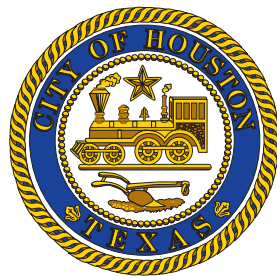
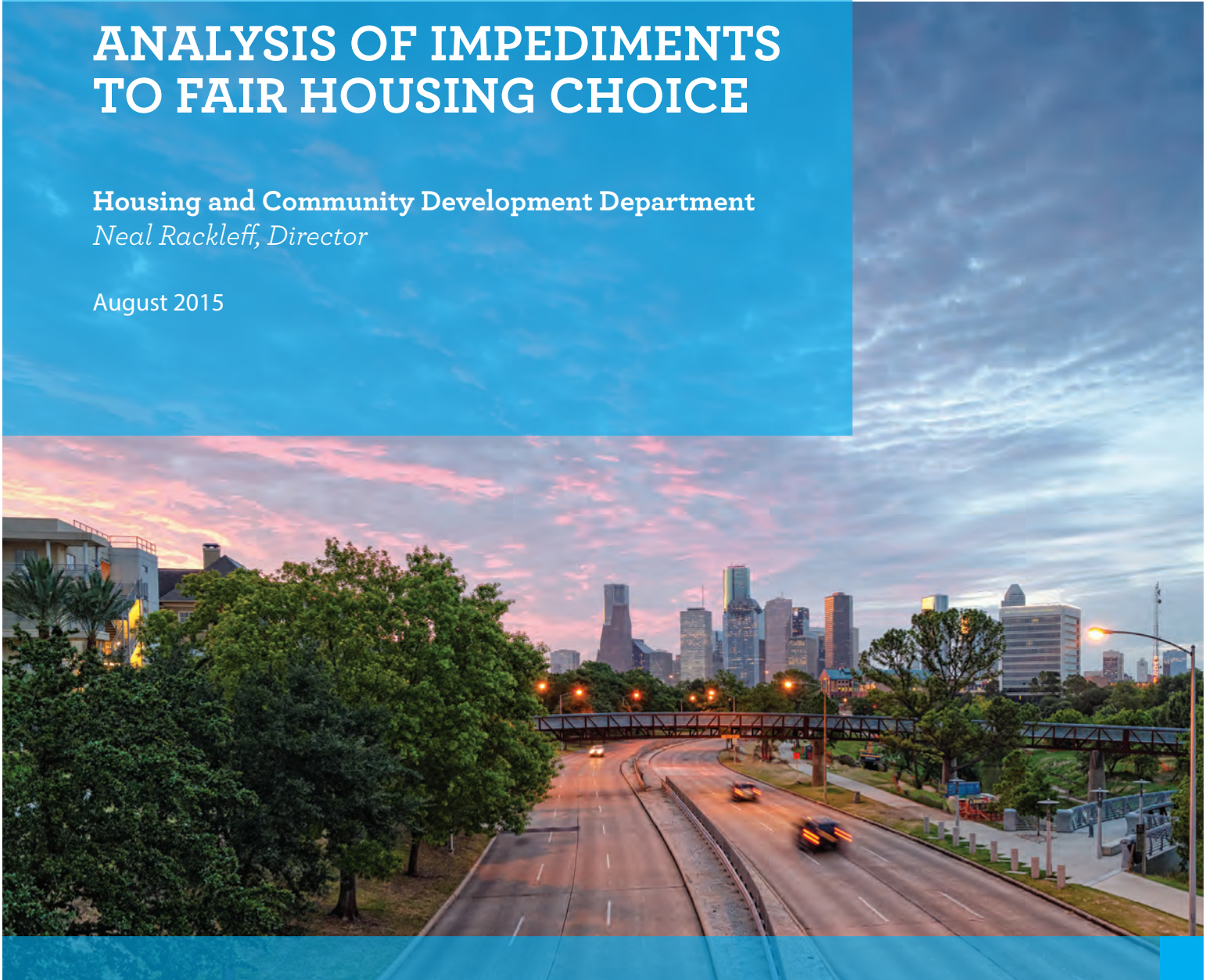


2015

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Housing and Community Development Department
Neal Rackleff, Director

August 2015



2015 ANALYSIS OF AMENDMENTS TO FAIR HOUSING CHOICE



CITY OF HOUSTON

ANNISE D. PARKER, MAYOR

HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT

NEAL RACKLEFF, DIRECTOR

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THIS DOCUMENT IS SUBJECT TO CHANGE

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1. Introduction

"All persons living in, working in, or visiting Houston are entitled to be treated with equal dignity and respect and have the right to be free from discriminatory and unequal treatment."¹ The City of Houston (City) strives to provide an environment that is free from discrimination based on selected characteristics, also called protected classes.

Fair housing and equal opportunity are fundamental principles to creating and sustaining communities in Houston. One way that the City demonstrates its commitment to these principles is by completing an *Analysis of Impediments to Fair Housing Choice* (AI). The AI is a review of obstacles that could impede fair housing choice and creates actions to remove or overcome these barriers.

The City's 2015 AI coincides with the City of Houston's *2015-2019 Consolidated Plan* and builds upon previous analyses that were completed in 2005, 2010, and 2014 (the amendment to the 2010 AI). Using current data, the AI is not a static document and may be updated periodically.

Title VIII of the Civil Rights Act of 1968 recognized as the Federal Fair Housing Act and Fair Housing Amendments Act of 1988 are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation of real property. The Fair Housing Act prohibits discrimination based on the following protected classes

- Race
- Color
- National Origin
- Religion
- Sex
- Familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under 18)
- Disability

Purpose of the Report

This AI was performed in order to satisfy the affirmatively furthering fair housing obligation defined by the requirements of 24 CFR 91.225(a)(1), titled "Certifications", which states:

Affirmatively further fair housing. Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis of actions in this regard.

According to the *Fair Housing Planning Guide*, the U.S. Department of Housing and Urban Development (HUD) interprets the broad objectives of affirmatively further fair housing to mean

- Analyze and eliminate housing discrimination in the jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color religion, sex, familial status, disability, and national origin

¹ City of Houston. (May 28, 2014). Ordinance No. 2014-530. Retrieved from: http://www.houstontx.gov/equal_rights_ordinance.pdf

- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

The City of Houston's AI 1) presents a demographic profile of the City of Houston and demographic information among specific protected classes, 2) evaluates the availability of a range of housing choices for all residents, and 3) analyzes the conditions in the private market and public sector that may influence the range of housing choices or access to housing.

The purpose of this report is to

- Identify impediments to fair housing choice within the City of Houston
- Recommend appropriate actions to overcome the effects of identified impediments
- Serve as a formal record of the City's consideration of fair housing issues

Sources and Methods

The City of Houston's Housing and Community Development Department (HCDD) conducted this report and is responsible for leading the coordination of this document. Staff time and other costs related to the development of this report were funded with program administration funds allocated for fair housing and general administration under the Community Development Block Grant (CDBG).

The information provided in this report was directed by HUD guidance in the following publications: the *Fair Housing Planning Guide*, the Affirmatively Furthering Fair Housing Proposed Rule, and the Draft Assessment of Fair Housing Tool. The Proposed Rule and Draft Tool are HUD's new guidance to help provide additional clarity about HUD's expectations for jurisdictions in regards to affirmatively further fair housing. Even though these were not finalized during the development of this AI, many of the proposed tables and maps from the Draft Tool were included in this document to illustrate the City's intent and best efforts to further fair housing.

In addition to gathering input from citizens, HCDD reached out and worked closely with fair housing organizations, adjacent governments, advocacy groups, housing providers, banks and other financial institutions, educational institutions, and neighborhood organizations throughout the planning and development process of this report.

When developing this report, HCDD endeavored to

- Accommodate diverse views and interests
- Provide input opportunities for persons who are not usually part of the process
- Provide for convenient, accessible meeting places and times

The report utilizes various sources of quantitative data including data from the U.S. Census, Federal Financial Institutions Examination Council (FFIEC), Comprehensive Housing Affordability Strategy (CHAS), Harris County Appraisal District, City of Houston Housing and Community Development Department, City of Houston Planning and Development Department, Houston Housing Authority, and U.S. Department of Housing and Urban Development.

The City of Houston worked with two consulting companies to enhance the AI. First, Morningside Research and Consulting (PO Box 4173, Austin, TX 78765) provided facilitation and support for one citizen input event, the Fair Housing Forum in January of 2015. Morningside Research and Consulting provided a report of the event categorizing all feedback received from the event. The report is included as an appendix to this document. Second, Planning/Communications (7215 Oak Avenue, River Forest, IL 60305) reviewed municipal land use and building codes, reviewed the impacts of regulations on housing for persons with disabilities, conducted a Free Market

Analysis™, and identified impediments and recommendations. Planning/Communications produced three documents which are included as an appendix to this document.

There are limitations to this report. This AI is intended to fulfill requirements set by HUD, and it is not a comprehensive planning document for all issues that might be identified or could be identified. In addition, there are data limitations. Although this AI strives to include the most recent data sources and data that most closely will inform the analysis, there is data that has not been used, whether because it was unavailable during the preparation of this AI or because of funding or other restrictions. Finally, the data used in the report has its own limitations. For instance, race and ethnicity data can be collected in a variety of ways, and therefore, analysis is limited to how the data was collected or reported, since sometimes race and ethnicity are collected separately and sometimes they are reported together.

Summary of Findings

The following summarizes the findings of this report.

Impediments Identified

HUD defines impediments of fair housing choice as

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice
- Any actions, omissions, or decisions that have this effect

With an extensive public participation process, data analysis, and policy review, the City of Houston found the following impediments to fair housing choice which are categorized under four fair housing rights.

The right to choose

All Houstonians have a right to live in a decent home in a neighborhood of their choice, free from discrimination.

1. Discrimination in Housing
2. Lack of Knowledge about Fair Housing
3. Lack of Affordable Housing Options
4. Lack of Accessible Housing for Persons with Disabilities
5. Lack of Income/Lack of Funding
6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status

The right to stay

Transitioning neighborhoods in Houston should be revitalized for the benefit of existing residents without replacement.

7. Affordability
8. Lack of Financial Education

The right to equal treatment

Houston will work to end discrimination and disinvestment in low-income, minority concentrated neighborhoods and ensure that infrastructure, public services and facilities, and other public resources are provided equitably to all neighborhoods

9. Imbalanced distribution of amenities, services, and infrastructure between neighborhoods
10. NIMBY Resistance
11. Lack of Transportation Options
12. Low Educational Attainment Among Minorities
13. Increased Health Hazard Exposure in Certain Neighborhoods

The right to have a say

All citizens have a right to be informed about, and have an input in, decisions that affect their communities.

14. Lack of Communication Between Government and Residents

Actions to Address Impediments

For each impediment identified, the City of Houston listed an objective with corresponding actions. The actions listed will be addressed over the next five years, aligning the accomplishments of these actions with the consolidated planning cycle. Although all of the impediments will not likely be eliminated in a short time period, such as five years, the City of Houston will strive to affirmatively further fair housing and reduce these barriers to promote fair housing choice.

2. Community Participation Process

HCDD encouraged participation from citizens and stakeholders including those from local and regional institutions, business and nonprofit organizations, and other government agencies to inform this report. HCDD emphasized involvement from citizens who live in areas affected most by housing discrimination: minority areas, low-income areas, subsidized housing, and those who may be affected by housing discrimination. In order to most effectively utilize funding, staff capacity, and citizens' and stakeholders' time, the citizen participation efforts for the development of the 2015 AI were combined with the efforts to produce the 2015-2019 Consolidated Plan.

The following summarizes the various citizen and stakeholder outreach activities that helped inform the 2015 AI.

Community Development Advisory Council (CDAC)

The Community Development Advisory Council (CDAC) is one way in which HCDD strengthens collaborative partnerships while gaining information about community needs and strategic guidance from Houston's housing and community development stakeholders. Representing a broad spectrum of organizations in the fields of housing, community and economic development, and social services, the CDAC provides input into the development of HCDD's strategic planning process, including the AI. Representative agencies are invited to join based on regulatory requirements. Representatives from the following organizations are currently serving a two-year term ending in 2015

- City of Houston Veteran Affairs
- Coalition for the Homeless
- Greater Houston Fair Housing Center
- Gulf Coast Community Services Association
- Harris County Community Services Department
- Houston Center for Independent Living
- Houston Housing Authority
- City of Houston Department of Health and Human Services
- Houston Food Bank
- Houston Housing Authority
- Houston Regional HIV/AIDS Resource Group
- Legacy Community Health Services
- Mental Health Mental Retardation Authority of Harris County
- Ryan White Planning Council
- United Way of Greater Houston
- Wells Fargo Home Mortgage

The CDAC meets with HCDD's staff several times a year to review data and current HCDD strategies, and to advise on HCDD's citizen participation process. Over the past two years, fair housing was addressed during each meeting in the following ways.

- Meeting #1: Discussion on regulations and process guiding the Consolidated Plan and AI
- Meeting #2: Discussion on importance of fair housing in Houston and the Fair Housing Stakeholder Survey
- Meeting #3: Discussion on ways to enhance citizen participation for the Consolidated Plan and AI
- Meeting #4: Discussion on trends in private lending related to protected classes

Results

The CDAC enhanced the AI and the citizen participation for the AI in several ways. First, the CDAC helped to define ways in which HCDD could best reach out to Houstonians, including marginalized communities. The CDAC also helped to promote HCDD's citizen participation process by attending and publicizing events. Finally, discussions about data or program activities HCDD shared with CDAC members also helped to inform this report.

Fair Housing Stakeholder Survey

In March and April of 2014, HCDD conducted a Fair Housing Stakeholder Survey. The goal of this survey was to assess local fair housing knowledge and receive qualitative fair housing information from a diverse set of organizations from the private, public, and nonprofit sectors that serve various protected classes. Members from HCDD's CDAC were asked to conduct the survey, and HCDD staff also conducted surveys with public service subrecipients. HCDD received a total of 55 surveys.

Members of the following industries participated in the survey

- Affordable housing development
- Economic development
- Fair housing services
- Government
- Health services
- Public housing
- Residential real estate
- Transit services
- Services for persons with HIV/AIDS, for persons with disabilities, for homeless persons, and for low-income residents

The first survey questions were directed toward determining whether or not stakeholders were receiving fair housing training and which organizations provided that training. Questions also focused on which organizations the stakeholders referred clients to when they needed additional fair housing information. Next, survey questions asked about the kinds of fair housing information needed in the community. Finally, the survey addressed questions regarding existing fair housing impediments and recommendations to address those impediments.

Results

The survey results revealed that stakeholders working with low-income individuals from protected classes or working in industries related to fair housing are not receiving any notable fair housing training. However, based on client information and data, they were able to identify fair housing barriers and provided the top three recommendations to address barriers to fair housing choice as 1) promoting fair housing education, 2) supporting, creating, and/or funding more affordable, accessible units, and 3) promoting and enforcing fair housing policies and building codes. Detailed information was also given regarding the kinds of fair housing education needed in the community.

Community Needs Survey

The Community Needs Survey was a quantitative survey conducted primarily to inform the 2015-2019 Consolidated Plan. This survey was made available online and in print from October 1, 2014 to December 15, 2015. The survey was available online. Also, PDFs were available for download and print through HCDD's website and during events attended by HCDD staff.

Results

A total of 2,120 respondents participated in the survey. 1,529 residents completed the survey online, and 466 paper surveys were received by HCDD. 125 respondents participated through the audience response system conducted by HCDD staff. Three percent or 71 participants completed surveys in one of the following languages: Spanish, Chinese, or Vietnamese.

The results of the survey showed that almost all citizens (80%) thought that affordable housing should be available throughout the city and not just certain areas. It also showed that almost one in three respondents had problems with one of the following when buying or renting property in Houston during the last 2 years: limited income (19%), credit issues (16%), loan denial (9%), or potential discrimination (3%). While the priority needs in this survey cannot be broken out by specific neighborhood, 1) affordable housing, 2) infrastructure improvements, and 3) neighborhood

facility improvements and neighborhood services ranked as the top three needs out of five categories. One question asked respondents to rank eight neighborhood services, three of which were related to fair housing. Although ranking the lowest out of eight examples of neighborhoods services, many respondents did think that fair housing education, homebuyer/homeowner counseling, and tenant/landlord counseling were important issues.

Information sessions

HCDD staff went to meetings and other events to inform citizens about the AI development process. HCDD staff was available with information at each event to make a short presentation or conducted the Community Needs Survey when requested. The following is a list of organizations visited

- East Lawndale Civic Association
- Harvest Time Church
- Homeless Coalition Provider Forum
- Houston Center for Independent Living
- Montrose Center's LGBT Seniors
- Project AIDS Nigeria
- United Way Care for Elders
- United Way Senior Services Expo
- United Way THRIVE

In addition, HCDD advertised the availability of HCDD staff to attend meetings to promote information about the development of the AI. While promoting the Community Needs Survey Needs Survey, advertisements and information were available in the following media outlets: *The Chronicle*, *La Voz*, *African American News and Issues*, *Forward Times*, CitizensNet, Facebook, Twitter, Flyers/Emails, Coalition for Community Concerns, The Tribune, and through a press release from Council Member Ed Gonzalez.

Results

HCDD staff was available to go to events in the community to promote the citizen participation process for the Consolidated Plan and AI. During these meetings HCDD reached at least 270 people in face-to-face meetings. Media outlet advertising provided exposure to a broader audience.

Neighborhood Discussion Groups

HCDD worked closely with Texas Low Income Housing Information Service (TxLIHIS) and the Texas Organizing Project (TOP) to host four neighborhood discussion groups, targeting minority neighborhoods in Houston. HCDD staff worked closely with TxLIHIS and TOP to review presentation materials and brainstorm areas to hold discussion groups. Four neighborhood discussion groups were held at convenient locations near or in each area selected

- East: East End and Magnolia Park
- Central: Near Northside, Third Ward and Fifth Ward
- North: Independence Heights, Acres Homes, and Northeast Houston
- South and West: Sunnyside, OST, South Union, and Gulfton

Each discussion group followed the same format with HCDD staff first making a presentation introducing the Consolidated Plan and AI, reviewing general data and maps related to Houston and the specific neighborhoods, and ending with discussion about community needs and strategies related to community and economic development and fair housing choice. Each neighborhood discussion group lasted from two to three hours.

Results

Approximately 70 people attended the neighborhood discussion groups. A detailed report from the discussion groups is included in an appendix.

Stakeholder Discussion Groups

HCDD worked with organizations that serve or represent groups of various protected classes or groups of citizens that may not always be able to participate. HCDD held discussions at the following organization's meetings

- Houston Housing Authority Resident Council
- Houston Center for Independent Living
- United Way THRIVE
- City of Houston Interdepartmental Fair Housing Group
- United Way Care for Elders

All stakeholder discussion groups included a presentation from HCDD staff describing the Consolidated Plan and AI. Individualized information including data or maps for each group was provided as needed. Some questions for the stakeholder discussion groups varied depending on the expertise of the group, however the questions were similar. The way discussions were conducted also differed depending on the group. Sometimes discussion questions were asked to the whole group while other times, in order to accommodate larger groups, discussions occurred with a smaller group with written reports collected by HCDD staff at the end of the discussion time.

Results

Approximately 175 people were involved in the stakeholder discussion groups. A detailed report from the discussion groups is included in the Appendix.

Key Stakeholder Interviews

Key informant interviews were performed to advise both the AI and the Consolidated Plan. Identifying stakeholders first using the consultation requirements set forth by HUD in 24 CFR 91.100, staff contacted twenty stakeholders. These stakeholders contacted were those that had not yet been part of the consultation process or those that could help refine strategies in the next one to five years.

Results

Staff conducted in-person interviews with nine stakeholders. A report of the findings is included in the Appendix. Some of the feedback received regarded the City's responsibility to affirmatively further fair housing and suggested that the City use consultants to provide fair housing testing and investigations as well as carry out fair housing marketing strategies. Others mentioned that the City should maintain the characteristics of neighborhoods by collaborating with schools, social service providers, and faith based organizations to develop a plan to attract black citizens back to historically black communities.

Fair Housing Forum

HCDD partnered with the Federal Reserve Bank – Houston Branch, Greater Houston Fair Housing Center (GHFHC) and Texas Low Income Housing Information Service (TxLIHIS) to host its first Fair Housing Forum. The goal of the Forum was to bring together citizens and stakeholders to discuss fair housing needs and strategies to overcome discrimination, as well as to broaden the community's perspective of fair housing issues.

The Forum was a daylong event centrally located at the Federal Reserve Bank – Houston Branch. Researchers, practitioners, and advocates made presentations throughout the day. During the day, there were two opportunities for participants to work in small groups and provide direct written input to HCDD about fair housing needs and impediments and strategies to overcome these impediments and promote fair housing choice.

Results

Over 200 people replied favorably to the Fair Housing Forum and more than 170 people attended. The forum concept was new to the City of Houston. We learned that the testimony model is perhaps the most preferred among some; however the objective of the forum was to create a dialogue among participants that resulted in written feedback to HCDD. This feedback was used to help HCDD staff identify current barriers to fair housing choice and future strategies and partners to lessen such barriers. A detailed report from the Fair Housing Forum is in the Appendix.

Public Hearings

HCDD held two Public Hearings open to the public during the development of the Consolidated Plan and AI. These Hearings were held in December of 2014 at a central location, the Neighborhood Resource Center, and a neighborhood location, the Southwest Multi-Service Center. HCDD held two additional Public Hearings during the 30-day comment period for the Consolidated Plan which included this AI.

A summary of the AI was presented to the City Council's Housing and Community Affairs Committee in April of 2015. A public comment opportunity was also available during this meeting.

Results

A summary of the Public Hearings is available in the Appendix of the 2015-2019 Consolidated Plan. The public comments and the city's response concerning the draft of this AI are in an appendix of this document.

Conclusion

HCDD used broad methods to solicit information from citizens and stakeholders for this report. Efforts were made to make information available to the public even after events occurred. Past events including a video of the fall Public Hearing and results from the Community Needs Survey were posted on HCDD's website. HCDD conducted a robust public outreach process to give all Houstonians an opportunity to participate in the development of the AI.

3. Community Profile

The *2015 Analysis of Impediments to Fair Housing Choice (AI)* reviews demographic and economic conditions of the City of Houston (City) and the region focusing on protected classes. The region is categorized as the Houston-Sugar Land-Baytown Metropolitan Statistical Area (Houston MSA) which includes the following counties: Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller (and Austin only after July 1, 2013). Current and historic conditions are the foundation of future actions to further fair housing. In addition, comparing demographics and existing housing and economic conditions may show the needs and obstacles some groups of citizens face when seeking housing.

Demographic Profile

The following will first provide an overview of the demographic and population characteristics of Houston residents compared to the region, state, and U.S. It will also examine population trends related to each of the protected classes. As a part of describing existing conditions of protected classes, maps will be used in order to analyze locations related to racially/ethnically concentrated areas of poverty (R/ECAP). R/ECAPs are defined by HUD as areas with a non-white population of 50% or more and with extreme poverty, which are census tracts with 40% or more of the residents living at or below the poverty line.

Population

The City of Houston is the fourth most populous city and is part of the third most populous county in the U.S. The Houston MSA ranks fifth in population among other metropolitan areas in the country. According to the U.S. Census 2008-2012 American Community Survey (ACS), the City of Houston's current population is more than 2.1 million residents. As of January 1, 2014, the City of Houston's Planning and Development Department estimated the population to be 2,201,027. The region, as well as the city, has experienced a significant amount of population growth over the last decade.

Table 1: Population Growth Comparison

	2000	2010	2012	% Change 00-10	% Change 10-12
City of Houston	1,953,631	2,099,451	2,107,449	7.5%	.38%
Houston MSA	4,669,571	5,946,800	5,962,416	27.4%	.26%
Texas	20,851,820	25,145,561	25,208,897	20.6%	.25%
United States	281,421,906	308,745,538	309,138,711	9.7%	.13%

Source: 2000 Census; 2006-2010 American Community Survey (ACS); 2008-2012 ACS

This growth is projected to continue. According to the Houston-Galveston Area Council's, the region's population is expected to reach 9.5 million by 2040 growing by 3.7 million people over the next 30 years, from 2010-2040. The average annual population increase is expected to be 1.7% per year.

Compared to the top five most populous cities in the United States, Houston ranked first (7.5% increase) in percent gain from 2000 to 2010 followed by Los Angeles and New York (2.6% and 2.1%, respectively). In terms of numeric growth for the same period of time, Houston was second with 145,820 additional residents following New York City with 166,855 additional residents.

Table 2: Population Comparison between the Five Largest Cities in the U.S.

	2000	2010	2012	% Change 00-10	% Change 10-12
New York City	8,008,278	8,175,133	8,199,221	2.1%	.29%
Los Angeles	3,694,820	3,792,621	3,804,503	2.6%	.31%
Chicago	2,896,016	2,695,598	2,702,471	-6.9%	.25%
Houston	1,953,631	2,099,451	2,107,449	7.5%	.38%
Philadelphia	1,517,550	1,526,006	1,525,811	.6%	-.01%

Source: 2000 Census; 2006-2010 American Community Survey (ACS); 2008-2012 ACS

Population by Age

Houston has a slightly younger population than the Houston MSA, Texas and the U.S. Although the median age in Houston has increased from 30.9 years in 2000 to 32.1 years in 2012, the median age in Houston was still less than in the region (33.2 years), Texas (33.6 years) and the U.S. (37.2 years) in 2010.

According to the 2008-2012 ACS, the Hispanic/Latino population in Houston had the youngest median age comparing racial and ethnicity groups at 26.7 years. The oldest racial/ethnic age group was White alone, non-Hispanic, which had a median age of 41.5 years.

Compared to the Houston MSA, Texas, and the U.S., Houston has the greatest proportion of people aged 18 to 64, which is 65.1% of the population.

Table 3: Age Distribution

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Under 18	542,848	25.8	1,658,315	27.8	6,849,329	27.2	73,979,859	23.9
18-64	1,371,288	65.1	3,783,742	63.5	15,724,178	62.4	194,487,411	62.9
65 and older	193,313	9.2	520,359	8.7	2,635,390	10.5	40,671,441	13.2

Source: 2008-2012 ACS

Historic Population Growth

Much of Houston's historic population growth can be attributed to the rapid annexation of surrounding areas. In 1836, Houston was founded on 147 acres of land which consists of a small northern portion of downtown today. In 1900, the city had grown to approximately 9 square miles and had a population of 44,000. In 1913, the city annexed areas outside of its central core along the ship channel and The Heights. During the 1920s, Houston annexed the former city of Independence Heights, the first African American incorporated city in Texas. Although Houston did not annex much land in the 1930s, the population swelled to almost 400,000 people. The 1940s is the beginning of a three decade expansion through annexation where the city's land size doubled. In 1956, the City conducted its largest single annexation which included Sunnyside and Central Southwest.

With the Passage of the Voting Rights Act in 1965, cities were required to receive preclearance from the Justice Department for annexations. However, this did not preclude the annexation of Acres Homes in 1967, which had been touted as the largest unincorporated African American community in the southern United States. In April of 1979, Houston submitted to the Justice Department a proposed plan of annexations and de-annexations, which were not precleared on the grounds that they would have a discriminatory effect on minority voting strength. Before these annexations were precleared, Houston conducted a referendum that changed Houston's electoral system under which the city council would be enlarged from nine members elected at large to fifteen members, nine of whom would be elected from single-member districts and six, including the mayor, elected at large. After this referendum was approved by the voters in 1979, Houston entered the 1980s with a population exceeding 1.5 million and a size of 557 square miles.² Some advocates and community members argue that these annexed

² Grofmoan, Bernard & Chandler, Davidson (1992), Controversies in Minority Voting: The Voting Rights Act in Perspective, pg. 61-63.

minority areas were never given the same level of public services or infrastructure as other areas of the city, especially concerned with drainage and flooding issues. This has been a main fair housing concern ever since Houston conducted these major annexations.

After the 1980s, there have been limited annexations compared to the previous decades. In 1999, Texas law governing annexations changed, and general purpose annexation became more difficult. Since then, the city has only conducted two general purpose annexations, both of which were requested by the property owners. The City has completed 196 limited purpose annexations. Limited purpose annexations, which usually only include commercial property, are annexations in which the city annexes territory through an agreement with the utility district that provides water and sewer service to that territory. In these areas, sales tax, and not property tax, is collected and typically split between the city and district and the city provides a limited array of services.

Although limited purpose annexations primarily include commercial property, the 2010 Census shows that 70,201 residents lived in the Census Blocks that were annexed by the City. The following table shows that minorities made up 82.5% of the annexed areas which is slightly higher than the total minority population in Houston at 74.4% in the 2010 Census. It is also higher than the minority population living in the Houston MSA which is just over 60%.

Table 4: Race and Ethnicity of Areas Annexed by the City of Houston between 2000-2010

	% Total Population (2010)	Census Blocks of Annexed Areas (2000-2010)
White Non-Hispanic	25.6	17.5
Hispanic	43.8	33.6
Black Non-Hispanic	23.1	42.6
Minority	74.4	82.5

Source: Updated 2010 AI

Population by Protected Class

Race/Ethnicity and Color

The Fair Housing Act prohibits discrimination by race and color. Although income, educational achievement, English proficiency, and housing status are not determined by race, ethnicity, or color, there is a strong correlation that can be found in current data. There is no information collected by the U.S. Census that specifically addresses the protected class of color. Instead, data and information based on race and ethnicity, and sometimes even national origin, can serve as a proxy for color. When determining descriptive statistics of the city and region on the basis of color, this report will use race information to also describe color.

Houston is a majority minority city with approximately 75% of its population identifying as minority. A quarter of Houston residents (25.9%) are non-Hispanic Whites. This is very different from the U.S., which has a majority of racially White alone, non-Hispanic residents (63.7%). Compared to the region, Texas, and the U.S., Houston has a larger percentage of residents identifying as Black/African American alone, non-Hispanic (23.2%).

Over two in every five residents in the City of Houston identifies as Hispanic/Latino of any race. Although slightly lower compared to Houston, over one third of residents in the Houston region (35.2%) and in Texas (37.6%) is also Hispanic/Latino of any race. This differs dramatically from the U.S. where Hispanic/Latinos of any race make up a much smaller percentage (16.4%) of the entire U.S. population.

Table 5: Race by Ethnicity Hispanic/Latino in Houston, Houston MSA, Texas, and U.S.

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
White Alone*	546,133	25.9	2,367,963	39.7	11,415,017	45.3	196,903,968	63.7
Black Alone*	489,529	23.2	1,007,073	16.9	2,903,204	11.5	37,786,591	12.2
American Indian and Alaska Native Alone*	3,018	0.1	11,396	0.2	67,134	0.3	2,050,766	0.7
Asian Alone*	128,223	6.1	392,257	6.6	966,343	3.8	14,692,794	4.8
Native Hawaiian and other Pacific Islander Alone*	761	0.0	2,688	0.0	17,955	0.1	480,063	0.2
Some Other Race Alone*	3,659	0.2	12,049	0.2	37,097	0.1	616,191	0.2
Two or More Races*	18,993	0.9	67,904	1.1	322,477	1.3	6,063,063	2.0
Hispanic/Latino	917,133	43.5	2,101,086	35.2	9,479,670	37.6	50,545,275	16.4
*Non-Hispanic/Latino								
Source: 2008-2012 ACS								

Population Change Based on Race/Ethnicity

The next table compares the population of the city and region by race and ethnicity over time from 2000 to 2010. During this time, Houston’s population grew 7.5% and the region grew by 26.2%. The region has grown more than any other in the United States.³

In 2000 and 2010, Hispanics were the largest racial/ethnic group in the city of Houston at 37.4% and 44.8% of the whole population. In 2010, Hispanics were the second largest racial/ethnic group in the region at 35.5%. The Hispanic population in the region still makes up less than the population of White alone, non-Hispanic in the region (39.4%). The Hispanic population grew 25.8% in Houston and 55% in the region from 2000 to 2010, which both greatly outpaced the growth rate of the total population. The Asian population, although making up a small percentage of the city and region’s population, grew at a high rate, like Hispanics, at 21.6% in Houston and 70% in the region from 2000 to 2010.

During the same period of time, the City of Houston had a decrease in population of some racial/ethnic groups. Houston’s White alone, non-Hispanic racial/ethnic group declined by 10.6%, but increased slightly in the region by 3.7%. The Black/African American, non-Hispanic racial/ethnic group decreased very slightly in Houston, by -0.4%, and increased in the region at a rate of 27.6% over ten years. Although there was a significant growth of Black/African American, non-Hispanic residents in the region, the proportion of Black/African American, non-Hispanic residents in Houston is still much higher (23%) than in the region (16.9%).

³ Emerson, Michael, Bratter, Jenifer, Howell, Junia, Jeanty, P. Wilner, & Cline, Mike. *Houston Region Grows More Racially/Ethnically Diverse, with Small Declines in Segregation*. Retrieved from http://kinder.rice.edu/uploadedFiles/Urban_Research_Center/Media/Houston%20Region%20Grows%20More%20Ethnically%20Diverse%202-13.pdf

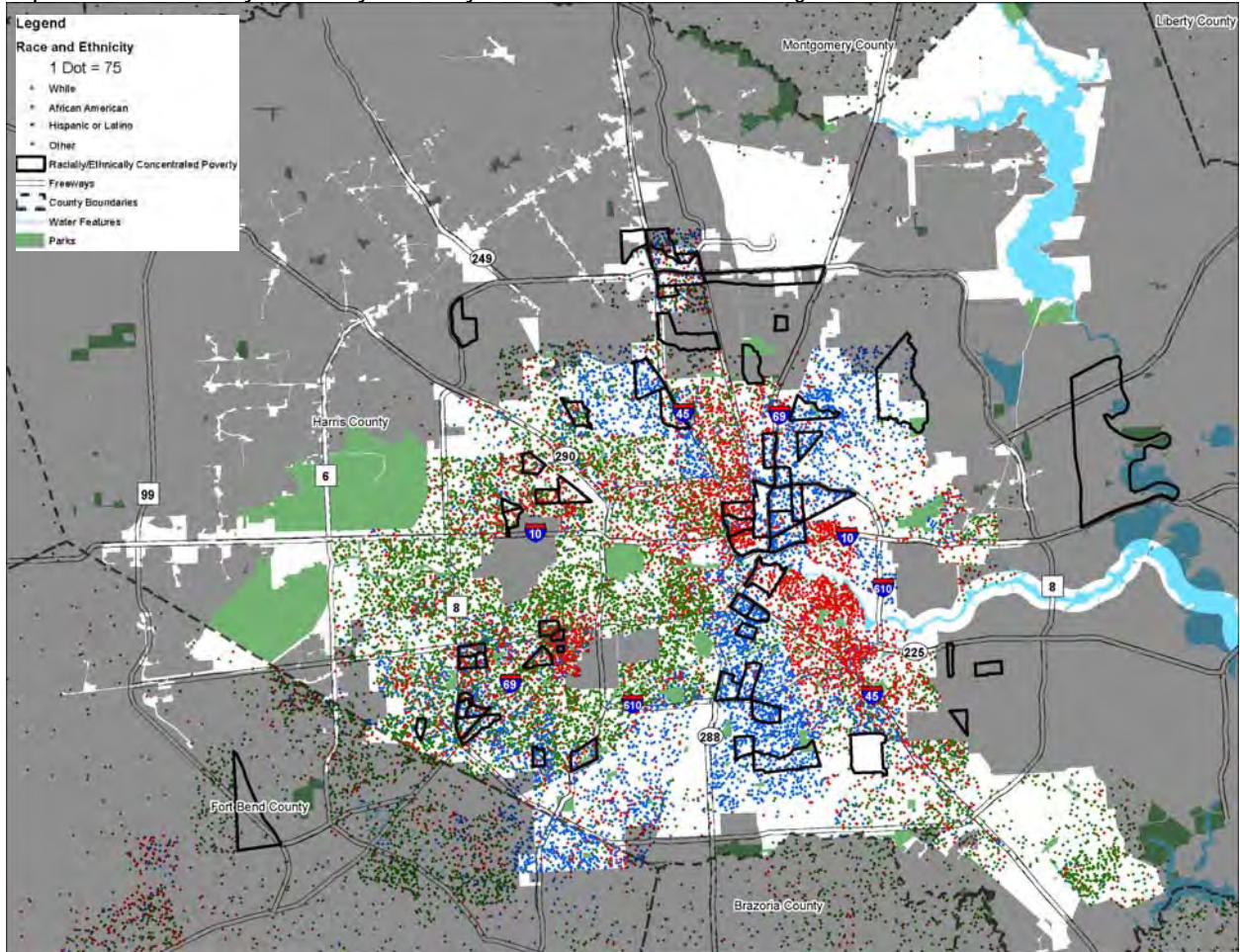
Table 6: Race and Ethnic Growth Rate in the City of Houston and Houston MSA from 2000-2010

	2000				2010				Change 2000-2010	
	Houston		Houston MSA		Houston		Houston MSA		Houston	Houston MSA
	#	%	#	%	#	%	#	%	%	%
Total population	1,953,631		4,669,571		2,099,451	100	5,891,999		7.5	26.18
Not Hispanic or Latino	1,222,766	62.6	3,320,983	71.1	1,179,783	56	3,802,108	64.5	-3.5	14.49
White alone*	601,851	30.8	2,239,893	48.0	537,901	26	2,321,611	39.4	-10.6	3.65
Black or African American alone*	487,851	25.0	778,684	16.7	485,956	23	993,599	16.9	-0.4	27.60
American Indian and Alaska Native alone*	3,234	0.2	11,019	0.2	3,528	0.2	13,745	0.2	9.1	24.74
Asian alone*	102,706	5.3	226,177	4.8	124,859	5.9	384,366	6.5	21.6	69.94
Native Hawaiian and Other Pacific Islander alone*	680	0.0	1,732	0.0	711	0.0	2,906	0.0	4.6	67.78
Some Other Race alone*	2,614	0.1	5,927	0.1	4,128	0.2	10,987	0.2	57.9	85.37
Two or More Races*	23,830	1.2	57,551	1.2	22,700	1.1	74,894	1.3	-4.7	30.14
Hispanic or Latino	730,865	37.4	1,348,588	28.9	919,668	44.8	2,089,891	35.5	25.8	54.97
*Non-Hispanic/Latino										
Source: 2000 Census; 2010 Census										

As with other cities in the region, the City of Houston was more diverse in 2010 than it was in 1990. In 2010, the City of Houston was no longer the most diverse city in the region. In 2010 Missouri City and Pearland were the region’s most racially/ethnically diverse cities.⁴ Examining where residents are living is significant when examining fair housing. Although Houston has become more diverse, there are still distinct separations between different racial and ethnic groups. A Rice University Professor, Michael Emerson recently completed an analysis and found that 1) The City of Houston is substantially more segregated than other areas of the region, 2) African American-Latino segregation in the region has declined most rapidly, 3) African Americans are most segregated where they represent the largest absolute and relative numbers, 4) the smaller the percentage Anglo in an area, the greater their segregation from other groups, and 5) Asians live closest to Anglos, and continue to be significantly segregated from African Americans and Latinos. The following maps show generalized geographic representations of racial and Hispanic/Latino change throughout Houston and the region at different points in time beginning in 1990 to 2010.

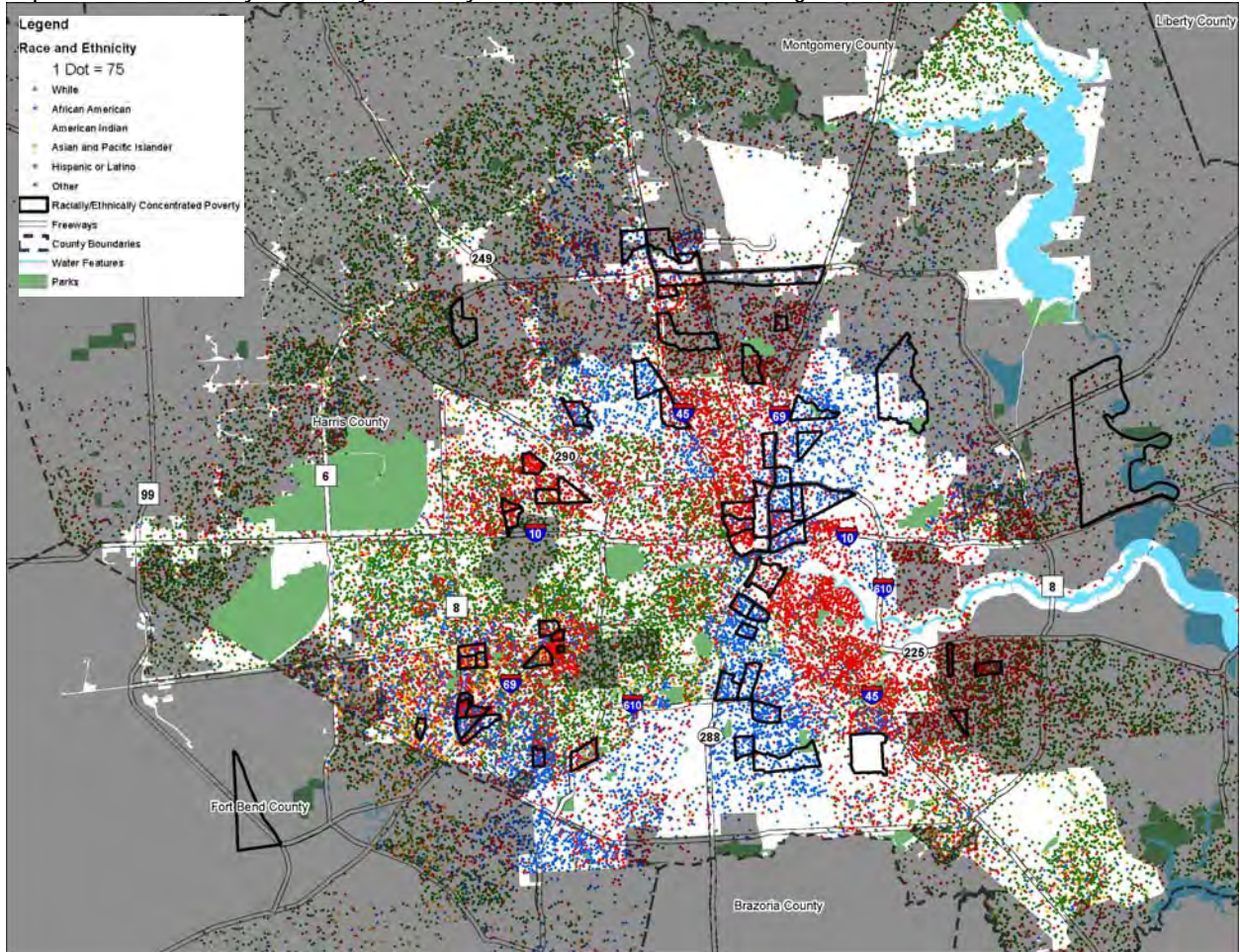
⁴ Emerson, Michael, Bratter, Jenifer, Howell, Junia, Jeanty, P. Wilner, & Cline, Mike. *Houston Region Grows More Racially/Ethnically Diverse, with Small Declines in Segregation*. Retrieved from http://kinder.rice.edu/uploadedFiles/Urban_Research_Center/Media/Houston%20Region%20Grows%20More%20Ethnically%20Diverse%202-13.pdf

Map 1: 1990 Race/Ethnicity Dot Density for the City of Houston and Some Surrounding Areas



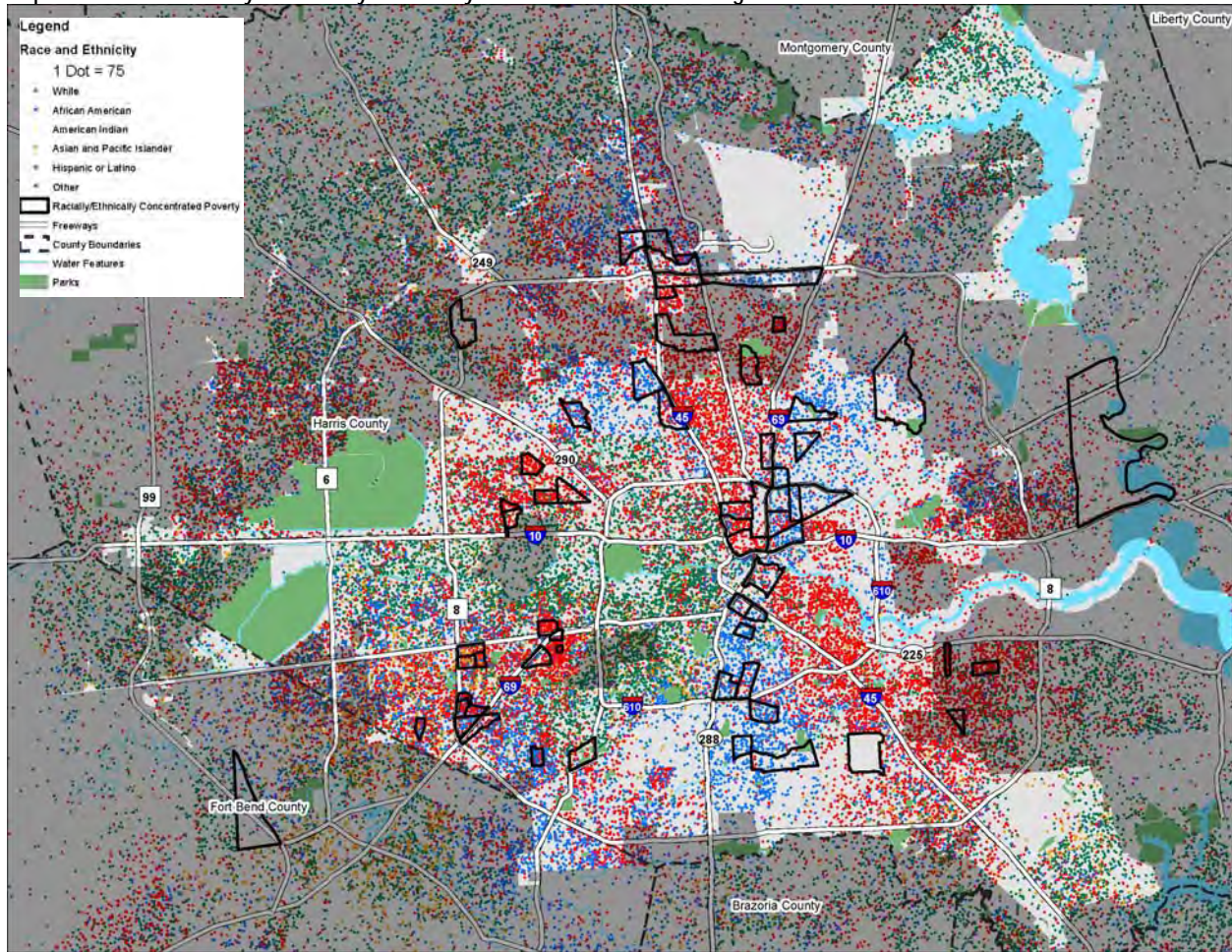
Source: 1990 Census

Map 2: 2000 Race/Ethnicity Dot Density for the City of Houston and Some Surrounding Areas



Source: 2000 Census

Map 3: 2012 Race/Ethnicity Dot Density for the City of Houston and Surrounding Areas



Source: 2008-2012 ACS

These maps show an increase of Hispanic and Asian population in Houston over the past two decades. It also illustrates how areas with minority populations in 1990 are still predominately minority. These maps could represent the results of various kinds of discrimination including remnants of historical discrimination resulting from segregation. They could also represent that people of various race and ethnicities choose to live in areas with others of similar race or ethnicity. This self-steering could also be because of discriminatory attitudes in the community where minorities feel apprehensive about living in majority White communities due to overt or covert racism. Later in this report, racial change and segregation will be analyzed further through several detailed quantitative methods.

Population by Gender

Gender is a protected class covered by the Fair Housing Act. The following provides a few examples of discrimination on the basis of gender. Discrimination may occur if a lender or landlord denies a female housing based on pregnancy. In addition, a single female-headed household may face significant disparities in income, access to jobs, and public services due to the lack of affordable housing choices throughout the City. Some landlords may deny housing women who have been victims of domestic violence, which could be another form of gender discrimination.

In Houston, the population of males and females is almost even. The Houston MSA, Texas, and the U.S. have a slightly greater proportion of females to males. Since 2000, there has only been a minimal change in population proportion by gender. In 2000, the percentage of males (49.9%) was slightly lower than females (50.1%) in the City of Houston.

Table 7: Sex of Population

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Female	1,051,474	49.9	2,996,718	50.3	12,699,085	50.4	157,119,912	50.8
Male	1,055,975	50.1	2,965,698	49.7	12,509,812	49.6	152,018,799	49.2

Source: 2008-2012 ACS

Although the Fair Housing Act does not specifically include sexual orientation and gender identity as prohibited bases, HUD includes additional regulations regarding these statuses. Housing providers that receive HUD funding, have loans insured by the Federal Housing Administration (FHA), and lenders insured by FHA, must ensure equal access to their programs for eligible individuals and families regardless of sexual orientation, gender identity, or marital status. Currently, there is no Houston specific research that has been completed that describes discrimination faced by the local Lesbian, Gay, Bisexual, and Transgender (LGBT) community. The lack of data on the LGBT community could conceal discrimination that this community is facing when accessing housing.

Population by Family Status

Familial status is defined in the Fair Housing Act as having one or more individuals under 18 years of age who reside with a parent or another person with care and legal custody of the child. Familial status also includes a pregnant woman or person who is in the process of adopting or otherwise securing legal custody of any individual under 18 years of age. Examples of housing discrimination based on protected class would be a landlord refusing to rent to a family with children or a landlord that enforces extra restrictions only on families with children.

According to the 2000 Census, the percent of families with children in Houston was 33.1% of family households (DP-1, 2000 US Census). Since then, the number of family households with children has decreased to 30.2% of families. Similar to Texas and the U.S., just under one third of family household in the City of Houston have children. The Houston region has a much higher percentage of families with children. This could indicate that families with children choose to live in the suburbs for reasons related to their children, which might include lower housing costs, larger housing units, or better ranked schools.

Table 8: Families with Children

Family Type	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Families with Own Children	233,937	30.2	740,740	51.2	3,024,991	34.4	34,484,648	29.9

Percentage based on Total Family Households
Source: 2008-2012 ACS

According to the 2008-2012 ACS, 9.2% of family households in Houston were a single female-headed household with children as opposed to single male-headed family households with children, which only consisted of 2.6% of the families. Single-headed households, especially female-headed households, generally have lower income and can be at much greater risk of limited housing options.

National Origin and English Proficiency

Fair housing laws protect individuals based on their national origin. Discrimination based on national origin can include an individual's ability to speak, read, or understand English. For instance, it is discriminatory when housing or housing assistance is not provided because of language barriers, whether it is because application materials are not translated or translated appropriately or the landlord refuses to assist someone because of language differences.

Ineffective or no outreach to persons with limited English proficiency could also lead to housing discrimination based on national origin.

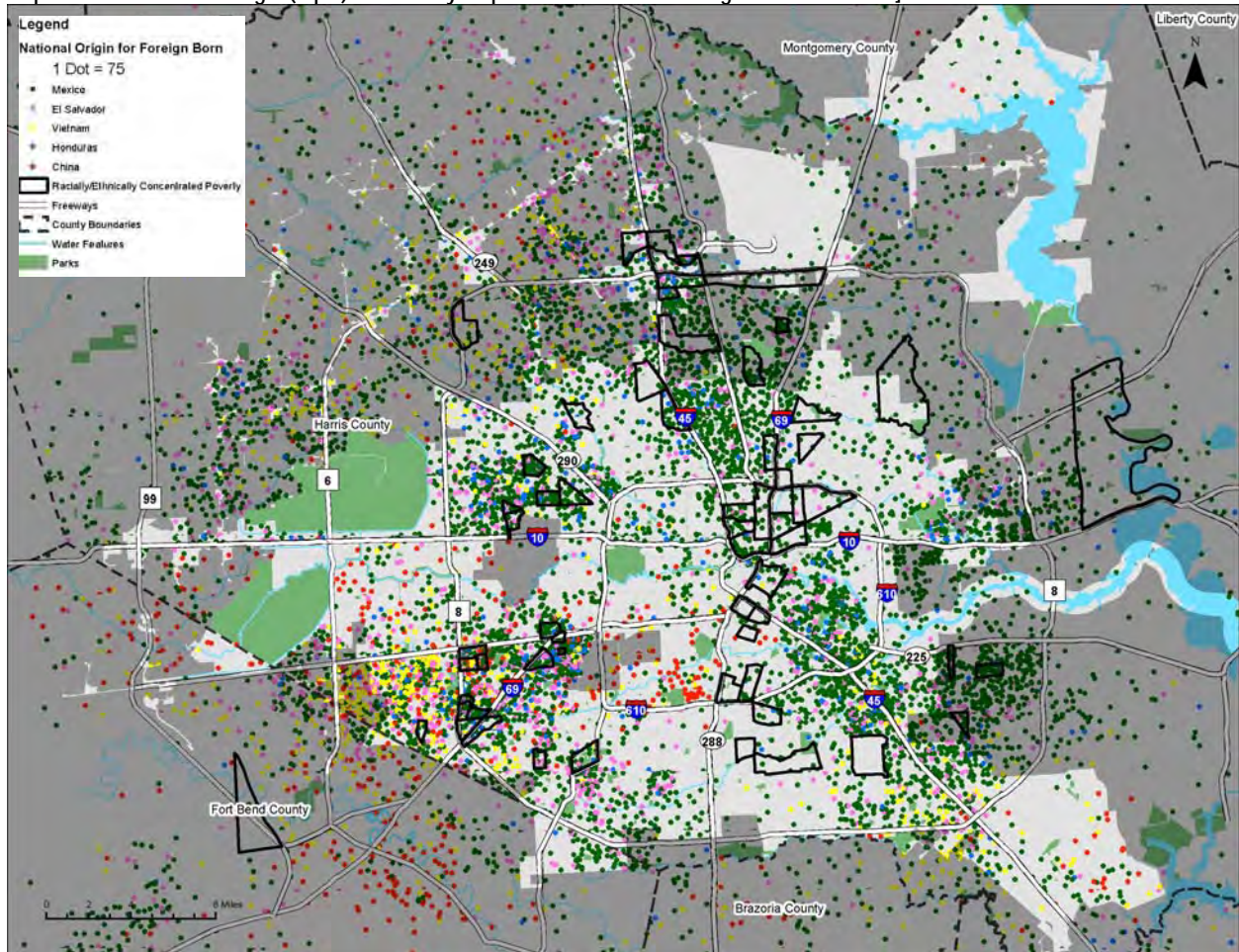
According to the 2000 Census, the total number of foreign-born residents in the city of Houston was 516,105. The top five countries of origin for foreign-born residents living in Houston in 2000 were Mexico, El Salvador, Vietnam, Honduras, and China. In 2012, the five countries with the most foreign born residents living in the City of Houston had not changed since 2000. These countries were almost identical to the top five countries of origin for foreign-born residents living in the Houston MSA in 2012: Mexico, El Salvador, Vietnam, India, and China.

The top place of birth of foreign-born residents living in Houston, the Houston MSA, Texas, and the United States was Mexico. Almost half of foreign-born residents in Houston and the Houston MSA were born in Mexico (48.3% and 45.4% respectively). Since 2000, the number of foreign-born residents has increased over 80,000 people, or by 15.6%, to 596,552 residents in 2012.

Table 9: National Origin

Houston			Houston MSA			Texas			U.S.		
Country	#	%	Country	#	%	Country	#	%	Country	#	%
Mexico	288,390	48.3	Mexico	599,471	45.4	Mexico	2,448,065	59.7	Mexico	11,599,653	29.2
El Salvador	56,700	9.5	El Salvador	104,091	7.9	El Salvador	170,536	4.2	China	2,166,563	5.4
Vietnam	28,564	4.8	Vietnam	73,725	5.6	India	164,349	4.0	India	1,837,838	4.6
Honduras	27,542	4.6	India	59,544	4.5	Vietnam	151,283	3.7	Philippines	1,810,537	4.6
China	20,239	3.4	China	48,763	3.7	China	106,359	2.6	Vietnam	1,231,716	3.1
Guatemala	20,106	3.4	Honduras	44,819	3.4	Philippines	80,985	2.0	El Salvador	1,201,972	3.0
India	17,582	2.9	Philippines	33,569	2.5	Honduras	79,020	1.9	Korea	1,085,151	2.7
Nigeria	8,040	1.3	Guatemala	30,858	2.3	Guatemala	57,841	1.4	Cuba	1,057,346	2.7
Philippines	7,883	1.3	Pakistan	25,654	1.9	Korea	53,647	1.3	Dominican Republic	866,618	2.2
Colombia	7,515	1.3	Colombia	20,511	1.6	Pakistan	44,683	1.1	Guatemala	822,947	2.1
Percentage based on total foreign-born											
Source: 2008-2012 ACS											

Map 4: Current national origin (top 5) dot density map for Jurisdiction and Region with R/ECAPs]



Source: 2008-2012 ACS

The City of Houston is a diverse community with many foreign-born residents living in the city and the region. Because of this, Houston residents speak many different languages and many are multilingual. Almost half (45.7%) of the population living in the City of Houston speaks English and another language, which is a greater percentage compared to the United States (20.5%), Texas (34.6%), and the metropolitan area (37.2%). The most frequently spoken non-English languages are Spanish, Vietnamese, and Chinese (2008-2012 American Community Survey, Table S16001).

Many Houstonians, whose first language is not English, may have a limited ability to read, write, speak, or understand English and are considered limited English proficient or "LEP". The U.S. Census estimates the number of persons over five years of age that speak English less than very well. This can serve as a proxy to show the number of LEP persons in Houston.

Compared to the Houston MSA, Texas, and the U.S, the City of Houston has the highest percentage of residents that speak English "Less Than Very Well." Almost one quarter (24.1%) of the population living in the City of Houston speaks English "less than well", which is a greater percentage compared to the United States (8.7%), Texas (14.4%), and the metropolitan area (17.2%).

