion is not served with the utilities necessary to annex and realize the development potential.

How many annexation applications are approved annually by the City Council?
Between 2016 and 2026, an average of ten applications were approved each year.

How much does it cost to submit an annexation application?
The City application fee is $5,155.70, which covers a portion of staff time for processing the application. In addition, an applicant must hire a registered land surveyor to prepare a legal description of the property proposed for annexation, and most applicants typically hire a private consultant to prepare and file the application. Anecdotally, staff have heard that consultant fees can range from $5,000 to $15,000 depending on the size and complexity of the proposal.

What triggers the need for annexation?
Development that would increase the demand for urban services typically triggers the need for annexation. Examples include:

- Subdivisions, partitions and zone changes
- New dwellings, such as a new home on a vacant lot or the creation of middle housing.
- New commercial or industrial development

What type of activity does not trigger annexation?
Examples include:

- Accessory dwelling units
- Additions, remodels or expansion of existing dwellings (including bathrooms, kitchens, bedrooms)
- Any improvements to residential lots which do not involve a residential dwelling, including garages, sheds, accessory buildings, landscape features, driveways, walls, fences, pools, sports courts, etc.
- Property line adjustments
- Land divisions which will not enable development of additional dwellings
- Agricultural related uses

What are Key Urban Services?
The Metro Plan defines the minimum level of key urban services as the following: wastewater service, stormwater service, transportation, solid waste management, water service, fire and emergency medical services, police protection, city-wide parks and recreation programs, electric service, land use controls, communication facilities, and public schools on a district-wide basis.

Wastewater Service: Within the city limits, Eugene relies on a combination of regional and local services for the provision of wastewater services. Eugene provides collection of wastewater through a system of sanitary sewers and pumping systems, which connects to a regional system of similar sewer collection facilities owned and operated by the Metropolitan Wastewater Management Commission. Except for the River Road and Santa Clara areas, developed unannexed properties are typically served by on-site septic systems.

Stormwater Service: The City of Eugene generally provides public stormwater service within the city limits, although there are also public stormwater systems owned by Lane County.

Transportation: Eugene, Lane County and the State of Oregon all own streets that provide access to properties within the city limits. For the River Road and Santa Clara area inside the UGB, the City of Eugene generally provides maintenance to all streets south of Beltline and Lane County provides maintenance to all street north of Beltline, through an intergovernmental agreement.

Solid Waste Management: Collection service within the UGB is provided by private firms. The City of Eugene licenses haulers within the city limits. Regional disposal sites are operated by Lane County.

Water Service: EWEB is the water service provider in the City of Eugene. Outside of the city limits, water is typically provided by special service districts. Some districts contract with EWEB to provide water. For instance, the River Road Water District and the Santa Clara Water District purchase water from EWEB to serve development within their district boundaries, and EWEB provides billing, administration and maintenance for the districts.

Fire and Emergency Medical Services: Eugene Springfield Fire (ESF) provides fire and emergency services within the city limits. For unannexed properties within the UGB, ESF does respond but the level of response is based on the location of the property. For calls within contract districts (such as the River Road Water District), ESF provides the same level of service as provided inside the city limits. For calls outside of contract districts, such as the Santa Clara area served by Lane Rural Fire, ESF has mutual aid agreements to respond. Over the last fiscal year, seven percent of the calls ESF responded to within Eugene's UGB were outside of the city limits. (This information is based on data collected in 2024.)

Police Protection: Within the city limits, police protection is provided by City of Eugene Police Department (EPD). The Lane County Sheriff's Office provides protection outside of the city limits. Through a mutual aid intergovernmental agreement with Lane County, EPD does respond to calls to annexed property inside the UGB. For unannexed areas, in the past 38 months, EPD calls for service outside account for one-percent of the department's responsive call volume. The majority of the calls

(72 percent) are initiated by EPD officers, and primarily traffic stops and patrol checks. (This information is based on data collected in 2024.)

City-Wide Parks and Recreation Programs: Within the city limits, parks and recreation programs are provided by the City of Eugene. Within the River Road area, the River Road Park and Recreation District provides park and recreation services to unincorporated residents.

Electric Service: Within the city limits, EWEB provides electrical service. For unannexed properties, service is provided by EWEB or a local electric cooperative, depending on the location.

Land Use Controls: The City of Eugene provides planning and building permit services for all properties located within the Eugene's urban growth boundary. For unannexed properties, the City of Eugene provides these services through an intergovernmental agreement with Lane County.

Communication Facilities: A variety of telecommunications providers offer communications services throughout the Eugene/Springfield area.