Table 10: Breakdown of Population 5 Years or Older – Language Spoken at Home

	Houston	Houston MSA	Texas	United States
Total Population	1,938,003	5,490,490	23,280,055	289,000,827
Speak English Only	53.8%	62.8%	65.4%	79.5%
Speak English Only or Speak English "Very Well"	75.9%	82.8%	85.6%	91.3%
Speak English "Less Than Very Well"	24.1%	17.2%	14.4%	8.7%

Source: 2008-2012 ACS

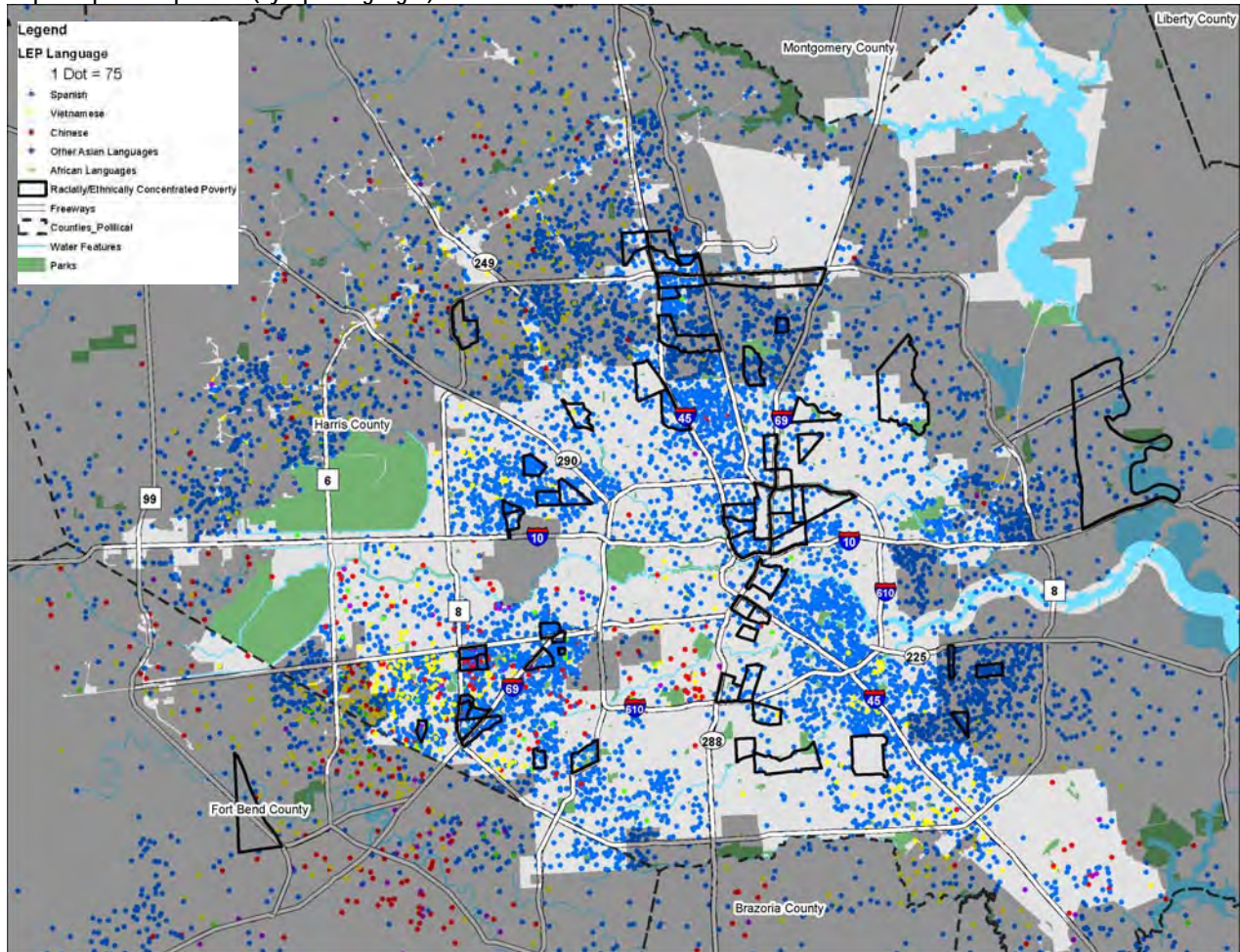
It is important to estimate the number of residents with limited English proficiency is important when identifying the need for language services. The following shows the number of City of Houston residents that speak English "Less than Very Well". Those with limited English proficiency living in Houston most frequently speak Spanish, Vietnamese, Chinese, Arabic, and Urdu.

Table 11: Populations 5 years or Older by Language That Speak English "Less than Very Well"

Houston			Houston MSA			Texas			U.S.		
Language	#	%	Language	#	%	Language	#	%	Language	#	%
Spanish	397,429	20.5	Spanish	771,884	14.1	Spanish	2,913,000	12.5	Spanish	16,386,716	5.7
Vietnamese	21,584	1.1	Vietnamese	53,787	1.0	Vietnamese	107,934	0.5	Chinese	1,553,500	0.5
Chinese	13,521	0.7	Chinese	31,936	0.6	Chinese	67,854	0.3	Vietnamese	822,537	0.3
Other Asian languages	3,580	0.2	Urdu	9,882	0.2	Korean	30,945	0.1	Korean	630,541	0.2
African Languages	3,364	0.2	Arabic	7,657	0.1	Other Asian languages	22,443	0.1	Tagalog	510,778	0.2
Arabic	3,324	0.2	Other Asian languages	7,632	0.1	African Languages Speak	19,715	0.1	Russian	420,454	0.1
Urdu	2,783	0.1	Tagalog	7,219	0.1	Arabic	18,618	0.1	Arabic	319,831	0.1
Other Indic Languages	2,718	0.1	African Languages	6,749	0.1	Other Indic Languages	17,306	0.1	French Creole	317,056	0.1
Korean	2,498	0.1	Korean	6,240	0.1	Tagalog	16,962	0.1	Other Indic Languages	298,497	0.1
French	2,084	0.1	Other Indic Languages	5,695	0.1	Urdu	16,509	0.1	French	272,872	0.1

Percentage based on population 5 years and over
Source: 2008-2012 ACS

Map 5 Map of LEP persons (by top 5 languages) for Houston with R/ECAPs



Source: 2008-2012 ACS

Population with Disabilities

Under the Federal Fair Housing Act, a disability, with respect to a person, is defined as:

- A physical or mental impairment which substantially limits one or more of such person's major life activities
- A record of having such an impairment or
- Being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance

Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance like a service animal. Persons with mental disabilities may face discrimination based on their landlord's refusal to rent to tenants with a history of mental illness or public opposition to a new development for persons with cognitive disabilities based on the stigma of mental disability.

According to the 2008-2012 ACS, in 2012, 205,866 residents had sensory, physical, mental, work, mobility, and/or self-care limitations, representing approximately 9.8% of the City's civilian, non-institutionalized population (B18101, 2008-2012 ACS). This percentage was less than Texas where 11.5% of the population have a disability and the U.S. where 12% have a disability. The number of persons with a disability living in Houston has decreased since 2000

when 364,485 residents over the age of five had a disability, representing 20.5% of the population five and older. This decrease could be due to the change in the way the U.S. Census collected disability data. There was growing consensus that the ACS questions did not coincide with the updated models of disability and the questions previously focused on the presence of specific conditions rather than the impact those conditions might have on basic functioning. In 2006 the U.S. Census modified content for the ACS questionnaire.

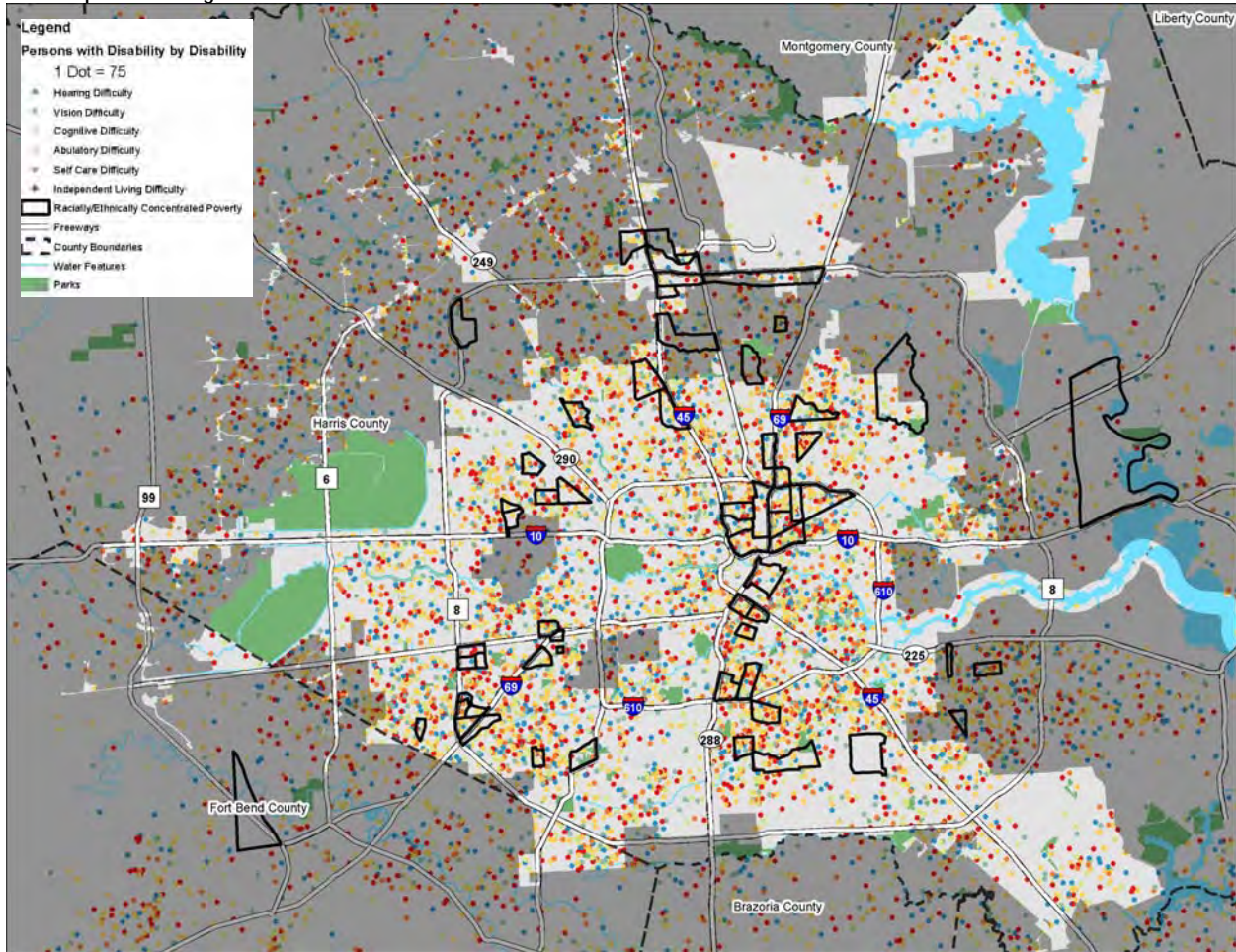
Currently, over half (54.6%) of persons with disabilities in Houston reported having ambulatory difficulty. About one third of persons with disabilities reported having cognitive difficulty (37.6%) and approximately the same (36.6%) reported having independent living difficulty.

Table 12: Disability Types in Houston, Houston MSA, Texas, and U.S.

Disability Type	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Hearing Difficulty	51,153	2.4	150,136	2.5	818,801	3.3	10,359,827	3.4
Vision Difficulty	46,511	2.2	115,031	1.9	604,521	2.4	6,551,824	2.2
Cognitive Difficulty	77,344	4.0	204,660	3.8	1,051,102	4.6	13,694,297	4.8
Ambulatory Difficulty	112,398	5.8	293,721	5.4	1,525,821	6.7	19,525,039	6.9
Self-care Difficulty	46,717	2.4	117,828	2.2	600,994	2.6	7,373,971	2.6
Independent Living Difficulty	75,416	4.9	189,888	4.5	963,589	5.4	13,037,439	5.7
Percentage for Hearing and Vision Difficulty based on entire population; Percentage for Cognitive, Ambulatory, and Self-care Difficulty based on population 5 years and older; Independent Living Difficulty based on population 18 years and older.								
Source: 2008-2012 ACS								

Eight of the top ten census tracts in the region with the highest percentage of persons with disabilities, ranging from 25% to 34% of the census tract population, are located in east Houston. These tracts are located in the following City of Houston designated Super Neighborhoods: Trinity/Houston Gardens, Greater Fifth Ward, Kashmere Gardens, Sunnyside, East Little York/Homestead (2), Greater OST/South Union, and Denver Harbor. The Greater Fifth Ward has the census tract with the highest number of persons with disabilities inside the Houston city limits, 1,276 persons with disabilities living in this census tract.

Map 6: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Houston



Source: 2008-2012 ACS

Residents between the ages of 18 and 64 years represented the majority of persons with disabilities. This means that most persons with disabilities cannot take advantage of housing and programs designed for persons with disabilities who are also elderly. Providing elderly housing that is accessible for persons with disabilities is important because approximately two in five (38.5%) residents over the age of 65 have a disability. However, housing and services for younger persons with disabilities is also very important for the community.

Table 13: Persons with Disabilities by Age Range

	Houston		Houston MSA	
	#	%	#	%
Under 5 years	1,419	0.1	3,221	0.1
5-17 years	16,927	0.8	53,251	0.9
18-64 years	114,670	5.5	304,978	5.2
65+ years	72,850	3.5	190,883	3.2

% represents a share of the total population.

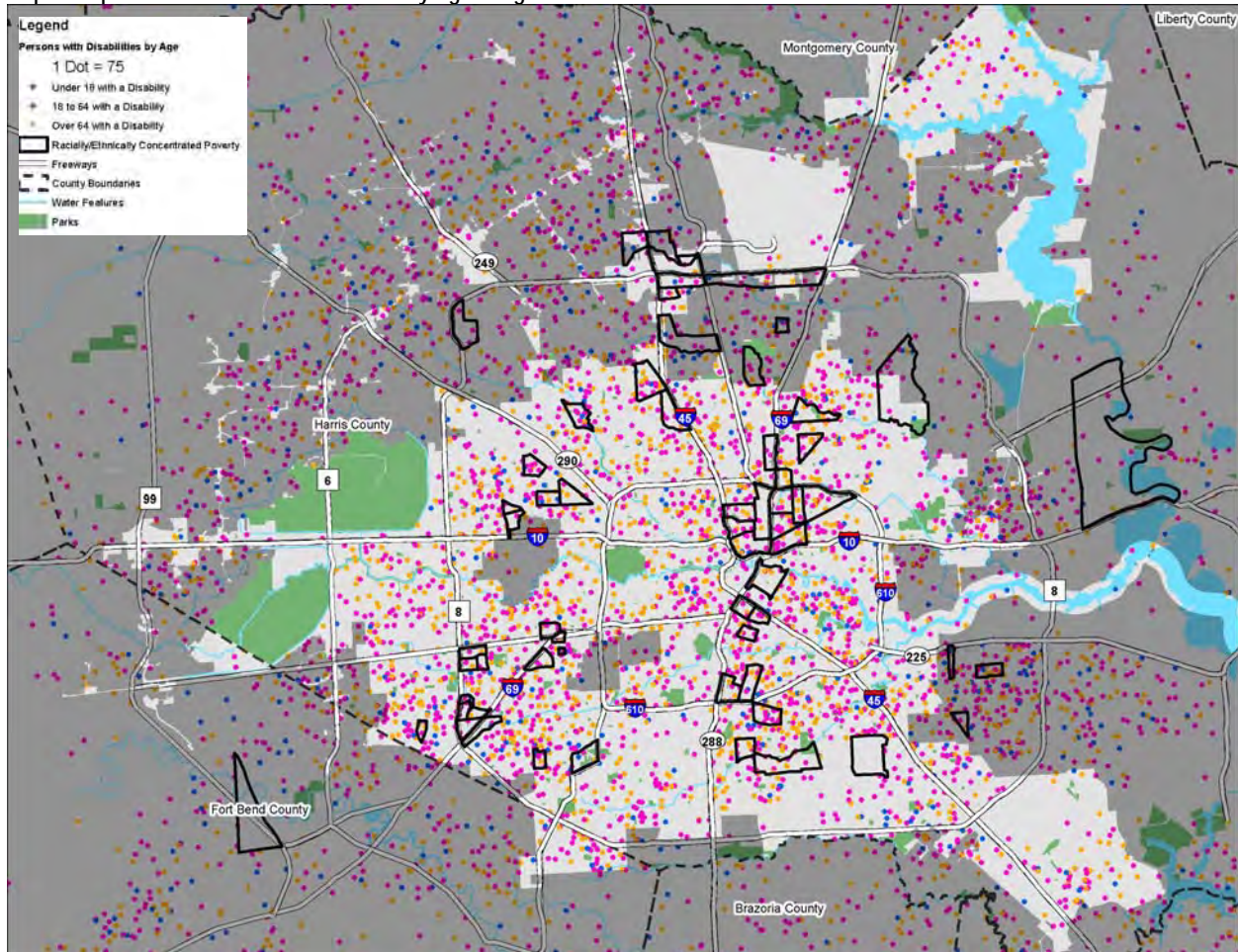
Source: 2008-2012 ACS

The top 20 census tracts in the region with the greatest absolute number of people with disabilities for two age categories zero to 18 and 18 to 64 live outside the city limits of Houston. Of the top twenty census tracts with the

greatest number of persons with disabilities aged 64 years or older, three are located in the neighborhoods of South Acres, Golfcrest/Belfort, and Northside/Northline.

Although age is not a protected class, many older people have disabilities. Similar to the American population, the population within the City of Houston and the Houston region is aging. The number of Houston residents 65 and older grew at a rate of 17.8% from 2000 to 2012, which was much faster than the overall population growth rate of the City of Houston at 7.9%. This is the same for the Houston MSA. In the Houston area the population 65 and older grew 44.4% while the total population grew 27.7% between 2000 and 2012.

Map 7: Map of All Persons with Disabilities by Age Range with R/ECAPs



Source: 2008-2012 ACS

Some persons with disabilities cannot live alone and need assistance. The City of Houston recently passed an ordinance to regulate group boarding homes for elderly persons and persons with disabilities that were previously unlicensed. It was noted by Houston Police Officers that regulate some boarding homes in Houston, that boarding homes tend to cluster geographically. Boarding homes tend to cluster due to economic reasons, cheaper housing costs like rent or land, and proximity to services. For instance, there are several social services for persons with disabilities including Houston Center for Independent Living and MHMRA located near Highway 59/Interstate 69 outside of Loop 610, and there many persons with disabilities clustered in this area.

Persons with disabilities are overrepresented in the homeless population. The Coalition for the Homeless Houston/Harris County conducted a homeless count in the Houston area on January 30, 2014. The count identified

5,351 experiencing homelessness by HUD's definition, which was a 16% decrease in homelessness from 2013 and a 37% decrease in homelessness from 2011. Approximately 43% were unsheltered. Two in five persons experiencing homelessness had mental health issues.

Given the prevalence of disabilities among the homeless population, the need for emergency shelters and transitional or supportive housing is evident. A continuum of housing options for this special needs population is essential and should include a range of housing from short-term emergency shelters, transitional housing, supportive housing, to permanent housing. Specifically, housing that connects to supportive services including substance abuse treatment programs and mental health counseling is needed. Addressing the provision of such housing will help mitigate the impediment of decent housing for disabled homeless people.

Persons with HIV/AIDS may have physical impairments that limit one or more major life activities or major bodily functions and are therefore considered to have a disability and are covered under the law. Persons who are discriminated against because they are regarded as having HIV are also protected. Moreover, the federal law protects persons who are discriminated against because they have a known association or relationship with an individual who has HIV. The *2014 Houston Area HIV/AIDS Needs Assessment* conducted a survey as part of the report. It found that persons with HIV/AIDS often encounter differential treatment or are discriminated against due to their HIV status. Of the respondents who replied to the survey, 15% said they had been treated differentially sometime in the past 12 months because of their HIV status; 3% said they were denied services; 2% said they were asked to leave a public place. From 3% to 8% of the respondents experienced some form of violence in the past 12 months including threats of violence, verbal harassment, violent relationship, physical assault, and sexual assault⁵. Although these findings are not specific to housing, this information shows those with or associated with HIV/AIDS may encounter discrimination when trying to find or maintain housing.

Religion

Discrimination in housing based on religion is prohibited by the Fair Housing Act. Prohibition under the Act also includes instances of overt discrimination against members of a particular religion as well as less direct actions, such as zoning ordinances designed to limit the use of private homes as a place of worship. Although not related to housing discrimination, religious tensions and discrimination can be seen in other ways. In February 2015, an arsonist set fire to Quba Islamic Institute, a mosque in southeast Houston. The suspect, a homeless man, had reportedly spoken about his hatred toward Muslims before the incident.⁶ In addition, the City Council of League City passed a resolution in 2014 which gave the false and unfair impression that Muslims are a threat to the United States by stating in the resolution that: "members of dangerous transnational criminal organizations and radical Islamic terror groups continue to exploit the situation to infiltrate the United States for the purpose of establishing criminal activity, terror cells, and training operations within our homeland."⁷

In general, neighborhoods in Houston haven't been developed on the basis of religion. However, Meyerland has been historically the center of Houston's Jewish community since its development, which may be because the Jewish Community Center, Congregation Beth Israel, Congregation Beth Yeshurun, and several smaller synagogues are located in southeast Houston. For the more observant Jewish community it is very important to be near within walking distance of their Synagogue. However, the Jewish community is also becoming more suburban: "Houston's Jewish community covers a range of religious branches from Orthodox to Reform. For decades, the heart of Jewish life could be found in Southwest Houston and surrounding neighborhoods, where the Orthodox community is still growing, according to the Jewish Federation. Now, some also see burgeoning Jewish communities – generally

⁵ Houston Area HIV Services Ryan White Planning Council. (March 2014) *2014 Houston Area HIV/AIDS Needs Assessment*. Retrieved from <http://www.rwpchouston.org/Publications/2014%20Needs%20Assessment%20-%20FINAL%203-13-14.pdf>

⁶ Rogers, Brian. (February 18, 2015). Arson suspect reportedly spoke of hatred toward Muslims. *Houston Chronicle*. Retrieved from <http://www.chron.com/news/houston-texas/houston/article/Arson-suspect-reportedly-speaks-of-hatred-toward-6088601.php>

⁷Nasrullah, Ruth. (July 12, 2014). League City resolution unfairly singles out Muslims. *The Daily New*. Retrieved from http://www.galvnews.com/opinion/guest_columns/article_f302e6b2-094f-11e4-ba9b-0017a43b2370.html

Reform or less strictly observant – in suburban areas like Pearland and Clear Lake, according to Jewish Family Services, as well as a shift toward the rapidly developing Katy area on the horizon.”⁸

An individual’s religion is not collected or tracked by the U.S. Census, and therefore it is difficult to study the various religious populations in the area because there are limited data sources available. The U.S. Religion Census is conducted by the Association of Statisticians of American Religious Bodies (ASARB) every ten years to coincide with the U.S. Census. The *2010 U.S. Religious Census: Religious Congregations and Membership Study* found that 55.3% of the total population in the Houston Metropolitan area were full members, children of members, or attended services regularly. Almost half (45%) of those were classified as Evangelical Protestant, almost one third (31%) were Catholic, and 12% were Mainline Protestant.⁹ Although this data gives an overview of the Houston area, there is a lack of data involving religious concentrations in the housing market. With a growing immigrant population, it is important to inform residents of their fair housing rights based on religion or other aspects of their life related to religion, including food or dress.

⁸ Binkovitz, Leah. (December 16, 2014). Jewish community on move in Houston. *Houston Chronicle*. Retrieved from <http://www.houstonchronicle.com/neighborhood/katy/news/article/Jewish-community-on-move-in-Houston-5961680.php>

⁹ The Association of Religion Data Archives. (2010). Houston-The Woodlands-Sugar Land, TX, Metropolitan Statistical Area: Metro-Area Membership Report. Retrieved from http://www.thearda.com/rcms2010/r/m/26420/rcms2010_26420_metro_name_2010.asp

Income Data

While income affects a household's housing choice by limiting or expanding their housing options, a person's earning potential may be influenced by their association with one or more protected classes. There is a strong relationship among household income, household type, race/ethnicity, and other factors. These relationships often create misconceptions and biases that could raise fair housing concerns. Dr. Stephen Klineberg sees the income divide as something that should be addressed:

The real challenge for the future of America is not a race divide but a class divide. We are heading into a world of division not by ethnicity but by class. It is becoming increasingly rigidified. The more income inequality there is, the more the upper classes live in a different world and in a different reality than the poor kids or the middle-class kids."¹⁰

Geographic division by income is seen as a problem for cities trying to racially and ethnically integrate, especially when income can be related to race, ethnicity, and other factors related to protected class. According to some housing advocates, as income stratification becomes more pronounced, it becomes harder to reverse. This division is a problem and can often reinforce discrimination when seen geographically. John Henneberger, a housing advocate in Texas, sees that there are significant costs when isolating the poor.

There certainly are negative consequences if poor people are isolated and living only with other poor people. The money tends to go where more affluent people live, where the people are politically engaged. Social capital is highly related to economic capital. Those isolated poor are going to be considerably disadvantaged."¹¹

The following analysis will compare income by protected class and examine the distribution of poverty.

Household Income

The median household income is lower in Houston compared to the Houston MSA, Texas, and the U.S. According to the 2008-2012 ACS, the 2012 median income in Houston was \$44,648, lower than the Houston MSA at \$57,426, the State of Texas at \$51,563, and the U.S. at \$53,046. The median income in Houston increased 17% from 2000 to 2010, which was less of an increase than Texas and the U.S. each at 24%.

Table 14: Median Household Income

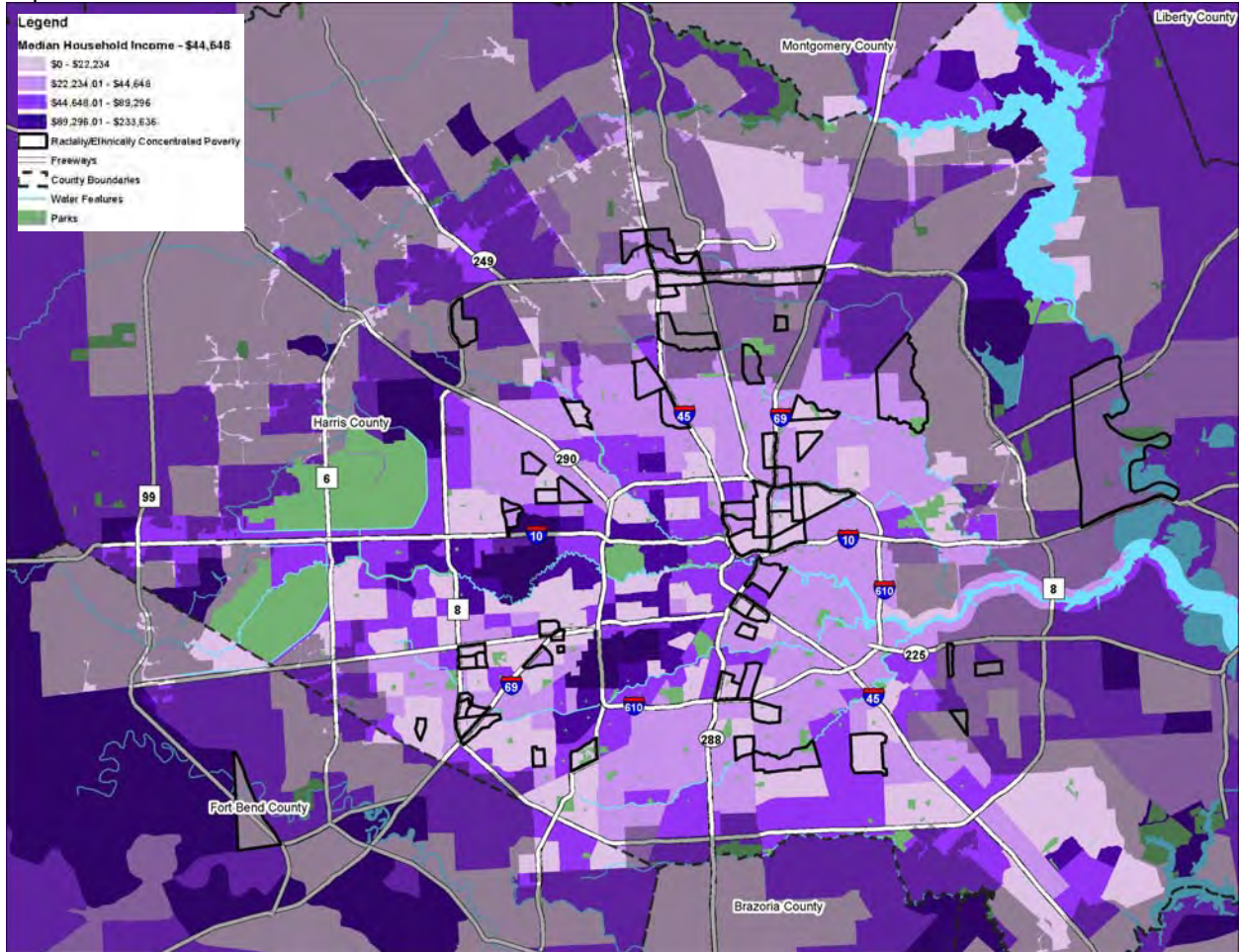
	Houston		Houston MSA		Texas		U.S.	
	\$	% Change	\$	% Change	\$	% Change	\$	% Change
2000	\$36,616		\$42,598*		\$39,927		\$41,994	
2010	\$42,962	17%	\$55,207	30%	\$49,646	24%	\$51,914	24%
2012	\$44,648	4%	\$57,426	4%	\$51,563	4%	53,046	2%
*Harris County Only								
Source: 2000 Census; 2006-2010 ACS; and 2008-2012 ACS								

The map below shows locations of census block groups that have a median income below and above the Houston's median income. Most areas below the city's median income are located in the east side. Many of the areas in Houston below the median income are also areas with high percentage of minority populations.

¹⁰ Tolson, Mike. (August 1, 2012) Segregation by income in Houston is among the starkest in U.S., *The Houston Chronicle*. Retrieved from <http://www.chron.com/news/houston-texas/article/Study-More-here-living-in-areas-with-similar-3755755.php>

¹¹ Ibid.

Map 8: Median Income

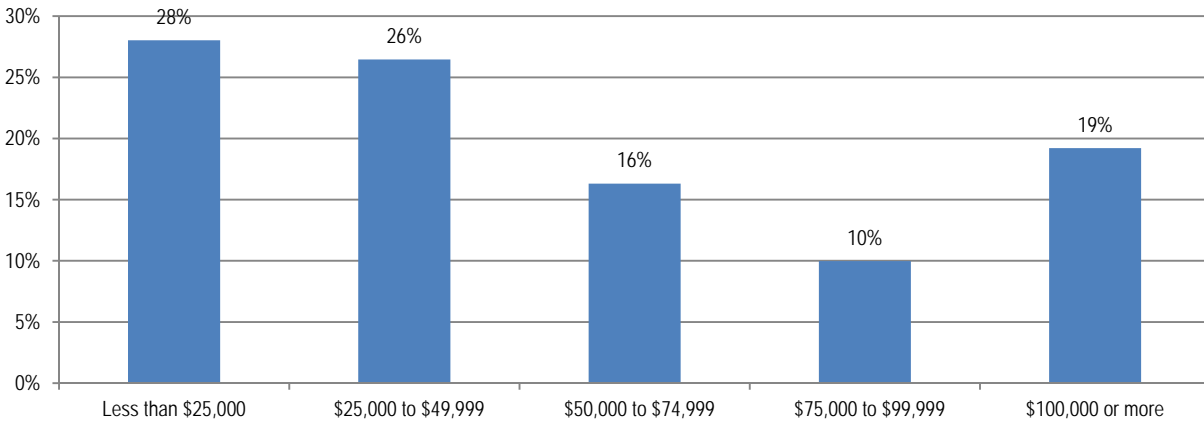


Source: 2008-2012 ACS

Income Distribution

The following graph shows the household income distribution for the city of Houston. According to the 2008-2012 ACS, more than half (54.5%) of Houston’s households earn less than \$49,999 per year and more than one in four (28%) households in Houston earn less than \$25,000 per year.

Figure 1: Household Income Distribution, Houston



Source: 2008-2012 ACS

For purposes of most housing and community development activities, HUD has established four income categories based on the Median Family Income (MFI) for the Metropolitan Statistical Area (MSA). The following are HUD’s income categories.

Table 15: HUD Income Categories

		Example of Latest Income limits for Houston MSA for a Family of Four for FY 2014
Extremely Low Income	Less than 30% MFI	Less than \$20,000
Low Income	31-50% MFI	\$20,000-\$33,300
Moderate Income	51-80% MFI	\$33,300-\$53,300
Middle/Upper Income	Greater than 80% MFI	Greater than \$53,300

Source: HUD

It is important not only to look at Houston’s distribution of current income, but it is also important to look at the changes in income over time. As the population grows in the city, so does the number of households. According to CHAS data from 2000 to 2007-2011 the number of households in the city grew at rate of 6.7%. The lower income categories grew faster compared to other income categories in Houston. The fastest growing income categories were “Low Income” households increasing at a rate of 13.8% and “Extremely Low Income” households increasing at a rate of 9.3% over the same time period. Although the absolute number of “Middle/Upper Income” households was the largest increase in HUD’s designated income categories, the rate of growth was lower than the city’s entire population at 5.1%. The absolute growth of all lower and moderate income household categories is increasing faster than the middle and upper income households.

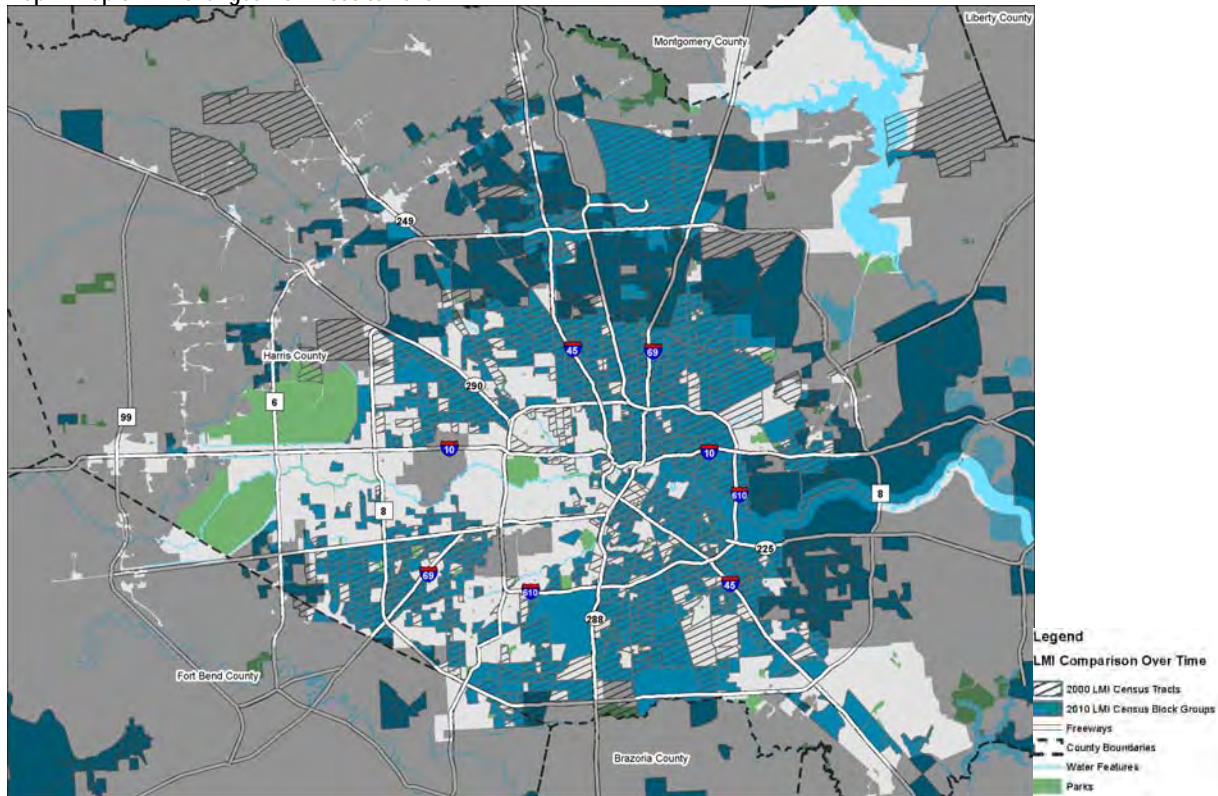
Table 16: Change in Household Income Distribution 2000 and 2007-2011

	2000		2008		Change	
	Households	%	Households	%	Number of Households	Percent of Households
Extremely Low Income	115,253	16.1	127,120	16.5	11,867	9.3
Low Income	96,555	13.4	112,050	14.6	15,495	13.8
Moderate Income	134,136	18.7	138,750	18.0	4,614	3.3
Middle/Upper Income	371,957	51.8	391,945	50.9	19,988	5.1
Total	717,901	100	769,865	100	51,964	6.7

Source: State of Cities Data Systems: CHAS Data 2000; 2007-2011 CHAS

The following map shows the way low- and moderate-income areas have changed over time. The map compares HUD information regarding areas with 51% or more low- and moderate-income residents. Most areas of the city that had a majority of low- and moderate-income residents in 2000 continued to have the same majority of low- and moderate-income residents.

Map 9: Map of LMI changes from 2000 to 2010



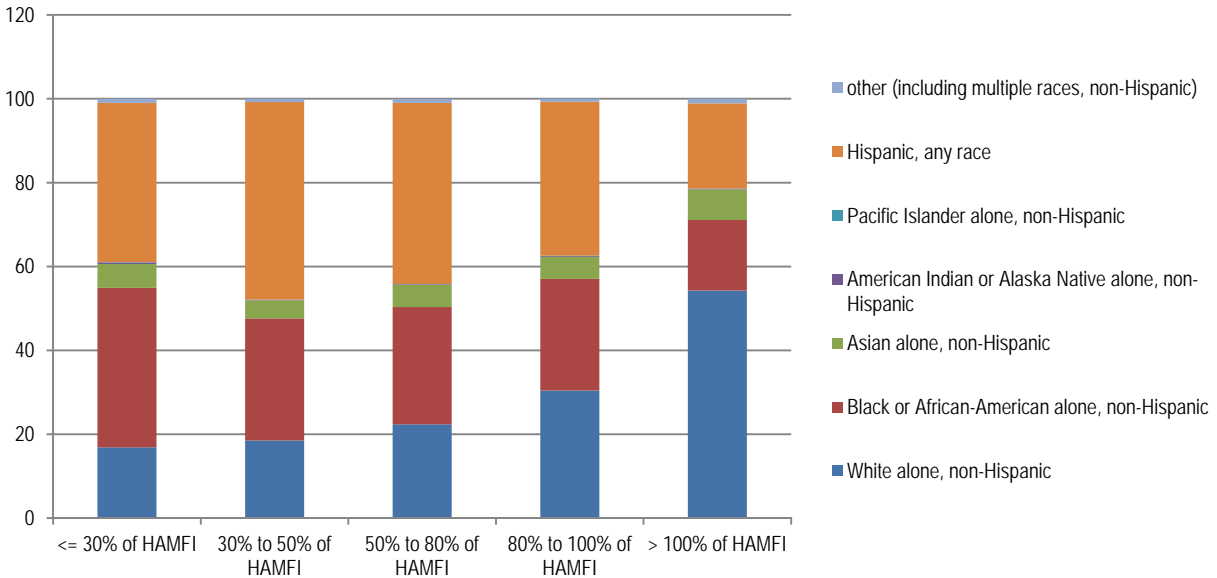
Source: 2008-2012 ACS

Income Distribution by Race/Ethnicity

According to the Comprehensive Housing Affordability Strategy (CHAS), there is a higher percentage of minority households earning less than the area median family income compared to non-minority households. The income group earning above 100% of the area median family income (AMFI) is majority White non-Hispanic households at 54%, which is a much higher proportion compared to the White non-Hispanic percentage of the total population. The

percentage of two racial groups, non-Hispanic Black/African Americans and Hispanics of any race, is larger and even increases in the lower income groups. For instance, of the high income category earning above 100% AMFI, Black/African Americans make up 16% of this group. The percentage grows at each lower income category, with the highest percentage of non-Hispanic Black/African Americans making up 38% of the lowest income category, households earning below 30% of the AMFI.

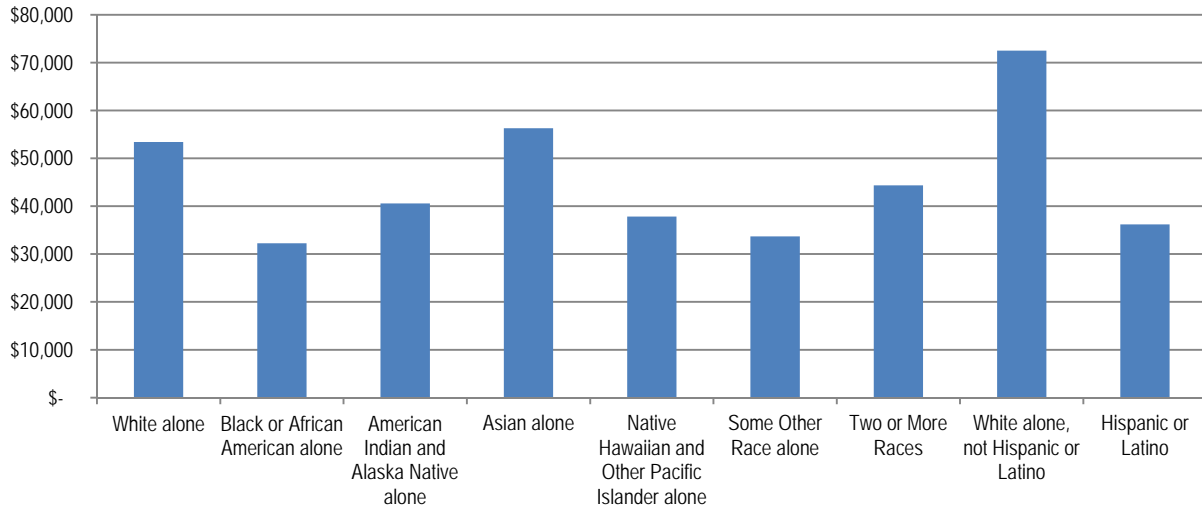
Figure 2: Income Distribution by Race and Ethnicity for the City of Houston



Source: 2007-2011 CHAS

Supporting the CHAS data findings, median income from the 2008-2012 ACS vary widely between racial/ethnic groups in Houston and the region. Black/African Americans had the lowest median income in Houston at \$32,243, while Hispanic/Latinos had the lowest median income in the Houston MSA at \$38,848. Median income was highest in both the city and the region for White non-Hispanics at \$72,508 and \$76,966. Asians had the second highest median income in the city and region; however Houston's median income for Asians at \$56,315 was much lower than the median income in the region at \$73,742.

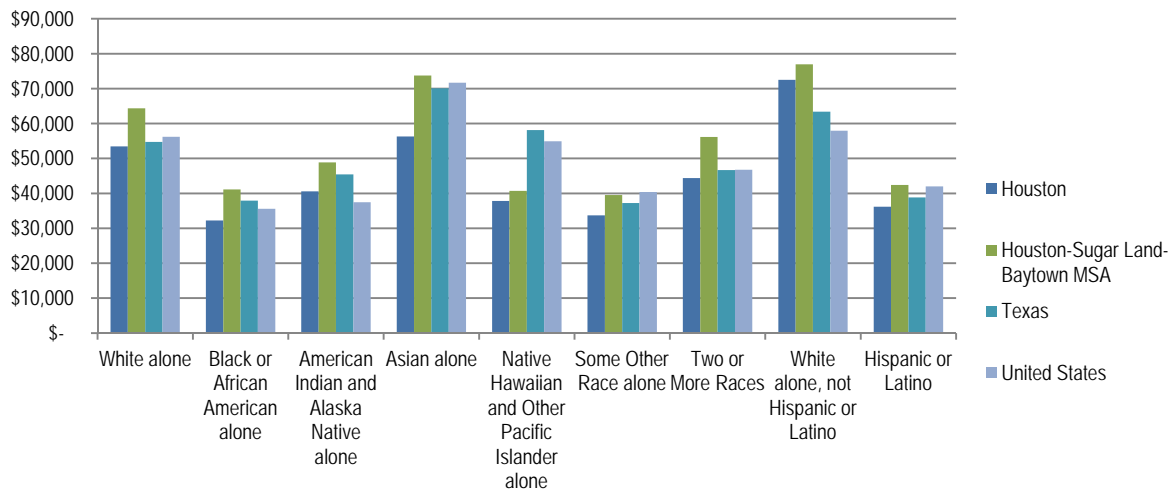
Figure 3: Median Household Income by Race/Ethnicity in Houston



Source: 2008-2012 ACS

This variance of income between racial and ethnic groups is not unique to the Houston area. Median income data from Texas and the U.S. also show that median income changes, sometimes drastically, depending on race or ethnicity. Asians and those who are White alone, not-Hispanic or Latino earned a higher median income than other racial/ethnic groups including Black African Americans and Hispanics of any race.

Figure 4: Comparison of Median Household Income by Race/Ethnicity



Source: 2008-2012 ACS

Comparing the rate of change in median income by racial/ethnic group shows the gains in income are not the same across all racial/ethnic groups. The median income in the city of Houston from 2000 to 2012 grew at a rate of 21.9%. Three racial and ethnic groups had median income increases almost double to that of the median income of Houston, which include Two or More Races (44.9%), White alone, non-Hispanic (39.9%), and Asian (39.0%). Hispanic/Latino saw an increase of 22.1%, almost matching the city's increase. The median income of Black/African American residents rose at a rate of 16.9%, lower than the total city's change in median income.

Figure 5: Median Household Income by Race in Houston

	2000	2012	% Change
White alone	\$44,625	\$53,432	19.7%
Black or African American alone	\$27,577	\$32,243	16.9%
American Indian and Alaska Native alone	\$36,200	\$40,577	12.1%
Asian alone	\$40,514	\$56,315	39.0%
Native Hawaiian and Other Pacific Islander alone	\$43,712	\$37,841	-13.4%
Some Other Race alone	\$29,152	\$33,697	15.6%
Two or More Races	\$30,628	\$44,372	44.9%
Hispanic or Latino	\$29,650	\$36,197	22.1%
White alone not Hispanic or Latino	\$51,830	\$72,508	39.9%
Median household income	\$36,616	\$44,648	21.9%
Source: 2000 Census and 2008-2012 ACS			

The difference in median income among racial/ethnic groups could be due to several reasons. Higher educational attainment correlates to income. White alone, non-Hispanic residents have higher educational attainment compared to other racial/ethnic groups according to the 2008-2012 ACS. Also, those who are White alone, not-Hispanic or Latino have the highest median age compared to other racial/ethnic groups, which could lead to this group earning higher incomes because they have been in the workforce longer.

The difference may also signify one or more forms of discrimination occurring in Houston. Although, discrimination cannot be proven from the differences in median income alone, this shows that discrimination may exist, whether it is attributed to the education system, the employment system, or the proximity of jobs or amenities to a person's residence. This income information does illustrate that racial/ethnic groups with higher incomes saw the most growth of their incomes during the last twelve years. This could lead to a more income stratified city in the future, further reinforcing the current racial/ethnic divides.

Income Distribution by Household Type

Income can vary by household type (elderly, small family, and large family). Certain groups had a higher proportion of lower income households. Specifically, large family households had a much higher percentage of lower income households than any other household type. According to 2007-2011 CHAS data, approximately 58.1% of large family households were lower and moderate income. More than one third of all large family households earn below 50% AMI, and almost three out of four of these lower income large family households were renter households. This may indicate the need for more education about the needs of large families for affordable housing rental complexes. It also indicates a need for larger number of rental units with more three or more bedrooms.

Another special needs group in Houston is households with elderly persons, meaning family and non-family households with persons aged 62 and older. Like large family households, elderly households also had a noticeably higher percentage of lower and moderate-income households (54.1%) when compared to the total city households (49.1%).

The majority of lower income and moderate-income (68.2%) households are renter households. The only exception is elderly households. Over half (59.0%) of lower and moderate-income elderly households are owner-occupied. This could signify a greater need for homeowner services including repair for elderly homeowners because with aging often comes a limited income and limited mobility to keep their homes maintained. According to housing advocates, seniors and large families often face discrimination in the rental housing market. Coupled with lower incomes, these households have limited housing choices.

Table 17: Income by Household Type 2007-2011

Household Type	Extremely Low (0-30%)	Low (31-50%)	Moderate (51-80%)	Middle/Upper (81%+)	Total
Elderly (62+ years)*	20.4%	17.0%	16.7%	45.9%	100%
Small Family (2-4 persons)	13.9%	14.5%	17.9%	53.7%	100%
Large Family (5+ persons)	18.0%	18.7%	21.9%	41.4%	100%
Other	17.4%	11.7%	17.5%	53.4%	100%
Total	16.5%	14.6%	18.0%	50.9%	100%
*Family and Non-Family Households					
Source: 2007-2011 CHAS					

Single-headed families earn less than married couples. Comparing single headed households by sex of the head of household reveals a stark difference between median incomes. According to the 2008-2012 ACS, female-headed family households, with and without children, made up over a quarter of the households in Houston, 26.5%, and had a very low median family income at \$27,180, much lower than male-headed family households at \$38,338.

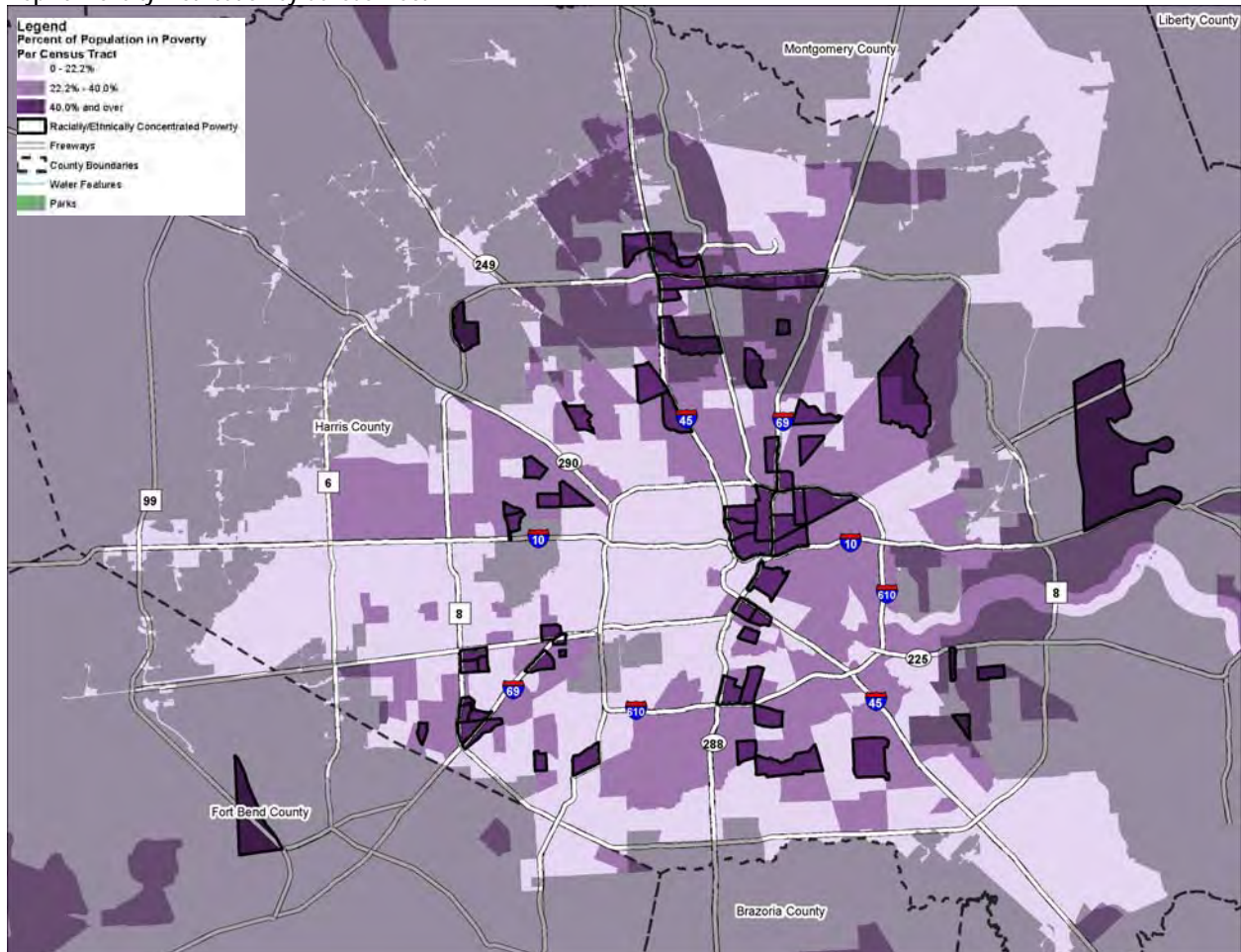
Income information is not available for each of the protected class. In the next section poverty will be used as a measure to describe income in which comparisons can be made within several protected classes.

Poverty

Although it is important to understand the income distribution, it is also important to understand the characteristics of the families and individuals in the lowest income categories that may be most vulnerable to housing discrimination because of their lack of income. Poverty describes individuals and families receiving the least amount of income. In addition, living in poverty or near others living in poverty can be an external stressor for families. The following describes Houstonians who live in poverty.

According to the most recent federal poverty guidelines a one person household earning below \$11,670 is considered living in poverty and a family of four earning below \$23,850 is living under the poverty line (2014 Federal Poverty Guidelines). As illustrated in the following map, the areas with the highest percentage of poverty relate to the areas with income below the median. These areas also include many majority minority areas. In fact, all of the census tracts with a poverty rate of 40% or more are also majority minority. This isn't all that surprising since Houston is a majority minority city; however it does reinforce the fact that minorities in Houston are affected by poverty differently than Whites.

Map 10: Poverty Distribution by Census Tract



Source: 2008-2012 ACS

According to the 2008-2012 ACS, the poverty rate was much higher in Houston at 22.2% compared to the Houston MSA at 15.8%. Of individuals living in poverty, over half in both the city and the region are Hispanic/Latino, 56.1% and 53.5%, respectively. Both the racial group of Black/African American and the ethnic group of Hispanic/Latino are

over represented in the poverty category compared to the entire population of the city and region. The percentage of White, non-Hispanic individuals living in poverty was low in both the City and the region. However, the proportion of White, non-Hispanics in poverty was almost twice as high in the region at 17.4% compared to the city at 9.4%.

Table 18: Poverty by Race/Ethnicity

	Houston		Houston MSA	
	#	%	#	%
Income in the past 12 months below poverty level	461,058	-	928,793	-
White alone	230,369	50.0	527,933	56.8
Black or African American alone	134,898	29.3	219,600	23.6
American Indian and Alaska Native alone	2,357	0.5	5,432	0.6
Asian alone	23,166	5.0	44,117	4.7
Native Hawaiian and Other Pacific Islander alone	336	0.1	747	0.1
Some Other Race alone	64,859	14.1	116,231	12.5
Two or More Races	5,073	1.1	14,733	1.6
White alone, not Hispanic or Latino	43,224	9.4	162,049	17.4
Hispanic or Latino	258,799	56.1	496,958	53.5

Source: 2008-2012 ACS

For both the city and the region there is a slight over representation of persons with a disability living in poverty. Over one quarter (27.8%) of those with a disability in Houston are living in poverty while only one fifth (21.3%) of individuals with a disability in the region are living in poverty.

Table 19: Poverty with Disability

	Houston		Houston MSA	
	#	%	#	%
Civilian noninstitutionalized population for whom poverty status is determined with a disability	205,508	-	550,823	-
Income in the past 12-months below poverty level	57,204	27.8	117,312	21.3
Income in the past 12-months at or above poverty level	148,304	72.2	433,511	78.7

Source: C18130 2008-2012 ACS

Just as Houston has a greater number of people in poverty than the region, there are also a greater percentage of families in poverty in the city (18.8%) compared to the region (12.6%). Four in five of the families living in poverty in the city and the region have related children under the age of 18. This differs from the families with incomes above poverty in which about half of the families have related children under 18 and half do not. Families with children are more likely to be in poverty than families without children, and therefore, fair housing education should be geared to families with children who may be vulnerable to discrimination because of their poverty status.

Table 20: Poverty Status by Family and Presence of Related Children under 18

	Houston		Houston MSA	
	#	%	#	%
Total Families	474,966	-	1,447,820	-
Families with Income in the past 12 months below poverty level	89,115	18.8%	181,796	12.6%
with related children under 18	73,307	82.3%	149,617	82.3%
with no related children under 18	15,808	17.7%	32,179	17.7%
Families with income in the past 12 months above poverty	385,851	81.2%	1,266,024	87.4%
with related children under 18	189,677	49.2%	667,026	52.7%
with no related children under 18	196,174	50.8%	598,998	47.3%

Source: 2008-2012 ACS

Over half of Houstonians five years and older who are living in poverty speak Spanish at home. Although this data does not include language ability, this information supports the need for providing language assistance, especially in Spanish, for housing and other services that serve persons in poverty.

Table 21: Poverty Status in the City of Houston by Language Spoken at Home for Population 5 Year and Over

	Population	Percent of Total Population	Percent of Population in Poverty
People in Poverty	400,069	21%	100%
Speak Spanish	198,897	10%	50%
Speak Asian and Pacific Island languages	14,133	1%	4%
Speak other Indo-European languages	10,668	1%	3%
Speak other languages	5,172	0%	1%

Source: 2008-2012 ACS

Sometimes there is a misconception that those living in poverty are poor because they do not want to work. Because minorities, people that do not speak English at home, and persons with disabilities are overrepresented in poverty, this may fuel the misconception that minorities and certain protected classes do not want to work. Of individuals over 16 who are in poverty, just under half are in the labor force and one third is employed.

Table 22: Poverty Status by Employment Status

	Houston		Houston MSA	
	#	%	#	%
Total	1,597,708		4,423,183	
Income in the past 12 months below poverty level:	293,492		585,724	
In labor force:	146,566	49.9	283,076	48.3
Employed	109,261	37.2	213,267	36.4
Unemployed	37,305	12.7	69,809	11.9
Not in labor force	146,926	50.1	302,648	51.7

Universe: Civilian population 16 years and over for whom poverty status is determined
Source: 2008-2012 ACS

Income of individuals in Houston, much like other places in the nation, coincides with certain characteristics of protected classes. Minorities consistently have lower incomes than non-minorities. In addition, those living in poverty may have additional special needs like needs for language assistance or assistance due to a disability. Advocates argue that poor people are often isolated and this limits opportunity. Because there is a relationship between income and certain protected classes in Houston, it is very important to consider income in strategizing ways to increase fair housing choice.

Employment

A major factor in determining family income is the type of occupation of its residents. To understand income distribution, the relationship between employment and the workforce must be examined.

Historically, much of Houston's economy has been based around energy businesses and this continues today. Houston is home to half of the 52 Texas firms named on the 2014 Fortune 500 companies. All but three of the 26 Fortune 500 companies located in Houston were in the primary business of energy, with the exceptions of Sysco Corp, Waste Management, and Group 1 Automotive.¹²

During the last five years, Houston enjoyed extraordinary growth. According to the Greater Houston Partnership, economic growth, as measured by increases in jobs and Gross Domestic Product (GDP), the value of all goods and services produced within the area, has been consistently strong over time. From 2009-2013, the region's gross domestic product grew by \$141.9 billion, exceeding the combined growth of Austin, Dallas-Fort Worth, El Paso, and San Antonio over this same period. With GDP at \$517.4 billion, Houston now ranks as the nation's fourth largest metro economy. The Greater Houston Partnership identified more than 1,500 significant corporate relocations and expansions in the region since 2009. Significant is defined as any project creating 50 or more jobs, leasing or construction 20,000 square feet of office or industrial space, or investing \$1 million or more in capital improvements. Since the bottom of the recession the Houston metro area has created 463,800 jobs, equaling three jobs for every one lost during the downturn. No other major metro area can make a comparable claim.¹³ With Houston's recent boom, 2015 brings uncertainty of the economy's future as oil prices have drastically fallen.

Employment

Employment has been growing since 2000. According to the 2000 Census and 2008-2012 ACS, Texas civilian employment grew 37%, which was more than the United States at 28.3% and the Houston MSA at 23.9%. Although the growth was not as high in Houston, the Houston civilian employment grew by 14.5% during the same period. The number of government workers was a slow growing class of employment while the number of self-employed workers grew more than one quarter (27.3%).

Table 23: Change in Houston Civilian Employment

	2000		2008-2012		Percent Change
	#	%	#	%	%
Total Civilian employed population	859,961		1,006,147		14.5%
Private wage and salary workers	708,790	82.4	832,524	82.7%	14.9%
Government workers	95,871	11.1	99,264	9.9%	3.4%
Self-employed workers in own not incorporated business	53,331	6.2%	73,354	7.3%	27.3%
Unpaid family workers	1,969	0.2%	1,005	0.1%	-95.9%

Source: 2000 Census; 2008-2012 ACS

In the City of Houston, one third of civilians are employed in the following two industries: "Educational services, and health care and social assistance" (18.9%) and "Professional, scientific, and management and administrative and waste management services" (13.9%). The number of persons employed in the Construction industry was much higher in Houston at 10.3% compared to the United States (6.5%).

¹² Feser, Katherine, (2014, June 2). Houston is home to half of the Fortune 500 companies in Texas. *Houston Chronicle*. Retrieved from <http://www.houstonchronicle.com/business/economy/article/Houston-is-home-to-half-of-the-Fortune-500-5523181.php>

¹³ Greater Houston Partnership. (2014, December 11). 2015 Houston Employment Forecast. Retrieved from: <https://www.houston.org/pdf/research/quickview/Employment-Forecast.pdf>

Table 24: Industry

	Houston		Houston MSA		Texas		United States	
	#	%	#	%	#	%	#	%
Civilian employed population 16 years and over	1,006,147		2,786,304		11,440,956		141,996,548	
Agriculture, forestry, fishing and hunting, and mining	25,348	2.5	85,948	3.1	343,348	3.0	2,699,250	1.9
Construction	103,357	10.3	258,554	9.3	928,574	8.1	9,221,878	6.5
Manufacturing	93,942	9.3	302,989	10.9	1,086,151	9.5	15,079,996	10.6
Wholesale trade	34,081	3.4	102,399	3.7	349,556	3.1	4,018,762	2.8
Retail trade	108,546	10.8	302,372	10.9	1,331,684	11.6	16,422,596	11.6
Transportation and warehousing, and utilities	57,783	5.7	174,812	6.3	636,941	5.6	7,096,633	5.0
Information	14,896	1.5	40,662	1.5	220,371	1.9	3,139,327	2.2
Finance and insurance, and real estate and rental and leasing	58,676	5.8	164,629	5.9	767,868	6.7	9,574,851	6.7
Professional, scientific, and management, and administrative and waste management services	140,196	13.9	346,779	12.4	1,227,671	10.7	15,141,136	10.7
Educational services, and health care and social assistance	190,387	18.9	548,064	19.7	2,461,200	21.5	32,513,621	22.9
Arts, entertainment, and recreation, and accommodation and food services	91,760	9.1	219,536	7.9	968,713	8.5	13,039,332	9.2
Other services, except public administration	61,984	6.2	153,381	5.5	608,319	5.3	7,027,803	4.9
Public administration	25,191	2.5	86,179	3.1	510,560	4.5	7,021,363	4.9
Source: 2008-2012 ACS								

The fastest growing industries in the city of Houston from 2000 to 2008-2012 were "Agriculture, forestry, fishing and hunting, and mining" (35.3%), "Construction" (27.4%) and "Arts, entertainment, recreation, and food services" (24.3%). The two fastest growing industries in Houston are likely to have low paying jobs including the construction and food service industries. The two industries in Houston with the largest absolute growth were "Educational, health and social services adding 37,291 employees and "Construction" adding 28,271 employees.

Table 25: Industry Change over Time in Houston

	2000		2008-2012		Change	
	#	%	#	%	#	%
Agriculture, forestry, fishing and hunting, and mining	16,404	1.9	25,348	2.5%	8,944	35.3%
Construction	75,086	8.7	103,357	10.3%	28,271	27.4%
Manufacturing	85,703	10	93,942	9.3%	8,239	8.8%
Wholesale trade	39,639	4.6	34,081	3.4%	-5,558	-16.3%
Retail trade	91,982	10.7	108,546	10.8%	16,564	15.3%
Transportation and warehousing, and utilities	53,547	6.2	57,783	5.7%	4,236	7.3%
Information	21,037	2.4	14,896	1.5%	-6,141	-41.2%
Finance, insurance, real estate, and rental and leasing	62,025	7.2	58,676	5.8%	-3,349	-5.7%
Professional, scientific, management, administrative, and waste management services	116,926	13.6	140,196	13.9%	23,270	16.6%
Educational, health and social services	153,096	17.8	190,387	18.9%	37,291	19.6%
Arts, entertainment, recreation, accommodation and food services	69,438	8.1	91,760	9.1%	22,322	24.3%
Other services (except public administration)	50,846	5.9	61,984	6.2%	11,138	18.0%
Public administration	24,232	2.8	25,191	2.5%	959	3.8%
Total employed civilian population 16 and over	859,961		1,006,147		146,186	14.5%
Source: 2008-2012 ACS						

As illustrated in the table showing 2008-2012 ACS data, Houston's unemployment rate is higher than the Houston MSA and Texas but lower than the United States. Since the recession, the unemployment rate has decreased all over the country as shown in the most recent one-year ACS in 2013. Houston's unemployment, although still higher than Texas, has been on a downward trend. With a recent decline of oil prices and the headquarters of many oilfield services companies located in Houston, the direction of Houston's unemployment rate is uncertain.

Table 26: Unemployment

	Houston	Houston MSA	Texas	United States
Percent Unemployed in 2012	9.0%	8.0%	7.7%	9.3%
Source: 2008-2012 ACS				
Percent Unemployed in 2013	7.9%	7.0%	7.1%	8.4%
Source: One year 2013 ACS				

Examining unemployment by race over the past two decades we find that despite some progress, racial employment gaps persist in Houston. With the notable exception of Native Americans, all the region's racial and ethnic communities participate in the labor forces, either working or actively seek employment, at similar rates, but African Americans, Hispanics, and Native Americans face much higher levels of unemployment compared to Whites and Asians.

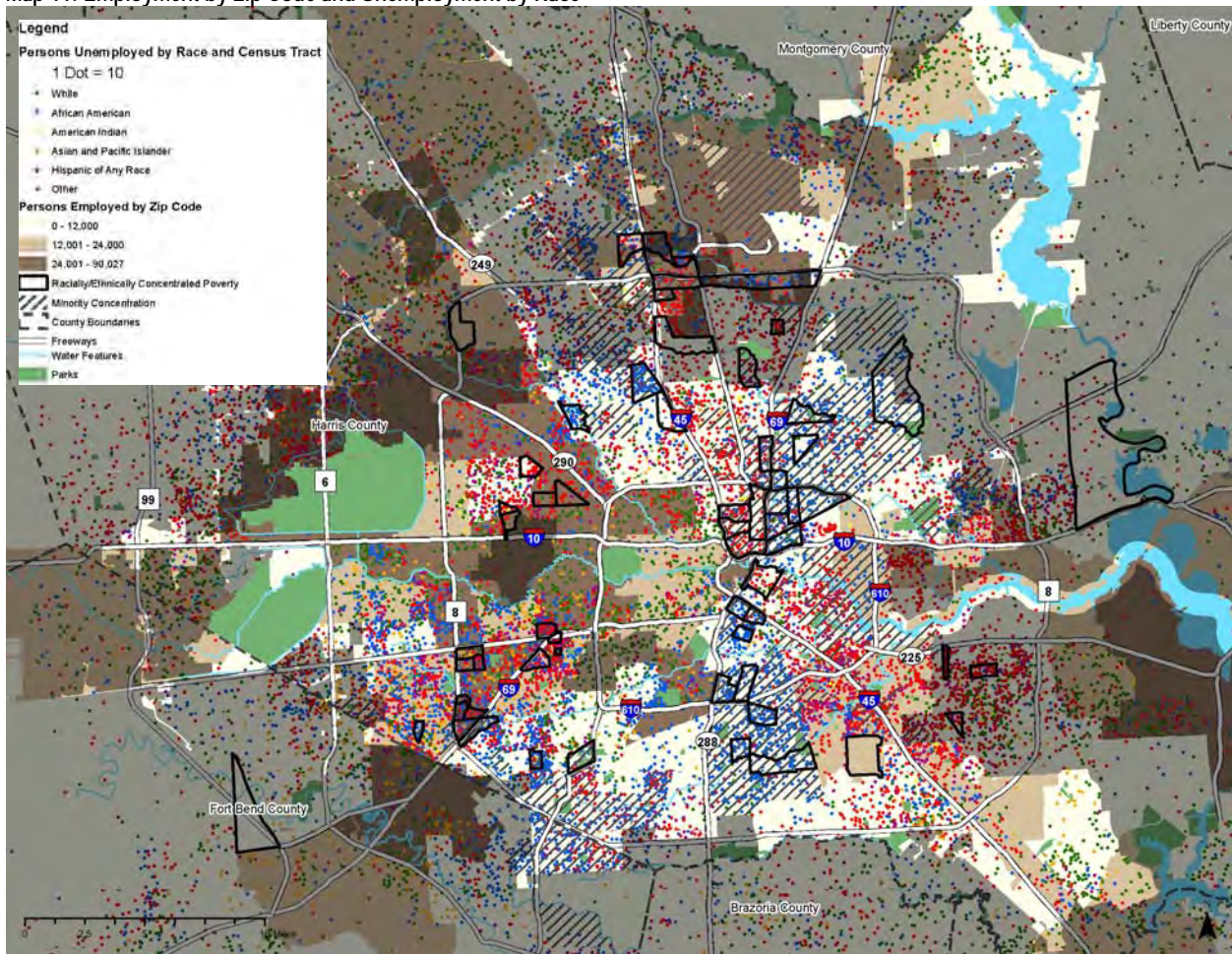
Table 27: Employment Status by Race and Ethnicity in Houston

	% In Labor Force	# In Labor Force	% Unemployed	# Unemployed
White alone	69.1	644,340	6.9	44,142
Black or African American alone	64.2	246,847	15.3	37,783
Native Hawaiian and Other Pacific Islander alone	70.8	4,702	10.5	495
Asian alone	67.9	72,322	6.5	4,693
White alone, not Hispanic or Latino	67.7	322,689	5.4	17,550
Hispanic or Latino	71.0	455,653	8.4	38,365

Source: 2008-2012 ACS

The following map illustrates the mismatch between where unemployed people live and where the majority of jobs are currently. The majority of jobs are currently located in neighborhoods with primarily non-Hispanic White residents extending west from downtown.

Map 11: Employment by Zip Code and Unemployment by Race

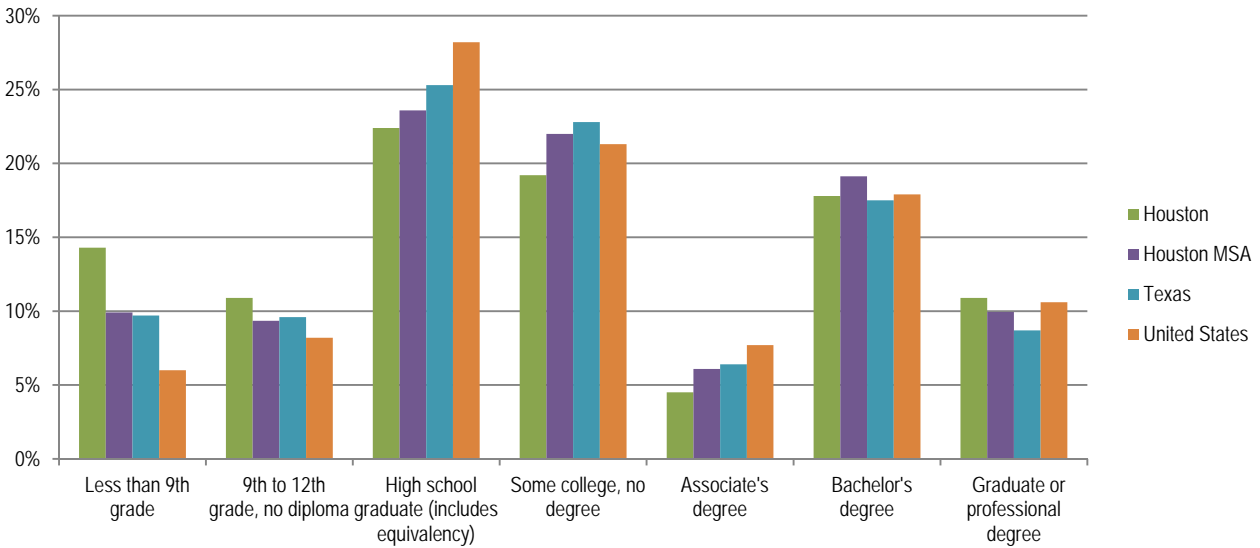


Source: County Business Patterns 2012 and 2008-2012 ACS

Workforce

To describe Houston’s existing workforce, educational attainment is examined. Although Houston has approximately the same percentage of its workforce with Bachelor’s degrees or higher compared to the nation, Houston has a much higher proportion of residents who did not complete middle school or high school. Approximately one in four people 25 years and older living in Houston (25.2%) have not completed high school. The City of Houston has a lower percent of high school graduates (74.8%) compared to the Houston MSA (80.7%), Texas (80.8%) and the United States (85.7%). However, the percent of the population 25 years and older that have bachelor’s degree or higher is 28.7%, which is similar to the region (29.1%), Texas (26.3%) and the United States (28.5%).

Figure 6: Educational Attainment for Population 25 and over



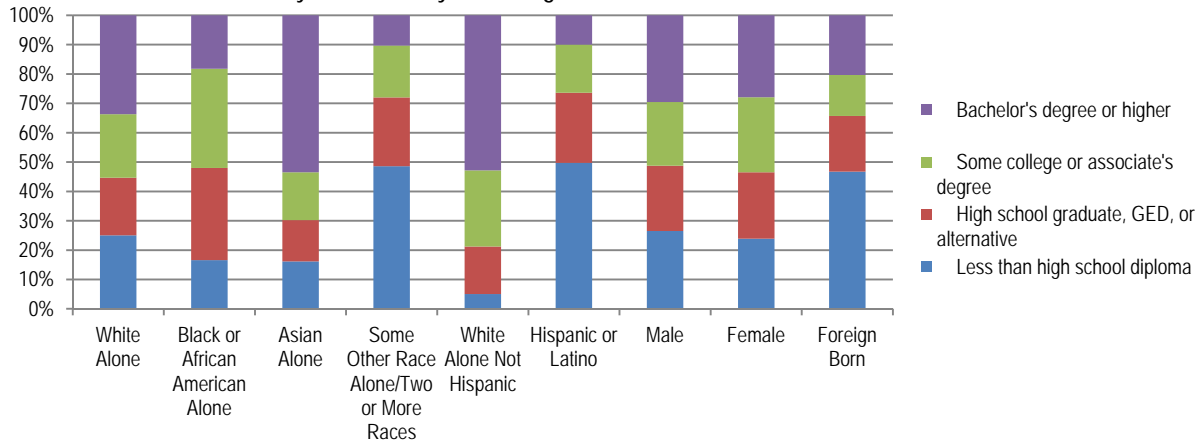
Source: 2008-2012 ACS

Educational Attainment by Race/Ethnicity, Sex, and Nationality

Educational attainment of residents in the City of Houston differs by race and ethnicity. Half of Hispanic residents 25 years and older hold less than a high school diploma. Residents of the group “some other race alone or with two or more races” make up a smaller total number of residents but still have a very high percentage of people who did not have a high school diploma at 49%. These two race/ethnicity groups not only have the highest percentage of people without a high school diploma but are also the two groups with the least percentage of residents who have a bachelor’s degree or higher, 10% for each group.

Almost half of Black/African Americans have their highest educational attainment as a high school diploma and less than one in five (18%) Black/African Americans have a Bachelor’s degree or higher. Asian residents have a similar percentage of residents with less than a high school diploma (16%) as Black or African American residents, 17%. However, Asian residents have a much higher percentage of residents that complete higher education than Black or African Americans. Asian and White non-Hispanic residents both have the highest percentage of residents with Bachelor’s Degree or higher (both 53%). White non-Hispanics also have the lowest percentage of residents (5%) who have less than a high school diploma.

Figure 7: Educational Attainment by Race/Ethnicity/Sex/Foreign Born



Source: 2008-2012 ACS

While race and ethnicity do not determine educational attainment, there are stark differences in educational attainment in Houston. This is important because those with a lower educational attainment have a greater chance of being in poverty. According to the 2008-2012 ACS, approximately 17% of the population over 25 years old is in poverty. Of those, over three-fourths of the residents living in poverty did not have any college or an associate's degree: 46% had less than a high school diploma and 26% had a high school diploma or equivalent only.

Residents with a higher education level are more likely to be employed and may earn higher wages. Residents living in Houston with a Bachelor's degree or higher were more likely to be in the labor force and to be employed than residents who did not have a Bachelor's degree. Of the population between 25 and 64, those with a Bachelor's degree or higher had the highest percentage of people in the labor force at 86% and the highest percentage of persons employed (96%), according to the 2008-2012 ACS. The unemployment rate was higher for residents with some college or associate's degree (9%), with a high school diploma (10%), or with less than a high school diploma (9%) compared to residents with a Bachelor's degree or higher who had a 4% unemployment rate. Those with less than a high school diploma have the lowest rate of participation in the labor force compared to other groups. This could be due to the fact that some people drop out of the labor force due to frustrations when they cannot find employment.

Transportation

Linking residents to jobs in a way that is not burdensome in regards to time, money, and stress is very important. Costly commutes or long commuting times can cause a higher-waged job to be not worth the long commute.

The City of Houston is known for its sprawling development patterns and extensive freeway network. The percentage of Houstonians commuting to work alone in a car was less compared to the region, Texas and the United States. According to the 2008-2012 ACS, the mean travel time to work in Houston was 25.8 minutes, only slightly higher than Texas at 24.9 minutes and the U.S. at 25.4 minutes.

Table 28: Commuting to Work

	Houston	Houston MSA	Texas	United States
Car, truck, or van -- drove alone	75.4%	79.2%	79.5%	76.1%
Car, truck, or van -- carpoled	12.6%	11.7%	11.4%	10.0%
Public transportation (excluding taxicab)	4.5%	2.5%	1.6%	5.0%
Walked	2.1%	1.4%	1.7%	2.8%
Other means	2.2%	1.9%	1.8%	1.8%
Worked at home	3.1%	3.4%	4.0%	4.3%
Source: DP03 2008-2012 ACS				

According to the 2008-2012 ACS, of those who carpoled to work, 62% were Hispanic/Latino while of those who travelled to work using public transit 40.3% were Hispanic/Latino and 37.3% were Black/African American. These percentages were higher than the entire percentage of Hispanics and Black/African Americans workers over 16, showing that Hispanics and Black/African Americans carpoled and rode public transit disproportionately compared to other racial/ethnic groups. Of those using public transportation to travel to work, over one third (34.9%) had a travel time of 60 minutes or more, which was much higher than other modes of transportation in which only 4.6% of workers driving alone and 9.7% of workers carpooling travel longer than 60 minutes to work. Minorities experience long commute times on public transportation disproportionately because only 15.4% of workers using public transportation were White, non-Hispanic. Time lost through transit times could negatively affect a family and even earning potential.

Public Transportation System

The Metropolitan Transit Authority of Harris County (METRO) is a multimodal transportation system and the Houston area's main public transportation agency. The METRO service area includes Houston and major portions of unincorporated Harris County. METRO services include a bus network including Park and Ride facilities, METRO Rail, METRO Lift, and High Occupancy Vehicle (HOV) lanes.

Ridership data collected by METRO reinforces Census data showing that a majority of minorities use public transportation services. The demographic data from the most recent conducted weekday ridership survey, the 2011 Transit Rider Survey, shows that many minority and low- and moderate-income persons take public transportation and may be transit dependent. However, there is even a racial and ethnic divide between the varied services offered by METRO. In this survey, Hispanic and race were treated within the same category. Black/African American riders were overrepresented in METRO riders compared to the entire population in the region. Black/African Americans made up 44.1% of the total riders and almost half (49.6%) of the riders on local bus routes. White riders, only making up 22.5% of the total riders, represented over half (55.8%) of the riders in the Park and Ride routes and almost one third (31.3%) in the METRO Rail route. The Park and Ride routes had the highest percentage of riders making above \$81,000, at 54.3% of the riders and the lowest percentage of people without vehicles available (8.7%). The majority of local bus riders was low- and moderate-income riders and had no personal automobile as an alternative method of transportation. When job centers and housing are inadequately served by public transportation, minority households, many of whom are low- and moderate-income, can be impacted disproportionately.

Table 29: METRO Ridership

	Fixed Route System (Total)		Local Routes		Park and Ride Routes		METRORail	
	#	%	#	%	#	%	#	%
Respondents-boardings	263,066		198,906		29,945		34,215	
Average Age	41.5		38.8		48.1		40.2	
Male		41.6		41.7		40.3		41.9
Female		52.5		51.8		56.9		52.8
Vehicle Available								
Yes		36.8		25.8		88.2		55.9
No		58.7		69.5		8.7		39.6
Race/Ethnicity								
No Response		4.8		5		3.8		4.4
Hispanic/Latino		20		21.8		11.8		16.4
Asian		5.8		4.7		9.5		8.7
Black/African American		44.1		49.6		16.5		36.1
White		22.5		16.0		55.8		31.3
Of another race or other		2.9		2.9		2.8		3.1
Household Income								
No Response		12.6		13.0		12.0		10.3
<\$16,000		26.9		32.4		.8		17.9
\$16,000 to \$31,999		20.4		23.8		3.7		15.2
\$32,000 to \$53,999		16.3		16.8		10.2		18.6
\$54,000 to \$80,999		10.4		8.1		19.0		16.6
Above \$81,000		13.5		6.0		54.3		21.4

Source: METRO 2011 Transit Rider Survey

System Reimagining

In 2013 METRO embarked on creating a plan to make the bus service simpler and more frequent and to better connect people where they live, work, play, and learn. This also coincided with the opening of two new light rail lines. The Reimagining Plan also reflects the Board’s change of direction to 80% maximum ridership and 20% maximum coverage, meaning that the new primary goal for METRO will be to maximize the number of people riding instead of bus service that touches every neighborhood. In February 2015, the new bus route system was approved by the METRO Board with implementation of the new system to begin in August 2015.

METROLift

METROLIFT is a transit service provided by METRO for customers who cannot use the local bus routes or rail due to a disability. This is a complementary paratransit service offered by the METRO in accordance with the 1990 Americans with Disabilities Act (ADA). METROLift provides transportation for persons with disabilities who cannot board, ride, or disembark from a METRO fixed-route bus, even if that bus is equipped with a wheelchair lift or ramp. METROLift is a shared-ride service meaning that each vehicle makes several stops en-route to its various destinations.

The service area for METROLift is 751 square miles, and the service area goes beyond the ADA requirements on weekdays by 29% and on weekends by 50%. Eligibility for METROLift requires residents to submit an application with a health professional or doctor’s verification of disability and also an in-person interview and functional assessment. Customers may request METROLift’s origin-to-destination service by requesting an appointment. METRO Lift uses 118 MV operated lift equipped vans and 197 Yellow Cab wheelchair accessible minivans. The METROLift Subsidy Program offers METROLift riders a same day taxicab trip (up to \$8.00) if their same-day trip requirements cannot be met by METROLift.

METROLift Moving Forward is an on-going initiative to review policies and practices associated with nine areas of interest: eligibility, curb to curb service, no-shows/late cancels, service area, fares, same day changes, on-time performance, travel training/feeder service and fixed route accessibility. As a result of 12 workshops based on these nine areas of interest and over 100 contributors who took part in meetings regarding the proposed revisions to METROLift's No-Show Policy and new Late Cancellation policy, a new No-Show/Late Cancel Policy went into effect June 1, 2014.

Table 30: METROLift Services FY2013

Eligible Patrons	17,000
Avg. Passenger Trips/Weekday	5,700
Avg. Vehicle Trips/Weekday	4,900
Trip Request Denials	0
Total Passengers	1.7 million
Average Trip Length	11.3 miles
Total Vehicle Miles	20 million
Average Cost per Trip	\$26.47
Fare	\$1.15 single ticket; \$9.75/10 ticket booklet
Source: METRO	

Feedback gathered from citizens and stakeholders during citizen participation events held throughout the development of this report showed that transportation was a barrier for many to find and maintain housing.

Housing Profile

This section of the AI profiles Houston’s housing market, focusing on affordability. It contains information on historical housing production, tenure (renter/owner), vacancy rates, unit sizes, condition, overcrowding and housing cost. The existing housing market will be reviewed followed by an assessment of population demand for housing.

Housing Supply

Housing Growth

In an effort to keep pace with the rapid population growth fueled by company relocations and a favorable employment outlook, many single family and multifamily units have been built within the past five years. Much of the construction has occurred in greenfield developments in the Houston area outside of the city limits. One major development affecting housing in the Houston area was the newly constructed ExxonMobil campus located on 385 acres in The Woodlands designed to accommodate 10,000 employees. During the period between 2000 and 2012, the number of housing units in the Houston area increased over one quarter (28.5%) and the number of units within the City of Houston increased slightly less at 15.4%.

Table 31: Population and Housing Growth

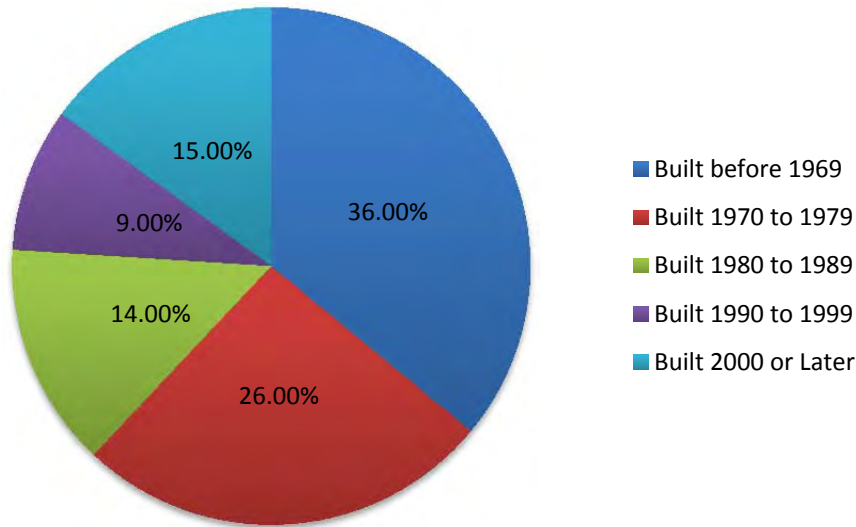
	2000				2012				% Change City 2000- 2012	% Change MSA 2000- 2012
	Houston		Houston MSA		Houston		Houston MSA			
	#	%	#	%	#	%	#	%	%	%
Population	1,953,631		4,669,571		2,107,449		5,962,416		7.9	27.7
Housing Units	782,009		1,777,902		902,153		2,284,127		15.4	28.5
Occupied Housing Units	717,945	91.8	1,639,401	92.2	773,450	85.7	2,022,104	88.5	7.7	23.3
Vacant Housing Units	64,064	8.2	138,501	7.8	128,703	14.3	262,023	11.5	100.9	89.2

Source: 2000 Census; 2010 Census; 2008-2012 ACS

Housing Stock

The housing stock in Houston is relatively new with 38% of the housing built within the past 35 years, since 1980. The decade with the largest percent of housing units built in Houston was the 1970s with 26% of the housing units, which corresponds to the rapid growth and expansion that Houston experienced during this time. Although much of the housing stock is new or has been updated in Houston, the majority of the housing stock is older than 1980. Older housing stock tends to be located in minority neighborhoods with new construction located in predominately non-minority areas. Older housing stock can be more expensive to maintain and can contain hazards such as lead-based paint, which is very dangerous to children under six years old with long-term effects and is very costly to remediate.

Figure 8: City of Houston Age of Housing Stock



Source: 2008-2012 ACS

Within the City of Houston, housing units with 1-unit, attached or detached, make up half (51%) of the housing stock. Just over one third (35.4%) of the housing stock are buildings with 10 or more units. The Houston area had more single family housing units, or 1-unit attached or detached, making up more than two thirds (65.7%) of the housing stock in the metropolitan area, while structures with 10 or more housing units make up a smaller portion at 20.7% of the area's housing stock.

New Construction

One way to gauge the strength of the housing market is to review permitting information. Single family permits within the City of Houston represent new construction and residential repairs, additions, or home moves for single family homes and townhouses. Studying the last seven years, single family permits have seen a sharp decrease during 2009 but have made a steady increase to reach the highest number of permits with the highest median and average permit value in 2014.

Table 32: Single Family Permits in the City of Houston

	2008	2009	2010	2011	2012	2013	2014
Median Permit Value	\$185,587.00	\$147,000.00	\$188,533.50	\$215,000.00	\$213,837.00	\$216,000.00	\$230,000.00
Average Permit Value	\$225,005.60	\$190,284.29	\$222,826.92	\$259,473.88	\$239,985.55	\$245,956.80	\$260,003.06
Value of All Permits	\$870,321,667	\$551,063,297	\$621,241,446	\$718,742,653	\$852,188,687	\$1,312,671,467	\$1,420,916,724
Number of Permits	3,868	2,896	2,788	2,770	3,551	5,337	5,465
Number of Units	3,844	2,871	3,291	2,758	3,482	5,100	5,437

Source: City of Houston Planning and Development Department

Not only has new single family construction increased in the past few years, but multifamily construction has also grown at a staggering pace, especially within the period of 2012 to 2014. There was limited multifamily construction during 2009 and 2010 due to the nationwide recession. Many planned housing developments were put on hold. As the market recovered and Houston became a popular destination for people to move, some stalled projects received funding and many other multifamily developments were constructed. Although thousands of multifamily rental units

have been recently completed, many of them are high-end, Class A construction with high rents and smaller units. In 2014, over 14,000 thousand multifamily units were approved to be built within the city of Houston, much higher from the 7 year low in 2009 in which the City only permitted 1,718 multifamily units.

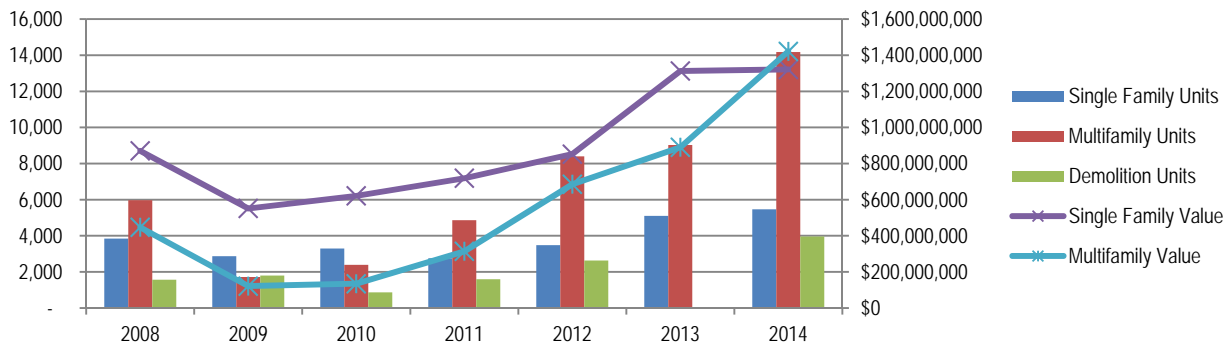
Table 33: Multifamily Permit Data

	2008	2009	2010	2011	2012	2013	2014
Median Permit Value	\$743,098	\$519,754	\$585,000	\$1,246,555	\$1,900,000	\$1,550,000	\$1,800,000
Average Permit Value	\$1,577,563	\$1,128,370	\$895,244	\$1,984,687	\$2,796,164	\$3,036,848	\$2,792,209
Value of All Permits	\$446,450,375	\$120,735,636	\$134,286,547	\$313,580,489	\$685,060,058	\$889,796,514	\$1,320,714,957
Number of Permits	283	107	150	158	245	288	473
Number of Units	5,968	1,718	2,390	4,867	8,398	9,030	14,174

Source: City of Houston Planning and Development Department

The following graph shows the growth over the past seven years of both the number of units permitted for single family and multifamily, the number of demolitions permitted, and the growth of the monetary value of the permits issued. In 2014, the value of multifamily permits became more than the value of single family permits for the first time in the last nine years.

Figure 9: Number of Units Permitted and Demolished and Estimated Value of Permits 2008-2014



Source: City of Houston Planning and Development Department

The increase in building activity over the last few years has put a strain on Houston’s construction market. According to the Houston Business Journal: “Industry experts say two of the biggest challenges facing Houston’s construction industry are the rising cost of building materials and a strained labor market, where builders are reporting that their competitors are poaching workers from their job sites.”¹⁴ Increasing costs of labor, supplies, and land for construction including housing will have a direct effect on the cost of housing affecting its affordability.

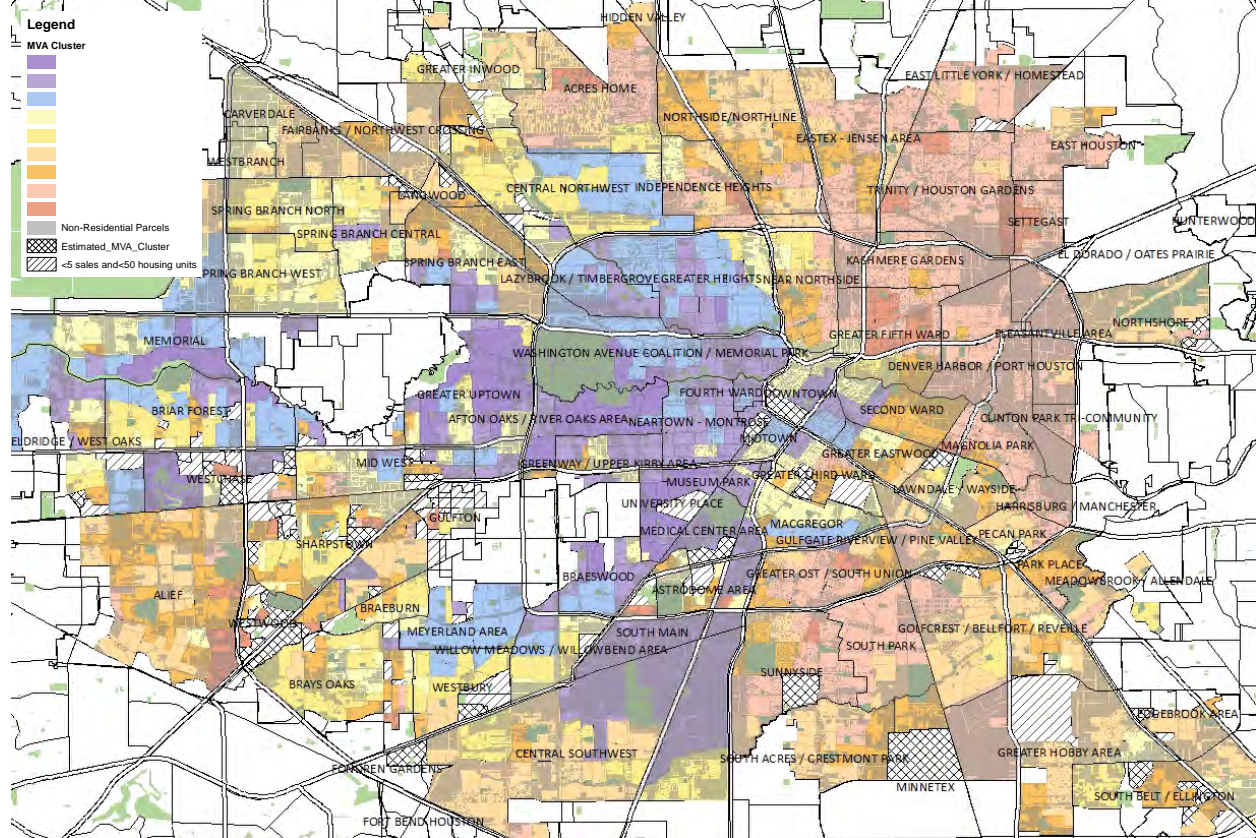
Houston Real Estate Market

Beginning in 2012, HCDD partnered with a nonprofit organization, The Reinvestment Fund (TRF), to prepare a Market Value Analysis (MVA) for the City of Houston. The MVA gives a snapshot of the Houston real estate market by comparing market valuations of various locations. There were several steps that staff from TRF and the City took

¹⁴ Agge-Aldridge, Jenny. (October, 8, 2014). Houston’s construction market: short on labor, high on costs. *Houston Business Journal*. Retrieved from <http://www.bizjournals.com/houston/blog/breaking-ground/2014/10/houston-s-construction-market-short-on-labor-high.html>.

to create the MVA. First, various real estate elements were analyzed, including median sales price, foreclosure filings, percent of vacant properties, subsidized rental stock, and housing violations. Then, areas of the city were categorized by similarity of the real estate elements. Ultimately, a map was produced showing areas where the private real estate market is strong and other areas where the private real estate market is weaker compared to other areas of the city during that period of time. The resulting map is shown below where the existence of a strong private market is indicated in the colors purple and blue and a weak real estate market is indicated in red and pink.

Map 12: Market Value Analysis Clusters



Source: HCDD

Many of the areas with a strong existing real estate market are the same areas of the city that have lower percentages of minority residents and higher median incomes. This is important to note because without a strong or even steady real estate market, some traditional ways to build assets, like through homeownership, do not occur as easily as in areas of the city with stronger markets and greater and constant increases in real estate values. This map does not indicate future market trends in the city, but instead only shows an analysis of the real estate market during one period of time, between 2010 and 2012.

Private investment occurs most in neighborhoods where the private market is strongest. Many areas where low-income families and/or minority residents live have the least private market investment. Although this MVA only studies one period of time, comparing MVAs at different times could show a pattern that the private market is more likely to invest in locations with low percentages of minority residents and higher median income. Although this would not indicate overt discriminatory practices, it could indicate that certain areas of the city are in need of market intervention by increasing government spending or services in those areas. By using this map to understand the existing real estate market, the public and private sector can more precisely create intervention strategies to address weak markets and also support sustainable growth in stronger market segments.

Housing Demand

Understanding the trends of the population in the city and the region can help determine the kinds of housing units that should be built or rehabbed for future use. This can also show the gaps within the current housing market.

Household Growth

Between 2000 and 2012, the number of households increased at a greater rate in the Houston metro region, at 18.9%, than in Houston, at 7.2%. Family and nonfamily households in the region grew at a similar rate, indicating a need for varied housing types in the region. The number of nonfamily households increased at a substantially higher rate in the city of Houston growing almost four times faster than family households. Nonfamily households are smaller than family households and often contain only one person living alone. Household size in Houston increased very slightly between 2000 and 2012. Family size increased more than household size during the same time period in Houston.

Table 34: Household Size and Composition

	2000		2012		% Change 2000-2012	
	Houston	Houston MSA	Houston	Houston MSA	Houston	Houston MSA
Population	1,953,631	4,669,571	2,107,449	5,962,416	7.9	27.7
Households	717,945	1,639,401	773,450	2,022,104	7.2	18.9
Family Households	457,549	1,169,507	474,966	1,433,213	3.7	18.4
Nonfamily households	260,396	469,894	298,484	588,891	12.8	20.2
Housing Units	782,009	1,777,902	902,153	2,284,127	15.4	28.5
Household Size	2.67	*	2.69	2.88		
*Not Reported						
Source: 2008-2012 ACS						

Tenure (Owner vs Renter)

The ratio of owner and renter housing in Houston remained steady from 2000 to 2012 with homeowners representing 45.9% of the occupied housing. In the region, there is a majority of homeowners and the proportion of homeowners has increased from 60.7% in 2000 to 62.4% in 2012. While Houston remains a predominately renter occupied city and showed little change across the time period, the region is occupied by almost two-thirds homeowners and that percentage increased from 2000 to 2012.

Table 35: Tenure

	2000				2012				% Change 2000-2012	
	Houston		Houston MSA		Houston		Houston MSA		Houston	Houston MSA
Occupied Housing Units	717,945		1,639,401		773,450		2,022,104		7.7	23.3
Owner Occupied	328,741	45.8	994,347	60.7	355,220	45.9	1,262,001	62.4	8.1	26.9
Renter Occupied	389,204	54.2	645,054	39.4	418,230	54.1	760,103	37.6	7.5	17.8
Source: 2000 Census; 2008-2012 ACS										

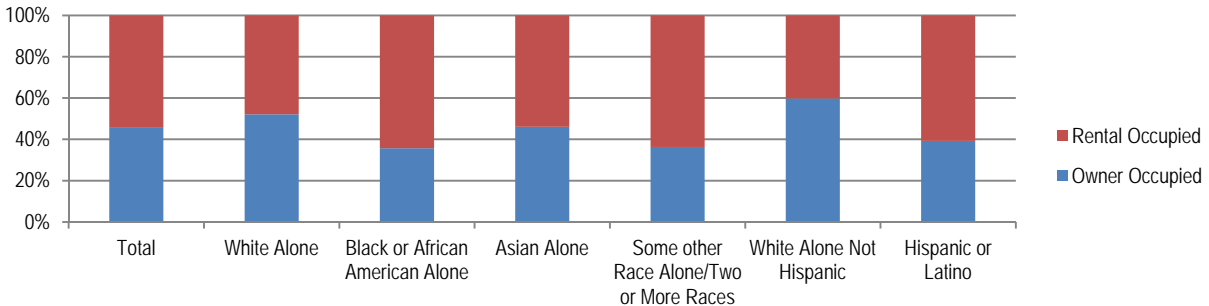
Tenure by Race

Residents of all races are more likely to own a home in the Houston MSA than they are if they live inside the city limits of Houston. Almost two-thirds (59.8%) of White, non-Hispanic residents own their homes within the City, which is by far the racial/ethnic group with the greatest proportion of homeowners. Non-Hispanic Black/African American Houstonians are the most likely group to rent (64.3%) followed by Non-Hispanic Other Races (63.7%) and Hispanic/Latino (60.7%).

The homeownership rate in the Houston MSA (62.6%) is much higher than in the City of Houston (45.9%). While the percentage of non-Hispanic Black/African American homeowners is larger in the region compared to Houston, it still is the lowest compared to other race and ethnicity groups (45.7%). Almost three fourths (73.5%) of white non-Hispanic residents are homeowners.

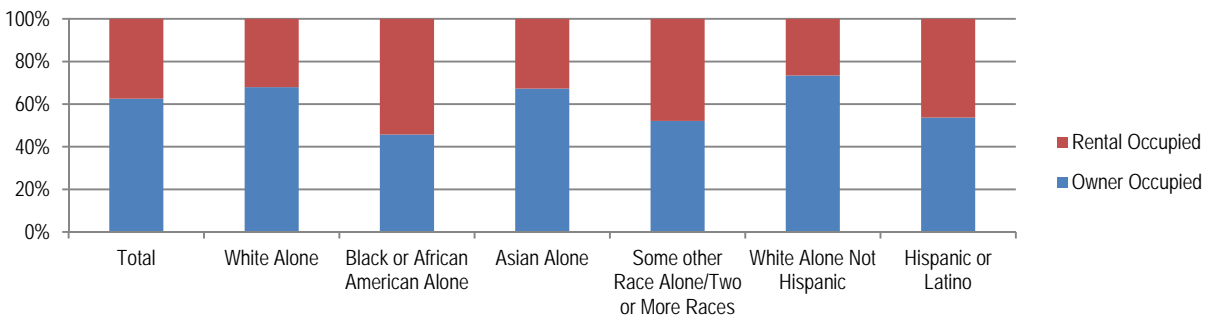
Historically, homeownership has been a way to build wealth in the United States. While this is not always the case, homeownership can be an important asset to families. The stark difference in tenure and racial/ethnic groups may indicate a need for financial education or homebuyer education in minority communities. It could also indicate a disparity in lending practices from private banking intuitions between minority residents and nonminority residents.

Figure 10: Houston Tenure by Race/Ethnicity 2008-12 Census B25003A-I



Source: 2008-2012 ACS

Figure 11: Houston MSA Tenure by Race/Ethnicity 2008-12 Census B25003A-I



Source: 2008-2012 ACS

Disproportionate Housing Needs

CHAS data is one dataset that demonstrates the number of households in need of housing assistance. For instance, it estimates the number of households with housing problems. A housing problem consists of one or more of the following four problems: cost burdened – monthly household costs exceed 30% of monthly income; overcrowding – more than one person per room; unit lacks complete kitchen facilities; and unit lacks complete plumbing facilities. A very small percentage of housing units in Houston and the region have housing problems that include a lack of complete plumbing or kitchen. However, almost all households experiencing housing problems are cost burdened and/or overcrowded.

Over two in five households in the City of Houston (41.2%) experience one or more housing problems. Comparing the race/ethnicity of households with housing problems to the overall population in Houston and the Houston area, Hispanic households had highest percentage difference at 8.4% in Houston and 9.4% in the region. This indicates that there is slightly higher proportion of Hispanics with one or more housing problems compared to the entire population. When reviewing household type and size, family households with more than five people had the highest

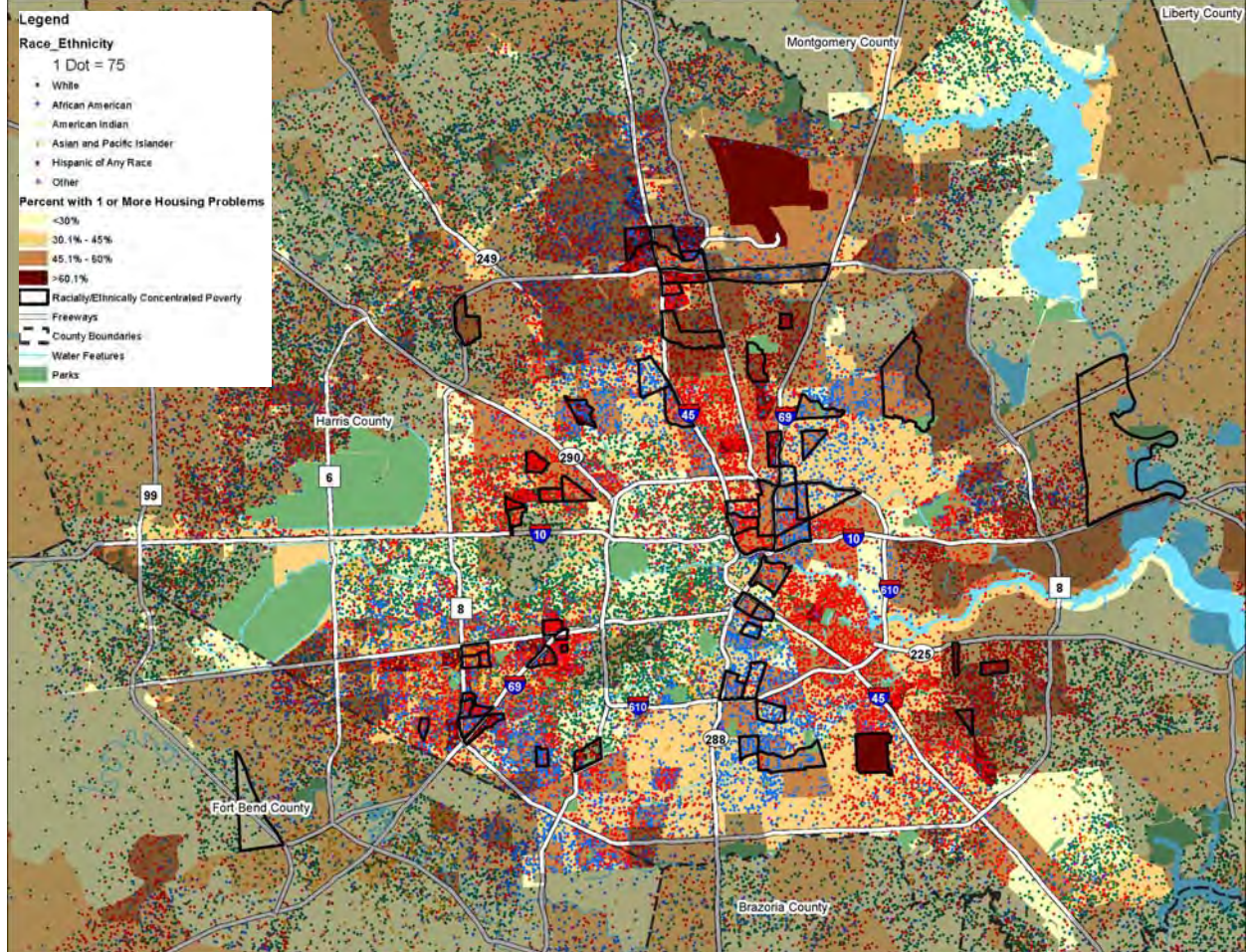
proportion of housing problems compared to the proportion of the population which could indicate higher needs of large families in the Houston area and within the city.

Table 36: Households experiencing one or more housing problems in Houston by race/ethnicity and family size

Race/ Ethnicity	City of Houston		Houston MSA	
	% of Total Households	% of Households With Housing Problems	% of Total Households	% of Households With Housing Problems
White alone, non-Hispanic	34.9	23.4	47.8	33.7
Black or African-American alone, non-Hispanic	25.0	29.0	17.9	22.7
Asian alone, non-Hispanic	6.1	5.2	5.9	5.8
American Indian or Alaska Native alone, non-Hispanic	0.2	0.2	0.2	0.2
Pacific Islander alone, non-Hispanic	0.04	0.1	0.0	0.0
Hispanic, any race	32.8	41.2	27.0	36.5
Other (including multiple races, non-Hispanic)	1.0	0.9	1.0	1.1
Total	100.0	100.0	100.0	100.0
Household Type and Size				
Family households, <5 people	49.9	43.1	57.7	47.7
Family households, 5+ people	11.8	18.0	13.4	19.7
Non-family households	38.3	39.0	28.8	32.6
Total	100.0	100.0	100.0	100.0
Source: 2007-2011 CHAS				

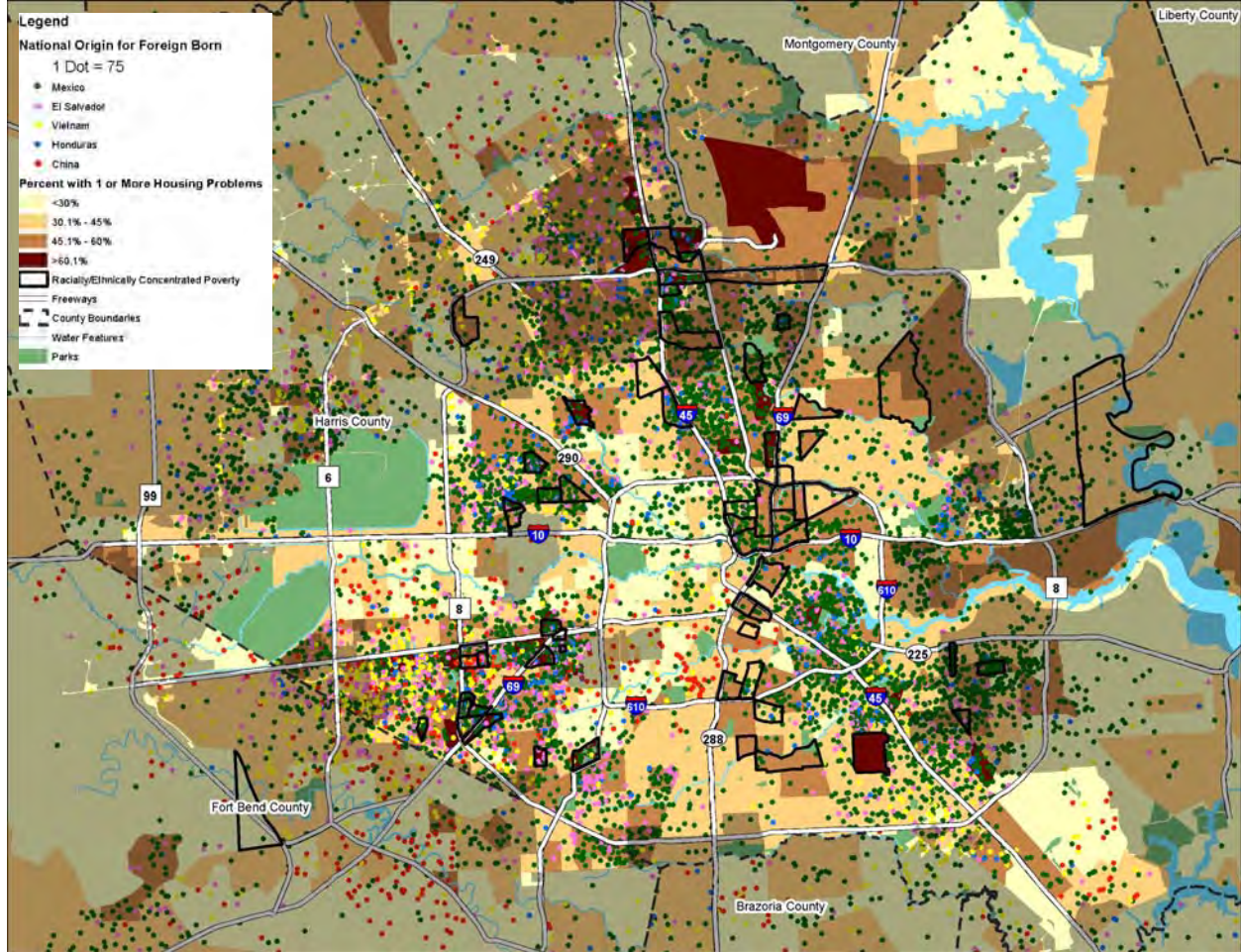
Higher proportions of households with populations of minority residents experience housing problems. This is illustrated in the following two maps. The areas of Houston with the lowest percentage of households experiencing housing problems resembles the locations of where White non-Hispanic residents live. The majority of foreign born are located in areas where more than 45% of the population has housing problems, concentrated in east downtown and southwest Houston.

Map 13: Map of households experiencing one or more housing burdens in Jurisdiction with R/ECAPs and race/ethnicity dot density



Source: 2008-2012 ACS; 2007-2011 CHAS

Map 14: Map of households experiencing one or more housing burdens in Jurisdiction with R/ECAPs and national origin dot density



Source: 2008-2012 ACS; 2007-2011 CHAS

Severe housing problems consist of one of the following: severe cost burdened – monthly household costs exceed 50% of monthly income; severe overcrowding – more than 1.5 persons per room; unit lacks complete kitchen facilities; and unit lacks complete plumbing facilities. Disparities between racial/ethnic categories of households experiencing severe housing problems are much more pronounced. The proportion of non-Hispanic Black/African American households experiencing severe housing problems in Houston was 41.1%, which was disproportionately higher than the proportion of all Black/African American households in Houston. Hispanic households had the greatest percentage difference in the Houston region with 41.4% of the households experiencing severe housing burdens were Hispanic while the Hispanic households only accounted for 27.0% of the total households in the region. Non-Hispanic White households in both the region and the city had a lower proportion of households experiencing a severe housing burden than the percentage of Non-Hispanic White households in the total population.

Table 37: Severe Housing Burdens by Race/Ethnicity for Houston

Race/ Ethnicity	City of Houston		Houston MSA	
	% of Total Households	% of Households With Severe Housing Problems	% of Total Households	% of Households With Severe Housing Problems
White alone*	34.9	16.6	47.8	28.8
Black or African-American alone*	25.0	41.1	17.9	22.8
Asian alone, non-Hispanic*	6.1	8.2	5.9	5.7
American Indian or Alaska Native alone*	0.2	5.1	0.2	0.2
Pacific Islander alone*	0.04	0.9	0.0	0.1
Hispanic, any race	32.8	37.1	27.0	41.4
other (including multiple races)*	1.0	0.7	1.0	1.0
All/Total	100.0	100.0	100.0	100.0
* Non-Hispanic				
Source: 2007-2011 CHAS				

Housing Affordability

The Texas Housing Affordability Index (THAI) gives a general picture of how affordable housing is for a person of median income. The THAI is the ratio of median family income to the income required to buy a median-priced home using currently available mortgage financing. A ratio of 1.0 indicates that the median family income is exactly equal to the income a conventional lender would require for the family to purchase the median priced house. A ratio of less than 1.0 means that the median income family has insufficient income to qualify for the loan to purchase a median priced house and a ratio greater than 1.0 indicates that a median income family earns more than enough to buy the median priced house. According to the Texas A&M Real Estate Center, the Houston area’s THAI has decreased from 2.00 in 2009 to 1.80 in 2014.¹⁵ This indicates that the Houston region is becoming less affordable, although families with median incomes can still qualify to purchase homes that are sold at the median price.

Publicly Supported Housing

Publicly supported housing is rental housing funded through federal, state, and local programs that offer lower rents to specific households based on income. The following will discuss publicly supported rental housing units and describe the current existing properties offering rents for low- and moderate-income families.

Public Housing

There are two main public housing authorities that operate in and around the Houston area, the Houston Housing Authority (HHA) and the Harris County Housing Authority (HCHA). Public housing authorities offer different housing opportunities for households earning below 50% of the Area Median Income (AMI). Public housing are rental housing owned by housing authorities offering subsidized rents for low-income households. Low-income families receiving Housing Choice Vouchers can rent any privately-owned rental unit and pay a portion of the rent using a Housing Choice Voucher. The final program is the Project-based Section 8 Program where rental vouchers are paired with specific housing units owned by private or non-profit entities.

Other Multifamily

There are other ways that affordable housing is built using public funding. First, the Texas Department of Housing and Community Affairs (TDHCA) funds the development and preservation of affordable housing units for low-income households mainly through the Housing Tax Credit Program. The Housing Tax Credit Program, although changes requirements each year, creates housing mainly for families earning below 60% AMI.

¹⁵ Texas A&M Real Estate Center. (2015). Housing Affordability: Texas Housing Affordability Index (THAI). Retrieved from <http://recenter.tamu.edu/data/hs/afford.asp>

HCDD also funds the development and preservation of affordable rental housing through several funding sources including CDBG, HOME, HOPWA, local Bond, and Tax Increment Reinvestment Zone (TIRZ). HCDD funded units are usually for households earning below 80% AMI although in some circumstances funding could be used for other income groups.

Finally, various other government funding sources can be used to finance affordable housing including affordable housing for special needs groups. HCDD and TDHCA also funds housing for special needs groups, but other funding sources have stipulations to funding housing for only certain populations. These include Section 202 and Section 811 funding sources which address the housing needs of elderly and persons with disabilities. When “Other Multifamily” is specified in the following information, it includes housing units built with one or more of these public funding sources.