Public Schools: Properties with Eugene's urban growth boundary are served by Eugene 4J School District, Bethel School District and Junction City School District. School district boundaries do not change due to annexation.

Do property taxes increase when a property is annexed to the City?
Yes. City taxes are higher than the taxes in unincorporated areas, to account for the higher level of services. For an idea how taxes may change for properties in River Road, Santa Clara and the Industrial Corridor, the City's Annexation Property Tax Estimator tool is available here http://pdd.eugene-or.gov/Home/PropertyTaxEstimator.

Would the annexation of more properties help solve the City's budget gap?
This idea is unlikely to help fill the City's budget gap because it is anticipated that property taxes from newly annexed properties would not cover the cost of providing city services to the property, and because annexation occurs incrementally over time. For more information, see Attachment B to the October 28, 2026, AIS for an updated fiscal impact analysis that provides estimated revenues and expenditures based on various levels of annexation. A previous version of this analysis was included in the City Council Agenda materials from the November 12, 2025, City Council work session and also in the City's 2023 Staff Revenue Team Revenue Options Report.

October 2026 Update:

What trends have been seen in annexations over the last ten years (2016-2026)?
Since 2016, there have been a total of 114 approved annexation applications, with an average of roughly 10 annexation applications per year. There have been 126 tax lots annexed during this time period, with roughly 734 acres being annexed into City Limits. The vast majority of applications have been for properties that are either zoned or designated for residential uses. The River Road and Santa Clara neighborhoods have seen the majority of approved annexations.

Land Use Zone or Designation	Total Approved Applications (2016-2026)		Total Acres
Residentially Zoned or Designated	97	85%	160
Right-of-Way	9	8%	98
Industrially Zoned or Designated	5	4%	217
Public Lands	2	2%	218
Commercially Zoned or Designated	1	1%	1

Neighborhood	Total Approved Applications (2016-2026)		Total Acres
River Road	40	38%	28
Santa Clara	28	27%	71
Northeast Neighbors	15	14%	28
Harlow Neighbors	5	5%	9
Laurel Hill Valley	4	4%	23
None	4	4%	97
Active Bethel Community	2	2%	272
Churchill Area Neighbors	2	2%	11
ICCO	2	2%	8
Clear Lake Area	1	1%	85
Southeast Neighbors	1	1%	6

What is occurring on properties following annexation?
Over the last ten years, approximately 51% of annexed tax lots have since subdivided to create new lots or develop new dwelling units. Approximately 28% of the annexed properties went through a form of land division, while 27% of annexed properties were developed with new dwelling units. Between 2016 and 2026, there have been a total of 248 new lots or parcels created following annexation, which can occur through partition, subdivision, or middle housing land division.

How does voluntary annexation help to facilitate housing production in Eugene?
As discussed above, annexation is typically required for the addition of a dwelling unit. Over the last 10 years, there have been 362 new dwellings that have been constructed or permitted following annexation. Most of the newly annexed lots that develop dwelling units are adding a single dwelling unit. That said, annexation of larger properties, especially those that subdivide provide many more units or the opportunity for more units. On average, for those properties that develop following annexation, the new housing is developed about 2 years after the annexation is effective.

Financial Impact on City from Annexations

Updated: October 2026

Goal:	Estimate potential financial impact on the City of large-scale annexation in the River Road and Santa Clara Community Organization areas. *Note : Previous versions of this analysis included Industrial Corridor Community Organization (ICCO). This analysis focuses on annexable properties in River Road and Santa Clara, thus ICCO is excluded.*
Key Assumptions:	All City services are provided at the same cost per capita as current City services. Annexation brings in property tax revenues at (i) full City permanent tax rate or (ii) a "hold harmless" tax rate that maintains pre-annexation total tax rate for a period of up to 10 years as an annexation incentive. Annexed properties also generate the same per capita amount of certain other General Fund revenues.
Results:	Revenues generated from annexing the area would be insufficient to pay the cost of providing the services, even at the full City tax rate. If a "hold harmless" rate is used as an annexation incentive, the shortfall would be even greater.