Table 38: Publicly Supported Housing in Houston

	#	%
Total housing units	902,153	100.0
Public Housing	3,261	0.3
Project-based Section 8	200	0.0
Other Multifamily	57,655	6.4
HCV Program	16,515	1.8

Source: 2008-2012 ACS; HHA; HUD; HCDD; TDHCA

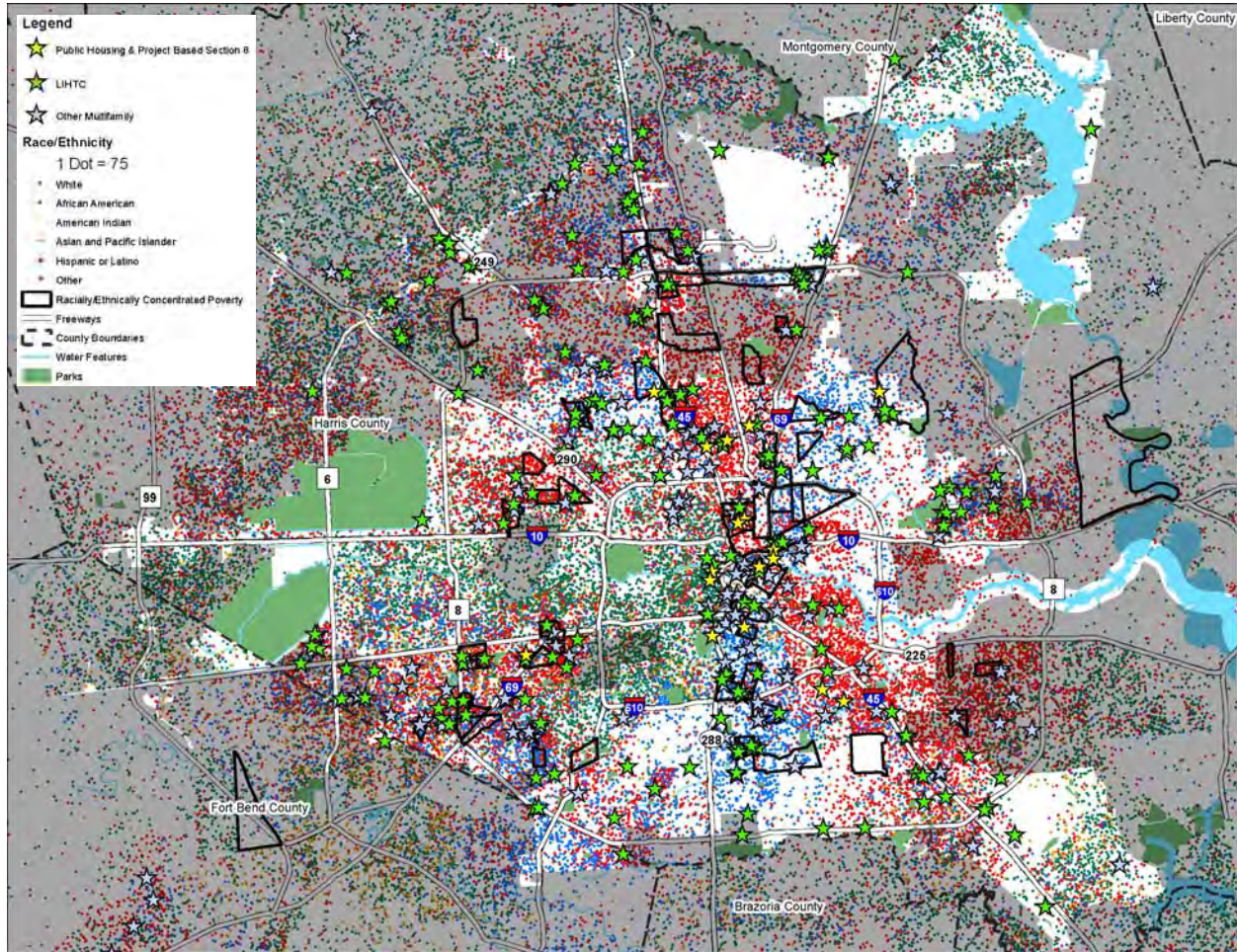
Considering that about half of the population living in Houston is low- and moderate-income, the amount of subsidized housing units is very low. Of course, housing units with rents that are affordable to low- and moderate-income families are not only publicly supported units, but often low rent housing in the private market could be deteriorating, small, or in inconvenient or less desirable locations. One example of the great need for affordable rental housing for low-income families is that HHA received 83,743 applications to apply to the Housing Choice Voucher Waitlist in August of 2012. In addition, with the rise of higher building and rehabilitation costs in the last few years, more developers may focus on market rate units rather than considering developing subsidized units.

Publicly supported housing units are located in most areas of the city. The top five Super Neighborhoods with the most developments of publicly supported housing include

- Northside / Northline (17 developments – 2,727 restricted units – 14.9% of housing units)
- Sunnyside (15 developments – 2,257 restricted units – 25.3% of housing units)
- Alief (14 developments – 1,841 restricted units – 5.1% of housing units)
- Greater OST / South Union (9 developments – 1,202 restricted units – 13.9% of housing units)
- Acres Homes (9 developments – 1,302 restricted units – 12.2% of housing units)

There are several areas where publicly supported housing is not available, mainly in the area west of downtown bordered by Interstate 10 to the north and Interstate 69 to the south. This is the same area of the city where private market investment is strongest according to the MVA. Areas in which the private real estate market is strongest are also areas with higher land costs, which could lead to publicly supported housing locating elsewhere. These areas are also areas in which the private market

Map 15: Public Housing/Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs



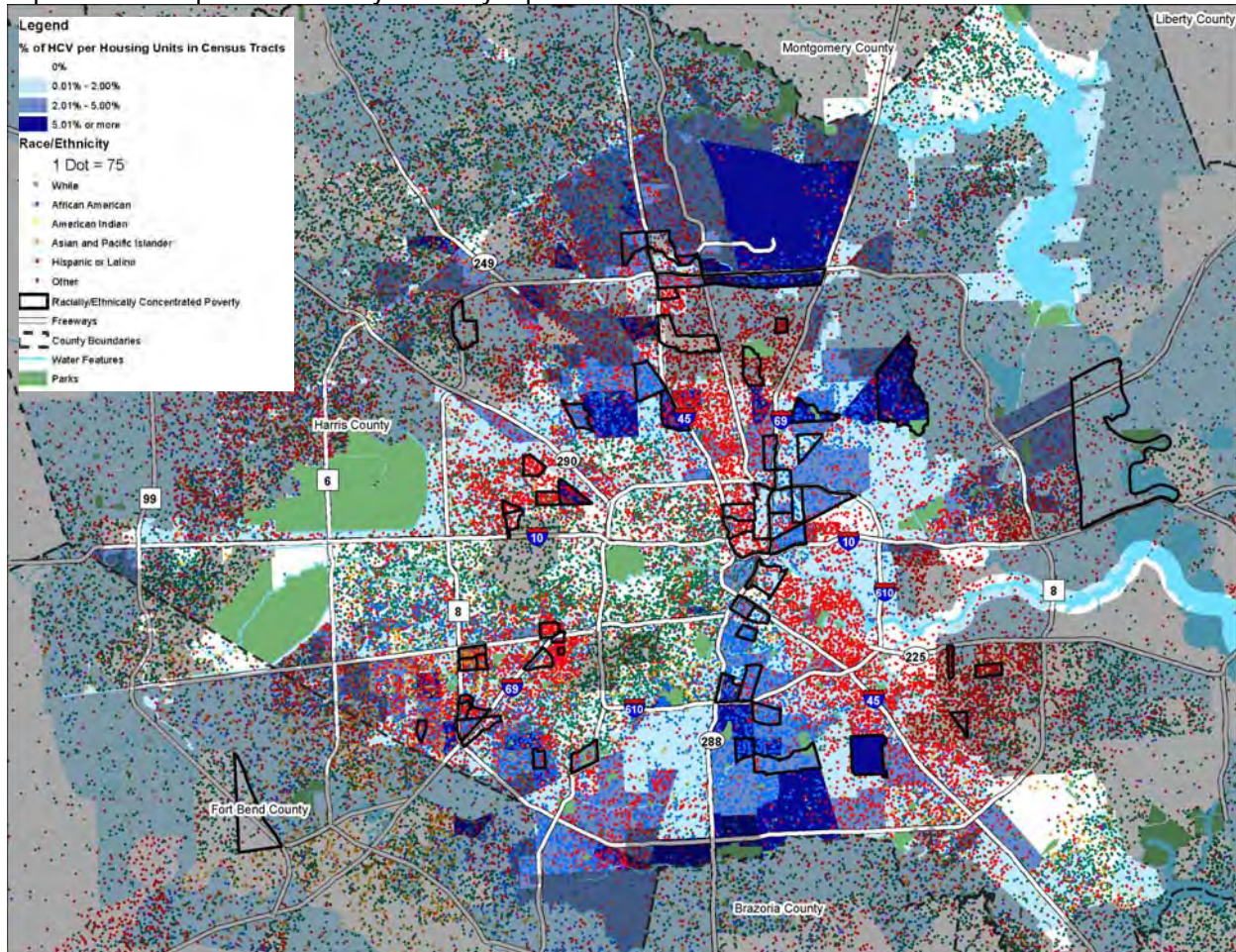
Source: 2008-2012 ACS; LIHTC; HHA; HUD; HCDD

The locations of Housing Choice Vouchers are found in most neighborhoods throughout the city however neighborhoods with no or very few vouchers are found in the most affluent areas. Some areas have a disproportionate amount of vouchers. The five Super Neighborhoods with the greatest absolute number of vouchers include

- Alief (1,078 vouchers – 3.0% of housing units)
- Brays Oaks (929 vouchers – 3.8% of housing units)
- Sunnyside (747 vouchers - 8.4% of housing units)
- Greater OST / South Union (613 vouchers – 7.1% of housing units)
- Fort Bend Houston (548 vouchers – 4.5% of housing units)

The following map shows the number of housing choice vouchers as a percentage of housing units in each census tract. Although persons receiving housing choice vouchers can move to any part of the city and region, voucher holders tend to cluster in areas close to publicly supported housing units.

Map 16: Voucher map with race/ethnicity dot density map and R/ECAPs

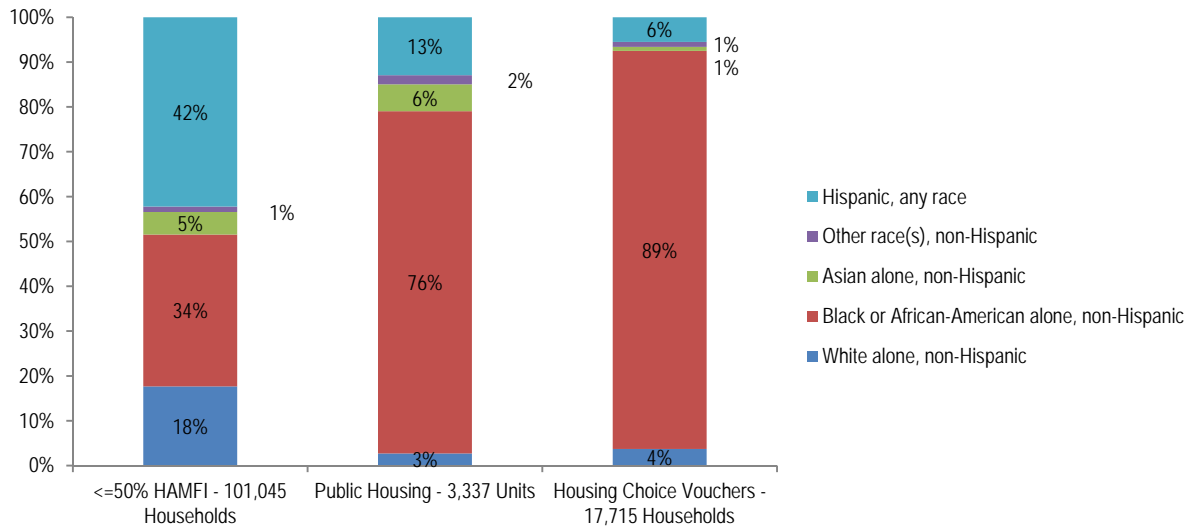


Source: HHA; 2008-2012 ACS

There are also disproportionate amounts of housing choice vouchers compared to the citywide amount of available vouchers in several census tracts. Approximately 2% of the housing units in all of the city of Houston have housing choice voucher holders. Some areas with over 5% of the housing units with housing vouchers are clustered in predominately Black/African American neighborhoods such as in and around Independence Heights and Sunnyside. Almost all voucher holders are Black/African American households.

When comparing the race and ethnicity of the general population to the race and ethnicity of those taking part in public housing and the Housing Choice Voucher Program, the programs are disproportionately utilized by Black/African American households. Although the proportion of Hispanic households attribute to almost half of households (42%) eligible for these two programs, African/American Black households are the group with the largest proportion of households utilizing public housing and the Housing Choice Voucher Program. This fact was brought up at a Stakeholder Discussion Meeting with residents from HHA. Residents suggested that other racial and ethnic groups did not have a greater participation in these programs because they either did not know about the programs or because there is a stigma associated with participation in these programs.

Figure 12: Comparison of Race and Ethnicity of Public Housing and General Population



Source: HHA, 2007-2011 CHAS

Similar to housing programs through HHA, other publicly supported housing is utilized primarily by minority households. The percent of Black/African American residents is highest for the HCV Program, Public Housing, and Project-Based Section 8. Hispanics as well as White individuals are most represented as a percentage in Project-Based Section 8 and Other Multifamily. These percentages for Hispanic participation are still very low compared to the overall Hispanic population in the community.

Table 39: Race/ethnicity data for 4 categories of publicly supported housing in the City of Houston

Housing Type	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing*	340	3	2,581	76	401	13	188	6
Project-Based Section 8*	59	20	226	75	53	18	12	4
Other Multifamily* **	1,576	25	2,022	32	972	15	260	4
HCV Program*	1,293	4	15,554	89	953	6	188	1

*Race and Hispanic calculated separately
 **Data is currently only available for units in HCDD's portfolio.
 Source: HCDD; HHA

The following table shows that Public Housing, Project-Based Section 8, and the Housing Choice Voucher Program serve higher percentages of persons with disabilities than are represented in the city's population, showing that there is a need for affordable accessible housing for persons with disabilities.

Table 40: Tabular Data on Disability and Publicly Supported Housing for Houston

	People with a Disability	
	#	%
Public Housing	1,209	36
Project-Based Section 8	155	52
HCV Program	4,324	24

Source: HHA

4. Community Amenities and Hazards

Residential location including the location of various community assets and the presence of adverse community factors can contribute to fair housing issues on the basis of race, ethnicity, national origin, and familial status. This chapter will identify patterns and outliers in access to community assets and exposure to adverse community factors: "Housing lies at the fulcrum of civil rights' because where one lives affects opportunities for education, employment, health care, recreation and other aspects of life, says John Relman, an attorney representing the National Fair Housing Alliance."¹⁶

Analyzing Community Asset Indicators

A two-stage process has been developed by HUD to analyze disparities as it relates to access to community assets. The first stage involves determining what level of availability exists in a neighborhood as it relates to community assets such as education, employment, transportation, as well as others. The metrics used by HUD rank each neighborhood by index scores ranking from 1-100 based on key dimensions. The second stage is described by HUD as combining the key dimension rankings with data based on where people in particular subgroups live to develop a measure of that group's general access or exposure to each asset dimension. A comparison is then made across subgroups to describe disparities in access to community assets. HUD considers community assets a multi-dimensional notion. HUD has selected six dimensions upon which to focus

- Neighborhood School Proficiency
- Poverty
- Labor Market Engagement
- Job Accessibility
- Health Hazards Exposure
- Transit Access

Data for each of the six dimensions has been made available in shape file format on HUD's e-GIS rest (<http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>). Due to the limitations on editing the spatial data, the GIS platform has been used to store and present the data at the local jurisdictional level.

Neighborhood School Proficiency Index

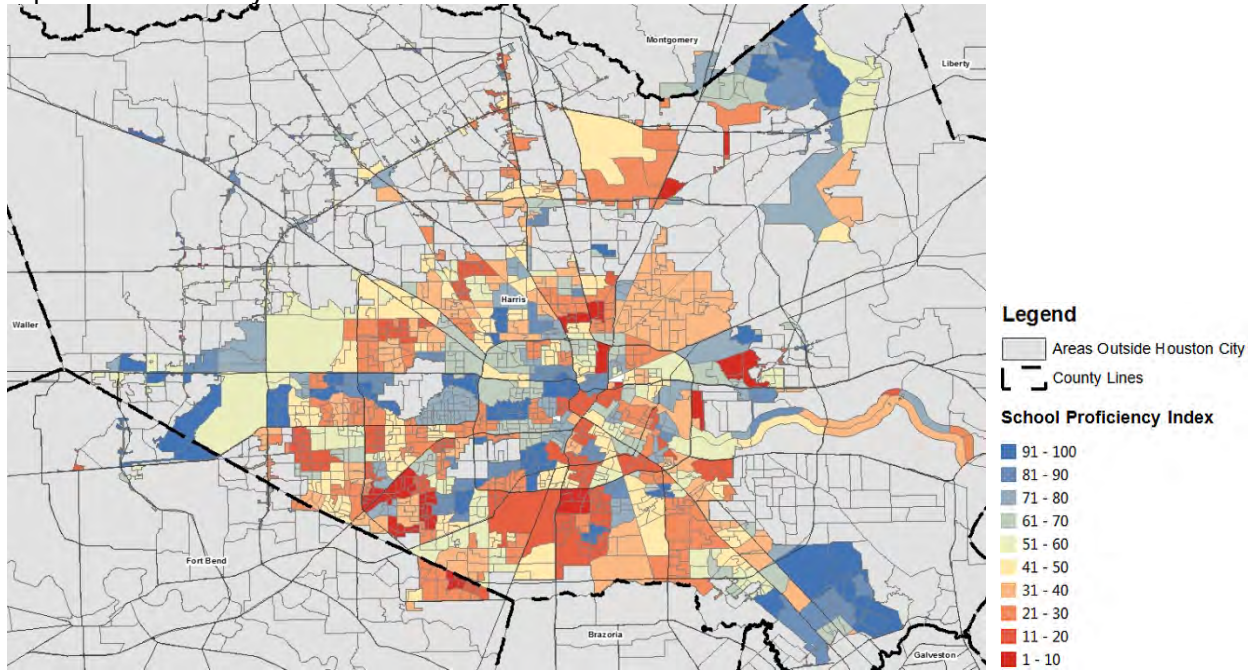
According to HUD, the neighborhood school proficiency index describes which neighborhoods have high or low performing elementary schools. Using HUD e-GIS data provided in shape file format, a spatial distribution of the index scores can be visualized. HUD's method uses the following neighborhood school proficiency index formula to calculate the scores for census block groups:

$$School_i = \sum_i^N \left(\frac{s_i}{\sum^n s_i} \right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i \right]$$

The proficiency index is a function of the percent of elementary school students proficient in reading (r) and math (m) on state test scores for the *i*th school associated with the neighborhood (*i* = 1, 2,...n) Where N is the maximum number of schools in any block group in the distribution, and school enrollment.

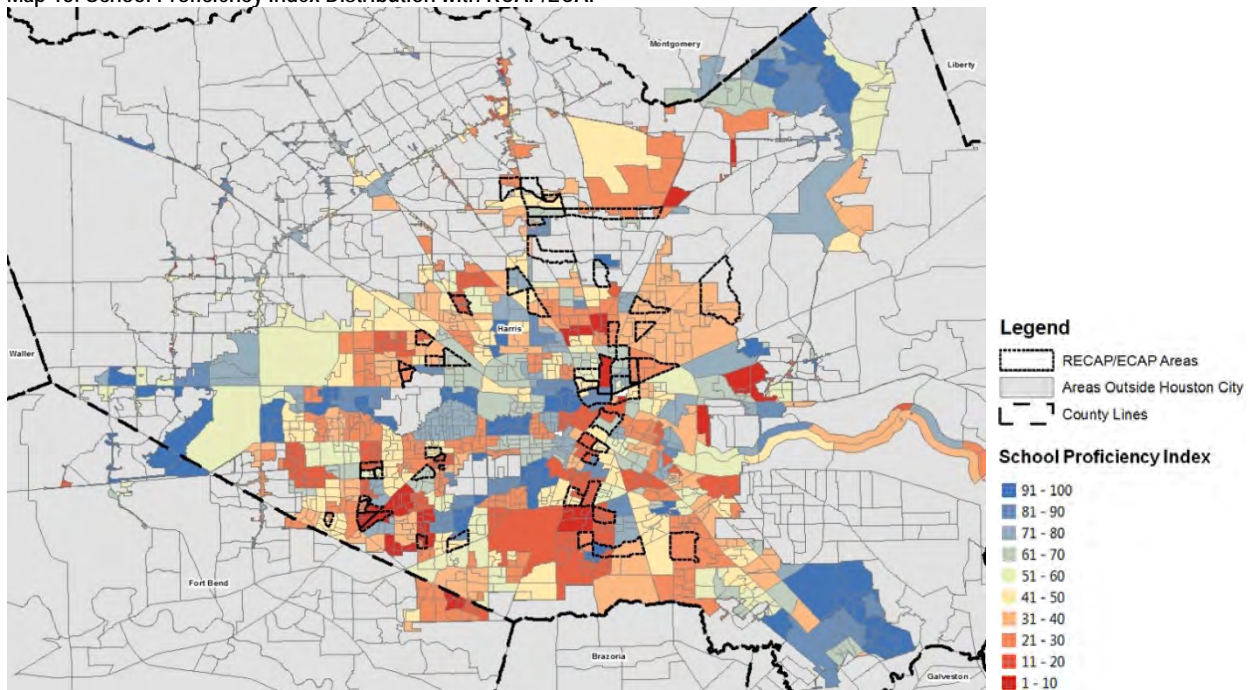
¹⁶ Welan, Robbie & Bravin, Jess. (January 20, 2015). Texas Housing Case Tests Civil-Rights Doctrine. *The Wall Street Journal*. Retrieved from <http://www.wsj.com/articles/texas-housing-case-tests-civil-rights-doctrine-1421811181>

Map 17: School Proficiency Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 18: School Proficiency Index Distribution with RCAP/ECAP



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Elementary schools are linked with block groups based on a geographic mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within district proximity matches of up to the four-closest schools within a mile.

Magnet programs are in schools throughout the Houston area, therefore if there are areas without census block groups with index scores of 61–100 in Map 17, it is likely that these neighborhoods are without elementary schools that have magnet programs more than a mile away. An additional assessment may be made with a layer showing where racially and ethnically concentrated areas of poverty (RCAP/ECAP) are correlated with the school proficiency index scores. The east side of Houston has the most RCAP/ECAPs and in Map 18 these areas, along with the city-wide distribution of RCAP/ECAPs have a significant spatial correlation with index scores less than 50.

The Houston Independent School District, with more than 203,000 students and encompassing 301 square miles within greater Houston, is the seventh largest public school system in the nation and the largest in Texas.¹⁷ The race and ethnicity of HISD students in the 2012-2013 school year was 24.6% African American, 3.4% Asian, 62.7% Hispanic, 8.2% White, and 1.1% other. Almost one third of students (29.8%) have limited English proficiency and 7.9% are classified in Special Education. Almost four in five students (79.7%) are considered economically disadvantaged, meeting federal criteria for free and reduced-priced lunch. In the 2012-2013 school year, the graduation rate in HISD was at an all-time high of 78.5% and the dropout rate was at an all-time low of 11.8%. In 2012 voters approved a \$1.89 billion school construction bond by 69%.

Poverty Index

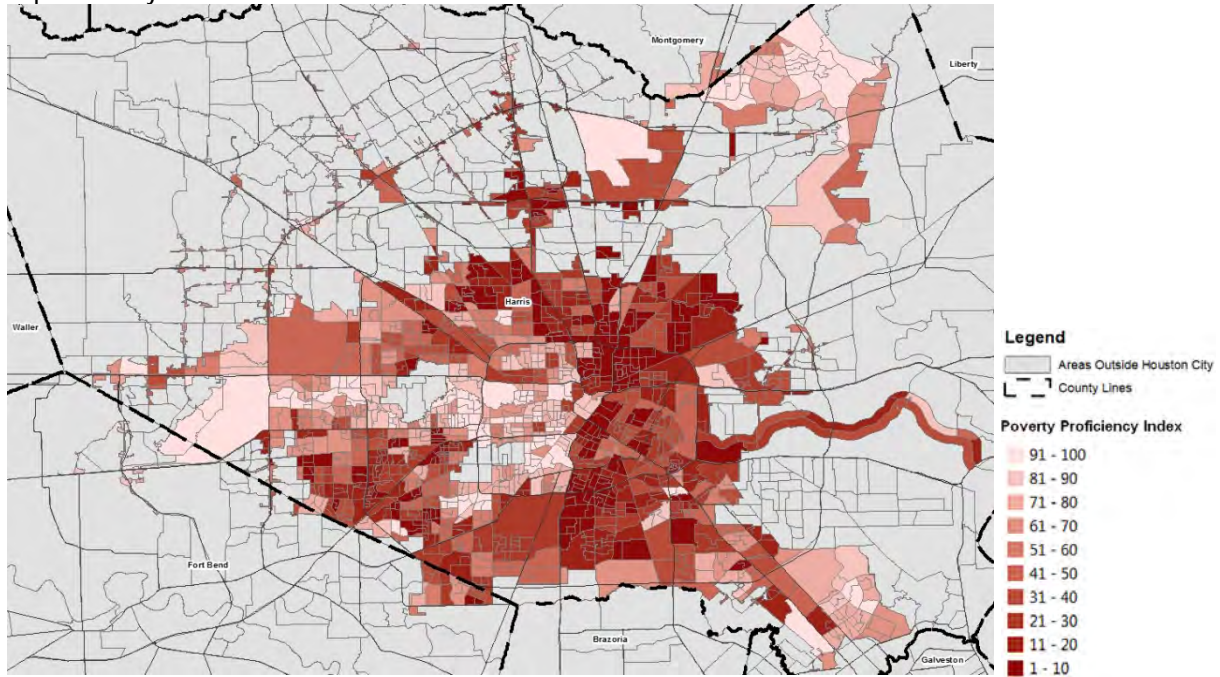
The poverty index is considered to be a simple index by HUDs standards and is intended to capture the depth and intensity of neighborhood poverty by census block group. It describes which neighborhoods have high or low poverty based on family poverty data and public assistance receipts in cash-welfare such as Temporary Assistance for Needy Families (TANF). The operationalization of both aspects is a linear combination of the two vectors: the family poverty rate (pv) and the percentage of households receiving public assistance (pa). Using HUD e-GIS data provided in shape file format, a spatial distribution of the index scores can be visualized. HUD's method uses the following poverty index formula to calculate the scores for census block groups where means (μ_{pv} , μ_{pa}) and standard errors (σ_{pv} , σ_{pa}) are estimated over the metropolitan area distribution or balance of state in non-metros:

$$POV_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) - 1 \right] + \left[\left(\frac{pa_i - \mu_{pa}}{\sigma_{pa}} \right) * -1 \right]$$

Based on the spatial distribution of census block groups in Map 19, any index score from 1-30 may be considered as neighborhoods that have a concentration of poverty. The distribution of index scores also show that there are more census block groups that are in poverty in the eastern portion of the City of Houston, more so in the central urban area. Map 20 also uses RCAP/ECAPs as an additional layer to the distribution of index scores. Based on the inclusion of the poverty factor in the additional layer, it is not surprising that all the RCAP/ECAPs have poverty index scores between 1-30.

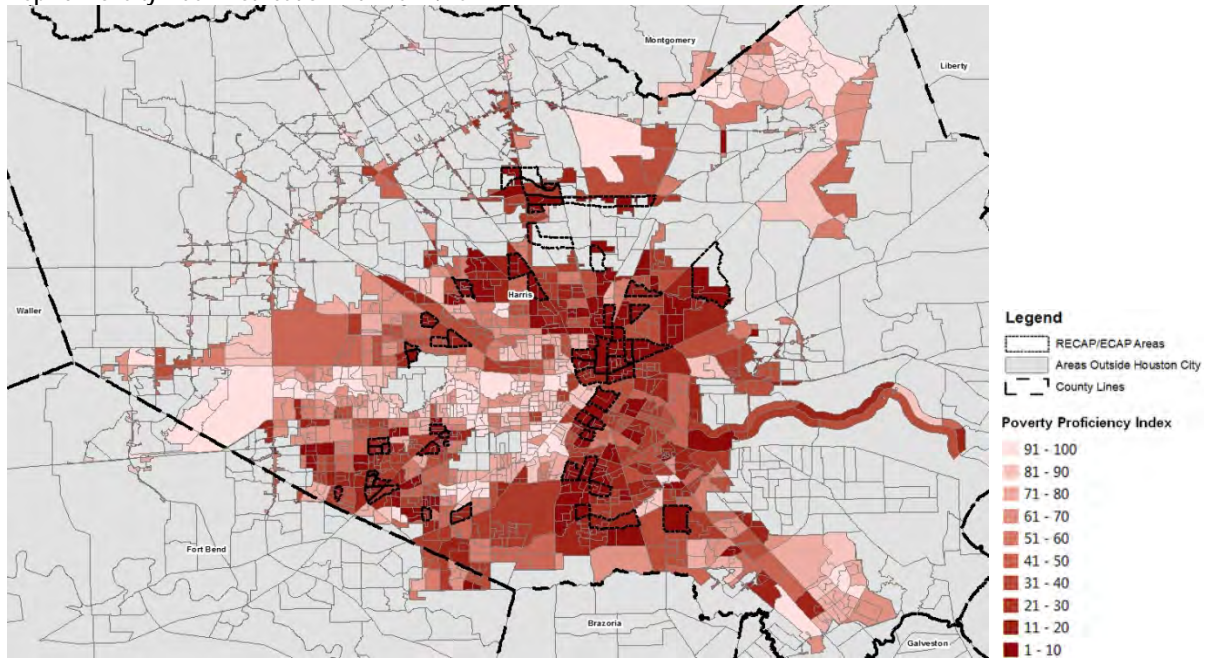
¹⁷ Houston Independent School District. *2012-2013 Facts and Figures*. Retrieved from <http://www.houstonisd.org/domain/7908>

Map 19: Poverty Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 20: Poverty Index Distribution with RCAP/ECAP



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Job Access Index (Gravity Model)

According to the AFFH Data Documentation proposed by HUD, the job access index summarizes the accessibility of a given residential neighborhood as a function of its distance to all job locations, with distance to larger employment centers weighted more heavily.

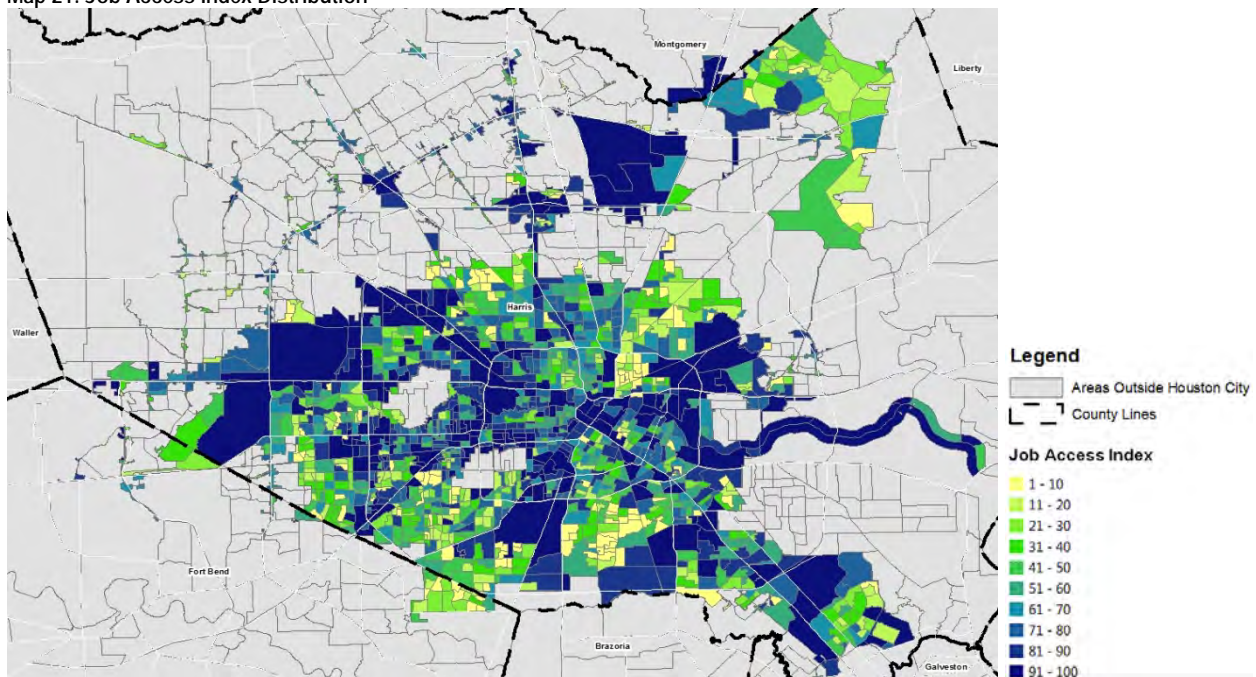
Specifically, a gravity model is used, where the accessibility (A_i) of a given residential block group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. More formally, the model has the following specification where i indexes residential locations and j indexes job locations, and distance, d_i is measured as “as the crow flies” between block groups i and j . E represents the number of jobs in tract j and L is the number of workers:

$$A_i = \sum_{j=1}^n \frac{E_j d_{ij}^{-2}}{\sum L_j}$$

Based on the spatial distribution of the model in Map 21, there are that are closer in proximity based on the index scores of 51-100. There is a smaller distribution of index scores ranging from 1-10 near the central urban area, but the distribution of index scores in census block groups ranging from 1-50 increase in numbers in the south, southwest, northwest, and northeast.

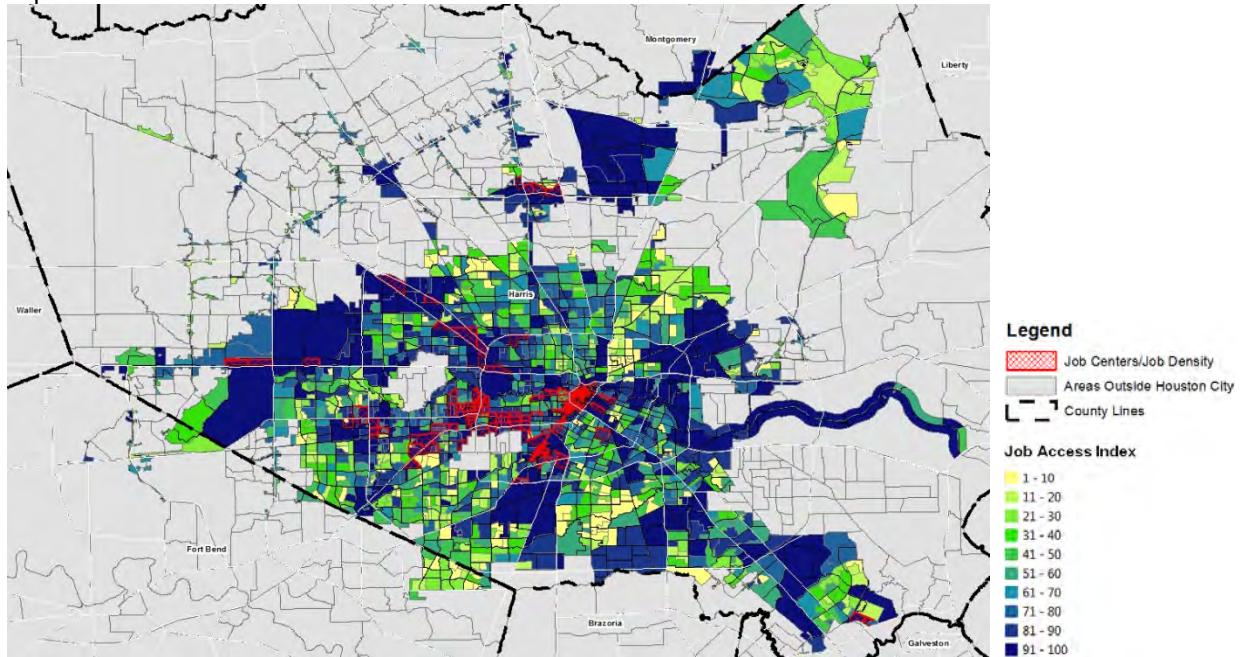
An additional factor added to the transit index, job/employment centers, supports where the higher index scores for job access are. Job/employment centers are calculated based on a density of 10,000 jobs or greater in a given traffic analysis zone. In Map 22 every job center has an index score greater than 70. It is also noticeable that most of the job centers are on the west side of the city away from the east areas of the city which have the most RCAP/ECAPs. Those areas with racial/ethnic and poverty concentrations are longer distances from the larger job centers.

Map 21: Job Access Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 22: Job Access Index Distribution with Job Centers



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Transit Access Index

According to HUD, a transit access index where available data exists to support local analysis has been constructed. HUD utilizes data to assess relative accessibility within metro areas (or balance of state). Because standardized data on the location of amenities is not uniformly available at a granular level, HUD uses the number of jobs in retail, arts entertainment & recreation, and food & accommodations as proxies for the magnitude of amenities at the block group level from the Local Employment Dynamics dataset published by the Census Bureau. For the index for transit access identified represent the number of jobs in these sectors within 1/2 mile of each bus stop and 3/4 mile of each rail transit stop and summed them. Then for each trip in the transit system, HUD calculated a stop-specific measure of the additional amenities accessed in each ensuing stop on that route, which it then divided by (deflated) the additional travel time to each ensuing stop. Mathematically, this can be expressed in several terms.

Let (s_{ij}) represent the accessibility of stop i on trip j , a is the amenity radius of a stop (the total jobs mentioned above), and T is the marginal travel time with each stop. Each stop of each trip takes on a value equal to the sum of the amenity radius of each ensuing stop divided by the time to that next stop for all stops on a trip.

$$s_{ij} = \sum_i^N \frac{a_{i+1}}{T_{t+1}}$$

These stop-journey specific (s_{ij}) values are then summed over all journeys j (where journeys in opposite directions are counted as two trips) made in 24-hours to create a single aggregate accessibility value for each stop in the system (where k is the total stops in the system).

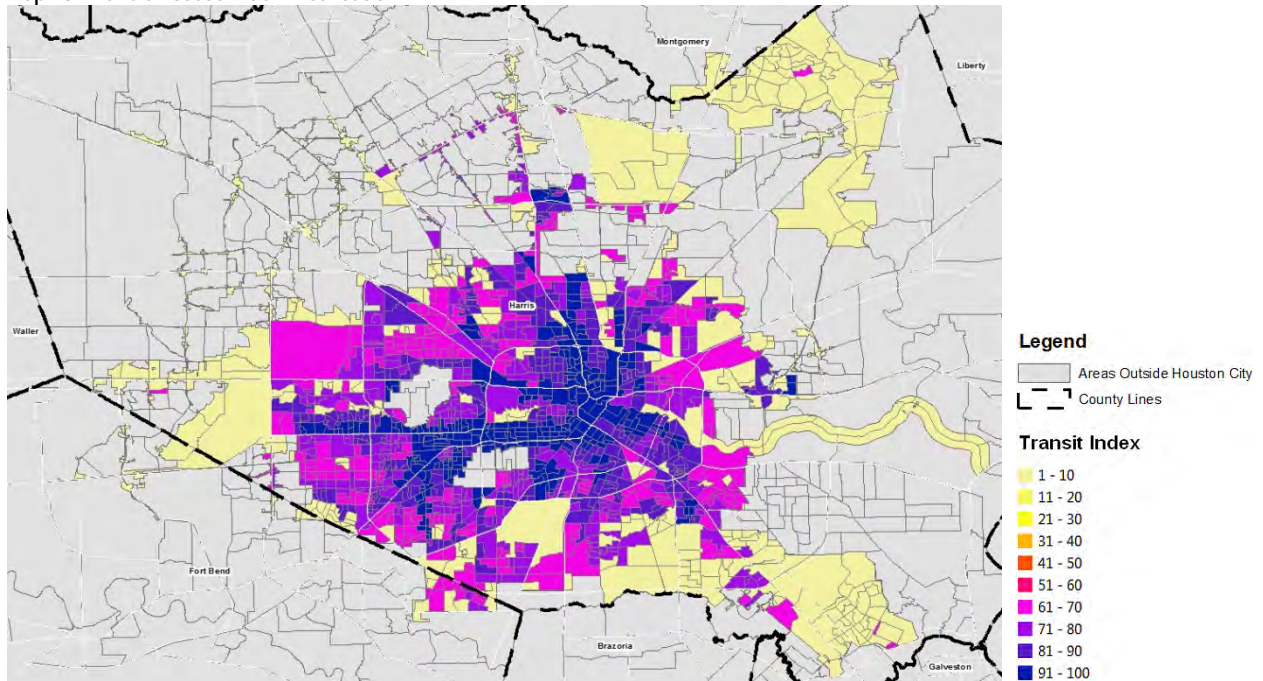
$$A_i = \sum_j^k s_{ij}$$

To translate these stop accessibility values (A_i) to block groups, HUD then calculates the distance between each stop and the population-weighted centroid of each block group. The three highest accessibility stops within 3/4 of a mile are summed to generate a block group value for accessibility. Finally, these values are placed into decile (10-percentile) buckets within-metro or balance of state, and are scaled up by a factor of 10 to align with the other

indices. Block groups that are not within 3/4 of a mile of either a bus or transit stop are normalized to a value of 1- the lowest accessibility score. The areas with index scores ranging from 1-30 in Map 24 are areas that lack transit that is at least 3/4 miles away. Another proxy that may be used to assess the limits of transit access would be local transportation data confirming why the area with higher index scores ranging from 31-100 has better transit access.

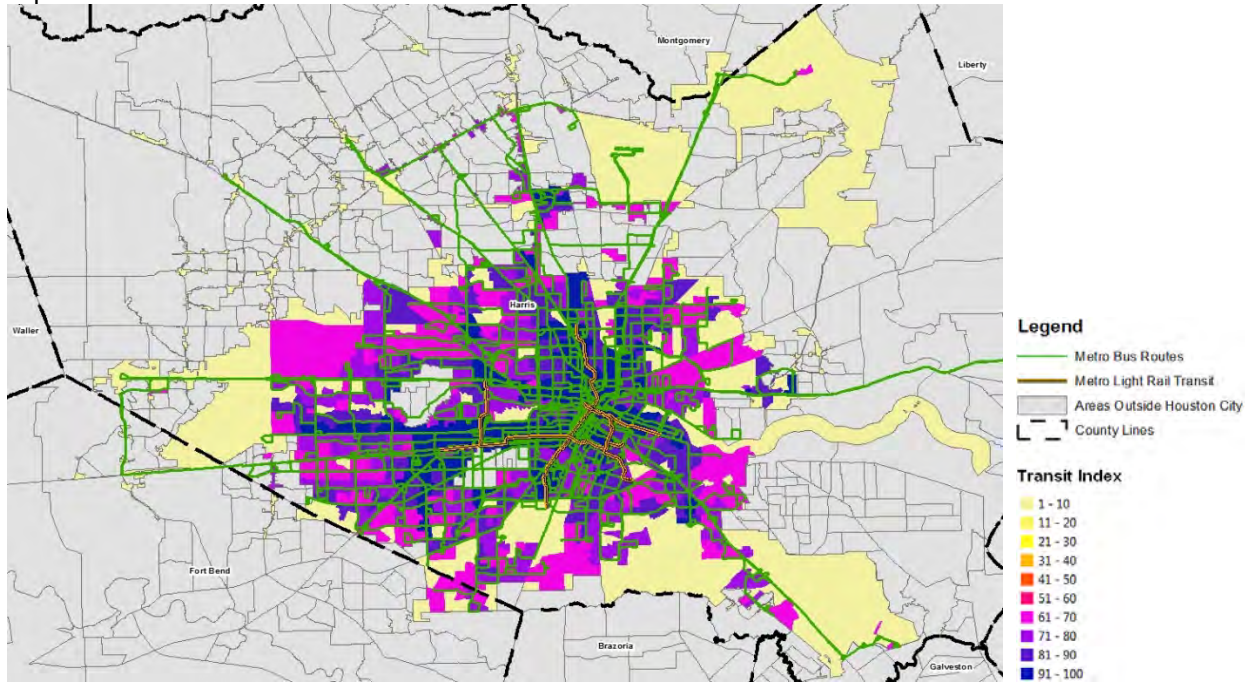
The METRO light rail transit (LRT) lines in Map 24 correspond directly with the census block group that have index scores ranging from 51-100, whereas the lack of LRT correlates with census block groups which have lower index scores. Areas with less than an index score of 30 represent geographies that do not have enough stops along transit lines. Based on the METRO routes and schedules, these are park and ride routes which are intended for long daily commutes during the work week. Although the park and ride lots are outside the central urban area, they are inside the City of Houston's jurisdiction.

Map 23: Transit Access Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 24: Transit Access Index Distribution with METRO Routes

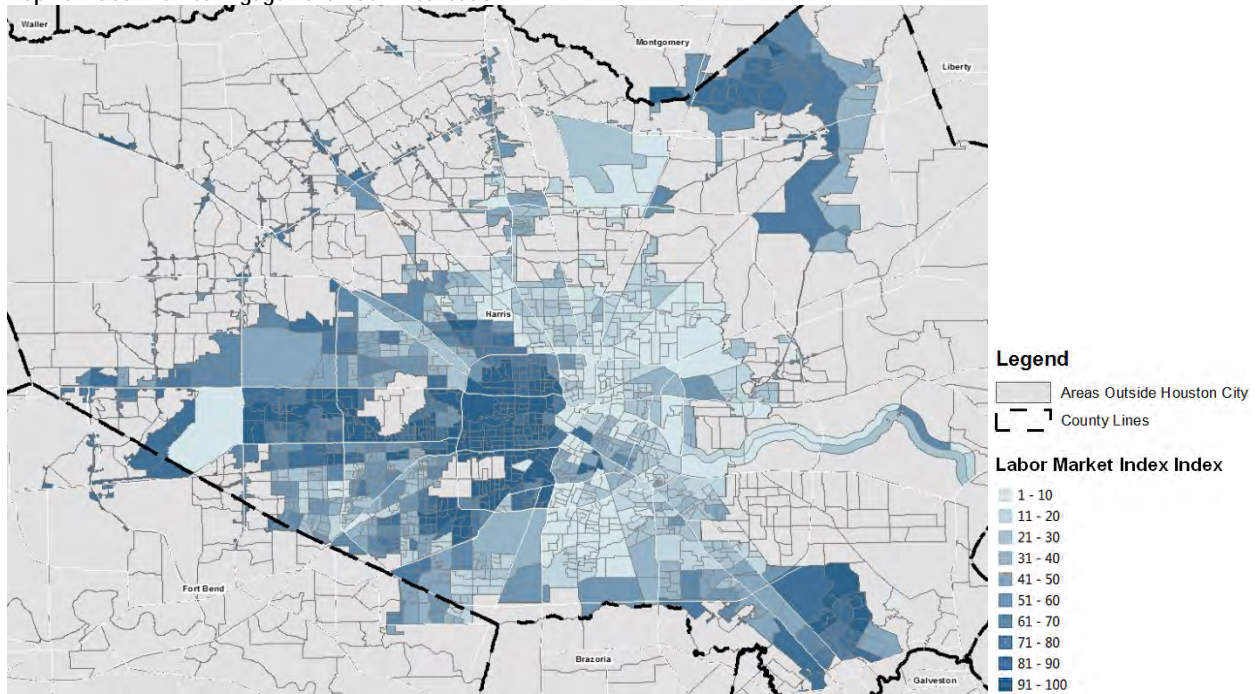


Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Labor Market Engagement Index

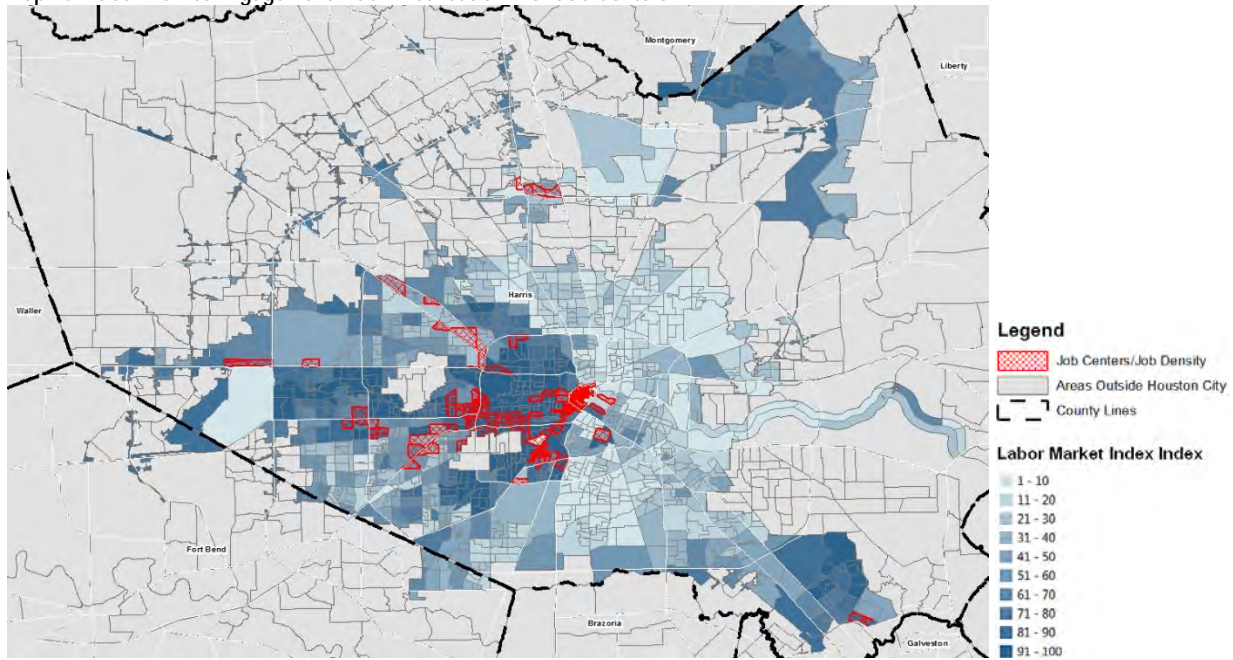
The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in that neighborhood.

Map 25: Labor Market Engagement Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 26: Labor Market Engagement Index Distribution with Job Centers



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/osh/Fhea/MapServer>

Formally, the labor market engagement index is a linear combination of three standardized vectors: unemployment rate (u), labor-force participation rate (l), and percent with bachelor's or higher (b), using the following formula where means (μ_u, μ_l, μ_b) and standard errors ($\sigma_u, \sigma_l, \sigma_b$) are estimated over the metropolitan area distribution or balance of state in non-metros.

$$LBM_i = \left[\left(\frac{u_i - \mu_u}{\sigma_u} \right) * -1 \right] + \left(\frac{l_i - \mu_l}{\sigma_l} \right) + \left(\frac{b_i - \mu_b}{\sigma_b} \right)$$

The labor market engagement index scores follow the spatial distribution of race/ethnicity, income, and access to jobs. The job density calculations for job/employment centers show that there is definitely a pattern to where opportunity exists (See Map 26). There is a small amount of census block groups that have index scores of less than 50 in the areas with job/employment centers.

Environmental Health Hazard Exposure Index

HUD has constructed a health hazards exposure index to summarize potential exposure to harmful toxins at a neighborhood level. Potential health hazards exposure is a linear combination of standardized EPA estimates of air quality carcinogenic (c), respiratory (r) and neurological (n) with i indexing census tracts.

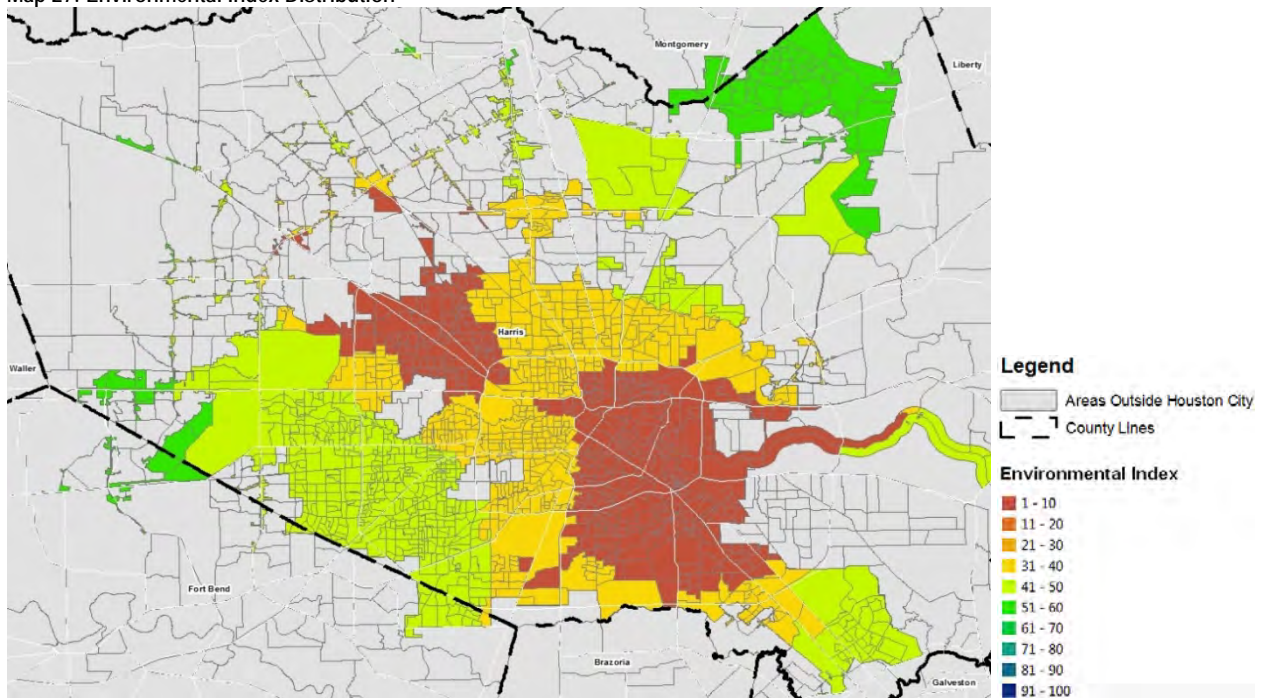
$$HazardExp_i = \left[\left(\frac{c_i - \mu_c}{\sigma_c} \right) + \left(\frac{r_i - \mu_r}{\sigma_r} \right) + \left(\frac{n_i - \mu_n}{\sigma_n} \right) \right] * -1$$

Where means (μ_c, μ_r, μ_n) and standard errors ($\sigma_c, \sigma_r, \sigma_n$) are estimated over the metropolitan area distribution or balance of state in non-metros.

East Houston was identified by Dr. Heidi Bethel, from the U.S. Environmental Protection Agency (EPA) Office of Water, as being exposed to a multitude of pollutants due to its adjacent vicinity to the industrial and chemical plants east of Houston. In Map 28 it may be observed that several environmental factors utilized in the index calculation

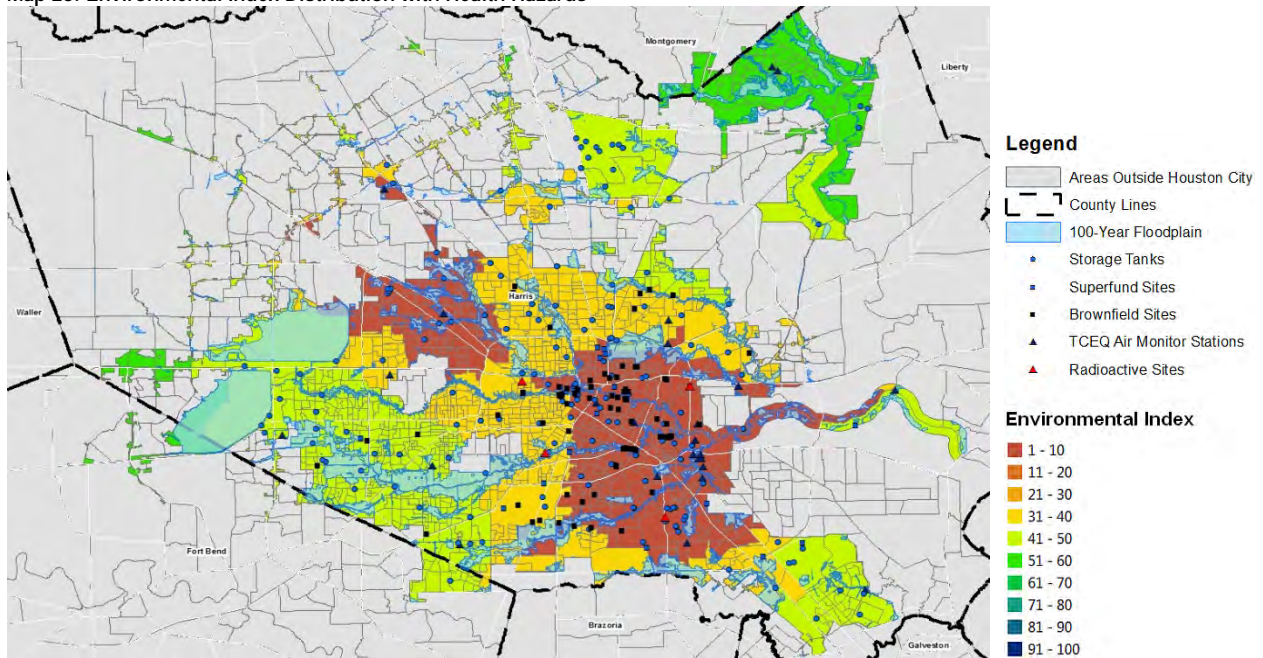
significantly correlate with the contributions from each factor's impact. Central Houston does not have an index score greater than 50, which is determined by the health hazards and exposure to the city as a whole.

Map 27: Environmental Index Distribution



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Map 28: Environmental Index Distribution with Health Hazards



Source: HUD - <http://egis.hud.gov/ArcGIS/rest/services/oshc/Fhea/MapServer>

Fair Housing Concerns

The indicators for community assets have imbalances that can be clearly visualized and quantified. The majority, or clustering, of the community assets are divided into neighborhoods that do not have high concentrations of poverty. There is a geographic pattern in the lack of community assets, which is consistent with the geography of concentrated race, ethnicity, and poverty. Within this geography is the largest exposure to health hazards in the entire environment of Houston.

The index scores for school proficiency raise concerns about magnet programs in schools that are located in neighborhoods with concentrated race/ethnicity and poverty. Within the multitude of neighborhoods that have these characteristics of concentration, some have high index scores. Based on further examination of the higher scores amongst lower scores, these areas have magnet schools which do not have a true representation of students from the geographic unit measured. The immediate community has an asset in the community, but it is questionable that they have access to it.

The spatial index distribution for job access, transit access, and labor market engagement creates a pattern that is based on where the job centers are located. Transportation lines follow this pattern but access to transportation is widely distributed other than LRT. Labor engagement index scores are clearly divided based on where race/ethnicity and poverty exists. The concern for fair housing choice is that the location of economic development is a strong determinant for access to community assets, whereas households in neighborhoods without economic development have imbalances as it relates to access.

5. Segregation, Integration, and Concentration

As discussed earlier, while Houston is one of the most diverse metropolitan areas in the country and the city has a majority minority population, some racial and ethnic groups are living in the same neighborhoods. Where a person lives has a profound impact on not only the individual's access to services and amenities but also how people view each other and interact. Measuring where members of various racial/ethnic groups live in the Houston region relative to one another is important to understand Houston's racial and ethnic dynamics.

Residential Segregation by Race/Ethnicity

This section will measure racial and ethnic segregation using several different methods. There are several ways to determine segregation. Segregation refers to the unequal distribution of social groups across units (e.g. census tracts) of an urban area. Economic and/or residential segregation, based on evenness, are the two common factors recognized as barriers to a more integrated society. Residential segregation has historically been based on the unevenness of where Blacks live in relation to where Whites live. According to the U.S. Census Bureau, a minority group is segregated if it is unevenly spread across neighborhoods. Evenness is scaled relative to another group. Segregation is maximized when all units of measurement have the same relative number of minority and majority (White) members as the city as a whole, and is minimized when minority and majority members share no areas in common.

Today there is more racial and ethnic diversity in large cities across America, and in Houston's minority (non-White) groups the Hispanic population has grown by 227% between 1980 and 2010 (see Table 41), giving this particular minority group a larger population than what is considered to be the majority group (White). This demographic is important as it relates to how residential segregation by race looks in Houston today.

Table 41: Population Growth 1980 -2010

30-Year Time Period by Decennial Years	Total Population	Non-Hispanic White	Non-Hispanic Black	Hispanic or Latino	Non-Hispanic Asian*	Non-Hispanic Other Races**
1980	1,595,138	834,061	436,392	281,331	34,259	9,095
	-	52.30%	27.40%	17.60%	2%	0.57%
1990	1,631,766	662,766	448,148	450,556	66,993	3,303
	-	40.62%	27.46%	27.61%	4.11%	0.20%
2000	1,953,631	601,851	487,851	730,865	106,620	26,444
	-	30.81%	24.97%	37.41%	5.46%	1.35%
2010	2,099,451	537,901	485,956	919,668	129,098	26,828
	-	25.62%	23.15%	43.81%	6.15%	1.28%
Net Change 1980-2010	504,313	-296,160	49,564	638,337	94,839	17,733
	31.62%	-35.51%	11.36%	226.90%	276.83%	194.98%
*Note: Asian includes American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander populations						
**Note: Other Races include Two or More Races and Some Other Race						
Source: 1980-2000, 2010 PL94-171 Data, US Census Bureau						

Each individual tallied in the population totals has a geographic reference related to a census tract, meaning the locational reference is understood to be where the individual lives. Using demographic census data, two methods will be utilized as measures of segregation: dot density distribution of race/ethnicity and dissimilarity index scores. The Geographic Information Systems (GIS) platform is the tool that displays the tabular data in a spatial context for analyses in the City of Houston jurisdiction. These methods allow for an exploration of descriptive statistics, as it relates to determining where differences occur with residential patterns of one ethnic/racial group in relation to another.

Race/Ethnicity by Dot Density

The display of spatial data in the form of points in a map can provide convincing evidence related to where segregation occurs. A dot distribution map (also known as dot density map) is a map type that is used to display a dot symbol to show the presence of where race and ethnic clusters exist. Dot distribution maps, through their simple and effective displays, are utilized in the following exploratory analyses for showing spatial relationships of race and ethnicity in the City of Houston jurisdiction.

Dots in the following maps represent and show distributions of race and ethnicity with densities of one-to-one and one-to-many. In a one-to-one dot map (See Figure 13), each dot represents one single individual, opposed to the alternative of having one dot represent many individuals as a one-to-many representation (See Figure 14). One-to-one dot density is used in the following maps to display the full impact of the makeup of individuals. Each dot within a census tract represents one individual of race/ethnicity out of a total of individuals of a specific race/ethnicity within a census tract. Therefore, data dots are not necessarily in their correct spatial location, as the dots represent aggregate data from census tables and are often arbitrarily placed on a map. The density placements of dots in ArcGIS are shown in the following Figures.

Figure 13: One-to-One Dot Density

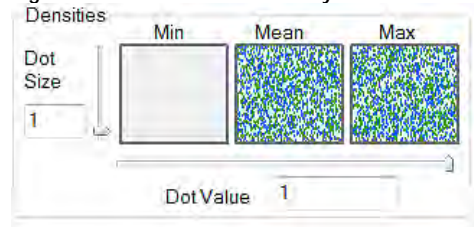
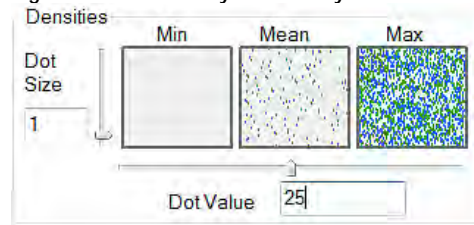


Figure 14: One-to-Many Dot Density



Race/Ethnicity by Dissimilarity Index Scores

The Dissimilarity Index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. This Index is the most commonly used measure for segregation. The Dissimilarity Index measures the evenness of the distribution between two (usually racial or ethnic) groups in a city, and reflects their relative distributions across neighborhoods. Lack of diversity in neighborhood housing often correlates to a similar lack of diversity in schools, churches/houses of worship, neighborhood amenities, etc.

A high value of dissimilarity indicates that the two groups tend to live in different tracts. Dissimilarity (D) ranges from 0 to 100. According to Massey and Denton (1988) a value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values between 30 and 60 are usually considered to be a moderate level of segregation, and values of 30 or below are considered to be fairly low.

The U.S. Housing and Urban Development Department (HUD) also examined the various statistical distributions of dissimilarity values across communities. Based on HUD's criteria in the AFFH (Affirmatively Furthering Fair Housing) Data Documentation Draft (June, 2013) the following values in Table 42 are being proposed for adoption:

Table 42: HUD's Proposed Categories of Dissimilarity

Measure	Values	Description
Dissimilarity Index	< 0.40	Low Segregation
[min: 0, max: 1]	0.41-0.54	Moderate Segregation
	> 0.55	High Segregation

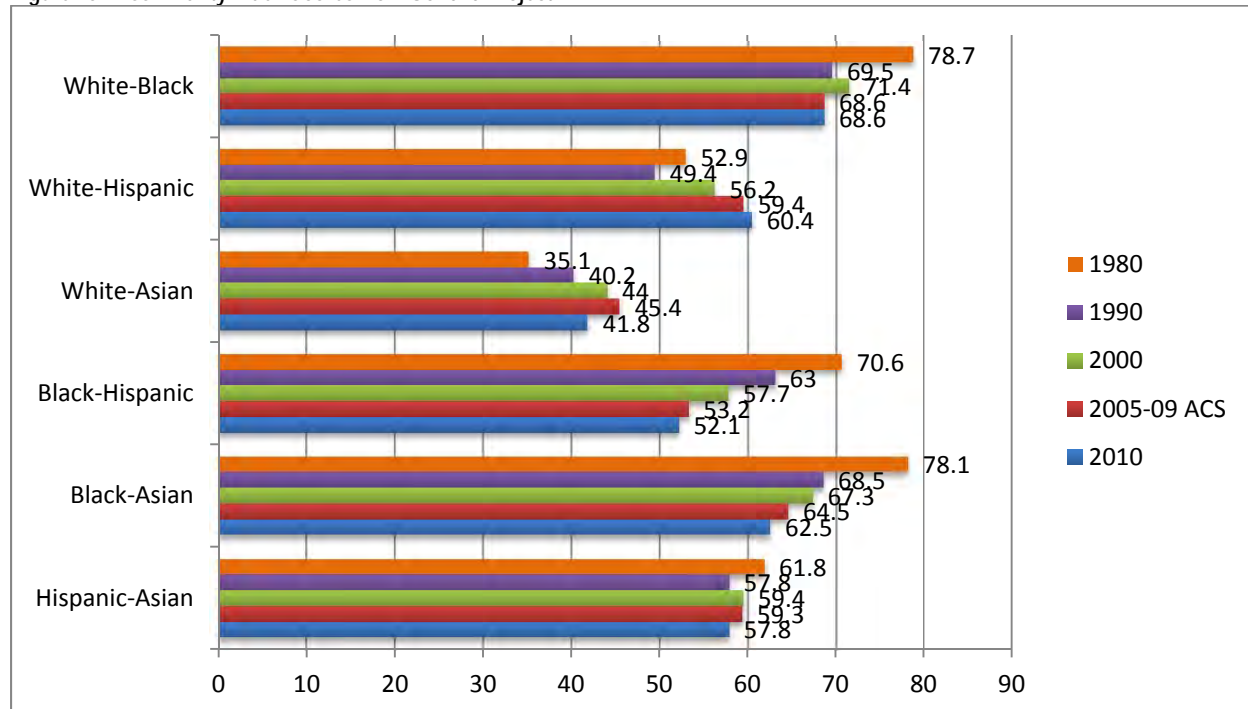
The measurement of segregation in the following maps is limited to the City's Black, White, Asian and Hispanic groups. Also, the values for measurement will reflect the proposed HUD values, as well as the very high segregation value of 60, as identified by Massey and Denton (1988) and is commonly used by scholars and practitioners. An example of the calculation for *D* is shown for Whites and Blacks in the following equation:

$$D = \frac{1}{2} \sum_i \left| \frac{w_i}{W} - \frac{b_i}{B} \right|$$

Where *w_i* is the number of Whites in each of *i* sub-areas, *W* is the total White population, *b_i* is the number of Blacks in each of *i* sub-areas, and *B* is the total Blacks population. *D* varies between 0 (no segregation) and 1 (complete segregation). The Dissimilarity Index is interpreted as the percentage of a group (in this case, Blacks) that would have to move to achieve a —evenll racial distribution where every neighborhood would have the same racial distribution as the entire city. In other words, if a city's White-Black dissimilarity index were 65, that would mean that 65% of White people would need to move to another neighborhood to make Whites and Blacks evenly distributed. Referencing HUD's AFFH document, the sub-areas for calculation are census block groups opposed to census tracts.

The extent of Houston's segregation is demonstrated in Figure 15 and this exploratory analysis uses decennial census data from 1980-2010 for its results. The bar chart was produced by *Spatial Structures in the Social Sciences, Brown University in the US2010 Project*. What stands out most in the bar graph is that there has been consistent very high segregation between Black and White groups as well as Black and Asian groups.

Figure 15: Dissimilarity Index Scores from US2010 Project



Spatial Distribution of Race/Ethnicity

The following maps and tables contain non-Hispanic White, non-Hispanic Black, Hispanic, Asian and Native American population data in the City of Houston Super Neighborhoods. The data shows the racial/ethnic composition in the City of Houston using 2010 decennial census block group data (aggregated to census tracts) for showing dissimilarity and 2012 ACS 5-year estimate data for dot density. The justification for using 2010 data for dissimilarity index is that the ACS census data does not provide data in the HUD suggested unit of measurement (census block groups). The 2012 ACS 5-year census data is more to date. The distribution of the data within the Super Neighborhoods Boundaries allows for cluster views

White-Black Dissimilarity

White-Black dissimilarity/segregation in Houston’s census tracts has been very high (60 and above) over the past 30 years. The following maps show how the two groups are currently blending together. All the dissimilarity index maps serve as points of reference for where segregation between two groups are low to very high as of 2010. These areas may be measured for improvement or decline based on changes over time. The distribution of dissimilarity in Map 29 shows gray areas that have a White-Black dissimilarity score greater than 55. There are 242 out of 665 census tracts in Houston’s jurisdiction that have high to very high White/Black segregation based on the distribution of White/Black dissimilarity in Map 29.

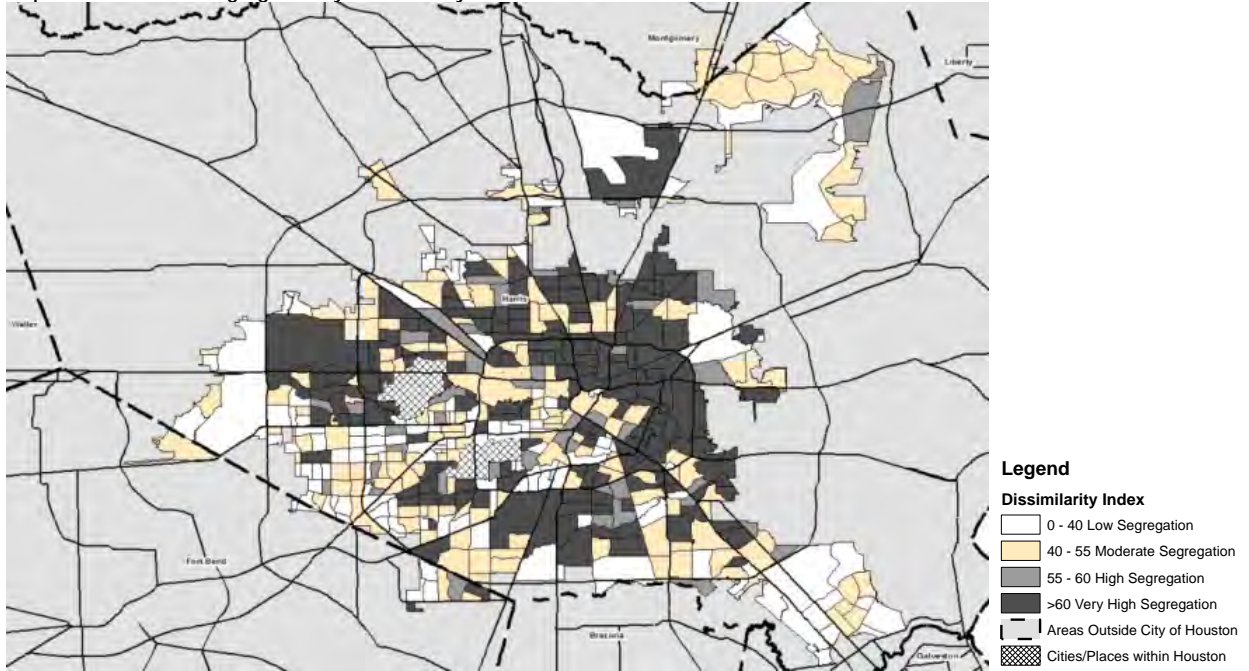
The distribution of green dots in Map 30 show the density of non-Hispanic White individuals, and the blue dots show the density of non-Hispanic Black individuals. The spatial data represents where individuals reside in the City of Houston and is reflective of how residentially segregated Whites and Blacks are. Using downtown Houston as a centroid for measuring in quadrants, an x and y axis through downtown Houston separates the city into a Northeast (NE), Northwest (NW), Southwest (SW), and Southeast (SE) quadrants. The spatial distribution of dot density shows the separation in space as it relates to Whites and Blacks, and based on where the dots are more dense, it may be discerned which are need more blending of Whites and which areas need more blending of Blacks.

Table 43: Tracts with Dissimilarity by Quadrants

Race/Ethnicity Paired Groups	Census Tracts with High and Very High Segregation by Dissimilarity				Total No. of Tracts with High to Very High Segregation
	NE Quadrant	SE Quadrant	SW Quadrant	NW Quadrant	
White-Black	50	58	61	73	242
White-Hispanic	21	23	29	25	98
White-Asian	98	98	38	53	287
Black-Hispanic	63	75	80	88	306
Black-Asian	91	81	144	130	446
Hispanic-Asian	103	101	68	78	350

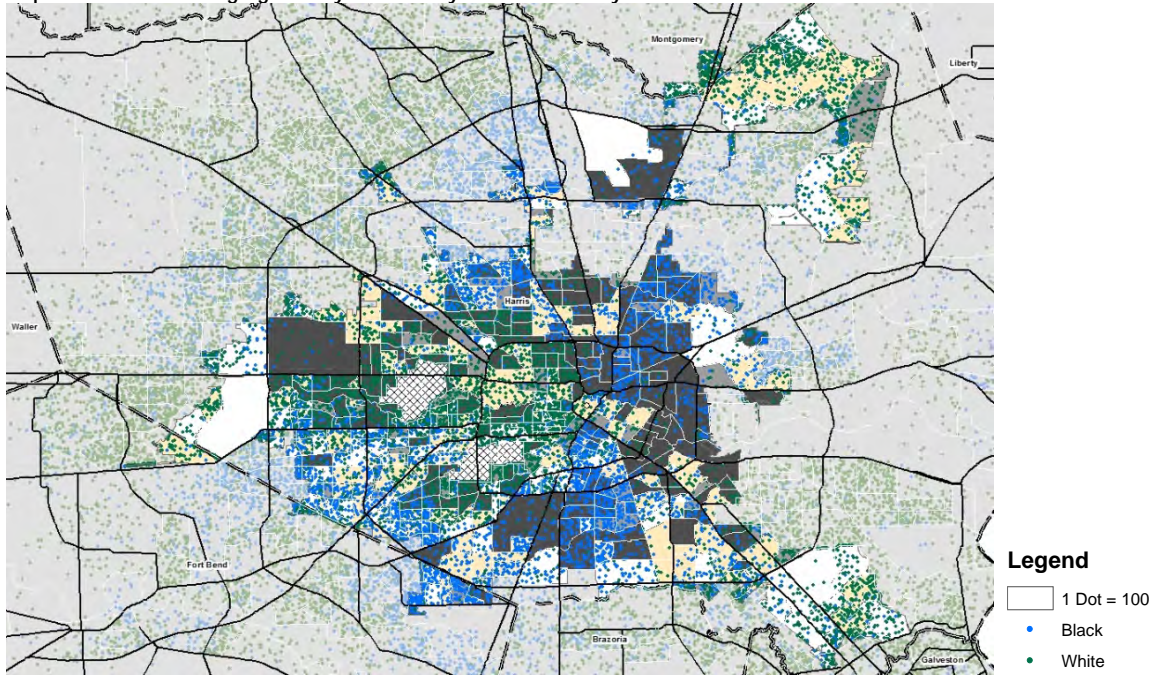
Based on the number of census tracts per quadrant, the NW and SW quadrants have the most census tracts with high to very high segregation (See Table 43). The NW and SW quadrants of the City of Houston have more census tracts that are majority (Above 51%) White than that of Blacks on the west side of Houston (See Table 45) based on the ACS 2012 5-year estimate data.

Map 29: White-Black Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 30: White-Black Segregation by Dot Density and Dissimilarity Index



Source: 2008-2012 ACS

White-Hispanic Dissimilarity

White-Hispanic dissimilarity/segregation in Houston's census tracts was moderate from 1980 to 1990, but became high by year 2000. The White and Hispanic groups were highly segregated by 2010, but this could be based on the increase in the Hispanic population as well as the decline in the White population. Map 31 and Map 32 show where the two groups may need more blending. The distribution of dissimilarity in Map 31 shows gray areas that have White-Hispanic dissimilarity score greater than 55. There are 98 out of 665 census tracts in Houston's jurisdiction that have high to very high White/Hispanic segregation based on the distribution of White/Hispanic dissimilarity in Map 31.

The distribution of green dots in Map 32 show the density of non-Hispanic White individuals, and the red dots show the density of Hispanic individuals. The spatial distribution of dot density shows the separation in space as it relates to Whites and Hispanics, and based on where the dots are more dense, it may be discerned which areas need more blending of Whites and which areas need more blending of Hispanics.

Based on the number of census tracts per quadrant, Hispanics are evenly distributed in three quadrants (See Table 45). The NE and SE quadrants of the City of Houston have more census tracts that are majority (Above 51%) Hispanic than all other race/ethnicity groups (See Table 44) based on the ACS 2012 5-year estimate data.

Table 44: Net Changes by Number Totals and Percentages

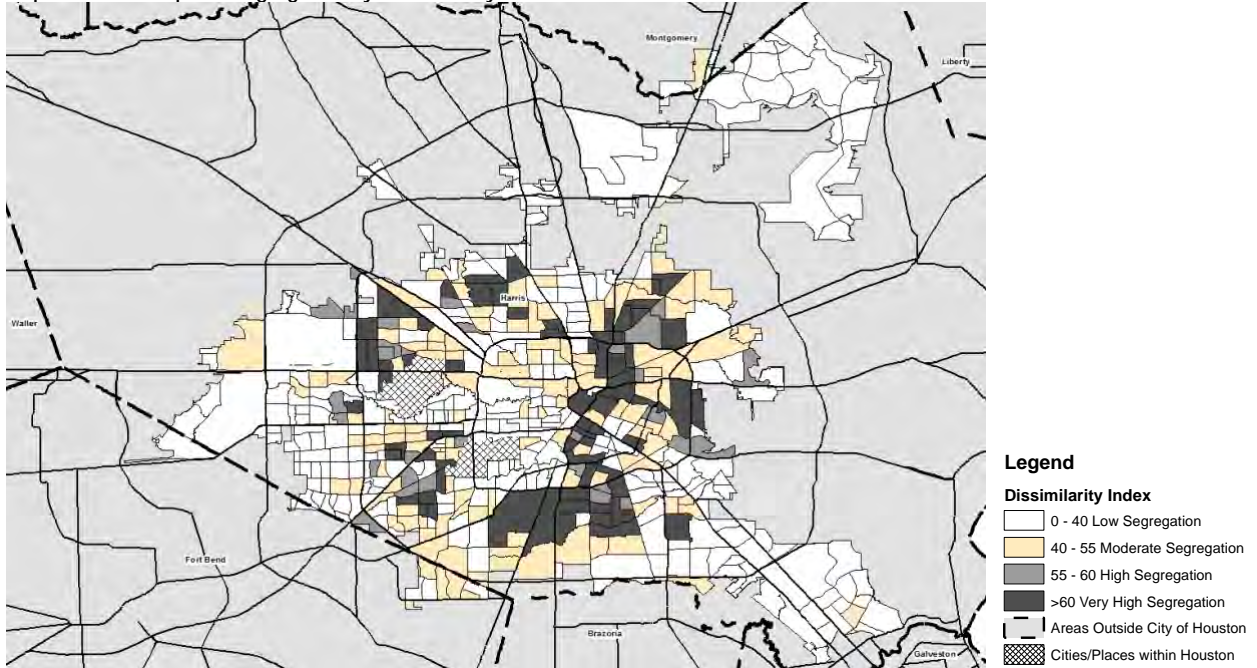
30-Year Time Period by Decennial Years	Total Population	Non- Hispanic White	Non- Hispanic Black	Hispanic or Latino	Non- Hispanic Asian*	Non- Hispanic Other Races**
Net Change 1980-1990	36,628	-171,295	11,756	169,225	32,734	-5,792
	2.30%	-20.54%	2.69%	60.15%	95.55%	-63.68%
Net Change 1990-2000	321,865	-60,915	39,703	280,309	39,627	23,141
	19.72%	-9.19%	8.86%	62.21%	59.15%	700.61%
Net Change 2000-2010	145,820	-63,950	-1,895	188,803	22,478	384
	7.46%	-10.63%	-0.39%	25.83%	21.08%	1.45%
Net Change 1980-2010	504,313	-296,160	49,564	638,337	94,839	17,733
	31.62%	-35.51%	11.36%	226.90%	276.83%	194.98%

Source: 1980-2000, 2010 PL94-171 Data, US Census Bureau

*Note: Asian includes American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander populations

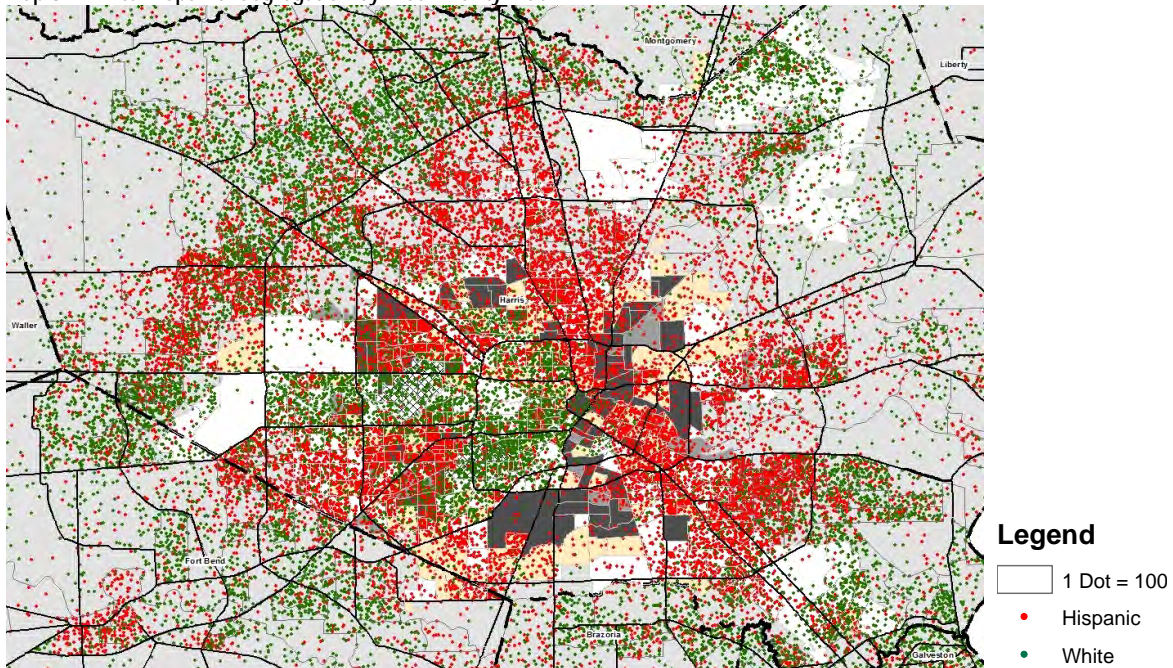
**Note: Other Races include Two or More Races and Some Other Race

Map 31: White-Hispanic Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 32: White-Hispanic Segregation by Dissimilarity Index



Source: 2008-2012 ACS

White-Asian Dissimilarity

White-Asian dissimilarity/segregation in Houston’s census tracts has been low since 1980. The Asian population is small (6.15%) and there is a larger group of census tracts that a segregated on the east side of Houston, similar to the White group. There are 287 out of 665 census tracts in Houston’s jurisdiction that have high to very high White/Asian segregation based on the distribution of dissimilarity in Map 34.

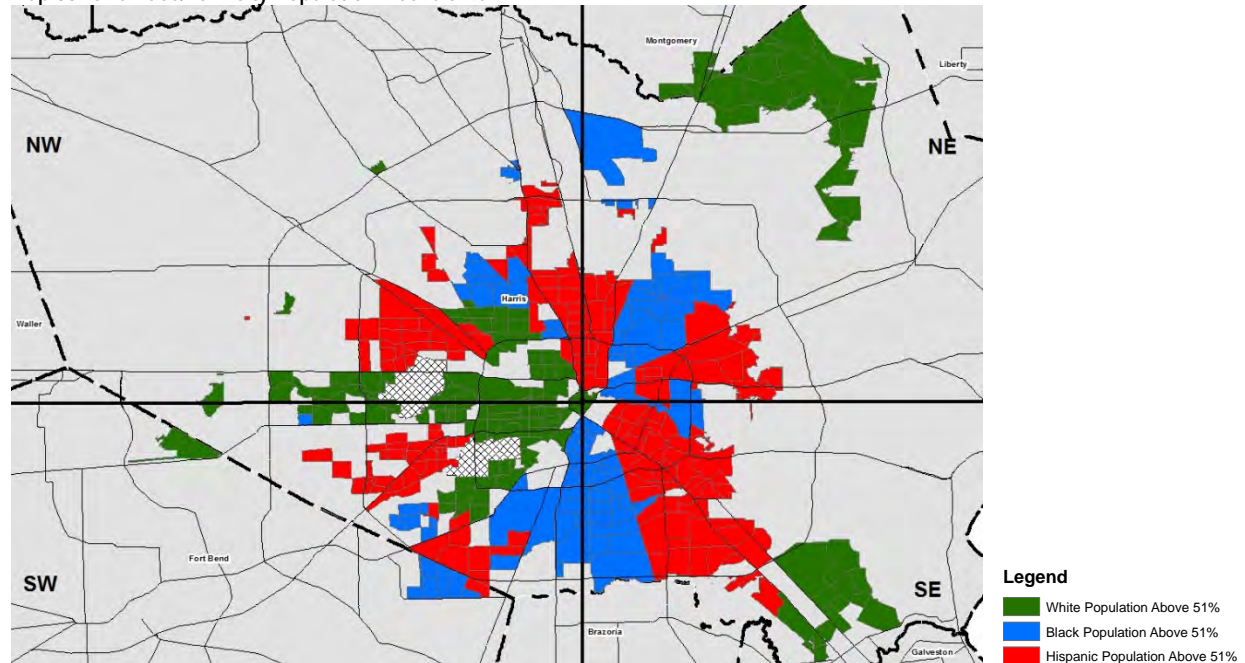
The distribution of green dots in Map 35 show the density of non-Hispanic White individuals, and the yellow dots show the density of Hispanic individuals. There is not a lot of density for the Asian group, but the Asians have a presence of at least 40% in two census tracts in the SW quadrant of Houston.

Table 45: Census Tracts with One Race/Ethnicity at 51% Population

Race/Ethnicity	Census Tracts with One Race/Ethnicity Above 51% of the Total Population				Total No. of Tracts with One Majority Race/Ethnicity
	NE Quadrant	SE Quadrant	SW Quadrant	NW Quadrant	
White	24	51	92	71	238
Black	24	23	29	15	91
Hispanic	65	66	41	61	233

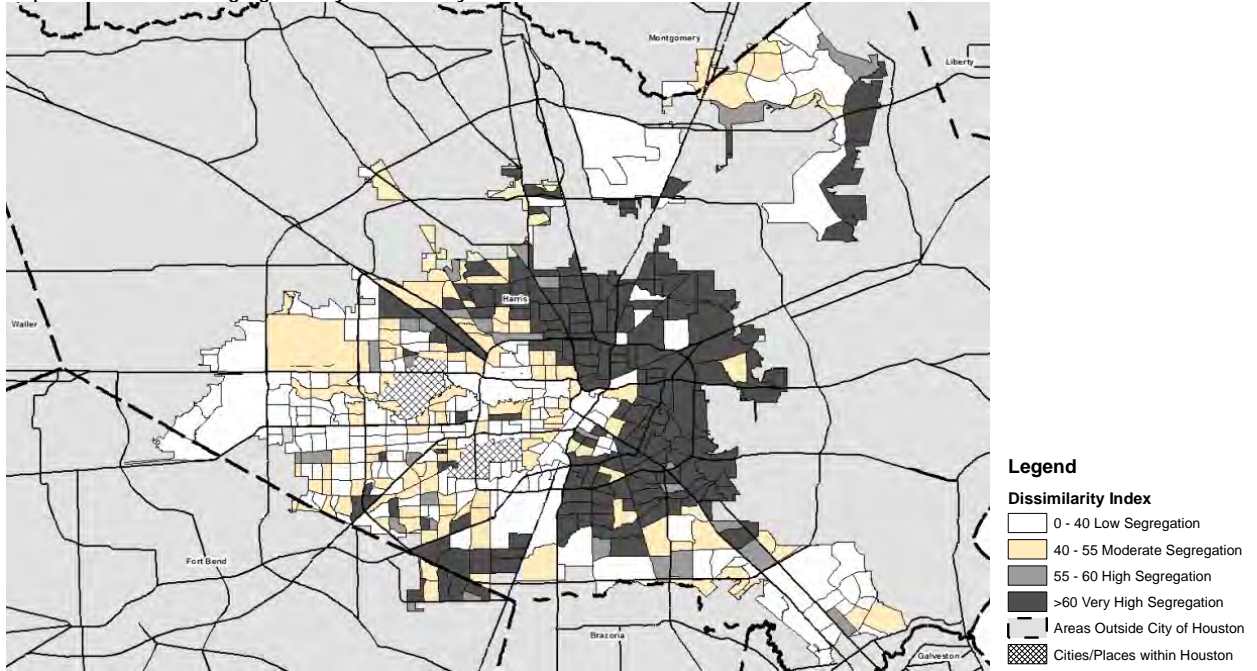
Source: 1980-2000, 2010 PL94-171 Data, US Census Bureau

Map 33: One Race/Ethnicity Population Above 51%



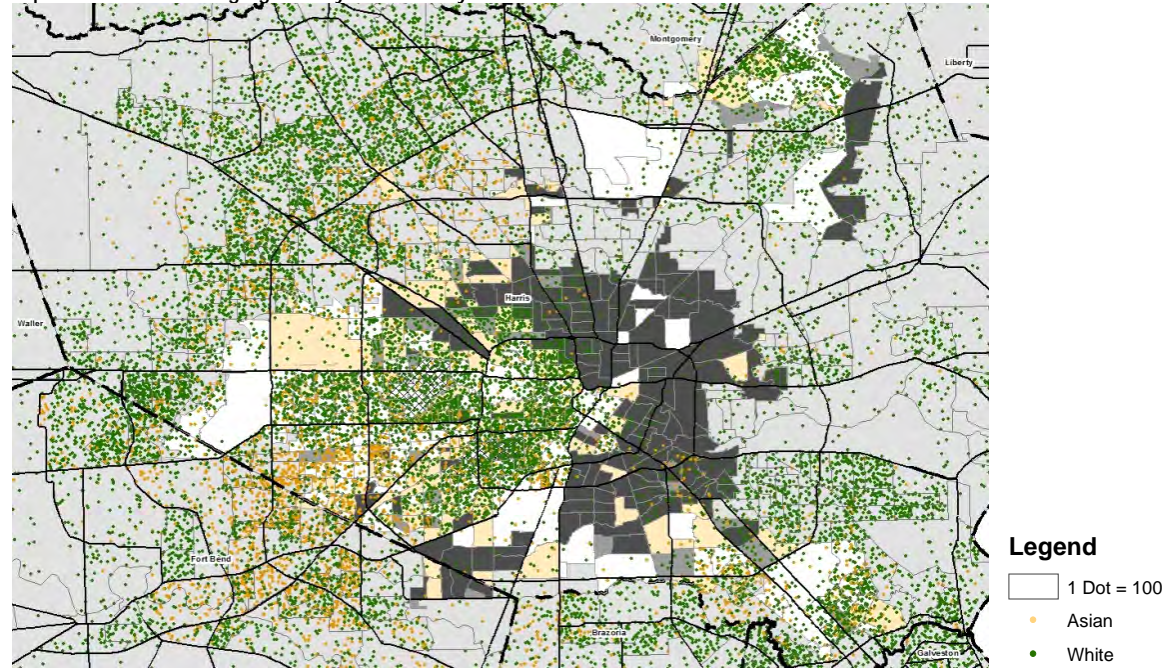
Source: 2010 U.S. Census

Map 34: White-Asian Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 35: White-Asian Segregation by Dissimilarity Index

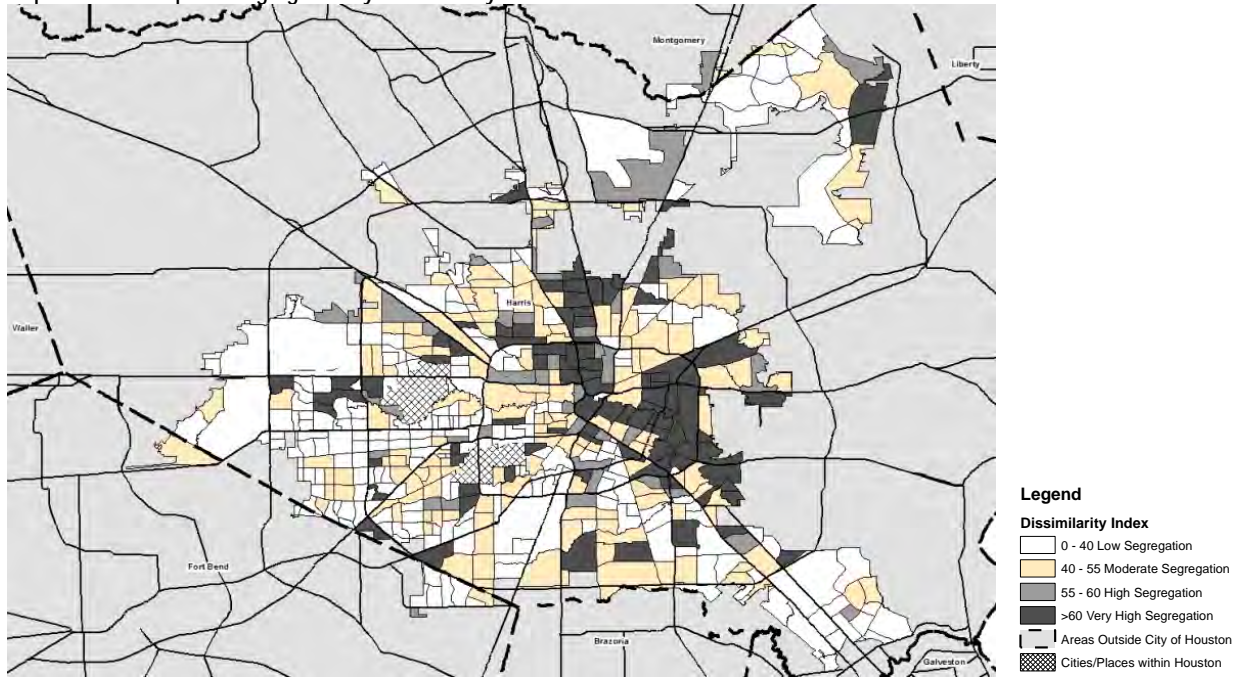


Source: 2008-2012 ACS

Black-Hispanic Dissimilarity

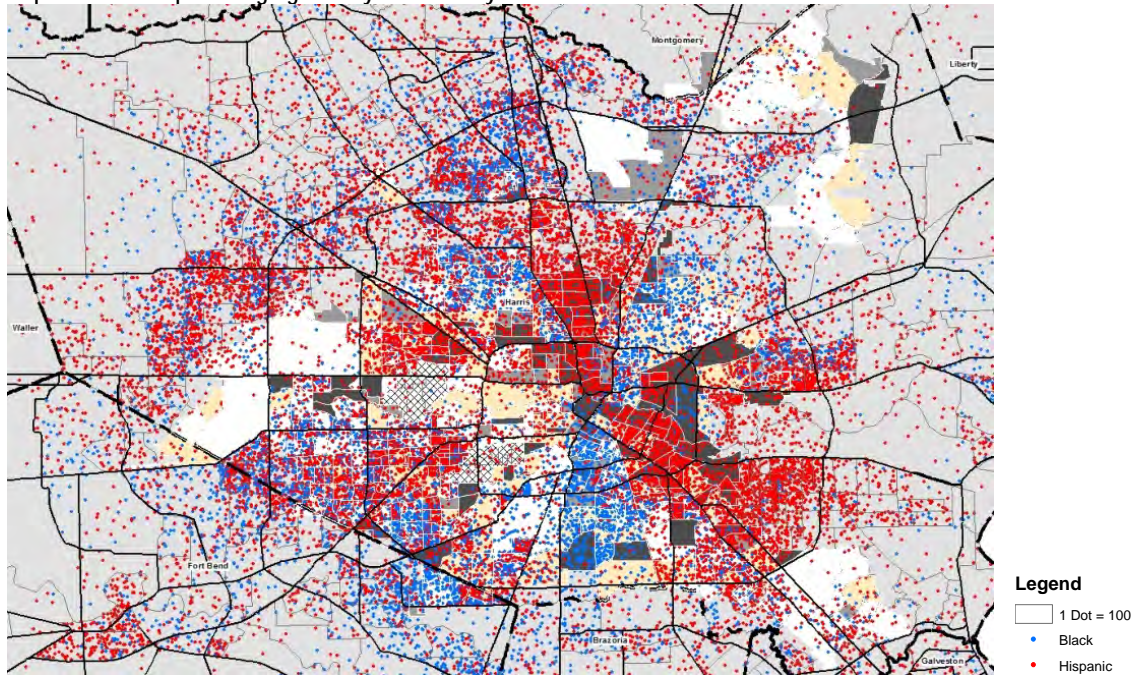
Black-Hispanic dissimilarity/segregation in Houston's census tracts has declined each decennial year since 1980. Segregation was very high (70.6) in 1980 and declined to 63 in 1990, but was still very high. The Hispanic population increased by 10% of the total population in the 10 year periods of 1980-1990 and 1990-2000. By year 1990, the Hispanic population was the second largest race/ethnicity in Houston. The Black population started decreasing by year 2000. The next two maps show how the two groups are currently blending together. There are 306 out of 665 census tracts in Houston's jurisdiction that have high to very high Black/Hispanic segregation based on the distribution of dissimilarity in Map 36.

Map 36: Black-Hispanic Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 37: Black-Hispanic Segregation by Dissimilarity Index



Source: 2008-2012 ACS

Based on the number of census tracts per quadrant, Blacks are evenly distributed in three quadrants (See Table 5). Blacks do not have more census tracts with a population above 51% in any quadrants of the city. Blacks and Hispanics have high and very high segregation more so in the SW and NW quadrants of the City. The distribution of blue and red dots in Map 37 indicates that there are more 2012 ACS census tracts populated with Blacks and Hispanics in the SE and NE quadrants of the City.

Black-Asian Dissimilarity

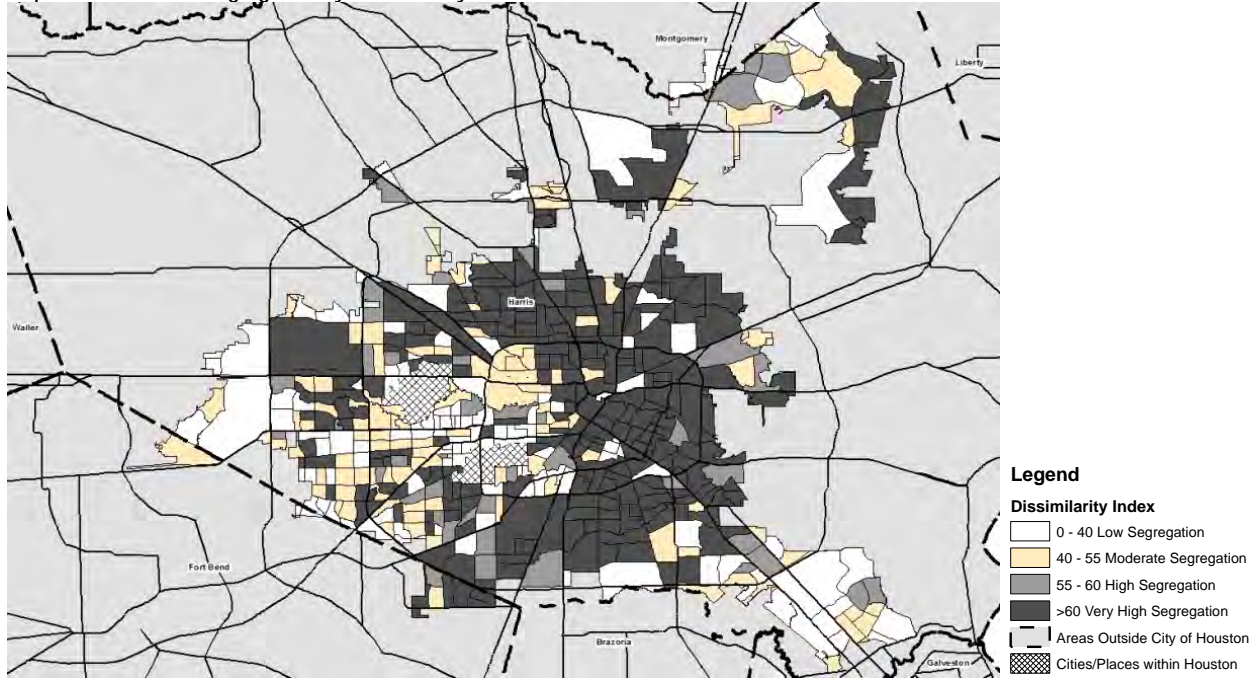
Black-Asian dissimilarity/segregation in Houston's census tracts has been very high since 1980 (See Figure 15). The dissimilarity index score has decreased from 78.1 to 62.5. Based on the 2010 index scores in Figure 15, Whites and Asians are most segregated from Blacks. There are 446 out of 665 census tracts in Houston's jurisdiction that have high to very high Black/Asian segregation based on the distribution of dissimilarity in Map 38.

The increase in the Asian population is not reflected in census tracts Blacks where Blacks reside nor is the Black population reflected where Asians reside. The dot density in Map 39 shows that Asians are dispersed in the W-SW area of Houston with some signs of density in the lower SE quadrant of the city.

The Asian population has grown but not significantly enough to show an impact on the total population count. With the majority of the Blacks residing in the SE and NE parts of the city and Asians residing mostly in the SW quadrant of the city, these two groups are more segregated than any other pairing of race and ethnicity.

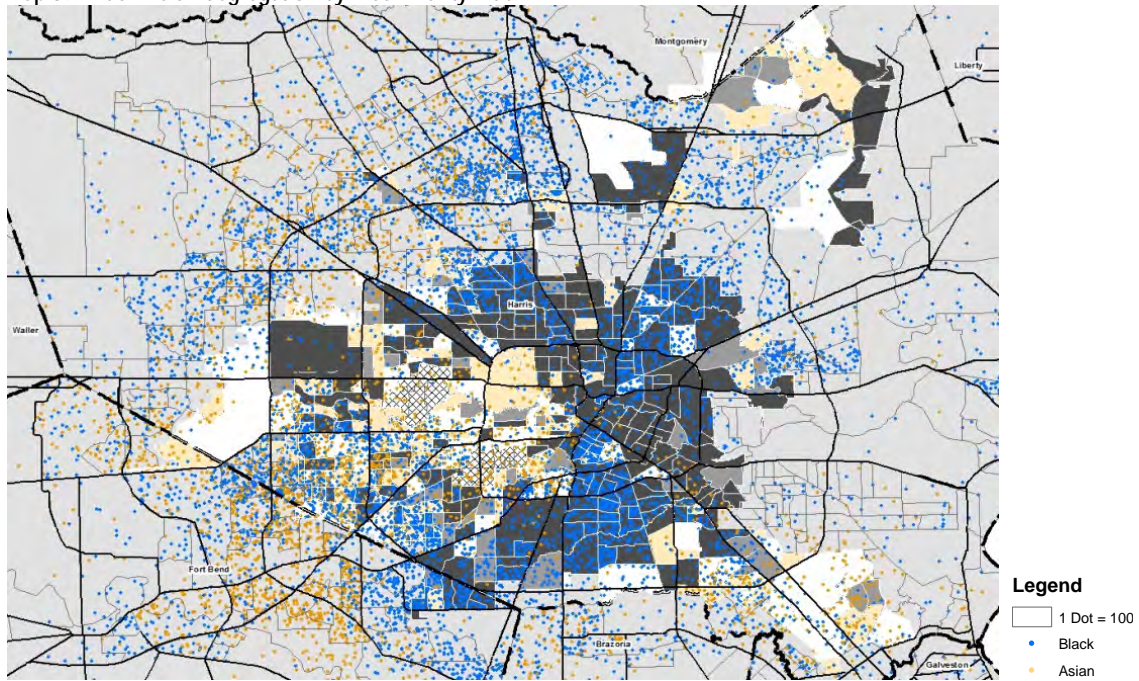
Based on the number of census tracts per quadrant, the Black population is in more census tracts with their population having more than 51% of representation than the Asian population. With such a low representation in Houston, Asians meet their percentage of the total population (6.15%) in 291 census tracts (See Table 46), whereas Blacks meet their percentage of the total population (23.15%) in 233 census tracts.

Map 38: Black-Asian Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 39: Black-Asian Segregation by Dissimilarity Index

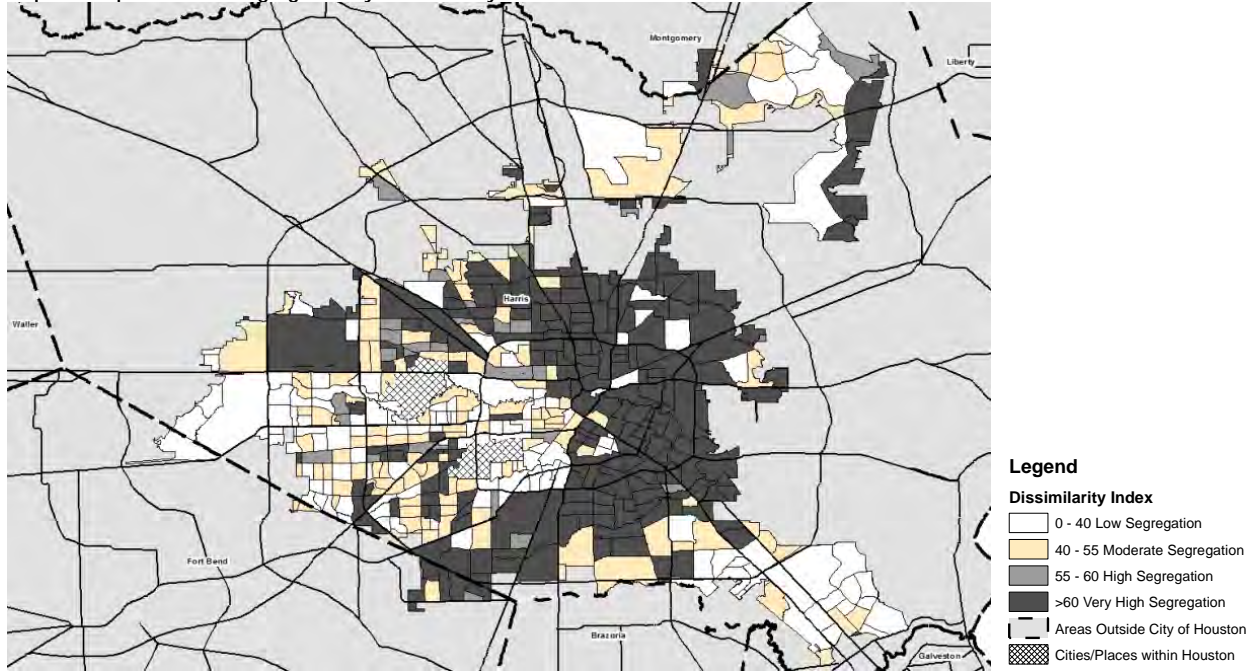


Source: 2008-2012 ACS

Hispanic-Asian Dissimilarity

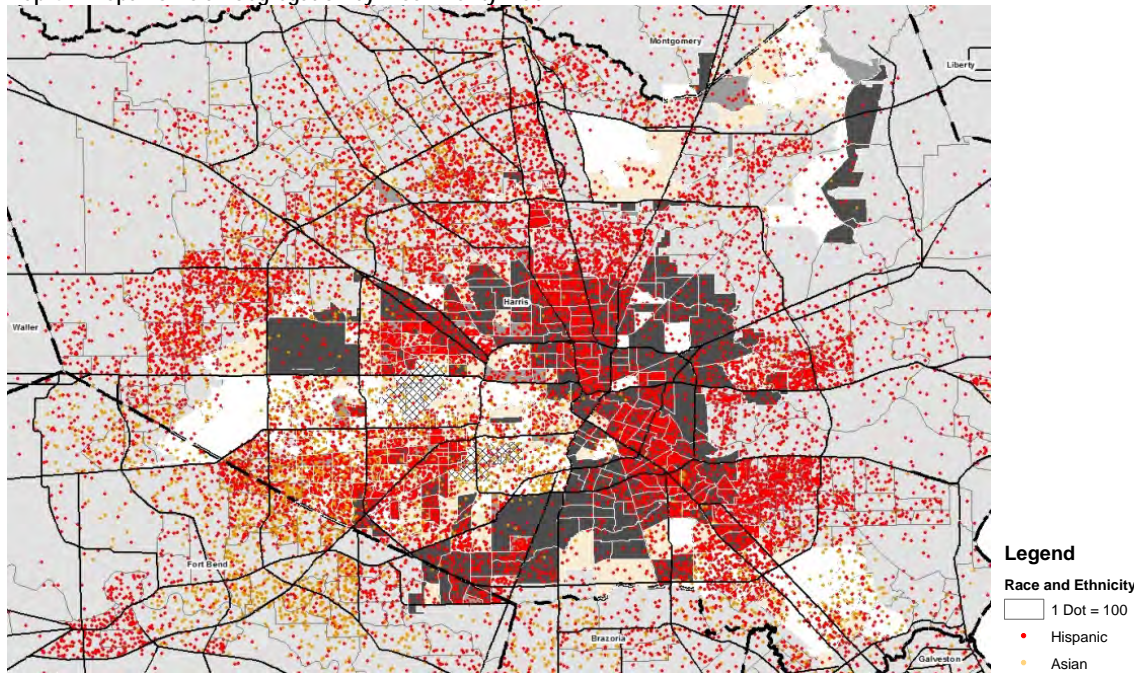
Hispanic-Asian dissimilarity/segregation in Houston's census tracts was very high in 1980 (See Figure 15). The dissimilarity index score has decreased in 1990 to a high index score and segregation has remained high since 1990. There are 350 out of 665 census tracts in Houston's jurisdiction that have high to very high Hispanic/Asian segregation based on the distribution of dissimilarity in Map 40. There are more census tracts with dissimilarity between Hispanics and Asians in the NE and SE quadrants of the city.

Map 40: Hispanic-Asian Segregation by Dissimilarity Index



Source: 2010 U.S. Census

Map 41: Hispanic-Asian Segregation by Dissimilarity Index



Source: 2008-2012 ACS

Similar to the dot density map of Blacks and Asians, the dot density in Map 41 shows that Asians are dispersed in the W-SW area of Houston with density in the lower SE quadrant of the city.

Based on the number of census tracts per quadrant, the Hispanic has more census tracts with their population having more than 51% of representation than the Asian population. Hispanics meet their percentage of the total population (43.52%) in 301 census tracts with the majority of those census tracts being in the NE quadrant of the city.

Table 46: Census Tracts that Match Race/Ethnicity by % of the Total Population

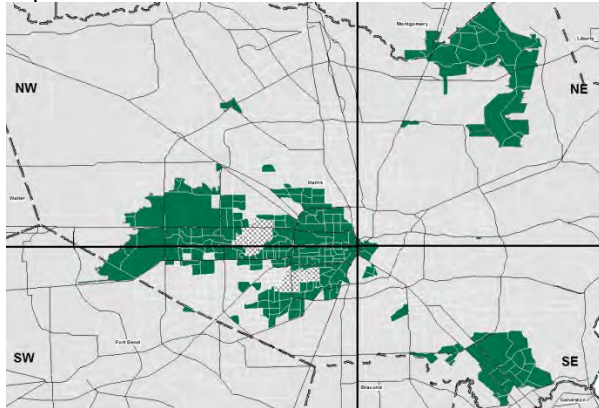
Race/Ethnicity (% of Total Population)	Census Tracts that Match ACS 2012 Estimates Total Population Percentages				Total No. of Tracts that Match Total Population %
	NE Quadrant	SE Quadrant	SW Quadrant	NW Quadrant	
White (25.62%)	31	75	130	110	346
Black (23.15%)	69	31	90	43	233
Hispanic (43.81%)	88	73	62	78	301
*Asians (6.15%)	5	45	158	83	291

Source: 1980-2000, 2010 PL94-171 Data, US Census Bureau

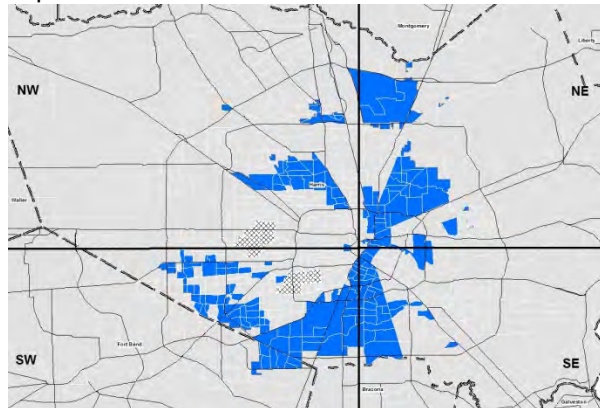
*Note: Asian includes American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander populations

The Quadrant View of Race/Ethnicity by % of Total Population

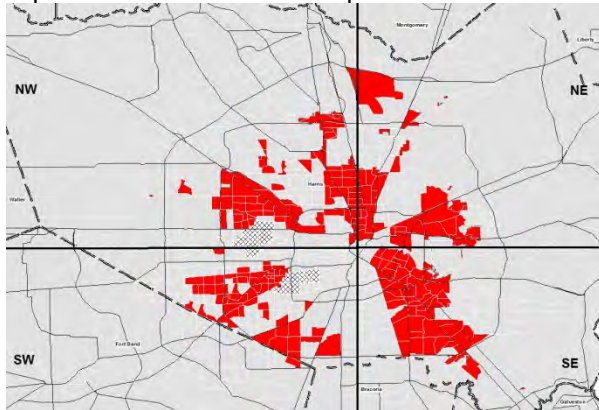
Map 42: Census Tracts ≥ 25.91% Whites



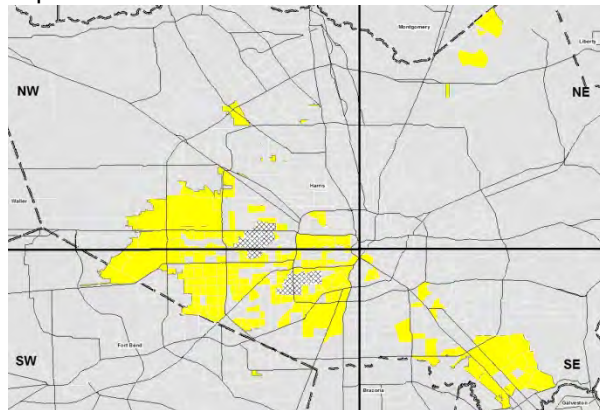
Map 43: Census Tracts ≥ 23.15% Blacks



Map 44: Census Tracts ≥ 43.81% Hispanics



Map 45: Census Tracts ≥ 6.15% Asians



Source: 2010 U.S. Census

Free Market Analysis™

To validate and compare the information found from the dissimilarity index, HCDD worked with Planning/Communications to perform a Free Market Analysis™. The Free Market Analysis™ compares the actual racial composition of a census tract with what the approximate racial composition would likely be in a free housing market not distorted by discriminatory practices such as steering, redlining, or discriminatory rental policies. This way of analysis differs from the dissimilarity index because it does not assume that every census tract or neighborhood should have the same racial and ethnic percentages as the entire city. Instead, this approach uses income to estimate the likely racial composition.

This analysis revealed that while Houston's population is very diverse, separate and often very intense concentrations of Hispanic households of any race or African American households dominate large geographic sections of the city. Also, Asian households tend to be concentrated in a few areas of the city. These concentrations are intertwined with Houston's economic stratification. There are many Super Neighborhoods in which racial or Hispanic concentrations have grown or persisted throughout the past 10 years. This continued and growing segregation is likely due to and perpetuated by discrimination in the housing market.

The entire Free Market Analysis™, including proposed barriers to fair housing and suggested actions, is an appendix.

6. Private Sector: Lending Practices

Home Mortgage Lending Practices

One of the barriers to fair housing choice throughout the country has been discrimination by private sector lenders based largely on race or ethnicity. These practices have led to minorities being denied conventional home loans significantly more frequently than whites and being approved at substantially lower rates. Access to credit for home purchases has long been considered key to helping low-income and traditionally disenfranchised groups build wealth in the United States. When qualified borrowers cannot get home loans, their housing and financial investment choices are unfairly limited.

Fair housing is an issue that extends beyond jurisdiction boundaries; therefore, fair housing data should be analyzed at a regional level. This is why this analysis reviewed Home Mortgage Disclosure Act (HMDA) data using the Houston Metropolitan Statistical Area (MSA). Five years of HMDA data for the Houston MSA was analyzed: 2009, 2010, 2011, 2012, and 2013, which is the most recent data that is available.