	Percent of River Road/Santa Clara Area Annexed			
	100%	75%	50%	25%
Assessed Value Annexed Area	$ 1,654,000,000	$ 1,240,000,000	$ 827,000,000	$ 413,000,000
Population Annexed Area	17,755	13,316	8,878	4,439
Total General Fund Revenues from Annexation				
At Full City Permanent Tax Rate	$ 12,560,000	$ 9,420,000	$ 6,280,000	$ 3,140,000
At "Hold Harmless" Tax Rate	$ 5,610,000	$ 4,200,000	$ 2,810,000	$ 1,400,000
Cost of Current Services	$ 18,900,000	$ 14,180,000	$ 9,450,000	$ 4,730,000
Surplus / (Deficit)				
At Full City Permanent Tax Rate	$ (6,340,000)	$ (4,760,000)	$ (3,170,000)	$ (1,590,000)
At "Hold Harmless" Tax Rate	$ (13,290,000)	$ (9,980,000)	$ (6,640,000)	$ (3,330,000)

Related City Policies

Eugene Springfield Metropolitan Area General Plan (Metro Plan)

Growth Management Policies

1. The UGB and sequential development shall continue to be implemented as an essential means to achieve compact urban growth. The provision of all urban services shall be concentrated inside the UGB.

8. Land within the UGB may be converted from urbanizable to urban only through annexation to a city when it is found that:
   a. A minimum level of key urban facilities and services can be provided to the area in an orderly and efficient manner.
   b. There will be a logical area and time within which to deliver urban services and facilities. Conversion of urbanizable land to urban shall also be consistent with the *Metro Plan*.

9. A full range of key urban facilities and services shall be provided to urban areas according to demonstrated need and budgetary priorities.

10. Annexation to a city through normal processes shall continue to be the highest priority.

11. The tax differential concept, as provided for in ORS 222.111 (2), shall be one mechanism that can be employed in urban transition areas.

12. Police, fire and emergency medical services may be provided through extraterritorial extension with a signed annexation agreement or initiation of a transition plan and upon concurrence by the serving jurisdiction.

15. Ultimately, land within the UGB shall be annexed to a city and provided with the required minimum level of urban facilities and services. While the time frame for annexation may vary, annexation should occur as land transitions from urbanizable to urban.

17. As annexations to cities occur over time, existing special service districts within the UGB shall be dissolved. The cities should consider developing intergovernmental agreements, which address transition issues raised by annexation, with affected special service districts.

21. Cities shall not extend water or wastewater service outside city limits to serve a residence or business without first obtaining a valid annexation petition, a consent to annex agreement, or when a health hazard annexation is required.

Residential Land Use and Housing Element

A.4 Use annexation, provision of adequate public facilities and services, rezoning, redevelopment, and infill to meet the 20-year projected housing demand.

Public Facilities and Services Element

G.1 Extend the minimum level and full range of key urban facilities and services in an orderly and efficient manner consistent with the growth management policies in Chapter II-C, relevant policies in this chapter, and other Metro Plan policies.

G.26 Wastewater and water service shall not be provided outside the UGB except to the following areas, and the cities may require consent to annex agreements as a prerequisite to providing these services in any instance:

a. The area of the Eugene Airport designated Government and Education on the *Metro Plan* Diagram, the Seasonal Industrial Waste Facility, the Regional Wastewater Biosolids Management Facility, and agricultural sites used for land application of biosolids and cannery byproducts. These sites serve the entire metropolitan area.

b. An existing development outside the UGB when it has been determined that it poses an immediate threat of public health or safety to the citizens within the UGB that can only be remedied by extension of the service.

In addition, under prior obligations, water service shall be provided to land within the dissolved water districts of Hillcrest, College Crest, Bethel, and Oakway.

Definitions

24. Key urban facilities and services:

Minimum level: Wastewater service, stormwater service, transportation, solid waste management, water service, fire and emergency medical services, police protection, city-wide parks and recreation programs, electric service, land use controls, communication facilities, and public schools on a district-wide basis (in other words, not necessarily within walking distance of all students served).

Full range: The minimum level of key urban facilities and services plus urban public transit, natural gas, street lighting, libraries, local parks, local recreation facilities and services, and health services.

49. Tax differential: Tax differential is a provision in Oregon city annexation law which provides an opportunity to phase in the city's tax rate over a period not to exceed 10 years. The proposal is specified at the time of annexation and cannot be modified thereafter.

Eugene 2035 Transportation System Plan

Cost Effectiveness and Finance Policies:

3. In collaboration with ODOT and Lane County, develop criteria that trigger logical phased jurisdictional transfer of streets and highways.

River Road Santa Clara Neighborhood Plan (2024)

Policy 5.5 Public Right-of-Way Management:
City and County will continue to cooperatively work towards addressing jurisdictional issues in the right of way, including parking, maintenance, street improvements, and annexation issues.

Policy 17.4 Annexation:
Annexation of the River Road and Santa Clara areas will occur only through strict application of state laws and local policies (e.g., ability to extend key urban facilities and services in a timely manner). In each case, Eugene will make every reasonable attempt to provide for annexation only on a voluntary basis and according to prior individual property annexation agreements.