HMDA data can be used to reveal potential discrimination in private lending markets by assessing residential capital investment. HMDA, enacted in 1975 and later amended, requires financial institutions to publicly disclose the race, sex, and income of mortgage applicants and borrowers by census tract. This data is widely used to detect evidence of discrimination in mortgage lending. There are limitations to HMDA data, and analysis of the available data cannot prove discrimination because of these limitations. Important constraints include

- Factors relative to the cost of credit including applicant credit information, loan-to-value ratio, or consumer debt-to-income ratio
- Data entry errors or incomplete loan applications

Both depository and non-depository lenders must collect and publicly disclose information about housing-related loans and applications for such loans. The Federal Financial Institutions Examining Council (FFIEC) collects and publishes certain data used in connection with federal reporting responsibilities under the HMDA and Community Reinvestment Act (CRA). HMDA data represents most mortgage lending activity and therefore is the most comprehensive collection of information regarding home purchase originations, home remodel loan originations, and refinancing available.

Summary of Findings

The following summarizes the analysis of HMDA data from 2009 to 2013:

- Over 1 million loan applications were processed for home purchases, home improvements, and refinancing during the last five years. The number of applications for all three types of loans decreased from 2009 to 2011, however, in 2012, all types increased above the amount of applications submitted in 2009.
- As owner occupied applications for homes declined in 2009 to 2011, the number of applications and originations for home loans for non-owner occupied housing increased and has continued to increase through 2013. This could signal that the rental market in Houston has attracted investors and more homes may have been added to the area's rental supply.
- Most applications in the Houston MSA for home purchases are for conventional loans with this proportion growing from 52% in 2009 to 65% in 2013. Although trending downward, there is still a large percentage of applications that are government backed (34% in 2013).
- The most common reasons for denial of conventional home loans were Credit History and Debt-to-Income Ratio followed by the third and fourth most common reasons, Credit Application Incomplete and Collateral.
- The denial rate for conventional home loans of females has been two to five percentage points higher than that of male applicants in the past five years, and the number of applications with a female main applicant is less than half of the applications where the main applicant is male.

- The percentage of conventional home loan applicants was not representative of the racial and ethnic composition of the Houston MSA. The proportion of applicants that identified as White made up more than two-thirds of all applications for conventional home loans. The average percentage of applicants that identified as Black/African American was 4%, as Asian was 12%, and as Hispanic was 13%.
- Denial rates for conventional home loans by race and ethnicity
 - The range of annual denial rates for Black/African American applicants had the greatest discrepancy to that of White applicants as the denial rates were almost twice as high as White applicants during the past five years, 22-29% compared to 12-15%.
 - Hispanics also had a high rate of denial (22-27%), although it was consistently lower, by several percentage points, than of Black/African American applicants.
 - Non-Hispanic Whites had by far the lowest denial rate at 10-12% during the past five years, below the total denial average of 14%.
- Minorities, in particular Black/African American and Hispanic applicants, were denied loans more often than Whites regardless of income in the past five years. Denial rates for higher income applicants include Black/African American at 18%, Hispanic at 13%, White at 9% and White non-Hispanic at 8%.
- In non-minority census tracts, the approval rates are higher, the denial rates are lower, and for every three home loan applications in a non-minority area there is only one application made in a majority minority area.
- Although the majority of subprime loans were made to White borrowers, the ratio of subprime loans to loans originated is highest for Hispanics.

Overview of HMDA

HMDA data reports several types of loans. These include loans to purchase homes, loans to make home improvements, and refinancing of existing mortgage loans, as defined below.

- Home purchase loan – A home purchase loan is any loan secured by and made for the purpose of purchasing a housing unit.
- Home improvement loan – A home improvement loan is used, at least in part, for repairing, rehabilitating, remodeling, or improving a housing unit or the real property on which the unit is located.
- Refinancing – Refinancing is any dwelling-secured loan that replaces and satisfies another dwelling-secured loan to the same borrower. The purpose for which a loan is refinances is not relevant for HMDA purposes.

Over 1 million loan applications were processed for home purchases, home improvements, and refinancing during the last five years. As the national financial crisis resulted in stricter lending requirements, as well as families reevaluating home purchases, the amount of home purchase applications fell significantly from 2009 to 2011 (-11%). Home improvement loan applications fell by 25% and refinancing applications decreased by 7% from 2009 to 2011. But all three types of loan applications rebounded in 2012 with more loan applications submitted than in 2009, and the number of home purchase and home improvement loans continued to increase in 2013.

Table 47: Purpose of Loan Application by Year – Houston MSA

Purpose	2009	2010	2011	2012	2013	Total	5 Year Approval Rate	5 Year Denial Rate
Home Purchase	87,453	80,553	77,805	92,383	114,783	452,977	74%	14%
Home Improvement	14,698	11,020	11,042	12,284	13,554	62,598	41%	52%
Refinancing	110,884	99,737	102,694	127,543	126,605	567,463	61%	22%
Total	213,035	191,310	191,541	232,210	254,942	1,083,038		

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Of the 452,977 home purchase loan applications in 2009 to 2013, almost all, 414,423 or 91%, were related to owner-occupied applications, as shown in Table 47. As owner occupied applications for homes declined in 2009 to 2011, the number of applications and originations for home loans for non-owner occupied housing increased. Although the

number of applications for non-owner occupied housing is still a fraction of the number of home purchase applications, the share of the applications steadily grew during the past five years. This could signal that the rental market in Houston has attracted investors and more homes may have been added to the area's rental supply.

Table 48: Owner Occupancy Status for Home Purchase Loan Application – Houston MSA – HMDA Data 2009-2013

Status	2009	%	2010	%	2011	%	2012	%	2013	%	Total	%
Owner Occupied	81,496	93%	74,230	92%	70,494	91%	84,030	91%	104,173	91%	414,423	91%
Not Owner Occupied	5,640	6%	6,149	8%	7,087	9%	8,064	9%	10,236	9%	37,176	8%
Not Applicable	317	0%	174	0%	224	0%	289	0%	374	0%	1,378	0%
Total	87,453	100%	80,553	100%	77,805	100%	92,383	100%	114,783	100%	452,977	100%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Table 48 shows the number of owner occupied applications for the four types of home purchase loans. Conventional loans are loans that are not government backed loans. The other types of loans are government loans backed by various federal agencies including the Federal Housing Administration, Veterans Administration, and Farm Service Agency or Rural Housing Service. Through the past five years, the share of conventional loan applications for home purchases has increased illustrating Houston's housing market recovery from the national financial crisis. Although conventional loan applications are the majority of applications, government backed loans do make up over two in five of the applications, at 45% in the past five years.

Table 49: Loan Type for Home Purchase Owner Occupied Loan Application – Houston MSA

Loan Type	2009	%	2010	%	2011	%	2012	%	2013	%	Total	%
Conventional	42,063	52%	38,837	52%	39,647	56%	49,382	59%	67,829	65%	237,758	55%
FHA-Insured	35,257	43%	31,441	42%	26,018	37%	28,675	34%	28,538	27%	149,929	39%
VA-Guaranteed	3,666	4%	3,376	5%	3,928	6%	4,904	6%	6,523	6%	22,397	5%
FSA/RHS	510	1%	576	1%	901	1%	1,069	1%	1,283	1%	4,339	1%
Total	81,496		74,230		70,494		84,030		104,173		414,423	

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Conventional Home Purchase Lending

To examine the fair lending practices of the private market in the Houston area, the following will concentrate on the owner-occupied, conventional loan applications for home purchases.

Financial institutions can take one of the following actions pertaining to loan applications:

- Originated – The loan was made by the lending institution.
- Approved but not accepted – The loan application was approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution.
- Application denied by financial institution – The loan application failed.
- Application withdrawn by applicant – The applicant closed the application process.
- File closed for incompleteness – The loan application was closed because all necessary documents were not given to the lender.

The outcomes of the conventional loan applications for owner occupied home purchases are presented in Table 49. Between 2009 and 2013, there were 162,027 loans originated and 32,943 loan applications denied, which resulted in denial rate of 14% for the five year period. The origination rate was 67% for 2009, 2010, and 2011, 70% in 2012, and 69% in 2013. The denial rate was lowest in 2012 and 2013 at 13% and highest at 16% in 2010.

Table 50: Owner Occupied Home Purchase Loan Applications by Action Taken – Houston MSA

	2009	%	2010	%	2011	%	2012	%	2013	%	Total	%
Loan Originated	28,077	67%	25,862	67%	26,614	67%	34,662	70%	46,812	69%	162,027	68%
Application Approved But Not Accepted	2,626	6%	2,660	7%	2,935	7%	3,232	7%	4,429	7%	15,882	7%
Application Denied	5,756	14%	6,109	16%	5,953	15%	6,524	13%	8,601	13%	32,943	14%
Application Withdrawn By Applicant	4,741	11%	3,404	9%	3,384	9%	4,094	8%	6,606	10%	22,229	9%
File Closed for Incompleteness	863	2%	802	2%	761	2%	870	2%	1,381	2%	4,677	2%
Total	42,063		38,837		39,647		49,382		67,829		237,758	

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Loan originations and loan denials for owner occupied conventional home loan applications are further analyzed as an indicator of the underlying success or failure of home purchase loan applicants. This information may help identify if there are any trends that may indicate discrimination in lending.

Denials of Owner-Occupied, Conventional Home Loans

Table 50 presents data by rationale for loan denial. HMDA data allows lenders to report up to three denial reasons for each loan application that was denied. The most common reasons for denial between 2009 and 2013 were Credit History and Debt-to-Income Ratio followed by the third and fourth most common reasons, Credit Application Incomplete and Collateral. The top two most common reasons for loan denial may suggest that further education efforts may be needed for future or potential homebuyers regarding financial literacy especially in regards to debt and building good credit.

Table 51: Owner-Occupied Home Purchase Loan Applications by Reason for Denial – Houston MSA

Denial Reason	2009	2010	2011	2012	2013
Credit History	27%	28%	25%	24%	17%
Debt-to-income Ratio	23%	21%	22%	20%	19%
Credit Application Incomplete	12%	11%	9%	11%	14%
Collateral	14%	11%	9%	9%	11%
Unverifiable Information	7%	6%	7%	7%	7%
Insufficient Cash	6%	6%	5%	5%	5%
Employment History	4%	3%	4%	3%	3%
Mortgage Insurance Denied	3%	1%	1%	1%	1%
Other	13%	10%	13%	13%	10%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Denial by Gender of Owner-Occupied, Conventional Home Loans

When comparing denial rates of owner occupied conventional home loan applications by gender of the main applicant, females have a consistently higher denial rate compared to males. As illustrated in Table 51, the denial rate of females has been two to five percentage points higher for the last five years than that of male applicants. More importantly, the number of applications with a female main applicant is less than half of the applications where the main applicant is male. This could reflect a social convention that if a married couple is applying for a loan, then

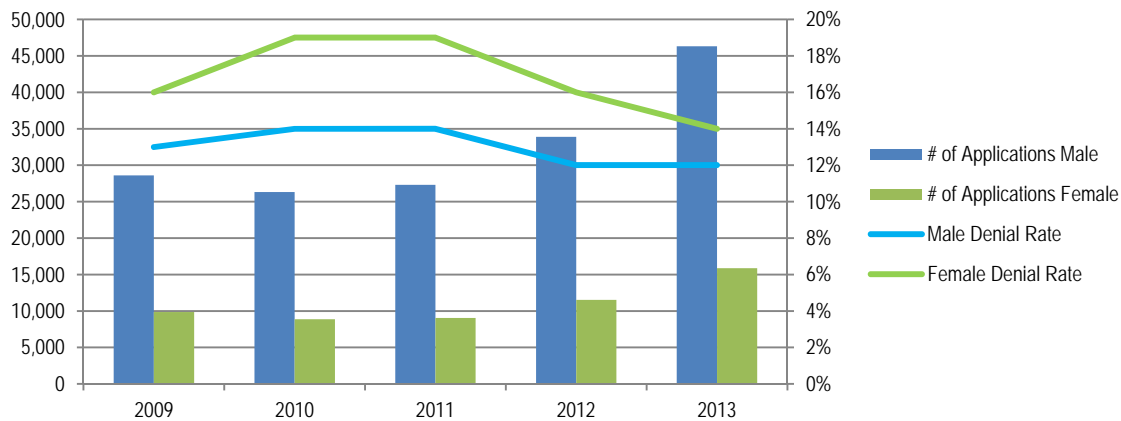
the male is listed as the main applicant. This could indicate that females would benefit from increased knowledge about homeownership, home buying, and general financial literacy.

Table 52: Denial Rate for Owner Occupied Home Purchase Loans by Gender of Main Applicant – Houston MSA

	2009		2010		2011		2012		2013	
	# of Applications	Denial Rate	# of Applications	Denial Rate	# of Applications	Denial Rate	# of Applications	Denial Rate	# of Applications	Denial Rate
Male	28,614	13%	26,333	14%	27,308	14%	33,891	12%	46,320	12%
Female	9,868	16%	8,867	19%	9,058	19%	11,521	16%	15,870	14%
Not Provided	3,742	12%	3,620	18%	3,269	18%	3,962	11%	5,630	13%
Not Applicable	20	5%	17	6%	12	0%	8	13%	9	22%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Figure 16: Home Purchase Owner Occupied Loan Applications by Gender in Houston MSA



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Denials by Race and Ethnicity of Owner-Occupied, Conventional Home Loans

Not only did the number of applications received between 2009 and 2013 vary by gender, but they also varied greatly by race and ethnicity. The proportion of applicants that identified as White was more than two-thirds of all applications. Of all main applicants that applied during this time period, the percentage of applicants identifying as Black/African American was 4% and applicants identifying as Asian was almost 12%.

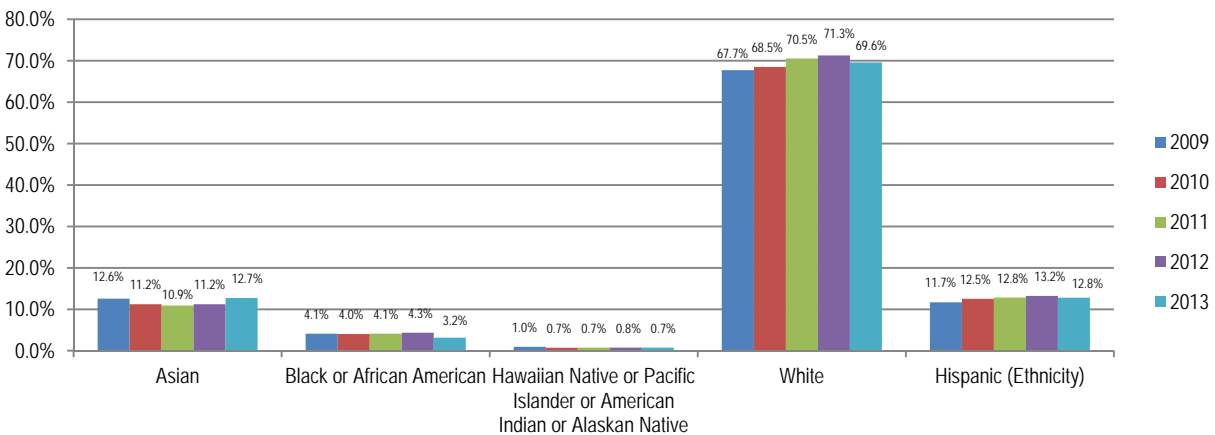
As a majority minority region, the percentage of applicants was not representative of the racial and ethnic composition of the Houston MSA, especially among applicants identifying as Black/African American and those identifying as Hispanic. Within the Houston MSA, Black/African Americans make up 17.2% of the population however only represented about 4% of the applications for conventional mortgages as illustrated in Figure 17 (U.S. Census Bureau, 2008-2012 American Community Survey).

Asians make up approximately 6.6% of the Houston MSA population (U.S. Census Bureau, 2008-2012 American Community Survey), and in the past five years applicants identifying as Asian have made up approximately 12% of the total applications.

HMDA reporting classifies Hispanic as an ethnicity, which is separate from race. In the past five years, there has been a slight, steady increase in the number and proportion of Hispanic applicants, reaching the highest percentage of 13.2% in 2012. However, the percentage of Hispanic applicants still does not represent the percentage of the population who are Hispanic in the Houston MSA, at 35.2% (U.S. Census Bureau, 2008-2012 American Community Survey).

This data could show that White and Asian residents buy and sell their homes more often than other minority groups or perhaps that some minority groups tend to see more value and flexibility in renting. However, it more likely illustrates that some minority groups are not aware of or are not prepared for the homeownership process. It could also show that some groups do not want to participate in the private lending market whether because of past discrimination or other reasons. Other research, more narrative based, could reveal why some minority groups have such a low percentage applying for homeownership loans. Due to the disparity between the number of applications received from Black/African American and Hispanic applicants compared to their share of the population in the region. Greater outreach by lending institutions may benefit or increased emphasis on financial education and the opportunities of homeownership for minority individuals may be needed in Houston.

Figure 17: Share of Applications by Race and Ethnicity – Houston MSA

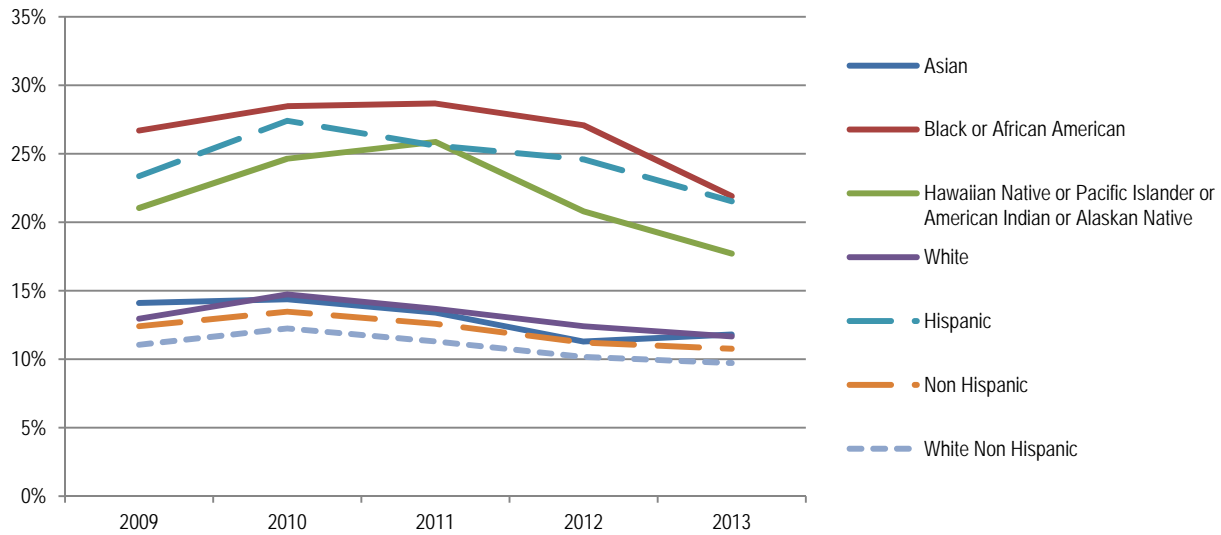


Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Not only was the share of applications vastly different between Whites and other races, but also the denial rates were considerably higher among minorities. As Figure 18 illustrates, the denial rate for White applicants was less than other races and very consistent to the average denial rate for the past five years at 14%. The denial rate for Asian applicants was very close to the denial rate of White applicants. The denial rates for Black/African American applicants had the greatest discrepancy to that of White applicants as the denial rates were almost twice as high as the White applicants during the past five years.

Hispanics also had a high rate of denial; although it has been consistently lower, by several percentage points, than of Black/African American applicants except when the denial rates were the same at 22% in 2013. Because HMDA data defines ethnicity apart from race, a denial rate was also calculated for White applicants that did not identify as Hispanic. Non-Hispanic Whites had by far the lowest annual denial rate ranging from 10% to 12% during the past five years, below the total denial average of 14%.

Figure 18: Denial Rates for Owner Occupied Home Purchase Applications by Race and Ethnicity 2009-2013



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

A higher denial rate of Hispanic and Black/African American applicants does not necessarily indicate fair housing problems or discrimination. It may be explained, in part, by these populations having lower incomes than Whites. It is also possible that credit histories vary among applicants with different racial/ethnic characteristics. Without a detailed analysis of each applicant, it is unclear if the reason for the difference is due to a variable other than income that is considered in making the lending decision (e.g., credit history, debt to income ratios) or if discrimination in lending could be occurring.

Denials by Income

When examining denials using race, ethnicity, and income, minorities were denied loans more often than Whites regardless of income. Using data from 2009 to 2013, denial rate was examined using the HUD Area Median Family Income (AMFI) for each corresponding year. Applicants making below 80% of the AMFI are considered low-income. Applicants making between 80% and 120% AMFI are considered average income, and those making above 120% of the area median income are considered upper income applicants. As expected, low-income applicants, making below 80% AMFI, have the highest denial rates. Applicants in higher income brackets are more likely to get a loan and have lower denial rates.

Table 53: Five Year Denial Rates of Owner Occupied Home Purchase Conventional Loan Applications by Race and Income

	<=80% AMFI (Low Income)	80%-120% AMFI (Average Income)	>120% AMFI (High Income)
Asian or Pacific Islander	22%	13%	10%
Black or African American	40%	27%	18%
Hawaiian or Pacific Islander	36%	21%	13%
White	27%	14%	9%
Not Provided by Applicant	35%	18%	10%
Hispanic (Ethnicity)	35%	24%	13%
Non-Hispanic	24%	13%	9%
White Non-Hispanic	23%	12%	8%

FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Black/African American applicants had the highest denial rate out of all races when considering all income groups. The denial rate for Black/African American denial rates (18%) was twice as high as the denial rate for White applicants (9%) upper income bracket. Asian denial rates were lower than other minority groups and were closest close to that of Whites.

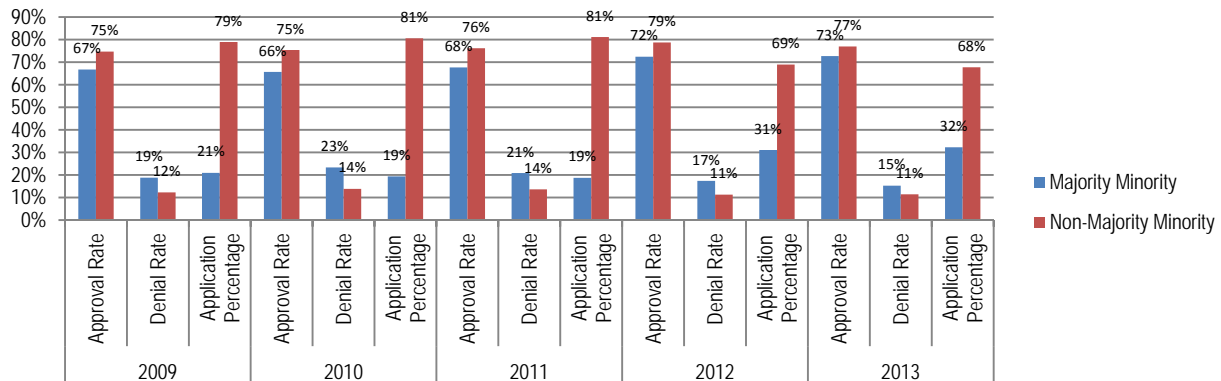
Hispanics had the second highest denial rate of all income levels considering race and ethnicity. Denial rates for upper income Hispanic applicants (13%) were considerably lower, approximately 5 percentage points lower, than that of upper income Black/African American applicants (18%). Non-Hispanic applicants were denied far less than Hispanic applicants for conventional home loans (9%). The denial rate for Hispanics was approximately 10 percentage points higher than Whites in the low and average income categories and approximately 1.5 times as high in the upper income category. Again, the denial rate for Non-Hispanic Whites was calculated. Applications for Non-Hispanic Whites were denied less than any other racial or ethnic group, at 12% and 8% in the average and upper income categories.

Lending in Minority Areas

HMDA data specifies the census tract’s minority percentage for each loan application. The Houston MSA is a majority minority area, meaning there are more census tracts in the Houston MSA that have over 50% minority residents, than there are census tracts with non-minority majorities.

In non-minority census tracts, the approval rates are higher, the denial rates are lower, and for every three home loan applications in a non-minority area there is only one application made in a majority minority area. Approximately three-fourths of conventional home purchase applications are concentrated in census tracts in non-minority areas.

Figure 19: Approval, Denial and Application Rates for Minority Census Tracts in Houston MSA 2009-2013



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

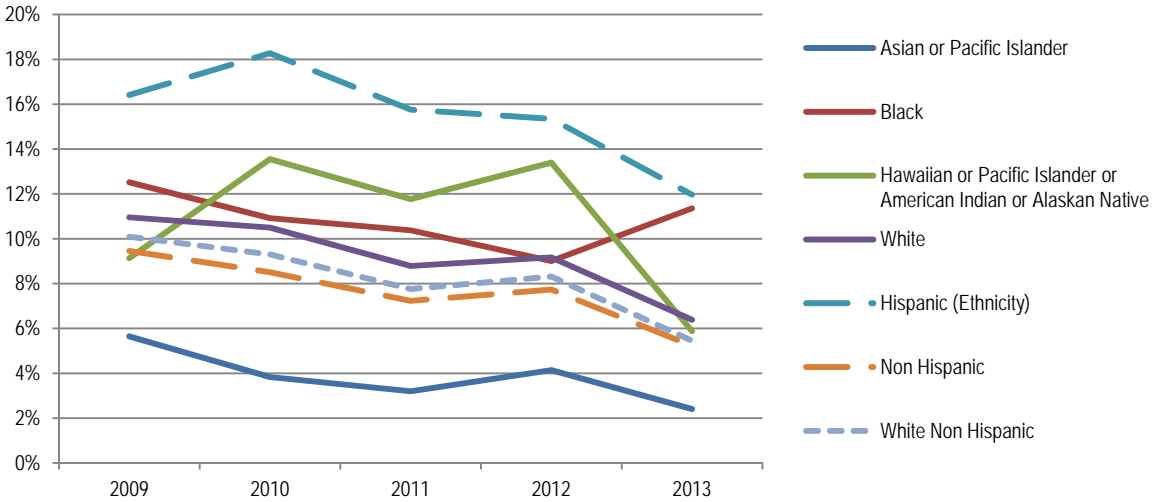
Subprime Loans

HMDA requires banks to provide information about the rate spread above a certain annual percentage rate (APR). This data is one identifier of subprime loans. As such, HMDA data has been used to examine differences in subprime pricing among borrowers of various races and ethnicities. In this section, a “subprime” loan is defined, consistent to HMDA data, as a loan with an APR of more than 3 percentage points above comparable Treasuries.

Of the 162,027 owner occupied home purchase loans originated in the Houston MSA between 2009 and 2013, 12,924 (8%), were considered subprime by this definition (i.e., these loans met or surpassed the pricing reporting threshold required by HMDA data). Of the subprime loans that were originated, 79% were made to White borrowers. The high percentage of subprime loans made to White borrowers could be because White applicants have the highest number of applications and a low denial rate.

About one in five subprime loans were made to Hispanic borrowers (19%) over the past five years. Examining the percent of subprime mortgages compared to those originated within each racial or ethnic group, Hispanic borrowers have the highest rate of subprime loans. Although the majority of subprime loans were made to White borrowers, the ratio of subprime loans to loans originated is highest for Hispanics; 15% of all loans originated to a Hispanic borrower were subprime compared to 11% of loans originated to Black/African American borrowers were subprime. This ratio is lowest for Asians; less than four percent of loans made to Asian borrowers were subprime loans.

Figure 20: Conventional Home Loans with Rate Spread by Race in Houston MSA 2009-2013



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2009, 2010, 2011, 2012, and 2013

Review of Lending Patterns by Specific Lender

In 2013, the top ten conventional mortgage lenders in Houston received approximately 57% of all lending applications. Among these lenders, Wells Fargo Bank, Vanderbilt Mortgage, and JPMorgan Chase Bank received 27% of the market share in the City.

Table 54: Top 10 Conventional Home Purchase Lenders in 2013

	Overall Market Share	Approval Rate	Denial Rate
Wells Fargo Bank	12%	59%	22%
Vanderbilt Mortgage	8%	38%	62%
JPMorgan Chase Bank	7%	42%	45%
Cornerstone Home Lending	6%	56%	5%
21 st Mortgage	5%	38%	62%
Compass Bank	4%	50%	13%
Flagstar Bank	4%	74%	26%
Bank of America	4%	51%	31%
Universal American Mortgage Company	4%	41%	20%
Network Funding	3%	63%	4%

Source HMDA Raw Data 2013

Many of the top lenders for the region corresponded with the list of top lenders for minority applicants during 2013. Almost three in four Black/African American applicants (71%) applied for conventional home loans at one of the five most common lenders for Black/African Americans. Just over half (57%) of Asian applicants applied to one of the top five lenders for Asians in 2013, and only approximately one third (31%) of Hispanic applicants applied to one of the top five lenders for Hispanics during the same year. The list of top five lenders is the same for Black/African American applicants and Hispanic applicants. However, the majority of Hispanic applicants apply to other lenders, while the majority of Black/African American applicants apply to at least one of the top five lenders.

Table 55: Top Lenders by Minority Applicants 2013

Black/African American		Asian		Hispanic	
Lender	% of Black/African American Applicants	Lender	% of Asian Applicants	Lender	% of Hispanic Applicants
Wells Fargo Bank	22%	Flagstar Bank	16%	Vanderbilt Mortgage	11%
JPMorgan Chase Bank	15%	Wells Fargo Bank	15%	Wells Fargo Bank	7%
Vanderbilt Mortgage	15%	JPMorgan Chase Bank	11%	21 st Mortgage	6%
21 st Mortgage	10%	Chicago Mortgage Solutions	9%	JPMorgan Chase Bank	4%
Compass Bank	9%	NYCB Mortgage Company	6%	Compass Bank	3%

Source: HMDA Raw Data 2013

Banking Locations

Another illustration of the private sector’s implementation of policies and practices is the location of bank branches. Bank branches can provide access to basic financial services, and the lack of bank branches can create access barriers to mainstream finance for primarily low-income people. Although more banking customers are beginning to use mobile and online banking as well as deposit-friendly ATMs for transactions instead of visiting regular bank branches, bank branches are the primary place in which consumers have access to products for either building assets or obtaining credit.

When mapping the locations of bank and credit union branches in the Houston area, most are located in high income areas and also in commercial areas like the Galleria area and Downtown. All branch locations for banks were mapped, even ones with limited services, and all branch locations of credit unions were mapped, even those with restricted access, for instance for employees only. These locations do not include locations with only ATMs.

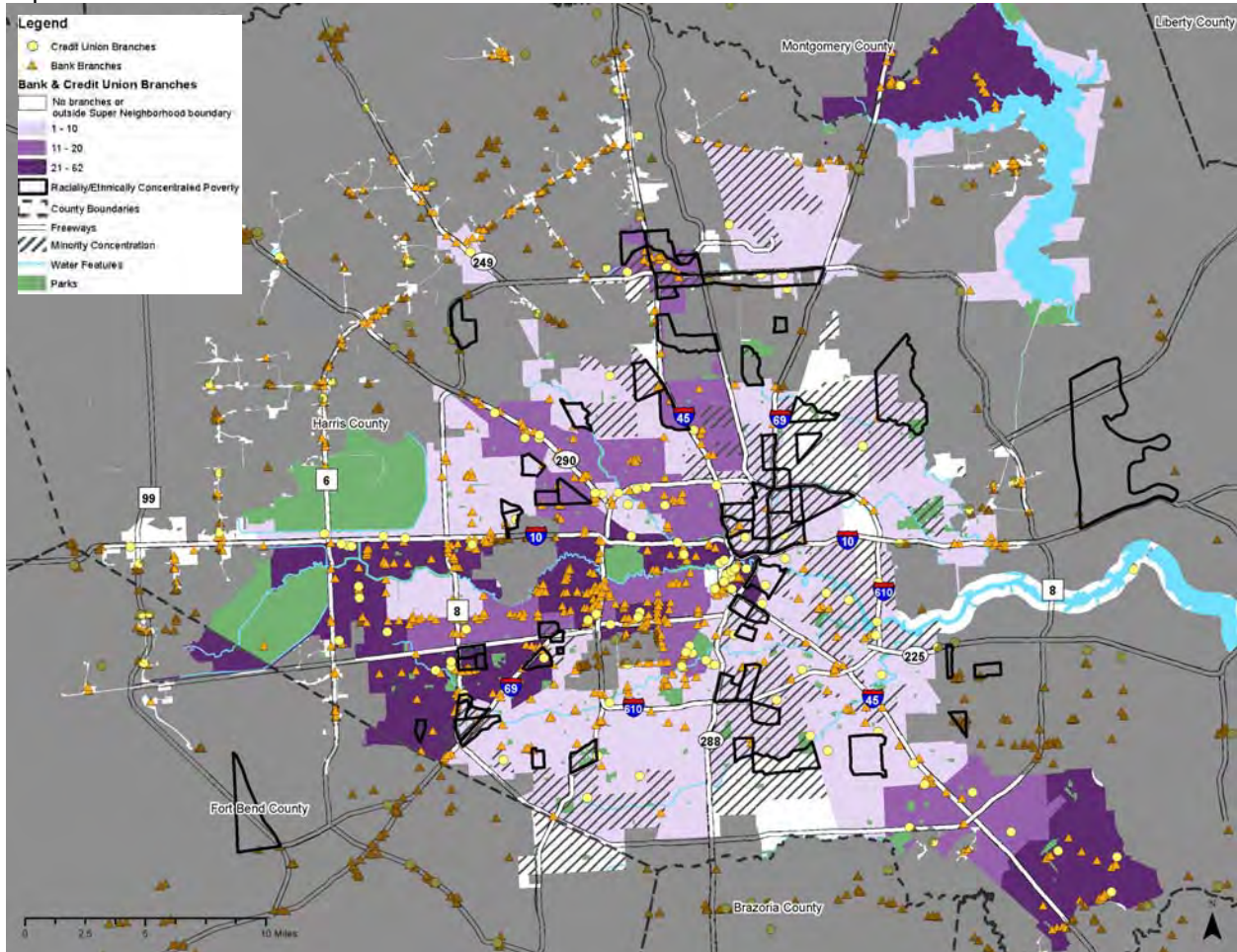
The ten Super neighborhoods with the most bank and credit union branches were

- Greater Uptown (62)
- Memorial (45)
- Downtown (41)
- Greenway / Upper Kirby Area (39)
- Clear Lake (28)
- Kingwood Area (22)
- Eldridge / West Oaks (21)
- Washington Avenue Coalition / Memorial Park (21)
- Sharpstown (21)
- Alief (21)

There are ten Super Neighborhoods where there are no banks or credit union branches. Many of these Super Neighborhoods have high numbers of minority residents

- Fourth Ward
- Pleasantville Area
- Minnetex
- Hunterwood
- Settegast
- Trinity/Houston Gardens
- Hidden Valley
- East Little York/Homestead
- Fort Bend Houston
- South Acres/Crestmont Park

Map 46: Bank and Credit Union Branch Locations



Source: National Association of Federal Credit Unions and Federal Deposit Insurance Corporation as of June 2015

Foreclosures

In the third quarter of 2010 more than 113,000 residential mortgages in the Houston area were 'underwater', meaning the owners owed more on their mortgages than their homes were actually worth.¹⁸ Since then, the negative equity rate has decreased and is way below the national average of 16.9%. About 7.4% of all Houston area homeowners with a mortgage are 'underwater', or 68,222 homeowners, almost half as many as in 2010. The number of underwater homeowners is an important factor contributing to the foreclosure rate of an area. Although the number of homes has steadily decreased, in 2014 the number of foreclosures has increased. The increase in foreclosures this past year may be due to many foreclosure auctions scheduled in July and November. Although the number of foreclosures has risen recently, over the past five years the number of foreclosures is trending down, and Houston still has a relatively low number of homes in the foreclosure process at 3,535 homes.¹⁹

Fair Housing Concerns

There is a clear disparity between racial, ethnic, and gender groups in the amount of lending applications received as well as in the rate of denials. The next chapter will discuss recent fair housing complaints that have been filed with HUD in the City of Houston, which reveals that the majority of complaints concern rental housing. This could show that there is underreporting of complaints related to lending and home buying. Without a large number of complaints, it is hard to measure the kinds of discrimination occurring in the private lending market.

In addition, the disparities in lending may not be due to only overt discrimination, meaning denial based on a protected class basis. Overt discrimination practices are easily noticed by individuals affected. Perhaps the low amount of complaints filed is due to discrimination that is historic or institutionalized. For instance, the majority of denials are based on credit history and debt-to-income ratio. Income directly affects both of these. The lower a household's income, the more likely a household is to have credit issues or become burdened by loans. As discussed earlier, median income is lower for minorities and income grows at a slower pace for minorities compared to non-Hispanic Whites. Another example is the lack of banking locations in minority neighborhoods which could serve as a barrier to accessing credit and lead to smaller numbers of minorities applying for home loans.

¹⁸ *Houston Business Journal*. (December 14, 2010). 'Underwater' mortgages increase in Houston area. Morning Edition. Retrieved from http://www.bizjournals.com/houston/morning_call/2010/12/underwater-mortgages-increase-in.html

¹⁹ Takahashi, Paul. (December 19, 2014). Fewer homes underwater, but foreclosure rising in Houston. *Houston Business Journal*. Retrieved from <http://www.bizjournals.com/houston/news/2014/12/19/fewer-homes-underwater-but-foreclosures-rising-in.html?page=all>

7. Public Policies

Public policies may affect the pattern of housing development, the availability of housing choices, and the access to housing. This chapter reviews the various policies that may impact housing choices in Houston. In addition, the appendix of this document contains more information about public policies related to fair housing. The analysis performed by Planning/Communications will serve as a supplement to this chapter.

Local Plans

Houston is unique as the largest city in the country without zoning ordinances. Houstonians have rejected efforts to implement zoning in various elections, and the lack of zoning regulations has become a matter of pride for some in Houston.

Without official zoning ordinances the City has enacted development regulations that specify how lots are subdivided, standard setbacks, and parking requirements. In addition, many private properties have legal covenants or deed restrictions that limit the future uses of land, which have effects similar to zoning ordinances. Without land use based zoning, the City has struggled to implement a comprehensive plan or general plan to guide future development. There have been many related efforts but none that have been adopted by City Council.

General Plan

Currently, the City of Houston is in the development process of creating a General Plan. In the fall of 2013, Mayor Parker directed the Planning and Development Department to explore the concept of a General Plan. Since then, committees have been convened and the development process has begun, and July 2014 marked the kickoff celebration for committee members.

This plan will serve as a broad policy document for the City defining long-term success and ways to accomplish these successes. Benefits of the plan are seen to

- Ensure City efforts are coordinated – both internally and externally
- Increase collaboration across City departments
- Maximize effectiveness of City efforts by enabling a proactive approach to solving problems
- Accelerate quality policy making at every level
- Increase public engagement
- Create consistency across changes in City leadership

The General Plan will rely on results from past community engagement and vision exercises while building on existing information in existing plans, policies, practices, and regulations. The General Plan hopes to provide guidance for future plans, policies, and regulations. Major components of the General Plan include a vision statement, a planning coordination tool, performance indicators, a neighborhood enhancement strategy, a growth and development strategy, and an implementation strategy. The plan is expected to be adopted by City Council in late 2015.

Although the General Plan will not be completed until after the start of HCDD's Consolidated Plan five year planning period, outcomes of General Plan may influence HCDD's direction in the future.

Regional Plan

The Houston-Galveston Area Council (H-GAC), in conjunction with the City of Houston, Harris County, and twenty-two other regional partners, applied for and received a \$3.75 million dollar regional planning grant administered by the U.S. Department of Housing and Urban Development's Sustainable Communities Initiative, and funded in partnership with the U.S. Department of Transportation and Environmental Protection Agency. This planning grant resulted in the development of a regional plan called the *Urban Houston Framework: A Case Study for the H-GAC*

Regional Plan for Sustainable Development published in May 2013. The intent of the Urban Houston Framework is to encourage sustainable forms of development through comprehensive policy by integrating land use and transportation planning by coordinating land development standards with new transit investments and by providing affordable housing in dense areas around new transit lines.

Various studies and supporting documents were created in support of the development of the regional plan. The *Fair Housing Equity Assessment* examined linkages between housing, socioeconomic, and demographic factors across the region's rural, suburban, and urban areas. The assessment provides analysis of fair housing and equity issues within the region. The five components reviewed include:

- Assessment of primary demographic concerns, including racially and ethnically concentrated areas of poverty
- Disparities in access to opportunity
- Fair housing activities
- Fair housing infrastructure/systems
- Physical infrastructure/economic investments

Although it is understood that this study will not lead immediately to implementation of improvements and new developer incentives to promote housing by transit investments, the study included numerous stakeholders and citizens coming together to consider the future of the community and agreeing on general future scenarios. The terminology, approach, and outcomes resulting from the dialogue could form the foundation for continued collaboration among stakeholders making recommendation for sustainable development in years to come.

Consolidated Plan

As a recipient of federal housing and community development grant funds, the City of Houston is required to adopt a Consolidated Plan that identifies and prioritizes housing and community development needs, analyzes barriers to affordable housing, and contains a strategies to address community needs. This AI will accompany the 2015-2019 Consolidated Plan which addresses a five year period between July 1, 2015 and June 30, 2020.

The Consolidated Plan directs the expenditure of funds of several programs operated by the U.S. Department of housing and Urban Development (HUD). These programs are:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with HIV/AIDS (HOPWA)
- Emergency Solutions Grant (ESG)

The actions taken as part of the Consolidated Plan during the next five years will be influenced by this AI. Many of the fair housing services provided by the City of Houston will be funded through one of the four grants included in the Consolidated Plan.

The 2015-2019 Consolidated Plan identifies the following priorities for targeting HUD resources in the next five years.

- Assistance for Renters
- Assistance for Homeowners
- Assistance for Homebuyers
- Homeless Needs
- Public Service Needs
- Improvement of Neighborhood Facilities
- Addressing Neighborhood Needs
- Economic Development Needs
- Fair Housing Needs

Economic Development and Housing Initiatives

"Whenever we approach planning in the city, it's a heavy emphasis on carrots, not sticks," said Andy Icken, the City's Chief Development Officer, in a recent article in the Wall Street Journal.²⁰ The following are some development incentives currently used by the City of Houston.

Economic Development Initiatives

380 Agreements

Allowed by Section 380.001 of the State of Texas Local Government Code, the City of Houston has chosen to use Chapter 380 agreements to stimulate economic development in Houston. These agreements are between the City of Houston and property owners or developers and are usually a public/private joint venture in which the city agrees to build, or loan or reimburse the funds to build infrastructure such as streets, sidewalks, utilities, and street lighting to support private development of vacant land.

In recent high-profile City of Houston 380 agreements, opponents have argued that the commercial developments are in areas of the city that are not in need of economic development and that the commercial developments would be built even if the agreement was not available. Proponents of these recent agreements have said that they have improved infrastructure in areas years sooner than the city would be able to accomplish.

Enterprise Zones

The Texas Enterprise Zone Program is an incentive tool for local communities to partner with the State of Texas to encourage job creation and capital investment in areas of economic distress. To participate in the program, a business must apply and receive a nomination by the City of Houston before the nomination is forwarded to the State Office of Economic Development where projects are competitively scored. Incentives can include a refund of State sales or use taxes, reduction of franchise tax, and priority in the Smart Job Funds. Requirements of the program include

- Businesses that are located within an EZ must commit 25% of the new jobs created and/or retained to residents of the EZ
- Businesses not located within the EZ must commit 35% of the new jobs created and/or retained to residents of the EZ.

An Enterprise Zone is any census block group in which the poverty level is 20% or higher as identified by the census.

Section 108/Economic Development Incentive (EDI)

The City was awarded an Economic Development Incentive (EDI) grant in 1995. Along with this came the loan authority from Section 108. The purpose of these funds from EDI and Section 108 is to enhance affordable housing and economic development within the City of Houston.

Most recently the City of Houston used Section 108/EDI funds as gap financing for the renovation of a vacant property located at 806 Main Street into a luxury hotel. In addition to the construction jobs provided for the renovation of this building, the hotel is expected to provide over 177 permanent, on-site jobs in downtown Houston. The project also eliminates one of the few remaining blighted areas of the Main Street District and offers needed rooms to support the efforts of the Convention and Visitor's Bureau and the George R. Brown Convention Center.

²⁰ Brown, Eliot. (December 30, 2014). Hands-Off Houston Tries Carrot to Lure Downtown Dwellers. *The Wall Street Journal*. Retrieved from <http://www.wsj.com/articles/hands-off-houston-tries-carrot-to-lure-downtown-dwellers-1419958122>

Housing Initiatives

Affordable Housing Trust Fund (TIRZ)

The City of Houston accomplishes a portion of its Capital Improvement Program through a financing mechanism called a Tax Increment Reinvestment Zone (TIRZ). Currently the City has 25 TIRZs which all share the following common characteristics

- Each zone is created by action of City Council pursuant to a financing plan embedded in a City Ordinance
- Each zone has defined geographical boundaries
- At the time each zone is created, the property taxes due to the City based on the current valuation of the property within the zone is frozen and for the life of the zone, any incremental property tax revenue resulting from the revaluation of property is dedicated to public improvements within the zone
- Each TIRZ has a board of directors that is responsible for its activities
- Each TIRZ has a termination date incorporated into the ordinance that created it.

A TIRZ may issue tax-exempt bonds to accomplish its mission and these bonds are backed by the expectation of future tax increments which is the amount of property tax that exceed the amount frozen upon creation.

In certain TIRZs, those with at least 10% of land value in residential use, there is a requirement that one third of the incremental tax revenue be set aside for affordable housing, as determined by the City Council and administered by HCDD. These funds may be used for projects within, and without, the district that generated the tax increment.

Some argue that TIRZs are discriminatory to neighborhoods and areas without existing or proposed private development. A TIRZ that has an increase of taxes because of market-driven development will benefit from the additional amount of taxes. However, then the City will receive less taxes to spend on improvements in other areas of the jurisdiction such as areas in which no development is occurring. While some may disagree with the basis of the TIRZ program and others may find faults in the locations of TIRZs, using TIRZs is a way to enhance targeted areas for a limited time in order to increase the market value of the city in the long term.

Downtown Living Initiative Program

To boost Downtown Houston's residency, in 2012 the Houston Downtown Management District and the TIRZ#3 Downtown Living Program of the Downtown Redevelopment Authority partnered to create the Downtown Living Initiative Program. Adding more residents will likely spur economic activity like restaurants and retail to transform downtown from a place that is primarily open during office hours only.

The program provides development incentives for multifamily and mixed use developments that 1) construct more than 10 new dwelling units, 2) are within the program boundary area, and 3) help to enhance the pedestrian environment. The program was originally intended to provide incentives for 2,500 units, but was expanded to provide incentives for up to 5,000 units total. The incentive offers tax relief of \$15,000 per unit of over 15 years, which abates most of the owner's property tax. Developers can take advantage of the program until June 30, 2016 or until all 5,000 units are accounted for. Up to \$75 million is available for this program.

To date, encouraged by the program, developers planned more than 4,200 new apartment units in the area, which would more than triple the downtown population of about 3,600 according to the geographic boundaries the district uses. Most of the new units are rentals, so the benefit goes to the developer.²¹

Some have been critical of this program claiming that it encourages high-end residential living and supports low-wage jobs while also furthering economic segregation in the city. In June 2015 a group gathered at Market Square to protest the city's policy on financial incentives for residential developers.²²

²¹ Ibid.

Development Regulations

The consulting firm Planning/Communications performed an analysis of Houston's current land use codes as well as analyzed current policies and regulations as they relate to persons with disabilities. These are located in appendices to this document, "Analysis of Houston's Development Controls for Exclusionary Impacts" and "Impacts of Development Regulations and Practices on Housing for People with Disabilities". These documents review current policies. Development regulations are summarized in this section using HUD and State guidance.

HUD's Initiative on Removal of Regulatory Barriers

Although part of America's Affordable Communities Initiative which has been discontinued, the "Questionnaire for HUD's Initiative on Removal of Regulatory Barriers" has been used as a guide to review potential regulatory barriers in Houston that may inhibit fair housing choice in this section.

City Plan

The City of Houston does not have a comprehensive plan. As discussed earlier in this chapter, the City is in the process of creating a General Plan with guiding principles for future development and growth. This plan has yet to be completed or adopted as of July 2015.

Impact Fees

The City has a few minimal impact fees. There is a direct relationship between developments and the fees incurred. Fees in Houston include wastewater and water impact fees and the park dedication requirement. In addition, there is a clear method for fee or dedication calculation stated in the city code. The City does provide waivers for the wastewater and water impact fees as well as the park dedication requirement for eligible low and moderate single-family housing subdivisions.

Building Codes and Permits

The City of Houston uses recent versions, versions published in the past five years, of the national recognized building codes including the 2012 International Building Code, 2012 International Residential Code, 2012 Uniform Mechanical Code, 2012 Uniform Plumbing Code, and 2014 National Electrical Code. The City does not have minimum building size requirements, which could limit the number of more affordable, smaller units. The City has time limits for government review and approval or disapproval of development permits. The recently consolidated Permitting Center acts as a one-stop-shop for permit applications to simplify the permitting and building processes.

Manufactured Homes and Accessory Dwelling Units

Manufactured housing and accessory dwelling units are two ways to create low-cost housing in a community. City of Houston code allows manufactured homes and modular housing to be located anywhere in the City. The City has no zoning and therefore does not limit accessory apartments.

Development Policy Review

In the past five years, the City of Houston has not funded comprehensive studies or an ongoing process to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing. However, HCDD did hire a consultant, Planning/Communications, to review the city's land use codes to look for any codes that negatively affect the development of affordable housing and housing for persons with disabilities. As a result of Planning/Communication's analysis and the information identified in the barrier component of the Consolidated Plan, the City will continue to research the feasibility and need to initiate major regulatory reforms.

²² Sarnoff, Nancy "Organizers criticize city's residential incentive program" *Houston Chronicle* June 29, 2015: <http://blog.chron.com/primeproperty/2015/06/organizers-criticize-citys-residential-incentive-program>

Affordable Housing Development and Incentives

The City does not have any density incentives for developers building affordable housing, 'as-of-right' or otherwise. Although HCDD works closely with the Planning and Development Department on many of HCDD's affordable housing developments or repairs, the City does not provide 'fast track' permitting and approvals for all affordable housing projects in the community. The City does not adjust or waive parking requirements for affordable housing developments. The City does not require affordable housing projects to undergo public review or special hearings if it otherwise is in full compliance with building and land use codes.

State of Texas AI Land Use Best Practices

The following is a summary of the best practices in land use and zoning for local governments as identified in the recently completed State of Texas AI, Action Item 5.1. The following bullets first outline the best practice as stated in the Texas AI followed with a description of the practice or policies currently implemented in Houston.

- **A definition of family that includes unrelated persons living together in residential settings.**
City of Houston: The definition of family in Houston's "Chapter 10, Buildings and Neighborhood Protection, Article IX – Building Standards" includes unrelated persons living in residential settings: Because this definition of 'family' allows up to ten unrelated individuals to live together in a dwelling unit, the City of Houston cannot impose any additional land-use regulations on community residents for ten or fewer people with disabilities.
- **The inclusion of at least one zone district that allows for small lot single-family dwellings.**
City of Houston: Houston has no zoning districts. In some areas of the City, there may be minimum lot size restrictions, but these restrictions are intended to be used to slow gentrification instead of disallowing certain kinds of housing.
- **Reasonable lot width and size requirements of residential dwellings.**
City of Houston: Under Sec. 42-181 the minimum lot size is 3,500 square feet within Houston and 5,000 square feet in the extraterritorial jurisdiction. Considering the mean of lot size is 4,250 according to an analysis performed for HUD's Office of Policy Development and Research, Houston has reasonable lot size requirements.
- **The inclusion of zone districts or overlays that allow the construction of multifamily homes by right. Enough land should be included in such districts/overlays to allow diversity of housing stock through multifamily development.**
City of Houston: Houston does not have zoning. Although there are some residential areas with deed restrictions, some of which may restrict multifamily development on lots designated for a single unit, generally there are no restrictions on multifamily development
- **Allowance of manufactured homes meeting HUD safety standards in at least one residential district.**
City of Houston: As Planning/Communications found and stated in the *Analysis of Houston's Development Controls for Exclusionary Impact*: "Rather than greatly restricting or prohibiting (manufactured home parks, manufactured home subdivisions, and modular or industrialized housing), as some communities do, the City of Houston Code allows manufactured homes and modular housing anywhere in the city, unless barred by a private deed restriction. Both of these are sources of affordable housing."
- **Avoidance of minimum house or dwelling unit sizes.**
City of Houston: The City's Chapter 42, which serves as the development standards for the City, does not have minimum floor area requirements.
- **Clarification that group housing for protected classes is treated as residential uses and allowance of such homes in a broad range of zone districts. Avoidance of regulations that cast group homes as commercial use and/or require special permits or public disclosure that the homes will serve persons with disabilities.**
City of Houston: As discussed above, because the definition of family includes unrelated persons living in residential settings, these kinds of group housing must be treated as other residential uses.

- **Incentives for diverse housing stock development such as density, reduced parking requirements, fee waivers or reductions, allowance for accessory dwelling units and public land donations or set asides for housing that accommodates low-income and special needs populations.**

City of Houston: Currently, Houston does not have different building requirements encouraging developers to build housing that accommodates low-income families or individuals or those with special needs. However, in certain Tax Increment Reinvestment Zones (TIRZs), a portion of the funding collected is set aside for activities related to affordable housing in the city. The City of Houston collects wastewater impact fees at the time of issuance of building permits for new development within the city's wastewater benefit area. Low and moderate cost single-family housing is exempt from paying wastewater impact fees. The City of Houston has a park dedication requirement for single family and multifamily residential subdivision developments in which developers are required to provide one of or a combination of dedication of land suitable for parks or a payment of fees in lieu of the dedication of land for parks. Up to a maximum of 100 percent of the total requirement may be waived for subdivisions with low- and moderate-income single-family housing.

Although some residential neighborhoods in Houston and the Houston area have deed restrictions which may limit some of the land use through private means, using the State of Texas's list of land use best practices to review the City of Houston's land use polices related to housing choice, the City does not have policies that differ from the best practices suggested for jurisdictions.

Other City Policies or Practices Related to Fair Housing

Boarding Home Ordinance

The Houston City Council passed an ordinance on July 24, 2013 calling for the regulation of boarding homes within the City of Houston. Residents of boarding homes are most vulnerable to become victimized because they are persons who are elderly, have a disability, or have limited income. The ordinance intends to make boarding homes safer for residents.

Since implementation, the Boarding Homes Enforcement Detail (BHED) in the Houston Police Department's Mental Health Division has worked to increase the number of boarding homes in compliance with the new ordinance. According to the *Mental Health Division 2014 Annual Report*, enforcement of the ordinance has resulted in standardization and improvement of living conditions for residents in these homes which were not monitored or supervised under any state agency, until this ordinance was passed. In 2014, there were 87 homes registered and 88 inspections conducted. During the year, staff issued 105 code citations and 189 code warnings.²³

There are many barriers to providing decent housing for elderly and persons with disabilities in boarding homes. For instance, there are a large number of homes that are unregulated, and even the homes that are licensed or certified by the state have little oversight. Some speculate that the number of new boarding homes and care facilities for the elderly will increase rapidly over the next few years because of the Affordable Care Act 745, which will favor boarding homes over nursing homes. For this reason, it was very timely for Houston to enact and begin implementation of this ordinance. Further discussion of boarding homes is located in the appendix, "Analysis of Houston's Development Controls for Possible Exclusionary Impacts" by Planning/Communications.

²³ Houston Police Department. "Mental Health Division 2014 Annual Report": <http://www.houstoncit.org/wp-content/uploads/2014/06/2014-Annual-Report-R.pdf>

Payday Lending Ordinance

On July 1, 2014 Houston's payday lending ordinance went into effect limiting payday loans to 20 percent of a borrower's gross monthly income and auto title loans to three percent of the borrower's gross annual income or 70 percent of the car's value, whichever is less. The ordinance also limits refinancing payday loans a maximum of three times. According to a recent article in the *Houston Chronicle*, the 10-county Houston region is home to one fourth of the state's 3,240 payday lenders, and borrowers in the Houston region refinance more and pay on time less than the state averages.²⁴ This ordinance enacts "business regulations" for payday lenders but does not include land use regulation which could limit the number of payday lenders in a certain neighborhood or location

According to the City's Administration and Regulatory Affairs Department, as of July 20, 2015, there were 253 registered Credit Access Businesses (CABs) registered with the City of Houston. The numbers of CABs licensed in the City is always fluctuating because of the additional regulations and inspections recently enacted, CABs choose to renew, move, or close. Since the implementation of the ordinance last year, there have only been five complaints filed with the City, and one complaint was already withdrawn. City staff has inspected approximately 35 CABs, and all CABs were issued written warnings due to code violations ranging from improperly displayed certificate of registration to improper loan paperwork. There is a plan to inspect all CABs within the next 18 months, including those that have not registered with the city but are registered with the state.

CABs use third party funding to lend to clients. CABs are regulated under Chapter 393 of the Texas Finance Code. Regulated lenders do not use third party funding, but instead lend directly to clients. Regulated lenders must comply with Chapter 342 of the Texas Finance Code. The City's ordinance only applies to CABs and not regulated lenders. Some CABs have applied to become regulated lenders perhaps to avoid compliance with the new ordinance.

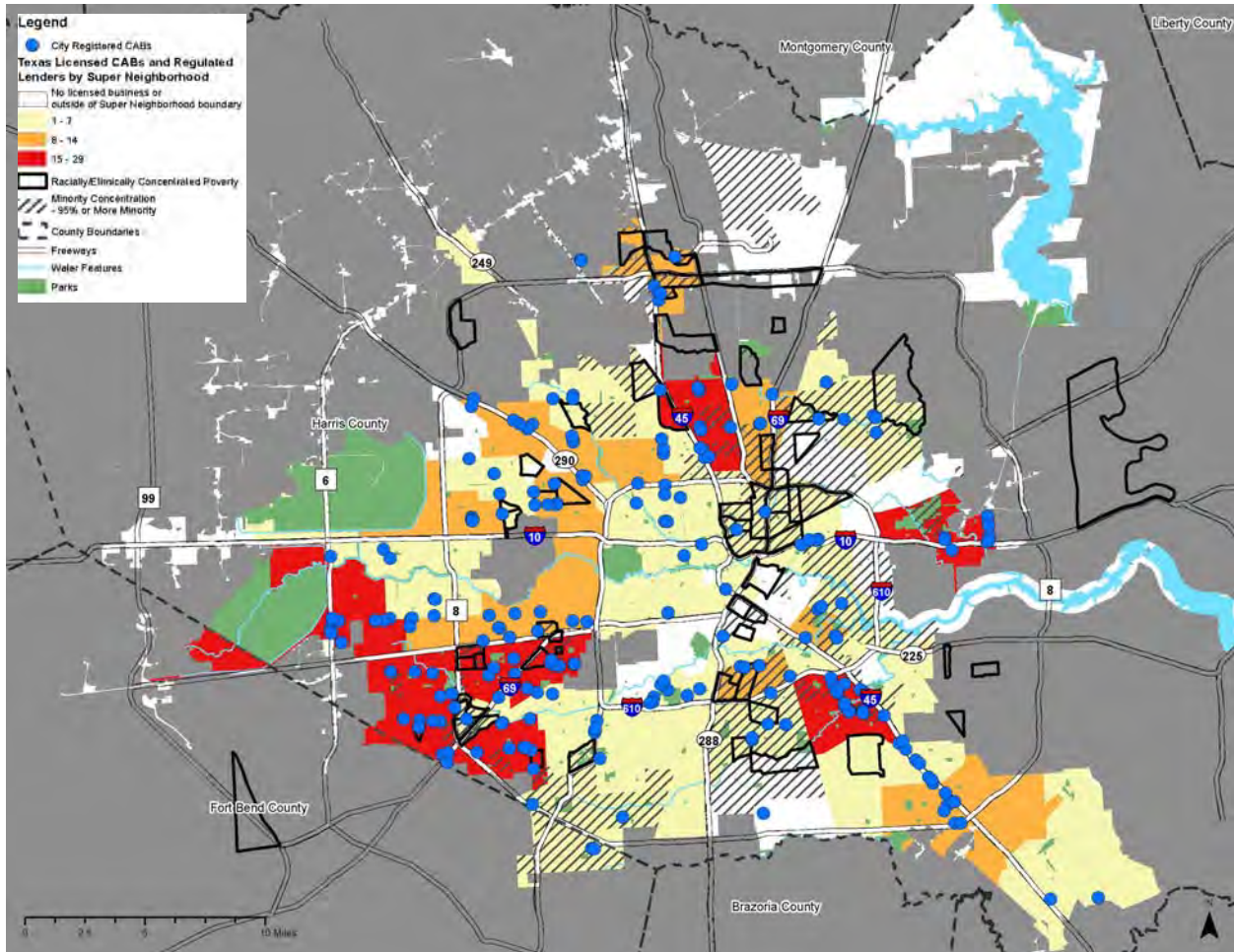
According to the Texas Office of Consumer Credit Commissioner, the agency that licenses and regulates non-depository lenders in the state, there are 572 CABs and regulated lenders located in Houston as of July 2015. The Super Neighborhoods with the greatest number of state licensed, active CABs and regulated lenders include mainly neighborhoods with Hispanic concentrations like Northside/Northline, Golfcrest/Bellfort/Reveille, Gulfton, and Northshore. Also, both CABs and regulated lenders tended to cluster away from areas with concentrations of minorities residents and areas with high poverty and majority minority, like R/ECAP census tracts,

City licensed CABs are located mainly south of Interstate 610 along Interstate 45 and on the southwest side of Houston. The following Super Neighborhoods have the greatest concentrations of city licensed CABs, of 10 to 15 businesses.

- Golfcrest/Bellfort/Reveille - 15 CABs
- Alief - 14 CABs
- Eldridge/West Oaks - 11 CABs
- Northside/Northline - 11 CABs
- Brays Oaks 10 CABs

Map 47: Credit Access Businesses and Regulated Lenders in Houston

²⁴ Morris, Mike. "City awaits complaints as payday loan rules go into effect" *Houston Chronicle* July 1, 2014: <http://www.houstonchronicle.com/news/politics/houston/article/City-awaits-complaints-as-payday-loan-rules-go-5594364.php>



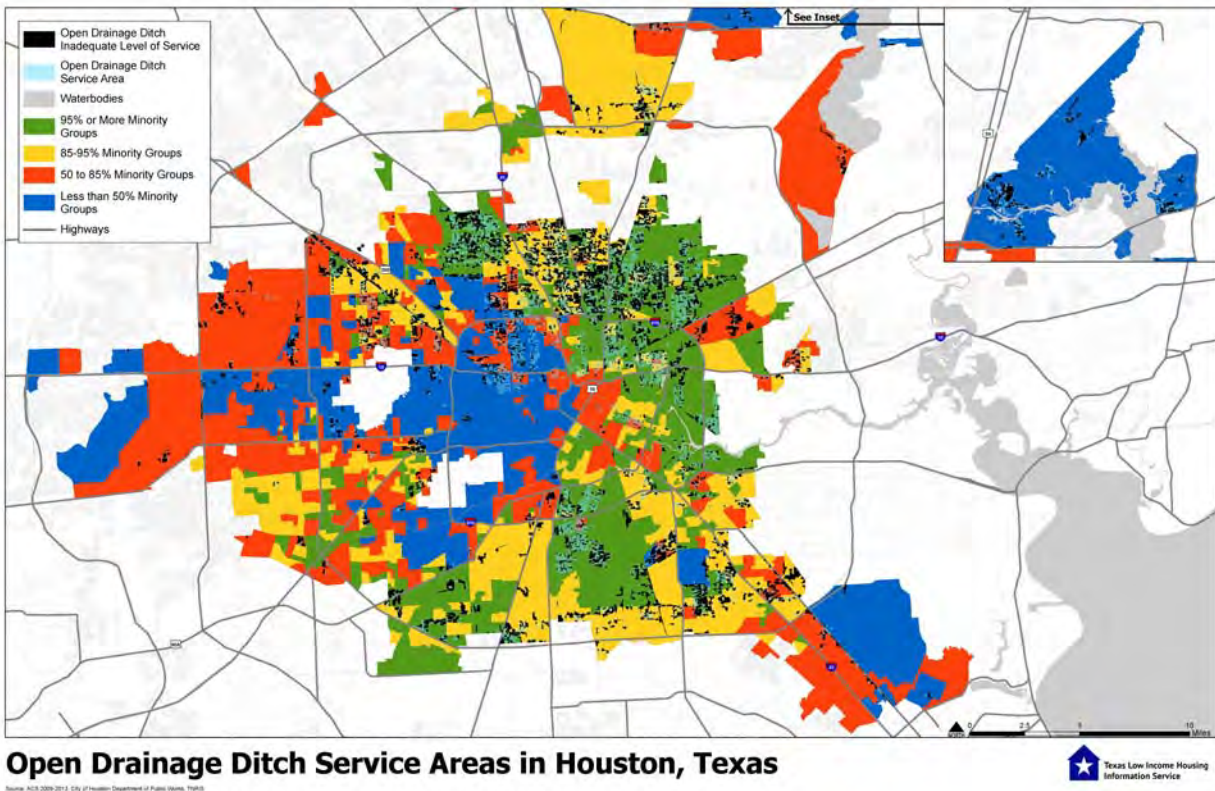
Source: City of Houston Administration and Regulatory Affairs Department – Registered CABs as of July 23, 2015 and Texas Office of Consumer Credit Commissioner as of July 22, 2015

Infrastructure

In the past, the way in which infrastructure improvements were carried out sometimes showed favor for some neighborhoods over others. For instance, the Federal Highway Interstate System was often built through minority or low-income neighborhoods, which caused further decay and disinvestment in these neighborhoods.

Some community advocates argue that the legacy of infrastructure placement still plagues minority and low-income communities in Houston. For instance, open ditches that are not well maintained and free from debris do not have the same capacity as streets with curbs and gutters to decrease the instances of flooding. The following map illustrates that the majority of open ditches are located in Houston neighborhoods with more than 85% minority residents.

Map 48: Location of Open Ditches in Houston



Source: Texas Low Income Housing Information Service

3-1-1 Houston Services Help Line

The 3-1-1 Houston Services Help Line is a consolidated call center designed to make city government more user-friendly and responsive to residents by providing a telephone number for information about city services and to report non-emergency concerns. Residents calling 3-1-1 with fair housing concerns are connected to the City's Fair Housing Hotline, HUD Fair Housing and Equal Opportunity Office or the Texas Workforce Commission.

The number of calls and the category of calls is one way to locate where infrastructure deficiencies are occurring or services are needed in the city. However, some neighborhood residents may not know about or think that it is important to notify 3-1-1 regarding infrastructure or other neighborhood concerns. As a result, residents in some neighborhoods may call 3-1-1 more than residents residing in other neighborhoods, leading to data limitations.

From January 2014 to June 2015, the 3-1-1 Houston Services Help Line received 124,549 calls. The following are nine Super Neighborhoods in which more than 10,000 calls were received in the past year and a half. Many of these Super Neighborhoods have concentrations of non-Hispanic White residents. This does not indicate that more problems are occurring in primarily non-Hispanic White neighborhoods, but instead, it likely indicates that these residents know about and use 3-1-1 as a resource.

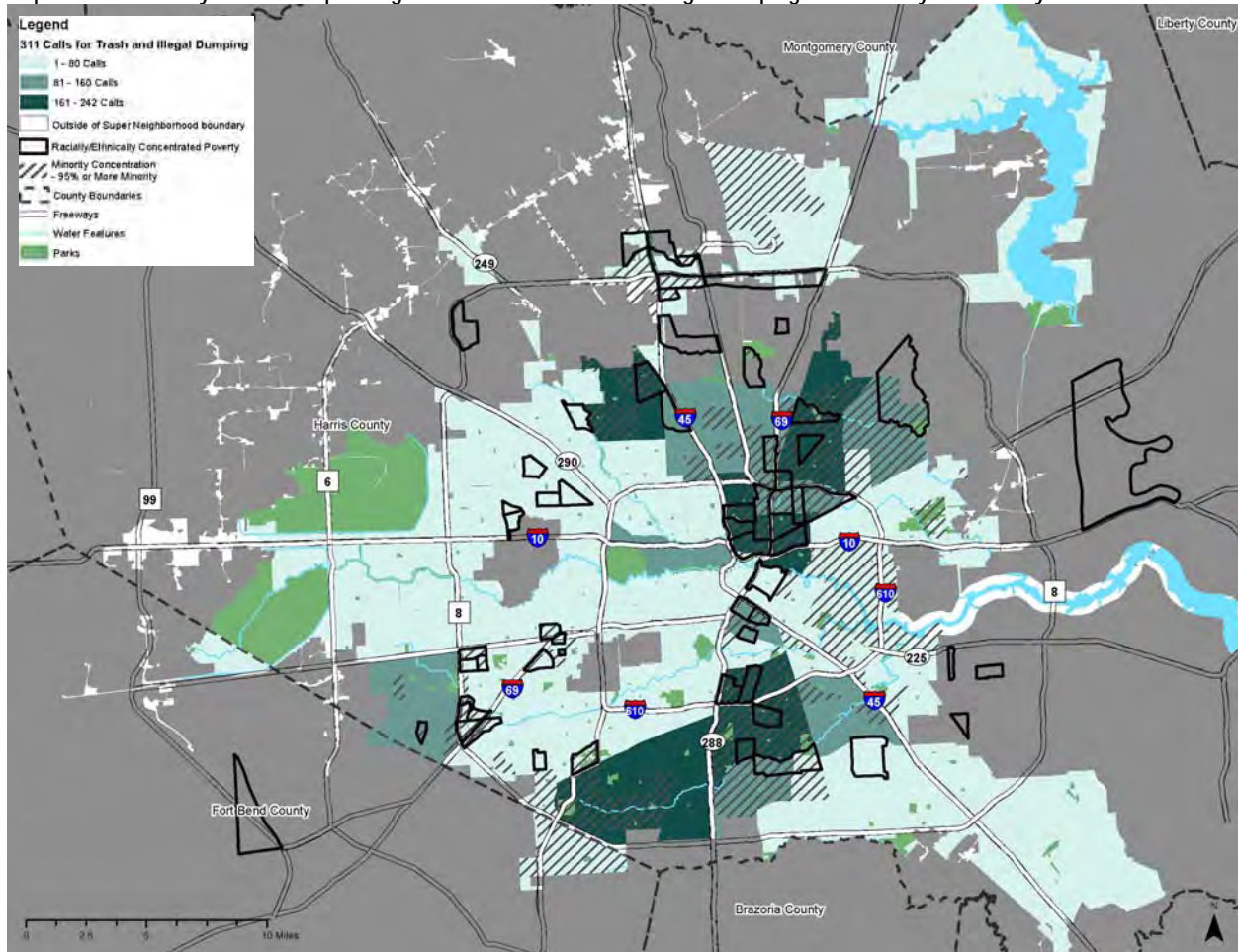
- Greater Heights - 18,084 calls
- Alief - 16,904 calls
- Neartown-Montrose - 15,856 calls
- Central Southwest - 15,792 calls
- Washington Avenue Coalition/Memorial Park - 13,244 calls
- Northside/Northline - 11,809 calls
- Downtown - 11,709 calls

- Central Northwest - 10,986 calls
- South Belt/ Ellington - 10,165 calls

The location and the category of the 3-1-1 calls received over the past 18 months was analyzed and revealed differences in issues reported between neighborhoods. One very stark difference was for calls categorized as Trash/Illegal Dumping. All but one of the eight Super Neighborhoods experiencing the greatest amount of calls to 3-1-1 regarding trash and illegal dumping were in areas of Black/African American concentration, meaning census tracts with more than 43% Black/African American residents as defined in the 2015-2019 Consolidated Plan. Most of these Super Neighborhoods also have minority concentrations, meaning census tracts with more than 95% of minorities as defined in the 2015-2019 Consolidated Plan.

- Sunnyside - 242 calls
- Greater Fifth Ward - 229 calls
- Greater OST/South Union - 225 calls
- Acres Home - 219 calls
- Trinity/Houston Gardens - 206 calls
- Central Southwest - 193 calls
- East Little York/Homestead - 177 calls
- South Park - 177 calls
- Near Northside - 174 calls

Map 49: 3-1-1 Calls by Houston Super Neighborhood about Trash and Illegal Dumping from January 2014 to July 2015



Source: City of Houston, <http://cohgis.mycity.opendata.arcgis.com>

Illegal dumping causes neighborhood blight. Communities with an accumulation of trash and illegal dumping may have greater difficulty in attracting new residents and new development. In Houston over the past 18 months, trash and illegal dumping has been a disproportionate issue occurring in neighborhoods with concentrations of Black/African Americans as opposed to other neighborhoods.

ReBuild Houston

ReBuild Houston is the City's current initiative to improve quality of life and mobility for residents by rebuilding the city's drainage and street infrastructure. Passed narrowly by voters in 2010, this pay-as-you-go funding system will maintain the infrastructure and plan for upgrades to meet future needs. The funding is designed to allow the city to pay down existing debt while financing drainage and road improvements primarily through monthly drainage fees collected from property owners.

The new method used by ReBuild Houston signaled a transition from choosing infrastructure projects based on political influences to a data-driven approach of prioritization where worst areas are repaired first. This worst-first approach promotes and accomplishes a fair approach to infrastructure improvement across the city. This supports one of the Fair Housing and Neighborhood Rights as stated by citizens during the public participation process: The Right to Equal Treatment.

Houston Housing Authority

Houston Housing Authority's 5-Year Plan

In the summer of 2015, the Houston Housing Authority (HHA) published a draft of the PHA 5-Year and Annual Plan that will be finalized by fall 2015. This 5-Year Plan will guide HHA's activities over the next five years, similar to HCDD's Consolidated Plan. The following are the draft goals and strategies from HHA's FY 2016-2020 5-Year Plan.

HHA Goal: Expand efforts to ensure equal opportunity in housing by

Strategy: Reducing operational barriers that may hinder access to programs it administers.

Strategy: Reducing language barriers that may hinder access to programs it administers

Strategy: Ensuring compliance with ADA requirements when constructing new and renovating existing units.

Strategy: Increase housing choice and mobility.

Strategy: Continue education of Fair Housing Laws.

HHA Goal: Increase the quantity and quality of housing

Strategy: Acquisition and new development of affordable housing.

Strategy: Modernizing, rebuilding, and/or demolish (if it can be replaced) aging units incrementally through the Capital Fund Program and other sources as available.

Strategy: Seeking additional vouchers through the Housing Choice Voucher Program and other special programs that may be available.

HHA Goal: Seek to improve community quality of life and self-sufficiency

Strategy: Providing services to residents, including youth, families, and seniors living in public housing and senior developments to enhance their quality of life.

Strategy: Create well-functioning communities with low crime and good neighbors.

Strategy: Providing Family Self-Sufficiency Programs for eligible Section 8 Housing Choice Voucher Program and Public Housing participants pursuant to applicable regulations and available funding.

Strategy: Increase Minority & Women Business Enterprises (MWBE) and Section 3 participation.

HHA Goal: Improve agency performance

Strategy: Seek other funding streams

Strategy: Improve the physical work environment

Strategy: Invest in human capital

Strategy: Increase interdepartmental collaboration and communication

Strategy: Seek new innovations

HHA Goal: Increase community engagement and participation:

Strategy: Improve relationships with clients and external stakeholders

Many of the new five year goals and strategies in HHA's draft 5-Year Plan relate closely to fair housing and expanding housing choice in the community and coordinate with the 2015 AI's Fair Housing Implementation Plan.

In addition, HHA will review and update, if needed, policies related to fair housing in each Annual Plan, including the Language Assistance and Reasonable Accommodation policies. Each year, HHA also signs a Civil Rights Certification, certifying that HHA will affirmatively further fair housing.

HHA has specific actions that will directly further fair housing in the near future. In 2016, HHA may consider proposals in areas of the city that promote fair housing and deconcentration of poverty for an RFP or non-competitive selection of Project Based Voucher proposals for up to 1,000 units. Also, HHA will work to address segregation by

converting from a central waiting list to having a site-based waiting list for each of its properties. HHA will look for acquisition opportunities on high opportunity sites. HHA will also continue to work to increase their funding ability by applying to grants like HUD's Choice Neighborhoods program.

Section 8 Selection Process

HHA administers and manages the Housing Choice Voucher Program, Moderate Rehabilitation Program, Single Room Occupancy (SRO) Program, and other Section 8 Special Programs. HHA may admit a participant to these programs either as a waiting list admission or a special admission.

Local Preferences for Admission

Each year HHA gives preferences to a certain number of households in special groups meeting specific criteria. These preference groups include homeless households and youth aging out of the foster care system. Members of both of these groups need referrals from a service provider to be considered by HHA under the local preferences.

Tenant Based Assistance Waiting List

Except for special admissions, voucher program participants will be selected from the Tenant-Based Assistance Housing Choice Voucher Program waiting list. Applicants will be added to the waiting list by a lottery system, when the application is open. Those that are added to the waitlist will be randomly assigned a lottery number and placed on the list in number order. Lottery applicants are selected from the waiting list in numerical order from lowest to highest.

Special Admissions

HHA may consider special admission for families in certain circumstances which may include families that are displaced because of demolition or disposition of a housing project or are residents in a multifamily rental housing project when HUD sells, forecloses, or demolishes the project.

Admissions and Continued Occupancy Policy

The Admissions and Continued Occupancy Policy (ACOP) guides the Public Housing and Section 8 New Construction occupancy in HHA-owned properties. HHA will affirmatively further fair housing by marketing the waiting list to promote a mix of applicants with various races, ethnic backgrounds, ages, and disabilities to be proportionate to the mix of those groups in the eligible population of the area. This will be achieved through the affirmative marketing plan which will take into consideration the number and distribution of vacant units, units that can be expected to become vacant because of move-outs and characteristics of families on the waiting list. Preferences for applicants on the waitlist for HHA housing may include site based preferences, preference to homeless households, preference for a police officer, and other factors like accessible units, income targeting and deconcentration.

HHA will work towards converting the community-wide waiting list to site-based waiting lists. It will contact all those on the central waiting list applicants to ask if they would like to switch to up to three different property's site-based waiting lists. HHA will phase out the central waiting list by only adding new applicants to site-based waiting lists. There are many potential benefits to using a site-based waiting list including achieving a broad range of incomes at each property and drawing applicants who may be interested in a specific property giving applicants greater choice in the application process.

Fair Housing Concerns

It is important that public policy does not inhibit fair housing choice through development codes and the provision of services. In fact, public policy should promote and encourage activities that further fair housing choice and reduce discrimination. The City and HHA have been working recently to enact policies that further fair housing. For the City, these include ReBuild Houston, the Payday Lending Ordinance, the Boarding Home Ordinance, and the Language Assistance Executive Order. Detailed concerns regarding fair housing and development policies by Planning/Communications can be reviewed in the appendix of this document.

8. Fair Housing Profile

This chapter of the report will provide a legal basis for fair housing in Houston. In addition, it will also discuss the existing organizational framework of fair housing services. Fair housing services typically include fair housing education, tenant/landlord education, and investigative and enforcement activities. It will also discuss recent data illustrating fair housing issues in Houston including fair housing complaint data and local information gathered about fair housing needs.

Legal Framework

Fair housing is a right protected by Federal, State, and Local laws. Almost every housing unit is subject to fair housing practices. The following will review various laws that impact the construction, rent, or sale of housing.

Federal Laws

"It is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States." (42 U.S.C. § 3601)

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968 recognized as the Federal Fair Housing Act and Fair Housing Amendments Act of 1988 are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation of real property. The Fair Housing Act prohibits discrimination based on the following protected classes

- Race
- Color
- National Origin
- Religion
- Sex
- Familial status (including children under the age of 18 living with parents or legal custodians, pregnant women and people securing custody of children under 18)
- Disability

No one may take any of the following actions based on a person's protected class

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions, or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting)
- Deny anyone access to or member in a facility or services (such as a multiple listing service) related to the sale or rental of housing

Architectural Barriers Act of 1968 requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974 prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act (ADA) of 1990 prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities.

All properties, open for occupancy after March 13, 1991, are required to be in compliance with design and construction requirements of the Federal Fair Housing Act and the Texas Fair Housing Act. Properties built before that date are required to make a reasonable modification of the existing premises or a reasonable accommodation in the rules, policies, practices, or services in order to afford a handicapped person equal opportunity to use and enjoy the dwelling.

Reasonable Modifications and Reasonable Accommodations

A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since rules, policies, practices, and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. The Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy the dwelling.

HUD Final Rule on Equal Access to Housing in HUD Programs

To better facilitate HUD's required obligations to affirmatively further the purposes of the Fair Housing Act for Entitlement Grantees and public housing agencies, HUD proposed a new structure and process replacing the AI with the Assessment of Fair Housing (AFH). The Affirmatively Furthering Fair Housing (AFFH) Proposed Rule was published July 19, 2013. Next, HUD published additional information about the Affirmatively Furthering Fair Housing Assessment Tool for public comment about the implementation of the AFFH Proposed Rule on September 26, 2014. The HUD Rule on Affirmatively Furthering Fair Housing was published in the Federal Register on July 16, 2015. Although these rules have not been implemented and the City of Houston's obligation is still under the former guidance of producing an AI, HCDD worked to incorporate as much information from the Assessment Tool as possible in this report.

Texas Laws

The Texas Fair Housing Act of 1993 (§15.001-§15.171) prohibits discrimination on the basis of race, religion, color, sex, national origin, disability, and familial status. The Act mirrors the Federal Fair Housing Act.

Local Laws

In May 2014, Houston City Council passed the Houston Equal Rights Ordinance (2014-530). This prohibits discrimination based on protected characteristics which are defined as an individual's sex, race, color, ethnicity, national origin, age, familial status, marital status, military status, religion, disability, sexual orientation, genetic information, gender identify, or pregnancy. The ordinance applies to businesses that serve the public, private employers, housing, city employment, and city contracting. Because of community opposition, this ordinance has been challenged and the Texas Supreme Court ruled in July 2016 that the challenge was valid and the ordinance must be rescinded or put up for a vote during the next election.

Fair Housing Education and Enforcement Organizations

Houston has several organizations engaged in fair housing education and in enforcement activities. The following five agencies have been very involved in fair housing education and/or enforcement within the Houston area. Other private, nonprofit, and governmental agencies have also been a part of fair housing education, but the following agencies have missions and/or large programs related to fair housing. Understanding the existing fair housing organizational structure and the data gathered from these organizations can help to provide information about how to best approach fair housing education in the future.

Greater Houston Fair Housing Center (GHFHC)

The Greater Houston Fair Housing Center (GHFHC) is a nonprofit organization which is a qualified fair housing enforcement organization and provides fair housing services in the metropolitan areas. GHFHC routinely is a recipient of HUD's Fair Housing Initiatives Program (FHIP). Fair housing organizations that receive funding through FHIP partner with HUD to assist people who believe they have been victims of housing discrimination, conduct preliminary investigation of claims, and promote fair housing laws and equal housing opportunity awareness.

Most recently GHFHC received FY 2014 FHIP funding in the amount of \$325,000 to perform enforcement services including conducting investigations and performing fair housing enforcement tests and accessibility and design audits and \$124,972 to provide education and outreach services in the Houston metropolitan area. GHFHC was one of three agencies in Texas to receive FY 2014 FHIP funding.

Houston Area Urban League (HAUL)

The Houston Area Urban League (HAUL) also received FHIP funding, most recently in FY 2012, to carry out fair housing education in Houston during the last five years. HAUL provides direct assistance to victims of fair housing and fair lending laws. It also conducts group outreach and education as well as individual housing counseling.

Texas Low Income Housing Information Service

Texas Low Income Housing Information Service (TxLIHIS) is a nonprofit organization based in Austin, Texas with an office in Houston. TxLIHIS began a Community Chat Series in October 2014 in support of educating community members on fair housing issues. The first Community Chat occurred in October 2014 at the Palm Center and had a representative from both HCDD and HCDD's consultant to discuss the Market Value Analysis recently conducted. The November 2014 meeting hosted Dr. Robert Bullard from Texas Southern University's Barbara Jordan-Mickey Leland School of Public Affairs to discuss neighborhood environmental justice issues in Houston's historically low income and minority communities. In April 2015, TxLIHIS hosted a People's Fair Housing Forum to discuss fair housing issues in Houston.

City of Houston Housing and Community Development Department (HCDD)

HCDD also carries out various fair housing education campaigns throughout the year, which has included making fair housing presentations at public hearings, making fair housing materials available at community meetings and events, and sending fair housing flyers through the mail to residents' homes. The City of Houston Fair Housing Hotline is also advertised to the community as an educational resource for fair housing and tenant/landlord issues. Fair Housing Hotline staff refers callers to HUD for investigation if staff is concerned that a caller's rights have been violated.

There are only select local governments in Texas that can perform fair housing investigative activities: Austin, Fort Worth, Dallas, Corpus Christi, and Garland. The City of Houston has not been certified by HUD as a substantially equivalent agency. Therefore, the City cannot investigate potential fair housing discrimination or enforce fair housing laws. In 2014, the City Council passed an Equal Rights ordinance which has had significant opposition from a few community members and may be withdrawn.

Texas Workforce Commission

The Texas Workforce Commission Civil Right Division is one of two administrative agencies that processes and investigates fair housing complaints.

U.S. Department of Housing and Urban Development (HUD)

The U.S. Department of Housing and Urban Development (HUD) is the second of two administrative agencies that processes and investigates fair housing complaints. Sometimes HUD will refer complaints to other Federal agencies to investigate which includes the Department of Justice and the Federal Bureau of Investigations when violence or threats are involved.

HUD Fair Housing Complaints

Fair housing complaints can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. The following analysis considers fair housing complaint data filed against respondents in the City of Houston with the U.S. Department of Housing and Urban Development (HUD) between 2005 and 2014. Using this data, the report identifies and analyzes the following

- The absolute number of complaints filed with HUD in Houston
- The basis of complaints filed
- The issues of complaints filed
- The complaint closures and variations in outcomes of cases

While conducting the analysis, several data limitations were identified. The following summarizes the most important limitations of the two datasets. However, it is not an exhaustive list.

- Because the complaint process relies on people self-reporting, the data represents only complaints filed. This does not represent all acts of housing discrimination, as all incidents may not be reported.
- While nine years of data provides a basis for simple analysis, a longitudinal approach of complaint outcomes is not possible in this analysis.
- HUD's dataset only includes closed cases that were filed within this time period.

Summary of Findings from HUD Complaints

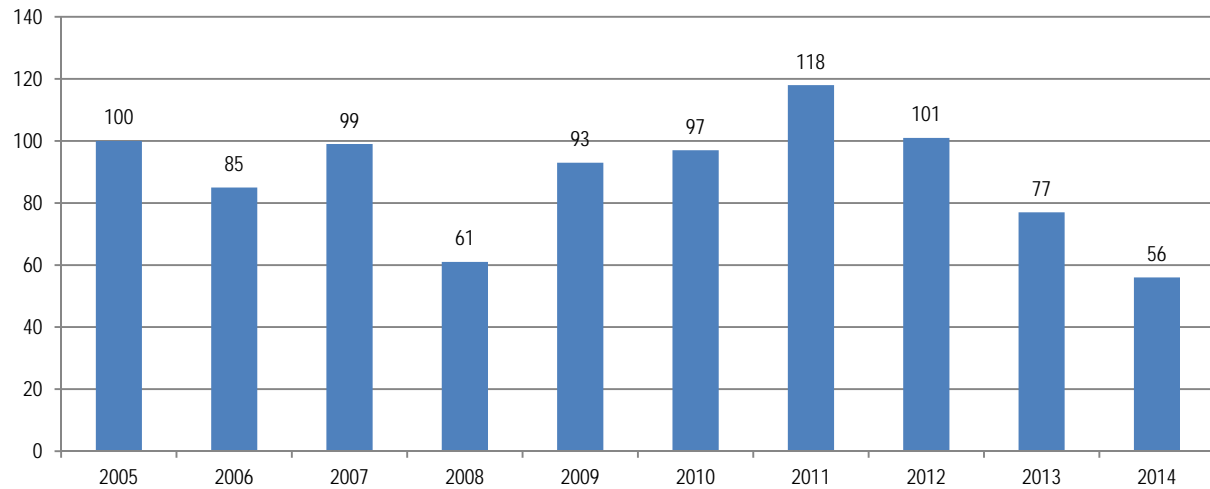
The following summarizes the analysis of complaints filed from 2005 through 2014:

- The total of closed HUD complaints filed against respondents in Houston was 887.
- The two largest shares of complaints by bases are racial discrimination (34%) and disability discrimination (33%).
- The share of complaints with the basis of disability discrimination has grown over the past ten years, from 26% in 2005 to 35% in 2014.
- Although the third most cited basis of complaints in the last ten years, the share of complaints with the basis of national origin has decreased since 2005, from 18% in 2005 to 4% in 2014.
- The issue most identified in complaints in the past nine years was discriminatory terms, conditions, privileges, services, and facilities in the rental or sale of property. This issue has grown from 12% of issues alleged in 2005 to 33% of issues alleged in 2014.
- Most issues identified in complaints were related to discrimination in rental housing.
- The closure rates by category generally matched those of the nation according to HUD's *FY 2011 Annual Report on Fair Housing*.

Housing Discrimination Complaints

Figure 21 shows the number of housing discrimination complaints filed with HUD during the period from 2005 to 2014.

Figure 21: Number of Closed Fair Housing Complaints Filed 2005-2014



Source: HUD

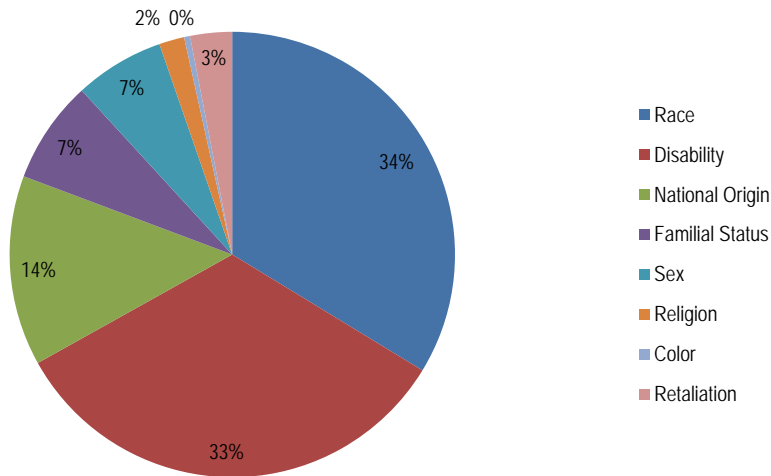
The total of HUD complaints was 887. The total number of complaints filed was at its peak in 2011 with 118 complaints filed in the City of Houston to HUD. This data illustrates closed HUD complaints. As complaints take five months to close on average, the most recent year will have a lower number of closed complaints as some filed complaints will still be open and under investigation.

Basis of Complaints

All complaints filed must allege a basis for discrimination. The Fair Housing Act lists seven prohibited bases for discrimination: race, color, national origin, religion, sex, disability, and familial status. The Fair Housing Act makes it unlawful to coerce, threaten, intimidate, or interfere with anyone exercising or aiding other in enjoying their fair housing rights. From 2005 to 2014, a total of 1,151 bases in complaints were filed with HUD against Houston respondents. If a single complaint alleged multiple bases, it was counted under each basis alleged.

Figure 22 shows that the majority of complaints in the past ten years cited racial discrimination as a reason for the complaint (34%), being alleged as a basis of 388 complaints. Disability discrimination was the second most common basis of complaints, being cited as a basis for 382 complaints, or 33% of the total complaints within the past ten years.

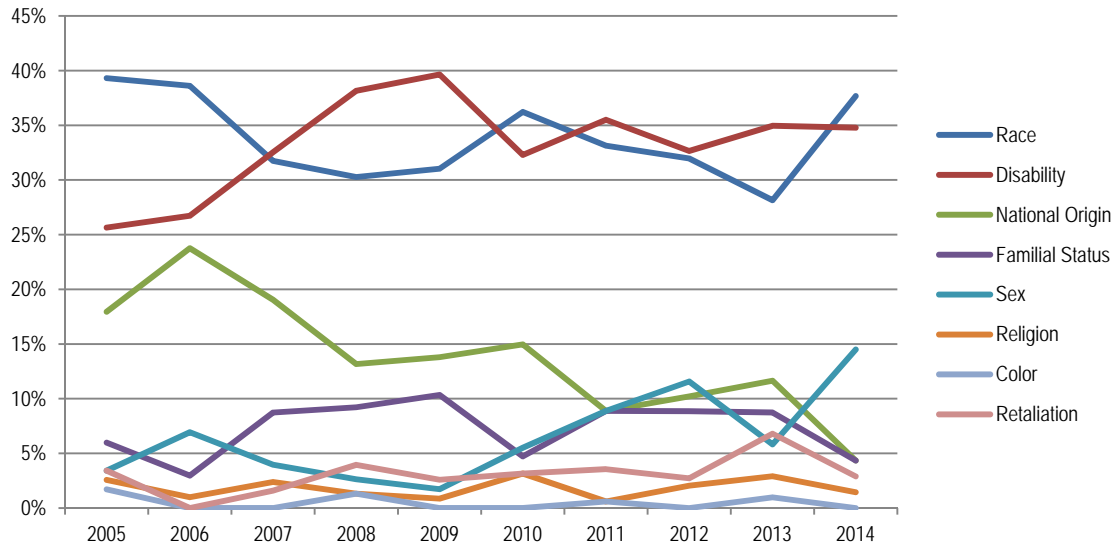
Figure 22: Total HUD Closed Complaints by Basis 2005-2014



Source: HUD

This data reflects a notable trend in the share of disability complaints. Whereas disability accounted for a share much less of the overall complaints than race in 2005 and 2006, the gap between these bases has become smaller. In four of the past five years, the amount of disability complaints has even surpassed complaints with race basis in recent years as illustrated below.

Figure 23: Basis of Closed Complaints by Year



Source: HUD

In the past ten years, the share of complaints with a basis of national origin has decreased considerably, by -12% points comparing 2005 and 2014 with 2014 having lowest percentage of national origin complaints at 4%. National origin has approximately twice as many complaints during this time period compared to familial status and sex. It is the third highest basis alleged in the overall amount of complaints with 159 complaints filed in the past ten years, 14% of the overall total.

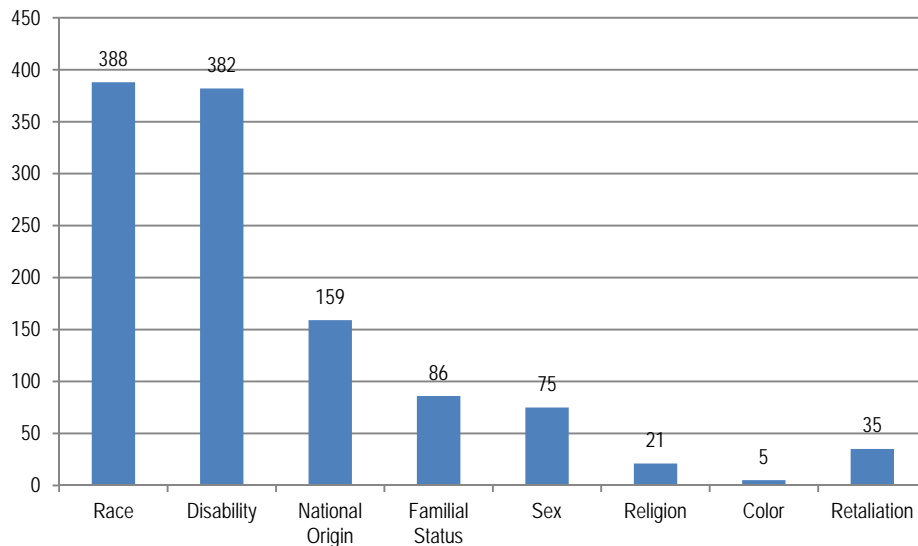
Familial status and sex were the fourth and fifth most common complaints in the time period from 2005-2014. Familial status was cited as a basis for 86 complaints, or 7% of the overall total. Sex was alleged in 75 complaints, or 7% of the overall total.

In the past ten years, retaliation, religion, and color were the least common bases of complaints filed with HUD. Retaliation was cited as a basis for 35 complaints, or 3% of the overall total. Religion was cited as a basis for 21 complaints, or 2% of the overall total, and color was cited as the basis for 5 complaints, or 0.4% of the overall total.

According to the National Fair Housing Alliance's *2013 Fair Housing Trends Report* and HUD's *FY 2011 Annual Report on Fair Housing*, disability complaints remain the greatest percentage of all nationwide complaints for the past five years. For three of the past five years in Houston, complaints with the basis of disability have been higher than race complaints in Houston.

Figure 24 illustrates the 1,151 bases alleged in the 887 complaints filed between 2005 and 2014.

Figure 24: Closed Complaints by Basis Filed with HUD 2005-2014



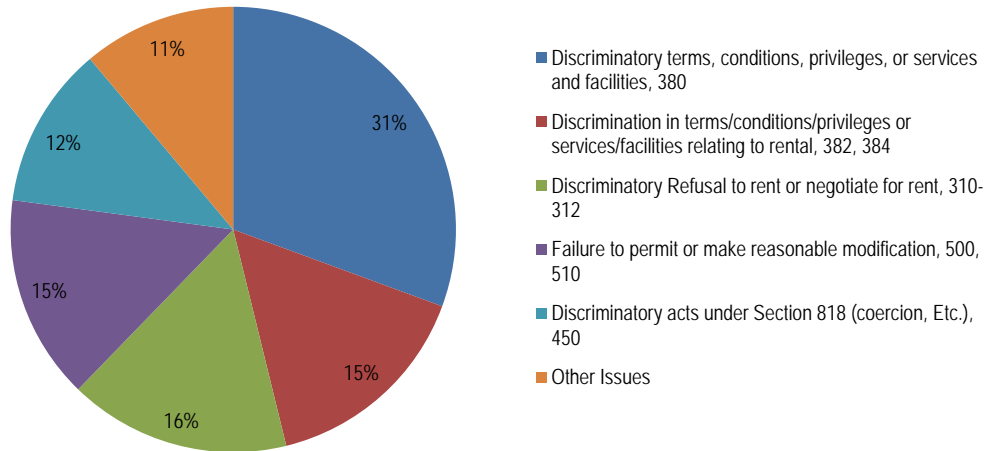
Source: HUD

Issues in Complaints

All complaints must specify the discriminatory actions that allegedly violated or would violate the Fair Housing Act. HUD records these discriminatory practices in overarching categories known as “issues”.

Figure 25 shows the percentage of complaints by issue filed with HUD from 2005 to 2014. If a single complaint alleged multiple issues, it was counted under each issue alleged. There were a total of 1,529 issues filed in the past ten years.

Figure 25: Issues in HUD Closed Complaints 2005-2014



Source: HUD

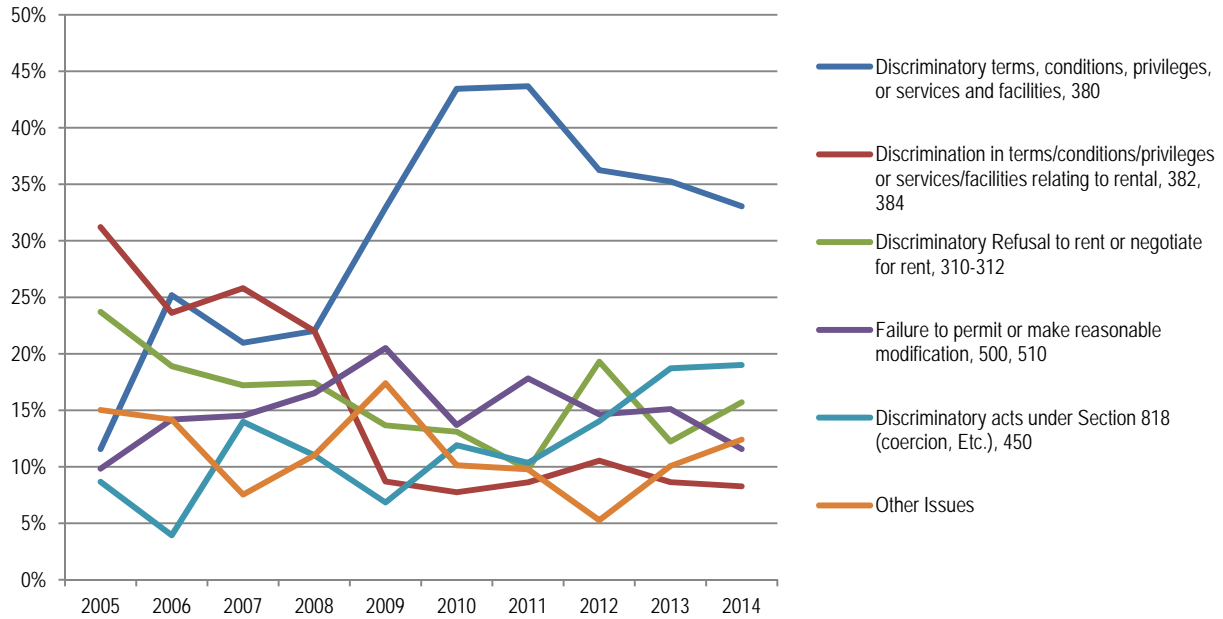
The most common issue in complaints filed within the past ten years was discriminatory terms, conditions, privileges, services, and facilities. This was by far the most common issue in complaints cited in almost one third, or 468, of all the total issues filed in complaints.

The second and third most common categories of issues in complaints were discrimination in terms/conditions/privileges or services/facilities relating to rental with 238 complaints, or 17% of the total complaints, and discriminatory refusal to rent or negotiate for rent with 246 complaints, or 16% of the overall total.

Not far behind is failure to permit or make reasonable modification with 227 complaints, or 15% of the overall total. The issue, discriminatory acts under Section 818 (coercion, etc.), had 180 complaints, or 11% of the overall total.

The remaining issue categories were each cited in less than 11% of the complaints. These other issues together consisted of 147 complaints, or 11% of the overall total of complaints filed and closed within the past ten years.

Figure 26: Issues in HUD Closed Complaints 2005-2014

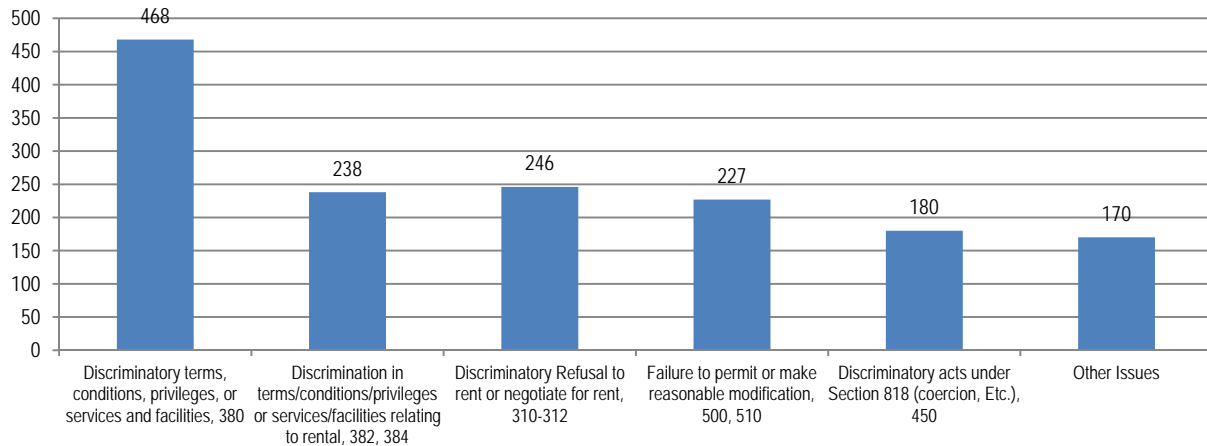


Source: HUD

The top issue cited in complaints made in Houston matched that of the nation, discriminatory terms, conditions, privileges, services, and facilities (*FY 2011 Annual Report on Fair Housing, HUD*). As illustrated in Figure 26, the share of issues alleging discriminatory terms, conditions, privileges, or services and facilities has increased in the past ten years, from 12% in 2005 to 33% in 2014. In addition, the share of issues based on discrimination in terms/conditions/privileges or services/facilities relating to rental decreased over the past ten years, from 31% in 2005 to 8% in 2014.

Figure 27 illustrates the distribution of the alleged issues for the total complaints from 2005 to 2014.

Figure 27: Closed Complaints by Issue Filed with HUD 2005-2014



Source: HUD

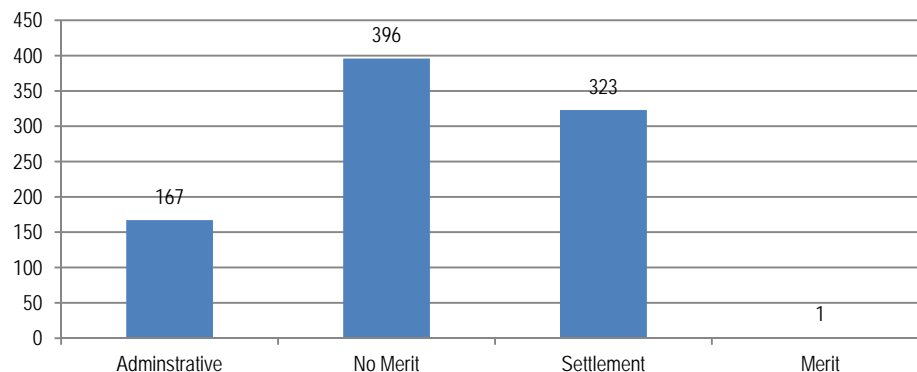
HUD Complaint Closures

The closing categories provided by HUD were aggregated into four general categories. The following provides details on the closure categories used in this analysis

- **Administrative closures:** This category includes cases closed for reason unconnected to merit determination including: untimely filed, dismissal for lack of jurisdiction, unable to locate complainant, complainant failed to cooperate, unable to identify respondent, and complaint withdrawn by complainant without resolution.
- **No merit closure:** These cases are closed because an investigation found insufficient evidence to prove violations.
- **Settlement closures:** This category includes cases closed because a resolution was reached prior to a determination: conciliation, settlement successful, and complaint withdrawn by complainant after resolution.
- **Merit-based closures:** These are cases closed after a merit determination has been made and includes a FHAP Judicial Consent Order.

The total number of complaints filed and closed HUD between 2005 and 2014 was 887 complaints. Other complaints may have been filed during this time period but were not included in this data because they were filed but not closed. The following shows the combined outcomes of complaints closed by HUD in the past ten years.

Figure 28: Number of Complaints by Closure Category with HUD 2005-2014



Source: HUD

The largest category of housing complaints was closed because an investigation found insufficient evidence to prove a violation (45%). The second largest category was cases closed through a settlement (36%), followed by administrative closures (19%). HUD reported one case in the last ten years that was closed under the category of merit.

In general, the closure rates by category matched those of the nation, according to HUD's *FY 2011 Annual Report on Fair Housing*.

Local Fair Housing Information

The following examines data from local sources which also illustrates the fair housing climate in Houston.

Greater Houston Fair Housing Center (GHFHC)

The Greater Houston Fair Housing Center (GHFHC) assists people who may have been discriminated against by helping file fair housing complaints with HUD and supporting them through the complaint and investigatory process. The following are the complaints from the past four years. GHFHC's data reflects that of the complaint data from HUD. The greatest number of complaints by basis was Handicap/Disability, National Origin, and Race. The basis of National Origin was slightly higher in the past four years of GHFHC's data than the HUD complaint data from the past nine years.

Table 56: GHFHC's Complaints Breakdown of Cases by Protected Basis*

	1/25/2010 to 1/24/2011	3/21/2011 to 3/20/2012	3/21/2012 to 3/20/2013	3/21/2013 to 3/20/2014
Race	62	84	113	134
Religion	3	6	1	4
Color	0	0	1	0
Sex	2	13	15	28
Handicap	104	93	130	158
National Origin	89	131	92	83
Familial Status	15	66	24	27

* Please note that more than one basis of discrimination is sometimes alleged in a single case.
 Source: Greater Houston Fair Housing Center

The issues of the complaints taken by GHFHC also reflect HUD's complaint data. Both show that most complaints are related to the rental of housing.

Table 57: GHFHC's Complaints Breakdown of Cases by Issue*

	1/25/2010 to 1/24/2011	3/21/2011 to 3/20/2012	3/21/2012 to 3/20/2013	3/21/2013 to 3/20/2014
Rental	199	311	309	300
Sales	13	21	2	3
Advertising	0	2	0	0
Lending (including redlining)	4	2	1	2
Interference, Coercion, etc.	0	0	0	3
Zoning: Disability Issues	0	0	0	0
Zoning: Other Issues	0	0	0	5

* Please note that more than one basis of discrimination is sometimes alleged in a single case.
 Source: Greater Houston Fair Housing Center

GHFHC is currently the only entity that conducts fair housing testing on a regular basis in the Houston metro area. Fair housing testing is a way to uncover evidence of fair housing discrimination. GHFHC uses paired testing in which two volunteer testers have, to the extent possible, the same in background, employment, and even educational characteristics differing only by a protected class like race, disability, or national origin. Testers then go to the same housing provider and try to obtain housing. After meeting with housing providers, both testers fill out a standardized form and GHFHC staff analyzes and evaluates these forms to determine if differential treatment had occurred. In the past four years GHFHC conducted testing on the basis of National Origin, Race, Handicap, and Familial Status. Testing only occurred in rental housing.

Table 58: GHFHC's Tests Breakdown of Cases by Protected Basis*

	1/25/2010 to 1/24/2011	3/21/2011 to 3/20/2012	3/21/2012 to 3/20/2013	3/21/2013 to 3/20/2014
Race	37	66	75	64
Religion	0	0	0	0
Color	0	0	0	0
Sex	0	0	0	0
Handicap	5	4	7	39
National Origin	32	44	24	17
Familial Status	14	6	12	5
* Please note that more than one basis of discrimination is sometimes alleged in a single case.				
Source: Greater Houston Fair Housing Center				

City of Houston Fair Housing Hotline

Staff from the City of Houston's Housing and Community Development Department is available to take calls and answer questions or make referrals on the Fair Housing Hotline every weekday during business hours. This is also sometimes referred to as the Fair Housing Hotline. During the last completed program year from July 1, 2013 to June 30, 2014 (PY 2013), HCDD staff received 1,848 calls through the Hotline. The majority of the calls pertained to Landlord/Tenant Relations (37.1%) and Repairs (28.1%). Repair topics included general repairs, pests, mold, and HVAC problems. Other calls received included those about Eviction representing 13.1% of all the calls, Rents or Money representing 10.1% of calls, and miscellaneous topics including questions about housing authorities and general information representing 11.7% of the calls.

This is an important resource for residents and landlords alike to gain information about the laws dictating tenant and landlord relationships. Many times renters do not understand their rights or the process in which a landlord can begin the eviction process. Simple actions, like paying rent in a timely manner or keeping a record of repair requests, can help protect tenants. Free information and referrals that residents can collect through the Fair Housing Hotline is very important to extending education to Houstonians.

Fair Housing Stakeholder Survey

In March and April of 2014, HCDD conducted a Fair Housing Stakeholder Survey. The goal of the survey was to assess local knowledge and receive qualitative fair housing information from a diverse set of organizations from the private, public and nonprofit sectors that serve various protected classes.

Only some survey respondents had received fair housing training, and respondents who had received training, received training from the following sources: Federal Government (HUD/FHEO), City of Houston, national non-profit organizations like the Fair Housing Alliance, local nonprofit organization including the Coalition for the Homeless, Houston Center for Independent Learning (HCIL), and the Greater Houston Fair Housing Center (GHFHC), and internal or industry sponsored training.

Survey participants most often referred clients with fair housing questions and concerns to HUD, GHFHC, HCDD's Fair Housing Hotline, Disability Rights of Texas, or private attorneys. While not all survey participants made fair housing referrals, most made referrals to appropriate organizations.

Most survey respondents agreed that more fair housing information should be made available. The list of general topics named included

- How to file a claim/What to do if you are discriminated against/Who to contact
- Overview and purpose of Fair Housing Act
- How to recognize discrimination
- Tenant rights

Fair housing information for agencies was requested and these topics of information included

- Best ways to support clients who experience discrimination
- More detailed “how to” for service providers
- Information about transgender accommodation for housing agencies

While this survey was only conducted with a small group of stakeholders, it does represent the need for greater fair housing education for residents and agency stakeholders. It also shows the kinds of education that could be most beneficial.

Fair Housing Lawsuits

According to two litigation sections in the City of Houston’s Attorney’s Office, there are no pending fair housing complaints or fair housing lawsuits filed against the City of Houston. There is one outstanding issue that indirectly affects fair housing. The Equal Rights Ordinance passed by City Council in 2014 has been challenged and a lawsuit is pending. The Plaintiffs allege that the Ordinance was not done in proper order and that the issue should be voted by the residents instead of passed by City Council. The Equal Rights Ordinance includes the language previously incorporated into Chapter 17 of the City’s Code of Ordinances and includes information about fair housing enforcement. The implementation of the Equal Rights Ordinance is waiting for litigation to end and a final decision is made. Although the opposition to the Ordinance does not directly relate to fair housing, it does illustrate the contention of equal rights laws.

Community Attitudes

Defining community attitudes about groups within the community is very difficult, however there are a few ways in which attitudes can be accessed.

Housing Discrimination

Two national studies regarding housing discrimination shed light on the varying attitudes in the country as a whole. Although the data from different Metropolitan Statistical Areas (MSAs) are combined for analysis, the Houston MSA was a part of both these studies.

One study conducted paired testing for those seeking both rental and for sale units based on race and ethnicity. This study showed that there has been a decrease in the past 30 years in the most blatant forms of housing discrimination, meaning refusing to meet with a minority homeseeker or provide information about any available units. But, the study found that more discrete forms of housing discrimination still persist, mostly that minorities are not shown the same number of units as their equally qualified white counterpart. This kind of discrimination is very hard to detect by those who are victims and can raise the costs of housing and restrict housing options for minorities. The appendix of this HUD study included metro-specific rental estimates. It found that Whites were told about more units and were shown more units than Blacks or Hispanics. The average rent and yearly net costs quoted were the same for Black and White homeseekers, however whites were offered both short term and long term leases and were told that fees and deposits were negotiable. Hispanic renters are more likely to be told about few units and also face a higher average rental cost, \$14 more a month, than White homeseekers. In addition agents are more likely to comment about a Hispanic homeseekers credit score and background check and they are more likely to follow up with White homeseekers than Hispanic.²⁵

²⁵ Urban Institute. (June 2013). *Housing Discrimination Against Racial and Ethnic Minorities 2012*. U.S. Department of Housing and Urban Development Office of Policy Development and Research. Retrieved from http://www.huduser.org/portal/Publications/pdf/HUD-514_HDS2012.pdf

Another recent study completed by the Urban Institute found that deaf or hard of hearing and people who use wheelchairs were treated differently when seeking rental housing.²⁶ This nationwide study conducted paired testing in two different ways. First, tests with people who are deaf or hard of hearing focused on housing searches conducted with telecommunications relay services (TRSs). These tests found that housing providers were less likely to respond to potential renters who are deaf and hard of hearing and also are less likely to tell those potential renters with hearing difficulty about available units. Second, tests with people who use wheelchairs focused on housing searches for accessible buildings and housing units. These tests revealed that: 1) less than half (44%) of the advertisements randomly selected for paired testing were accessible units, 2) potential renters who use wheelchairs were treated less favorably than other qualified renters, and 3) housing providers denied 7% of requests and failed to provide a clear response 21% of the time for potential renters who use wheelchairs asking if the housing provider would allow modifications. Although Houston was one of the 30 MSAs where these paired tests were conducted, no specific conclusions about the Houston area were made in this study.

Interethnic Relations

Dr. Stephen Klineberg of Rice University's Kinder Institute has performed the Houston Area Survey for 34 years. The Survey measures the attitudes of the population and is a source of data showing community attitudes in a longitudinal scientific survey. Since 1992, survey respondents have asked to assess the overall relations among racial or ethnic groups in the Houston area today. The proportion of area resident giving positive ratings ("excellent" and "good") has increased steadily in all of Houston ethnic communities across the years. In 1992, the percent rating ethnic relations as positive was 27% of Latinos, 21% of Anglos, and 14% of Blacks. In 2015, the percent of respondents rating ethnic relations as positive was 56% of Anglos, 46% of Latinos, and 36% of Blacks.²⁷

The Houston Area Survey also measured attitudes about immigrants. The 2015 findings confirmed the 2014 increasingly favorable attitudes from questions measuring attitudes toward undocumented immigrants and beliefs about the impact of immigration on the local economy. Although, decreasing since 2013, the percent of area residents in favor of the United States admitting more or the same number of immigrants in the next 10 years that were admitted in the last 10 years has grown from 54% in 2009 to 69% in 2013. The proportion of area residents in favor of "granting illegal immigrants a path to legal citizenship if they speak English and have not criminal record" has continued to increase, from 64% in 2009 to 72% in 2015. Finally, residents also have increased their favor about new immigration.²⁸

NIMBYism

Many people agree that affordable housing, which includes housing available for people with special needs like persons who are homeless or persons with disabilities, should be available throughout the city. According to the Community Needs Survey in support of the 2015-2019 Consolidated Plan, 80% of people surveyed thought that affordable housing should be located throughout the city. However, sometimes when affordable housing is located within some neighborhoods, there is opposition.

The Not In My Back Yard (NIMBY) sentiment can serve as a significant constraint to the development of affordable housing or even market-rate multifamily housing. NIMBYism describes opposition by residents and public officials to the inclusion of additional or different kinds of housing units in their neighborhoods and communities. NIMBY resistance can be opposition to specific types of housing or kind of developer or just general opposition to any form of development or changes to the community. NIMBYism often reflects concerns about property values, service levels,

²⁶ Urban Institute. (June 2015). *Discrimination in the Rental Housing Market Against People who are Deaf and People who use Wheelchairs: National Study Findings*. U.S. Department of Housing and Urban Development Office of Policy Development and Research. Retrieved from http://www.huduser.org/portal/sites/default/files/pdf/HDS_Disabilities.pdf

²⁷ Rice University Kinder Institute of Urban Research. (2015). *The 34th Annual Kinder Houston Area Survey: Perspectives on a City in Transition*. Retrieved from <https://kinder.rice.edu/content.aspx?id=2147486871&blogid=306>

²⁸ Ibid

community ambience, the environment, or public health or safety. However, it can also reflect racial, ethnic, or other prejudices concealed under a legitimate concern.

One recent example of NIMBYism publicized by *The Houston Chronicle* in March of 2014 was the City Council's vote for support of the Women's Home tax credit application for an affordable apartment development of approximately 80 units for mothers and children in the Houston neighborhood of Spring Branch. Opposition, both from community representatives and public officials, argued that the neighborhood had its fair share of affordable apartments and that revitalization efforts should focus on ownership housing instead of apartments. The City Council ultimately voted 11-5 supporting a Resolution of Support for a tax credit application for the Women's Home Phase II housing development, but this is one recent example of opposition to affordable housing.

(Fraser, Jayme. Spring Branch residents divided over proposed apartment development, March 25, 2014, *The Houston Chronicle*. <http://www.houstonchronicle.com/news/politics/houston/article/Spring-Branch-residents-divided-over-proposed-5349218.php#0>)

Hate Crimes

While Houston has not passed any anti-NIMBYism legislation or ordinances, HCDD removed the developer requirement for elected officials to approve of the proposed affordable rental housing application when developers applied for HCDD's grant funds. HCDD strives to promote the need for quality affordable housing in Houston, however sometimes prejudices are engrained into a person's psyche and require not only education but also time.

Hate crimes are violent acts against people, property, or organizations motivated in whole or in part by a bias related to a victim's perceived race, ethnicity, religion, gender, sexual orientation, national origin, or physical or mental disability. These crimes are a fair housing concern because it may reveal hidden attitudes in the community. In addition, the rate at which hate crimes occur may also deter potential residents from residing in certain neighborhoods or cities from fear of harm or harassment.

The Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects data on instances and types of hate crimes. For this analysis, crime statistics for the most recently available nine year period (2005-2013) were reviewed for trends that may indicate pervasive discriminatory attitudes in the City of Houston.

The FBI's Reports indicate that Houston hate crimes decreased and have remained constant for the past five years. This is also similar to hate crimes declining in Texas. As the following table depicts, between 2005 and 2013, a total of 174 hate crimes were reported in the City of Houston. In total, Houston had the second highest number of hate crimes reported during this time period, second to Dallas with 211 hate crimes.²⁹ In 2007, 2008, and 2009 Houston had the most hate crimes reported out of all other cities in Texas.

²⁹ Federal Bureau of Investigation. FBI Uniform Crime Report (Data). <http://www.fbi.gov/stats-services/crimestats>

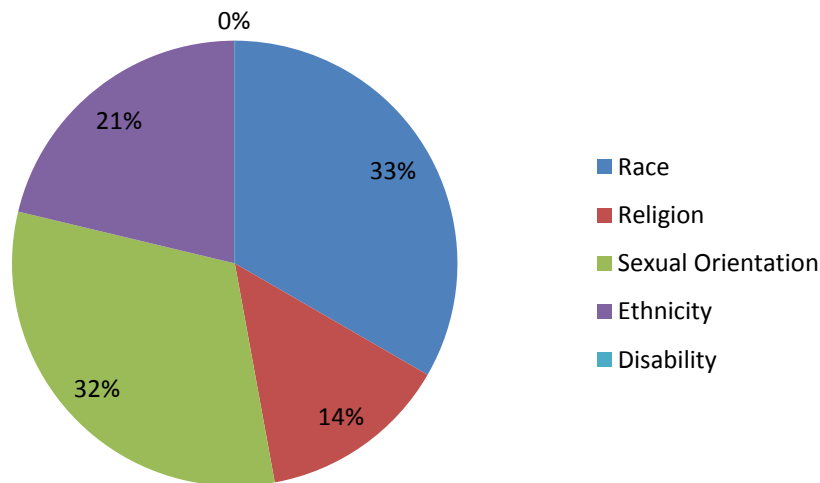
Table 59: Hate Crimes by Bias Motivation in Houston and Texas 2005-2013

		Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
2005	Houston*	7	9	4	4	0	24
	Texas	122	36	63	43	0	264
2006	Houston	8	1	4	7	0	20
	Texas	124	27	47	46	1	245
2007	Houston	12	3	11	10	0	36
	Texas	130	20	46	46	0	242
2008	Houston	10	6	10	2	0	28
	Texas	131	25	55	35	0	246
2009	Houston	4	1	5	4	0	14
	Texas	84	18	36	27	0	165
2010	Houston	5	0	6	2	0	13
	Texas	75	19	34	28	0	156
2011	Houston	4	1	4	4	0	13
	Texas	45	19	43	22	0	129
2012	Houston	4	3	6	0	0	13
	Texas	56	19	49	27	1	152
2013	Houston	4	0	5	4	0	13
	Texas	54	7	44	25	2	132

Source: FBI Uniform Crime Report: <http://www.fbi.gov/stats-services/crimestats>
 *only three quarters reported

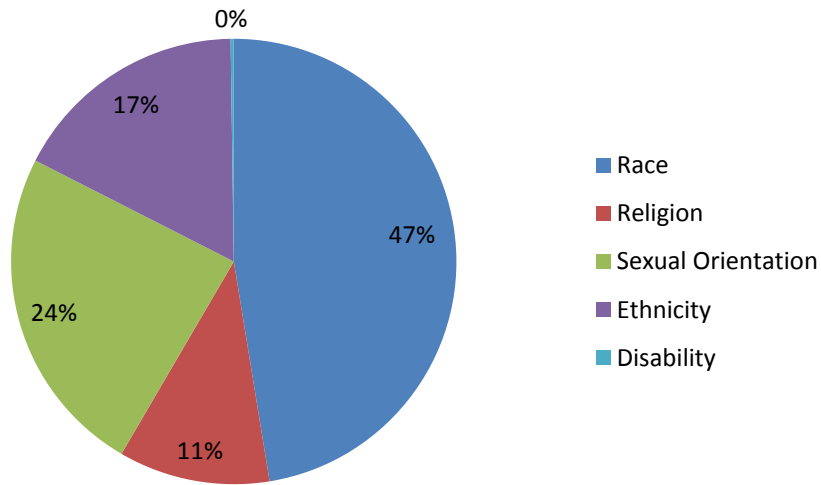
Of the 174 hate crimes reported in Houston 33% were motivated by race which was less than the Texas percentage motivated by race at 47%. A higher percentage of crimes reported in Houston were motivated by religion, sexual orientation, and ethnicity compared to the state of Texas. Although not insignificant, the number of hate crimes reported in Houston are similar or lower compared to other cities of similar size in the nation.

Figure 29: Hate Crimes by Bias Motivation in Houston 2005-2013



Source: FBI Uniform Crime Stats: <http://www.fbi.gov/stats-services/crimestats>

Figure 30: Hate Crimes by Bias Motivation in Texas 2005-2013



Source: FBI Uniform Crime Stats: <http://www.fbi.gov/stats-services/crimestats>

Fair Housing Concerns

Complaint and other local data as well as a qualitative review of affordable housing sentiment shows some of the factors that influence fair housing choice in Houston. Complaint data from HUD shows that the majority of complaints have the basis of disability and race. In the past 9 years, there have been approximately 100 fair housing complaints per year made to HUD. In a city of more than two million residents, the number of complaints alleged seems rather low. The number of fair housing complaints filed cannot exclusively be used to determine if there is a fair housing problem in a community. For example, a community with a relatively high number of complaints could be a reflection of an effective public education program that has successfully informed residents about their fair housing rights and how to exercise them. Or it could mean that there is a problem with discrimination, especially if the complaints are filed on the same basis. Conversely, a community with a relatively low number of complaints may mean that there is no problem with discrimination. Or it could mean residents do not know their fair housing rights or how to exercise their rights.

As discussed in a previous chapter of the report, there is a clear disparity between race, ethnicity, and sex related to private lending. In Houston, most fair housing complaints refer to discrimination in rental housing. Of most concern in rental housing, according to the recent complaint data, is discrimination based on disability, race, and national origin. Complaint data can be used to monitor existing conditions in Houston, as well as a key source of information for organizations regarding fair housing education needed in the community.

Education is believed to be one of the most important tools in ensuring that fair housing opportunities are provided and therefore, is one of the most important components of fair housing services. Education gives residents the knowledge to understand their rights and responsibilities, to recognize discrimination, and to locate resources if they need to file a complaint or need general assistance. Although there are several organizations that carry out fair housing education on a regular basis, funding and other resources for fair housing services are scarce.

There is limited local fair housing enforcement in Houston. Results from the citizen participation process also reveal that the lack of enforcement can be a barrier. Not only enforcement of fair housing is important but also the enforcement of other codes and regulations related to conditions at multifamily properties and boarding homes for persons with disabilities is important to keep members of protected classes safe.

It is difficult to know when and why neighborhood or public official opposition will be revealed in the development of affordable housing or other housing that could benefit protected classes. Understanding personal views can be hard to measure or predict. NIMBYism was also named as a fair housing issue in Houston during the Fair Housing Forum.

9. Progress since Previous AI

2010 Analysis of Impediments to Fair Housing Choice

The following summarizes key findings from the most recent AI, from 2010, in order to evaluate the progress and actions toward addressing impediments to fair housing choice over the past five years. The 2010 AI was originally prepared by the Greater Houston Fair Housing Center Inc. In a letter dated November 30, 2011, HUD's Fair Housing and Equal Opportunity (FHEO) office in Houston determined that the 2010 AI was incomplete and lacked sufficient data and analyses. The 2010 AI was revised as a part of the 2013 CAPER. The revisions addressed the three main issues identified in the letter and included data for twelve other potential impediments identified by HUD. The revised AI was completed by International Development and Planning LLC (IDP), subcontractors hired by HUD's OneCPD contractor Enterprise Communities. Although data from the potential impediments was included in the amended AI, no additional impediments were officially added because the 2015 AI was already under development when the amended AI was completed.

The following progress reviews only those impediments listed in the original 2010 AI, and the following only includes a summary of some activities completed. Each year, the CAPER includes a more detailed accomplishment summary of completed activities addressing impediments. As described in the FHEO letter, there were no quantifiable measures incorporated into the 2010 AI, and some of the recommendations did not clearly support the elimination of the impediment. However, when reporting accomplishments in the CAPER, HCDD quantified the fair housing accomplishments when possible.

Many of the actions and recommendations from the 2010 AI are repeated for several impediments. The following will try not to repeat summaries for each impediment with the same or similar recommendations. Although activities can and do address multiple impediments, for the following, only some highlights will be addressed. Below the impediments will be named, the 2010 AI recommendations for the impediment will be introduced, and finally highlighted actions from the past five years to address the identified impediment will be summarized.

Summary of Actions Taken to Address 2010 Identified Impediments

Impediment #1: Discrimination against Disabled

Impediment #2: Discrimination against Race

Impediment #3: Discrimination against National Origin

Impediment #4: Discrimination against Families with Children

2010 AI Recommendations: The City should increase fair housing education and outreach. The City should support fair housing enforcement. The City should continue efforts to pass a substantially equivalent Fair Housing Ordinance.

Efforts to Overcome Impediments: HCDD and the City of Houston have endeavored to increase fair housing education and outreach over the last few years to decrease discrimination in housing. This has included training and information for HCDD staff, HCDD subrecipients, HCDD's stakeholders, and information provided to the general public.

The City of Houston has promoted Fair Housing Month in April. In April 2012, the Houston City Council passed an ordinance declaring April as fair housing month. In April 2013, the Houston City Council passed an ordinance declaring April as fair housing month in Houston in perpetuity. In support of this ordinance, HCDD conducted fair housing trainings and informational campaigns during the month of April. In April 2013, HCDD sent a fair housing flyer in English and Spanish to more than 200,000 households in resident's water bill. The most recent fair housing campaign was in April 2014 named "Houston Be Fair: Fair Housing is a Right for Everyone." In this multilingual

campaign HCDD reached tens of thousands of people by placing posters in more than 150 city buildings including multi-service centers, health clinics, libraries, police department storefronts, and parks and recreation community centers. In addition, posters were given to CDBG, HOPWA, and ESG subrecipients. Also, postcards were mailed to an estimated 40,000 renter households in low- and moderate-income areas with information about fair housing in English and Spanish. We estimate that these actions together have resulted in outreach to more than one million citizens in Houston.

The City does not currently enforce fair housing laws because HUD has not certified the City as a substantially equivalent jurisdiction. In May 2014, the City of Houston passed an ordinance that created a new equal rights chapter in the municipal code to address discrimination in city employment, city contracting, housing, public accommodations, and private employment. There was substantial community opposition to this change and opponents to the ordinance gathered 50,000 signatures to force a repeal referendum. The City Attorney disqualified many of the signatures. Three months after the a state district judge ruled that opponents had not gathered enough signatures, in July 2015 the Texas Supreme Court ruled that the Houston City Council must repeal the city's equal rights ordinance or place it on the November 2015 ballot.

Impediment #5: Lack of accessible housing

2010 AI Recommendations: The City should increase fair housing education and outreach. The City should support fair housing enforcement. The city should increase efforts to create more accessible housing.

Efforts to Overcome Impediment #5: As discussed in impediments 1-4, the City of Houston has made efforts to increase the fair housing outreach and education for staff, organizational partners, and citizens.

HCDD has helped to increase the number of affordable, accessible housing in Houston during the past five years. One of Mayor Annise Parker's initiatives was to end chronic homelessness in Houston. A major way the City started to work towards this goal was to increase the amount of permanent supportive housing units in the city. These are units that combine affordable housing with a variety of supportive services that help chronically homeless individuals maintain long-term housing. A majority of individuals who are chronically homeless also have a disability or mental illness and permanent supportive housing will help to house this population and decrease chronic homelessness. HCDD also funds other affordable housing developments and over the past five years this has included the development units of accessible rental housing. In addition, HCDD received its first grant through the Texas's Amy Young Barrier Removal Program in 2013 and completed 3 renovations and modifications for families with a person with a disability and referred 11 households to other area programs in which modifications were completed.

Recently, two important policies were enacted to help maintain or create new opportunities for safe, accessible housing. First, Houston City Council passed an ordinance, which regulates boarding homes not already regulated by the State of Texas. The enforcement of this ordinance is intended to make boarding homes safer for their residents, which often include persons with disabilities and the elderly. Although not directly related to the construction of accessible units, it enhances the safety of persons with disabilities that may live in an assisted housing environment.

Second, the Mayor signed a Complete Streets Policy which aims to make streets safer and more accessible for persons of all abilities. Creating more accessible streets for walking could help expand housing opportunities by providing accessible ways to get to and from housing.

The Mayor's Office for Persons with Disabilities promoted the National Deaf-Blind Equipment Distribution Program, iCanConnect, which aims to provide technology, including Braille devices, computers, mobile devices, phones, and signalers, for eligible low-income Americans who have combined hearing and vision loss. Providing these free modifications help make homes more accessible or livable for persons with disabilities.

Some persons with disabilities may lack accessible housing due to discrimination from a housing provider or landlord who does not provide reasonable accommodations. Collaborating with the Mayor's Office for Persons with Disabilities, the South Texas College of Law Legal Clinic and the Houston Volunteer Lawyers Program offers free legal assistance for persons with disabilities at various times throughout the year. This helps create more access to housing for persons with disabilities when landlords do not provide appropriate accommodations.

Impediment #6: Lack of affordable housing

2010 AI Recommendations: The City should ensure that affordable housing including low-income housing is included in developments throughout the City and not just in traditional neighborhoods. The City should seek creative ways to work with the owners of vacant housing stock to create affordable housing units.

Efforts to Overcome Impediment #6: The City addressed this impediment in other ways not directly influenced by the recommendations made in the 2010 AI. To more directly address the lack of affordable housing, the City ensured that housing providers complied with fair housing requirements, decreased housing discrimination, and provided equal housing opportunities by creating more affordable housing units.

The City worked with housing providers to comply with fair housing regulations. Before city funded multifamily housing is built, HCDD staff work with the developer to ensure that fair housing requirements are followed and the affirmative marketing plans are detailed to ensure equal housing opportunities for renters regardless of protected class. HCDD's Compliance Division regularly reviews the multifamily portfolio and is a resource for housing providers to ensure current and future compliance. When conducting on-site monitoring, staff is available to provide any technical assistance needed for housing providers.

As described earlier, the City strives to decrease housing discrimination by providing fair housing information through public information campaigns and information available to housing providers. For instance, HCDD provided fair housing training for CDBG, HOPWA, and ESG subrecipients in April 2014.

Previously, HCDD required the member of City Council in whose district an affordable housing development was proposed, to write a letter of support as part of the RFP response to HCDD for grant funding. This may have been an unintentional discriminatory practice because outspoken constituents against affordable housing could have influenced elected officials, which may have had negative effects on viable affordable housing proposals. HCDD no longer requires that responses to the RFP for Affordable Rental Housing include the District City Council member's approval letter. Instead, the latest multifamily RFP, issued in 2014, requested, but did not require, letters of support from community and legislative representatives as part of the "Location Information" section of the selection criteria.

HCDD worked in the past four years to create 922 more units of affordable rental housing which includes some accessible units. In addition, HCDD also repaired or reconstructed 221 units of homeowner housing, prolonging homeownership for families that might have been forced to move because of the condition of their home.

Although not directly related to vacant housing units as recommended in the 2010 AI, HCDD did pursue ways to use underutilized multifamily properties in the past five years to increase the number of affordable housing units for underserved populations. In 2012 and 2013, HCDD worked with a group of students from Texas Southern University, supported by HCDD staff and funding from Fannie Mae, to develop a database of distressed multifamily properties in Houston. The goal of this research was to identify opportunities to use underutilized properties as subsidized permanent supportive housing and to develop strategies and tools to educate stakeholders on benefits of housing homeless individuals in existing underutilized properties.

Impediment 7: Lack of a substantially equivalent fair housing ordinance

2010 AI Recommendations: The city should continue efforts to pass a substantially equivalent Fair Housing Ordinance. The city should start pursuing the development of a Fair Housing Administrative Program (FHAP).

Efforts to Overcome Impediment #7: The City is currently not certified as a substantially equivalent jurisdiction. However, as discussed earlier in this section, an updated equal opportunity ordinance was recently passed by City Council, but the Texas Supreme Court recently ruled that the city must repeal this ordinance or place it on the ballot.

Impediment #8: Not In My Back Yard (NIMBY) resistance

2010 AI Recommendations: The City should increase fair housing education and outreach

Efforts to Overcome Impediment #8: HCDD has educated the community, as well as organizations and other city officials, about fair housing obligations. In the spring of 2013, Daniel Bustamante, Executive Director of the Greater Houston Fair Housing Center, gave three training presentations reviewing fair housing laws and the impact they have in Houston. Mr. Bustamante presented at two public hearings for the 2013 Annual Action Plan for citizens and during a Housing and Community Affairs Committee meeting where the public as well as Council members and their staff were addressed. HCDD also has worked to alleviate NIMBYism for future affordable housing developments by working very closely with various communities.

In November 2013 and February 2014, HCDD held four Developer Meet and Greet meetings to provide information to residents of neighborhoods in which affordable housing funded with CDBG-DR was proposed. This was an opportunity for area residents to evaluate the proposed plans and to ask any questions of the development team or city staff. This encouraged understanding about future affordable housing developments that can often lead to objection due to misinformation in the community.

In addition, HCDD invited residents, community leaders, local design architects, and other stakeholders to participate in a one day DR2 Community Design Workshop to share ideas and influence the design of over 300 single family homes that will be built as part of Houston's DR2 single family home repair program. The results of the Workshop, consisting of over 36 floor plans and conceptual home design boards, were displayed and over 200 citizens voted on their favorite designs.

While it is easy to measure NIMBYism through objections at City Council or in news articles, it is difficult to measure the impact of antiNIMBYism actions. HCDD believes that these actions of working with various communities to explain affordable housing and being available to residents with questions could help to relieve some NIMBY tensions that could arise in the future.

Impediment #9: Affordability

2010 AI Recommendations: The City should ensure that affordable housing including low-income housing is included in developments throughout the City and not just in traditional neighborhoods. The City should seek innovative ways to utilize the high number of private housing units identified as vacant throughout the community.

Efforts to Overcome Impediment #9: Similar to Impediment 6, the activities carried out to address this impediment are more focused on the affordability of housing rather than the 2010 recommendations made. The actions taken in the last five years address affordability by creating jobs and increasing incomes, educating citizens about their rights, and lowering the cost of various housing opportunities.

HCDD works with economic development agencies to help create jobs in Houston. The Houston Business Development Inc. (HBDI) has received CDBG funding to lend to small businesses to create or retain jobs for low- and moderate-income persons. Since 2010, HCDD has helped small businesses create or retain 84 jobs. In addition, many of HCDD's public service activities have been related to workforce development and helping low-income persons or persons with disabilities receive jobs. Increasing a person's or a family's income can help create more housing opportunities by making higher priced housing more available and affordable.

As discussed in other impediments, HCDD and the City of Houston have worked hard to inform and educate the community about their fair housing rights.

Finally, HCDD created affordability for 576 homeowners from July 2010 through the beginning of 2015 through the Homebuyer Assistance Program. This Program funds downpayment and closing cost assistance to low- and moderate-income homebuyers. The results make homeownership more affordable by lowering monthly payments and the upfront cost to purchase a home. As discussed in Impediment 6, HCDD has helped create approximately 922 affordable rental units in Houston during the last five years.

Impediment #10: Lack of public transportation

2010 AI Recommendation: The City should expand its efforts to promote good paying job development and assist in small business development.

Efforts to Overcome Impediment #10: HCDD has prioritized low- and moderate-income people's need for transportation options. HCDD supports programs administered by non-profit organizations that connect services to low- and moderate-income persons without transportation. In PY 2013, HCDD helped to provide essential services to 14,449 homeless individuals without transportation through SEARCH Mobile Outreach, transportation services for 20,223 homeless persons seeking healthcare and supportive services, and literacy and workforce development trainings in low-income areas through Houston Public Library Mobile Express. Finally, in the past five years, the City of Houston has supported the development of new permanent supportive housing units which link housing and services needed by residents in order to reduce the need for travel by residents to receive services.

HCDD prioritizes housing and services that have easy access to public transit options to enhance the usability of public transit. For instance, one of the selection criteria for multifamily developments receiving HCDD funding is location. This includes the proximity and ease of access of the development to local transit, medical facilities, amenities including grocery stores, and employment and training opportunities. HCDD prioritizes housing developments based on location to amenities, services, and employment, which can improve a low and moderate-income person's transportation options.

In the next five years, METRO will fully implement two new light rail lines that are located in low- and moderate-income areas. In addition, METRO will implement a new bus route system that hopes to better connect housing with employment and recreation. The City of Houston does not have a direct influence over public transit routes.

Impediment #11: Predatory lending practices

Impediment #12: Disparity in lending practices

Impediment #13: Geographic concentration of loan denials in minority communities

Impediment #14: Inadequate education and outreach by financial institutions on mortgage lending

2010 AI Recommendations: The City should support fair housing education and outreach. The City should support fair housing enforcement. The City should increase and expand its financial literacy education programs.

Efforts to Overcome Impediments #11, #12, #13, and #14: The City of Houston partners with organizations to support initiatives increasing low-income families' knowledge of mainstream banking benefits and general financial education. Most recently the City participated in Houston Money Week in April 2015, a week of free financial education classes, events and activities for all citizens promoting the importance of financial literacy. In September 2013, the City helped send an English and Spanish flyer in water bills to approximately 200,000 households advertising Bank On Houston, which encourages low-income people to enter the mainstream banking industry.

Through partnerships with banks, realtors, and nonprofit organizations, HCDD staff presented details about the Homebuyer Assistance Program and fair housing at four various homebuyer classes reaching over 115 potential homebuyers and made fair housing information available to over 1,000 homebuyers at housing fairs, expos, forums and new developments during PY 2013. In addition, the Homebuyer Assistance Program endeavors to partner with lenders that do not participate in predatory lending practices.

During 2013 and 2014 HCDD staff compiled Home Mortgage Disclosure Act (HMDA) lending data from the Federal Financial Institutions Examination Council (FFIEC) and analyzed this data to determine lending trends as presented earlier in this report. Understanding home mortgage lending trends and past disparities in lending can help to focus financial literacy programs and fair housing education during the next five years.

Finally, HCDD works to leverage federal funds to rehabilitate and support deteriorating neighborhoods. For instance, HCDD funds public facilities including new or upgraded parks, health clinics, libraries, multiservice centers, or other enhancements to increase the marketability of a neighborhood. HCDD also funds economic development activities that also enhance a neighborhood. For example, HCDD recently funded a new grocery store in a minority neighborhood that was considered a food desert in Houston, Pyburn's Grocery Store. In addition, HCDD supports code enforcement efforts in low- and moderate-income areas to ensure that health and safety codes are current. Funding also supports legal assistance for properties that are in severe violation and need to be removed for safety reasons. This helps areas maintain neighborhood integrity.

Impediment #15: Insufficient multi-lingual marketing efforts targeted to those who have limited English proficiency

2010 AI Recommendation: The City should increase fair housing education and outreach. The City should financially support fair housing enforcement. The City should increase and expand its financial literacy education programs.

Efforts to Overcome Impediment #15: HCDD has made major efforts to enhance its multilingual advertisements. Fair housing materials have been created in multiple languages including Spanish, Vietnamese, and Chinese. In addition, the Consolidated Plan Community Needs Survey was available online and in print in Spanish, Vietnamese, and Chinese. The 2013 Annual Action Plan included HCDD's first Language Assistance Plan, which outlines the steps HCDD will carry out to advertise and assist people with limited English proficiency. A few months after HCDD's Language Assistance Plan was submitted to HUD, the Mayor signed an Executive Order and later an Administrative Procedure for Language Access establishing policies for providing information about City services, programs, and activities to residents and visitors with limited English Proficiency. By 2014, all City of Houston Departments had a Language Assistance Plan.

Impediment #16: Demographic patterns that reflect the geographic concentration of racial and ethnic minorities in certain areas that reinforce segregated housing patterns

2010 AI Recommendations: The City and HHA should ensure that affordable housing including low-income housing is included in all developments throughout the city not just historical minority neighborhoods.

Efforts to Overcome Impediments #16: As stated earlier in this chapter of the report, the City of Houston has no zoning and will not likely implement inclusionary zoning, which could regulate developers to include affordable housing in some or all new developments built. Instead, HCDD has tried to counteract the concentration of minorities in certain neighborhoods by rehabilitating neighborhoods and by assisting minorities to move to other neighborhoods that may have lower concentrations of minorities.

First, HCDD extensively researched the City and defined areas in which DR2 funds would be beneficial and help to spur market forces. DR2 funding, as well as CDBG and HOME funding, has been and will be used for new housing, repair of existing housing, infrastructure and public facility improvements, and economic development in three DR2 areas in the City. In addition, as part of the DR2 funded Single Family Repair Program, homeowners were given an option to move to another area of the City or metropolitan region of their choice. HCDD's Homebuyer Assistance Program also provides an opportunity for first time homebuyers to expand their housing choices, which could include moving to a non-minority area by offering them downpayment assistance.

The City also helped to create more market development in areas that have limited market interest; many areas are minority areas, by changing policies. For instance, City Council amended the definition in city regulation to define grocery stores more loosely in regards to alcohol sales in order to draw more potential grocery stores into areas known as "food deserts". While demographic patterns of racial and ethnic minorities may be due to historical factors and, to some extent, residents' choice, the City has made efforts to improve minority areas with additional development funds and to provide funding for residents wanting to move to non-minority areas.

Impediment #17: Low educational attainment among African Americans and Hispanics

2010 AI Recommendation: The City should expand its efforts to promote good paying job development and assist small business development

Efforts to Overcome Impediments #17: As discussed earlier, HCDD supports efforts to expand workforce development opportunities including job training programs to low- and moderate-income persons as well as persons with disabilities. The City also supports HBDI, which funds small businesses. In addition, HCDD helped 48,601 children attend afterschool and youth enrichment programs that provide computer classes, job training, and tutoring, and 52,196 people have had access to the Houston Public Library Mobile Express, which offers workforce training. In addition, HCDD funded the expansion of a Charter School, Pro-Vision School, to help increase educational opportunity for minority students.

Impediment #18: Lack of Financial Literacy Education

2010 AI Recommendations: The city should increase and expand its financial literacy education programs.

Efforts to Overcome Impediments #18: As discussed previously, the City of Houston continues to support Bank On Houston, which supports financial education classes, especially during April, which is Financial Literacy Month, as well as Fair Housing Month. Due to a lack of financial literacy among Houston residents, the City made policy changes to help residents not currently part of the mainstream banking system and therefore at risk of paying high fees at check cashing businesses. City Council passed a payday loan ordinance limiting the high fees that trap borrowers in a cycle of debt.

Impediment #19: Lack of Income

2010 AI Recommendation: The City should rigorously pursue the Section 3 requirements of HUD. The City should expand its efforts to promote good paying job development and assist small business development.

Efforts to Overcome Impediments #19: HCDD continues to support activities that create jobs for low-income residents. HCDD provided training to, and monitored contractors, ensuring that they complied with Section 3 guidelines that provide job training, employment, and contracting opportunities to low-income residents. HCDD also contributes funding for economic development projects that increase the number of jobs. One such example includes contributing Section 108 and EDI funds for the renovation of an historic building for a new 352-room hotel located at 806 Main. The project is expected to create 178 new jobs over a period of time. HCDD also provided funding to HBDI, which resulted in the creation of 84 jobs available to low- and moderate-income individuals.

HCDD also promotes asset building for low- and moderate-income families through homeownership. The Homebuyer Assistance Program provides downpayment assistance to low- and moderate-income first time homebuyers. In the past, this assistance has been given through a forgivable loan, which when the loan period is over the homeowner does not owe the City, creating additional equity for the homeowner.

Another example of the City promoting equal access and economic opportunity is through the Office of Business Opportunity sponsored Annual Meet the Buyer Forum where small businesses connect with City Purchasers and through other small business workshops like the a recent workshop entitled "How to do Business with the City of Houston and HISD."

Conclusion

During the past five years, the City has taken major steps to enhance the gathering, review, and analysis of data that has an impact on fair housing. In addition, HCDD has also taken on new initiatives to promote varied ways of citizen and stakeholder involvement in fair housing and fair housing planning. One recent success illustrating both HCDD's data driven outlook approach to fair housing and the encouragement of citizen and stakeholder participation is through the Fair Housing Forum. The Forum was held on January 29, 2015 at the Federal Reserve Building. Attendees consisted of over 170 members of the Houston community including representatives from governmental and nonprofit agencies, housing industry professionals and citizens. During the Forum, attendees listened to fair housing information provided by local experts and brainstormed fair housing issues that need to be addressed and strategies that should be used to address the issues identified. Note that this was one success; there were others as have been identified herein.

The City takes its affirmatively furthering fair housing obligations seriously. While the City has made decisive actions to promote fair housing choice and illuminate identified impediments, changing attitudes takes a long term approach.

10. Identification of Impediments to Fair Housing Choice Fair Housing Action Plan

The following includes the list of impediments found to be barriers to fair housing choice in Houston. By no means is this an exhaustive list of all impediments that could be found within the City of Houston or the Houston region. However, this list is an attempt to outline impediments that were found during the development of this AI using various data sources and extensive community input. The impediments listed are intended to be broad and include more specific barriers as identified in the summaries of each impediment.

Impediments from the 2010 AI have been reviewed as well as potential impediments listed in the FHEO letter dated November 2011. A new list of impediments for the 2015 AI is as follows. Past impediments have been consolidated within the new impediments to avoid reporting duplications in the actions carried out. This AI, including the impediments and recommended actions, may be updated periodically throughout the next five years, as needed.

At the suggestion of several community groups, impediments have been categorized under four fair housing and neighborhood rights that incorporate affirmatively furthering fair housing principles of reducing segregation and expanding equal opportunity. These four fair housing and neighborhood rights include: the right to choose, the right to stay, the right to equal treatment, and the right to have a say.

The right to choose: All Houstonians have a right to live in a decent home in a neighborhood of their choice, free from discrimination.

1. Discrimination in Housing
2. Lack of Knowledge about Fair Housing
3. Lack of Affordable Housing Options
4. Lack of Accessible Housing for Persons with Disabilities
5. Lack of Income/Lack of Funding
6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status

The right to stay: Transitioning neighborhoods in Houston should be revitalized for the benefit also of existing residents without replacement.

7. Affordability
8. Lack of Financial Education

The right to equal treatment: Houston will work to end discrimination and disinvestment in low-income, minority concentrated neighborhoods and ensure that infrastructure, public services and facilities, and other public resources are provided equitably to all neighborhoods

9. Imbalanced distribution of Amenities, Services, and Infrastructure Between Neighborhoods
10. NIMBY Resistance
11. Lack of Transportation Options
12. Low Educational Attainment Among Minorities
13. Increased Health Hazard Exposure in Certain Neighborhoods

The right to have a say: All citizens have a right to be informed about, and have an input in, decisions that affect their communities.

14. Lack of Communication Between Government and Residents

The list of impediments includes a brief summary of the importance of each impediment. Each impediment also includes one or more objectives. The objectives listed for each impediment will not necessarily eliminate the impediment in the period of the next five years; however, these objectives will make strides to lessen the effect of the impediments and to expand housing choice.

Impediment #1: Discrimination in Housing

Impediment

Housing discrimination in the housing market continues to persist for protected classes seeking to find or maintain housing.

Impact

Residents of protected classes who experience housing discrimination, whether overt or unintentional, have difficulty finding or maintaining housing resulting in limited housing choices and limited access to opportunity,

Analysis

The 2010 AI identified four impediments of discrimination based on disability, race, national origin, and families with children. Discrimination in rental or homeowner housing for all protected classes continues to be an issue in Houston. Race, disability, familial status, and national origin continue to be at the basis for the majority of alleged complaints made to HUD in recent years. The recommendations made in the 2010 AI to address these four impediments were similar. For this reason, these four impediments have been included under the new impediment of “discrimination in housing”.

Discriminatory mortgage practices based on protected class continues in the Houston mortgage market. The following four impediments were identified in the 2010 AI: predatory lending practices, disparity in lending practices, geographic concentration of loan denials in minority communities, and inadequate education and outreach by financial institutions about mortgage lending. As illustrated by the most recent HMDA data, minorities had a higher rate of denial and a lower application rate, as did females. Minority areas also had higher denial rates and lower application rates compared to non-minority areas. Although the majority of subprime loans were made to non-Hispanic White borrowers, Hispanic borrowers had the highest ratio of subprime loans. In addition, feedback from Neighborhood Discussion Groups included stories of lenders denying a home improvement loan based on the neighborhood location of the house. Still clearly issues in the current housing market, the four mortgage impediments identified in the 2010 AI are now consolidated into this new, broader impediment, “Discrimination in Housing”.

Housing industry professionals, such as lenders, insurance providers, and real estate agents, may carry out actions that cause issues affecting fair housing choice and may encourage or result in discriminatory behaviors. There is not recent, local research known allowing a full analysis about these issues to take place in this document. Although staff did not hear of any complaints regarding steering problems in Houston during the public participation process, steering can be an issue that encourages segregation. Steering is an illegal practice in which professionals only showing housing units in certain complexes or neighborhoods because of perceived wants or needs based on a protected class. Detailed, updated, and reliable data describing fair housing issues and trends in Houston and the Houston area can assist in decreasing discrimination by providing more targeted education campaigns.

Also, discrimination in rental housing continues to be a concern as it is the most identified issue in HUD fair housing complaints. The stakeholder and public input process revealed that many people thought that housing industry professionals should be better trained in fair housing and that education and training could be an important activity that the City could support to decrease housing discrimination in rental housing.

Finally, there continues to be a lack of fair housing enforcement activities in the Houston area. Only one local organization, the Greater Houston Fair Housing Center, performs fair housing enforcement and testing activities on a regular basis. HUD performs investigations as fair housing complaints are filed. HUD has not certified the City of Houston fair housing law as substantially equivalent. Becoming substantially equivalent would allow the City to apply for the Fair Housing Assistance Program (FHAP) which would provide funding reimbursement for enforcement of and

other activities related to fair housing laws. The 2010 AI listed the “Lack of substantially equivalent fair housing ordinance” as Impediment #7, which has now been incorporated into this impediment in the 2015 AI.

Objective

To reduce this impediment over the next five years, the city will undertake actions that will work to fulfill the following objectives.

- Analyze and monitor area trends in housing discrimination to better understand discrimination in the community and how to better address discrimination
- Decrease discriminatory housing practices based on protected classes
- Provide resources to citizens who may have been discriminated against

Impediment #2: Lack of Knowledge about Fair Housing

Impediment

Information about fair housing rights is not universally known to organizations working with people in protected classes. Also, persons of protected classes may not know about or do not understand discrimination and how to address the situation if discrimination occurs.

Impact

Fair housing complaints may be under-reported.

Residents of protected classes who experience housing discrimination may not understand that discrimination has occurred or may not know how to report discrimination and therefore could miss out on housing opportunities.

Housing professionals, organizations, businesses, or policymakers that are unfamiliar with fair housing could unintentionally implement policies or procedures that are discriminatory based on a protected class.

Analysis

An issue that was repeated during the citizen and stakeholder engagement process was the need for additional fair housing education. Fair housing knowledge was not only mentioned as a barrier for staff of governmental agencies and organizations partnering with HCDD but also for citizens. The citizen and stakeholder input gathered at the Fair Housing Forum revealed that the highest priority action that the City can undertake to decrease housing discrimination and promote housing choice is to enhance communication and education.

The number of complaints made to HUD about fair housing is very low for a city the size of Houston, approximately 100 per year. This could indicate a lack of understanding of fair housing rights. Providing education, resources, and continued outreach is needed for city or stakeholder staff and citizens who may not know about or not understand fair housing. From the public participation process, HCDD learned about topics that may need to be addressed in fair housing education, including what happens once a fair housing complaint is filed.

In addition to providing education to citizens, the public engagement process also promoted the idea that citizens should be involved and also advocate for fair housing. When asked about the citizen's role in decreasing housing discrimination, participants at the Fair Housing Forum thought that it was their role to educate others about the importance of fair housing rights.

Objective

This city has one main objective to address this impediment.

- Increase the fair housing knowledge of government staff, subrecipients, housing professionals, HCDD's partners, and citizens

Impediment #3: Lack of Affordable Housing Options

Impediment

There are not enough quality affordable housing units to meet the demand in Houston.

Impact

Many low-income residents, including residents of protected classes, have less access to quality affordable housing.

Many affordable housing options are located in certain neighborhoods with limited access to the jobs, services, and amenities available in other neighborhoods.

Some housing options that are affordable to modest income residents of protected classes are deteriorating or have environmental hazards.

Analysis

The citizen participation process revealed that the lack of affordable housing units was an issue in the community. According to the feedback gathered from the Fair Housing Forum, the supply of housing was both the top challenge that people face when finding and maintaining housing as well as the top barrier to fair housing choice.

Data from the analysis in this document also showed that Houston has a lack of affordable housing options. For instance, an extraordinary number of families expressed interest in being added to the Houston Housing Authority's Housing Choice Voucher waitlist during the last open application period that lasted for less than a week. This illustrates the great need and lack of housing options for low-income households. According to CHAS data, almost half of renter households (45%) in all income brackets have a housing cost burden and approximately one quarter of the owner occupied households have a cost burden. These cost burdened percentages substantially increase for households earning below the area median income. Since approximately half of Houston's households are low- and moderate-income, having a number of affordable housing options in the community is imperative when helping families.

There is also a lack of affordable housing options located in certain areas of the city. Although 80% of those responding to the Community Needs Survey agreed that affordable housing should be available in all areas of the City, some housing affordable to low- and moderate-income families are in neighborhoods that are not located near public transportation or high quality schools, lack amenities, or have a high number of crime incidences. Many of the publicly funded affordable housing developments are located in mostly low-income neighborhoods. In addition, market rate housing available for low- and moderate-income households are often in older housing stock which may need a higher cost of repairs and may have additional health hazards, like lead-based paint or asbestos.

This impediment has not changed from the 2010 AI.

Objective

The City will work towards creating more housing and preserving housing options especially for person in various protected classes including in higher opportunity areas where housing is generally not available by carrying out activities that address the following objectives.

- Preserve the supply of existing affordable housing for low- and moderate-income households
- Expand the supply of affordable housing for low- and moderate-income households

Impediment #4: Lack of Accessible Housing for Persons with Disabilities

Impediment

Accessible housing options are not often available to people with disabilities.

Impact

Persons with disabilities needing accessible housing do not have free and equal access to housing.

Developers/property managers with accessible housing units available may be unable to connect with persons with disabilities in an efficient manner, resulting in accessible units being occupied by households who do not need the additional accessible features.

Existing accessible units may be in locations where retail services, transportation services, and public amenities are inaccessible, or where sidewalk or curb cut improvements are needed in order for persons with disabilities to have full access to services and amenities

Analysis

Housing options for households or individuals with special needs is an issue when there is a lack of accessible units. These vulnerable populations already face limited choice, and with a lack of accessible housing city-wide, these households and individuals are most affected. For instance, finding housing with accessibility features is very limited. Sometimes units with accessible features are rented by a resident without disabilities which further reduces existing, available stock. In addition, accessible housing where neighborhood conditions do not present barriers is also very limited. Local information and data regarding housing for persons with disabilities is limited, and aligning the special needs population with existing housing is difficult because the needs of persons with disabilities are so unique.

The supply of accessible housing for persons with disabilities is an issue that has been raised by stakeholders who advocate for special needs groups. The concerns include, but are not limited to, the lack of data used to describe the spatial distribution of disabled persons and accessible housing as it relates to structural and neighborhood conditions. Another concern raised was that disability data is not discussed based on the category/characteristic of the disability (i.e. physical, mental, etc.).

Census Bureau data sets are reliable as it relates to age, disability characteristics, and quantity per census tract. Disability data from the Census Bureau has not been consistently used at the census tract level, but instead secondary data at the place level (Houston city) is often utilized. Reliable data, as it relates to accessible housing or neighborhood conditions for the disabled, has not been readily available.

This impediment has not changed from the 2010 AI.

Objective

The city will work to increase the number of housing choices and the access to high opportunity neighborhoods for persons living with disabilities. The following objectives will be addressed through proposed actions the city plans to undertake in the next five years addressing the lack of accessible housing for persons with disabilities.

- Gather research and data to better understand and describe the needs for and the supply of accessible housing in Houston
- Increase availability of accessible units for low- and moderate-income households

Impediment #5: Lack of Income / Lack of Funding

Impediment

Persons with select protected characteristics, such as minorities, females, and persons with disabilities, are disproportionately represented in the low-income category. This lack of income not only restricts protected classes to finding housing in only affordable areas in the City, but it also can be exacerbated by discriminatory actions. The lack of funding for fair housing activities limits how organizations, including the city, can address these impediments to fair housing choice.

Impact

Many people with low-incomes do not have enough money to find a home in many higher opportunity areas of the City or region.

Many residents with limited income often cannot maintain the housing they currently live in. As housing is the major asset to low-income families, this could reduce the inherited wealth for future generations.

Funding may not be available to organizations and the City to most effectively address housing discrimination.

Analysis

This impediment relates to both the lack of income residents earn to then be able to afford increased housing choices, as well as the lack of funding for agencies, such as HCDD, to perform fair housing outreach, education, or enforcement activities.

The lack of income includes insufficient income to pay for and maintain housing. This was one of the top issues discussed at the Fair Housing Forum. Validated in CHAS data, housing cost burden is the most common housing problem for households in Houston.

Expanding resources to increase affordable housing stock was the second priority listed in the Fair Housing Forum public input related to the actions that the City can do to decrease discrimination and promote choice. For instance, continued funding of programs that increase a low- and moderate-income household's downpayment can expand the housing options that are affordable to that household. Public funding like downpayment assistance can be used to address the impediment of lack of household income.

Although HCDD and the City of Houston are committed to further fair housing and increase fair housing choice, available funding often limits the extent of fair housing outreach that can be provided by the City.

Objective

The city is committed to promoting economically, racially, and ethnically integrated neighborhoods of opportunity and will take actions to encourage mixed income housing, preserve affordability in neighborhoods rapidly increasing in value, and create affordability and opportunities to find housing in areas of high opportunity. The following objectives will help to reduce this impediment.

- Assist low- and moderate-income residents secure and maintain quality housing
- Promote ways for low- and moderate-income individuals of protected classes to become employed or retain employment
- Create efficiencies to best utilize dwindling government funding

Impediment #6: Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status

Impediment

Many neighborhoods in Houston are divided by race, ethnicity, and/or economic status.

Impact

Residents living in certain neighborhoods are often at a disadvantage because those neighborhoods do not have similar opportunities in jobs, housing, education, services, and market value compared to other neighborhoods.

Living in segregated neighborhoods can perpetuate segregation.

Analysis

Houston is a very diverse city, but it is also a segregated city. As data illustrates, many communities in Houston have high concentrations of minorities and other communities have high concentration of non-minorities. The Free Market Analysis™ revealed that separate and often very intense concentrations of Hispanic households of any race or African American households dominate large geographic sections of Houston. Also, Asian households tend to be concentrated in a few areas. These concentrations are intertwined with Houston's economic stratification. There are many Super Neighborhoods in which racial or Hispanic concentrations have grown or persisted throughout the past ten years. This continued concentrated segregation is likely due to and perpetuated by discrimination in the housing market.

Objective

The city will work to affirmatively further fair housing through the following two objectives.

- Promote racial and ethnic desegregation
- Promote the deconcentration of poverty

Impediment #7: Affordability

Impediment

Many neighborhoods with high opportunity do not have a range of housing prices limiting housing choice in those neighborhoods. Land costs and development costs continue to rise in the Houston area.

Impact

High opportunity areas with housing only available to wealthy households, limits housing and other opportunities for not only low-income but also middle income families.

In neighborhoods with increasing amounts of private development, some residents may be forced to move because of the increase in rents or taxes due to increased market value in an area.

As land and development costs continue to rise in the Houston area, particularly in desirable and high opportunity areas, more residents will continue to be priced out.

Analysis

Related to the lack of affordable housing options is affordability. Affordability relates to housing for all income groups rather than just the low- and moderate-income groups. As advocates have noted, a class divide is very visible in Houston as well as other cities of the nation. This income divide is growing more pronounced as indicated earlier in this document. Incomes are growing faster for higher income earners compared to other income groups. Housing affordability is important for all income groups in all neighborhoods throughout Houston.

In addition, many previously low-income areas of the city are becoming redeveloped with newer, higher priced housing. The cost of land in these areas is also rising. There is a need to not only create housing in areas of high opportunity, but also create ways in which existing households are able to stay in neighborhoods where opportunity is growing without being negatively affected by gentrification or market increases.

Objective

The city will work to affirmatively further fair housing through the following two objectives.

- Increase housing choice for the workforce population
- Research ways to maintain affordable housing in areas where land values are increasing

Impediment #8: Lack of Financial Education

Impediment

Some residents do not understand or are not exposed to financial education opportunities.

Impact

The lack of financial understanding coupled with discriminatory practices in the housing industry can prevent some residents from accumulating wealth and having the resources to exercise free housing choice of where to live.

Analysis

As seen through the public input process, financial literacy and housing literacy were important issues. The Community Needs Survey revealed that many people have problems buying or renting property in Houston due to credit issues or being denied a loan. Many Houstonians have trouble finding and maintaining housing because they have a lack of income or savings. Others have unique personal issues that may impact rental housing or loan approval such as job history, credit history, rental history and evictions, or criminal history.

This impediment is the same as Impediment #18 from the 2010 AI.

Objective

The city will take actions to increase the knowledge in the community about financial programs and financial well-being to further the following objective to address this impediment.

- Promote financial education

Impediment #9: Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods

Impediment

Minorities and persons in poverty are located mainly in areas of the city that may lack amenities such as commercial development like grocery stores or schools, public and private services such as transportation options, or infrastructure such as recreation options.

Impact

It is difficult for families in protected classes to find housing that is close to quality amenities, services, and infrastructure, which limits a family's opportunity.

Steady employment is more difficult to find and maintain for members of protected classes living in neighborhoods with few job resources and opportunities.

Substandard services and lack of amenities, like the lack of financial and banking services in a neighborhood, can maintain segregation, exacerbate blight and depress wealth accumulation.

Analysis

As discussed by Susan Rogers, a professor at the University of Houston, at the Fair Housing Forum, the distribution of amenities differs by neighborhood. Rogers demonstrated this by comparing the proximity of grocery stores for a person living in Montrose to a person living in the Third Ward, proving that a Third Ward resident has a much longer distance to travel to a grocery store and has fewer choices of grocery stores nearby. This limits a resident's options to healthy food and could negatively affect a family.

In addition, citizen input revealed that residents from all over Houston often feel that there are not enough City services available for their neighborhood. According to residents that participated in the Neighborhood Discussion Groups, some areas of the city may need additional services due to unique circumstances. For instance, illegal dumping seemed to be more of a problem in certain low-income areas than in other areas of the city and would therefore need more services like trash removal and enforcement. In addition, during the discussions, some residents felt that they were marginalized from benefiting from positive market forces such as improved property values or increased commercial development. This can also be seen in the data illustrated in Houston's Market Value Analysis. This analysis showed that areas with most market value were located in predominately White and upper-income neighborhoods.

In recent years Houston has worked to change the way it approaches infrastructure improvement to a more equity based approach. Through Rebuild Houston, Houston has addressed areas with the worst conditions first, evidenced by the cataloging of street and ditch conditions used to then to prioritize projects based on greatest need.

Objective

In the next five years Houston will continue to address imbalances caused by historical conditions, legacy decisions, or those perpetuated by market forces by carrying out activities that address the following objectives.

- Improve neighborhoods lacking in quality amenities
- Promote balanced approach to public and private services and infrastructure

Impediment #10: NIMBY Resistance

Impediment

Residents often oppose the location of housing for protected classes in or near their neighborhood, including affordable housing, housing for persons with disabilities such as group homes, or even market rate housing that is more affordable than other kinds of housing such as multifamily housing or housing on smaller lot sizes.

Impact

Resident resistance may influence policy makers who might otherwise support housing development for protected classes.

Resident objections can slow or eliminate the development of group homes or other housing for persons with disabilities.

If residents opposed to housing for protected classes in or near their neighborhoods succeed, development may not be able to provide appropriate housing choices in areas of opportunity.

Successful NIMBY opposition may help perpetuate discriminatory attitudes toward protected classes.

Analysis

Many Houstonians do not understand fair housing and affordable housing. This can cause misinformation that may lead to NIMBY resistance. In addition, NIMBY attitudes can keep affordable housing in certain neighborhoods. A greater presence from HCDD in the community can help to answer questions and dispel concerns about activities.

This impediment is the same as Impediment #8 from the 2010 AI.

Objective

NIMBY resistance often restricts access to housing in high opportunity neighborhoods. The City will address this impediment by carrying out actions supporting the following objective.

- Provide education and outreach activities for affordable housing

Impediment #11: Lack of Transportation Options

Impediment

Job or housing growth in transit inaccessible areas of the city and region may decrease the available employment opportunities for persons in protected classes. There are limited transportation options in the city for residents without automobiles.

Impact

Many people in protected classes are limited in where they can live or work.

Many amenities in high opportunity areas are inaccessible to those living in some low-income or minority neighborhoods.

Analysis

Transportation was an issue that was consistently mentioned as a barrier from stakeholders and citizens. For instance, the ability to get to and from places to apply for housing or other services is a barrier. Many low-income persons do not have a personal automobile available to use, which limits their mobility in Houston, a city that is very low-density and spread out.

The majority of residents that ride public transportation in Houston are minority. As the Census data shows, the longest commute times to work are for those that ride public transportation. Long public transportation commute times disproportionately affect more minorities.

METROLift addresses the transportation needs of persons with disabilities who cannot ride on regular METRO transportation. There is a great need for this service, but there are many limitations to the services it currently provides.

This impediment expands on Impediment #10 Lack of Public Transportation in the 2010 AI.

Objective

Adequate public transportation is an important key to providing equal access to quality neighborhoods and the city will pursue the following objectives over the next five years to address this impediment.

- Promote alternative modes of transportation including bicycling
- Promote greater access to transportation options
- Promote equitable transportation options

Impediment #12: Low Educational Attainment Among Minorities

Impediment

Minorities, especially Black/African Americans and Hispanics, achieve low educational attainment compared to White, non-Hispanic residents.

Impact

Low educational attainment correlates to higher rates of unemployment and lower wages causing minorities to be unable to grow wealth.

Many low performing schools are located in minority and low-income neighborhoods, which perpetuates the low educational attainment for minorities and households in poverty.

Analysis

As illustrated earlier in the AI, Black/African Americans and Hispanics have a very low educational attainment. As seen in the Census data, higher educational attainment relates to lower unemployment and higher wages, both of which relate to the impediment of lack of income.

As illustrated through the School Proficiency Index, there is a high correlation between low performing schools and RCAP/ECAP areas. The higher performing schools tend to be located in higher income areas with limited minority residents.

Impediment #17 in the 2010 Analysis of Impediments was “Low educational attainment among African Americans and Hispanics” and has been incorporated into this updated impediment.

Objective

Education is strongly correlated with income and wealth. Many existing minority neighborhoods are served by low performing schools. The city will work to provide housing opportunity in areas with high performing public schools and increase services available to enhance educational opportunities in minority or low-income areas through the following objectives.

- Increase the number or quality of activities for youth available in the city
- Support workforce development opportunities and other job training programs

Impediment #13: Increased Health Hazard Exposure in Certain Neighborhoods

Impediment

In some neighborhoods households have more exposure to health hazards due to the quality or age of the housing units or the location of the housing units in proximity hazards.

Impact

Protected classes are often more affected by health hazards which can affect children's growth and development process.

Analysis

As illustrated in the Environmental Health Hazard Exposure Index the majority of health hazards are located east of the central business district in Houston and in close proximity to the Port of Houston. This index summarizes the potential exposure to harmful toxins at a neighborhood level, which disproportionately affects areas with a high number of minorities in east Houston.

This is a new impediment to expand fair housing choice.

Objective

There are many limitations to address this impediment for HCDD and even the City of Houston. Promoting understanding for citizens about health hazards and the importance of these hazards is the main objective for the city for reducing this impediment.

- Increase knowledge of public exposure to health hazards

Impediment #14: Lack of Communication between Government and Residents

Impediment

Many residents do not understand or know about the housing programs or other government assistance available.

Impact

Residents do not have access to housing programs available.

Persons with limited English proficiency will not be informed about available information and programs.

Analysis

The feedback from the Fair Housing Forum noted that the most significant challenge faced by the City is communicating with residents about housing discrimination, fair housing laws and rights, and City programs. Opening more avenues of communication between residents and the City will also help to address other impediments such as promoting fair housing understanding.

One impediment from the 2010 AI has been included in this new impediment, Impediment #10: Insufficient multi-lingual marketing efforts. Marketing programs and information in a way that the community understands is part of the communication between government and residents. A quarter of Houston's population has limited English proficiency, and of those who have limited English skills, they are more likely to be living in poverty and therefore more likely to be eligible for many City and HCDD services for low- and moderate-income individuals. HCDD will continue to strive to provide marketing materials for the housing programs, as well as other informational materials, including fair housing education, in multiple languages.

Objective

The City is committed to encouraging citizen participation through partnerships and carrying out activities at the neighborhood level to reduce this impediment over the next five years.

- Provide ways in which citizens can be updated on fair housing actions
- Increase resident knowledge about available housing programs
- Increase understanding of the City's qualifications and criteria for housing programs

Recommended Actions and Fair Housing Implementation Plan

The following table summarizes recommended actions to reduce the identified impediments. Each action includes the relative priority, possible funding sources, potential partner organizations, proposed timelines, and anticipated measures for success or defined milestones. Actions were identified through several processes including the continuation of existing work to further fair housing that HCDD and other organizations have undertaken and suggestions made by consultants and the community during the development of this document. Prioritization of actions is indicated with High, Medium, or Low and was determined by staff. Although some of the actions will be continued past the next five years, this implementation plan will address the five year period coinciding with the consolidated planning period, beginning in PY 2015.

Using this implementation plan as a guide, HCDD will summarize which actions and impediments staff and partners plan to address over the period of a year within each Annual Action Plan. Then, the Consolidated Annual Performance and Evaluation Report (CAPER) will briefly describe the annual accomplishments related to those planned for the year and compare to the measures for success and milestones included in this document. HCDD will keep records of all actions in support of reducing the impediments taken during the next five years.

The City has also been responsible for complying with impediments to fair housing choice that were recognized by the State of Texas in its Fair Housing Action Statement Texas (FHAAT). Some of the State's impediments overlapped with those identified under the City of Houston 2010-2015 AI. The General Land Office (GLO) of the State of Texas, monitored the FHAAT in 2014, and found the City to be in compliance with the requirements under the FHAAT that dictated measures the City must take to address each barrier. The actions from the FHAAT were considered during the development of this plan, and the City will continue to build on all actions began under the FHAAT.

This table is meant to be a working guide allowing both policymakers and the general public to quickly understand the concrete steps the City plans to take to affirmatively further fair housing in the next five years.

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>1. Conduct housing discrimination testing and studies HCDD will contract with one or more qualified fair housing organization to conduct fair housing testing or studies which may be related to whether lenders are engaging in mortgage pricing practices unrelated to credit worthiness or engaging in mortgage redlining, whether insurance redlining is occurring, whether discrimination in real estate appraisals is taking place, whether real estate advertising is discriminatory, to what extent landlords refuse Housing Choice Voucher participants, or whether other discriminatory housing practices are occurring. This action will help to reveal actual discriminatory practices taking place in the community so that future resources can be better allocated to address discrimination.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p>	<ul style="list-style-type: none"> • CDBG • CDBG-Staff Time 	<p>Start: 2015 Complete: 2018</p>	<ul style="list-style-type: none"> • HCDD (RE) • Fair housing organizations 	<ul style="list-style-type: none"> • Contract with qualified fair housing organizations • Conduct testing • Produce study or studies
<p>2. Provide counseling through the City's Fair Housing Hotline The City's Fair Housing Hotline provides a year-round, free resource to citizens who may have been discriminated against or have questions or concerns about various tenant and landlord issues. This action will continue to provide a resource to anyone living in, owning housing, or planning to move to the Houston area that may have a question or concern about their rights. The Fair Housing Hotline is one way to address several impediments by empowering citizens about their rights, giving citizens various ways to remedy possible discriminatory actions, and preventing future discrimination from occurring.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p> <p>2. Lack of Knowledge about Fair Housing</p> <p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • City departments • Multifamily properties • GHFHC • HUD-FHEO • TWC • Non-profit housing and service providers 	<ul style="list-style-type: none"> • Assist 7,500 callers
<p>3. Provide fair housing education to housing industry professionals HCDD will provide fair housing education and outreach to 200 housing industry professionals, such as housing providers, by supplying housing materials to distribute with City of Houston contact information or information about complying with the Fair Housing Act which may include topics like providing reasonable accommodations. HCDD may also sponsor free training opportunities. This action will address discrimination by reducing the numbers of people impacted by covert and overt discriminatory practices due to housing providers being unaware or unfamiliar with fair housing laws.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p> <p>2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials 	<p>Start: 2016 Complete: 2018</p>	<ul style="list-style-type: none"> • HCDD (RE) • HUD-FHEO • GHFHC • Fair housing organizations • Housing industry professionals • Apartment Association • Houston Realtors Association 	<ul style="list-style-type: none"> • Reach 200 housing industry professionals

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>4. Provide fair housing information to HCDD stakeholders HCDD will provide education and outreach through trainings, presentations, informational brochures, and other methods to 200 HCDD stakeholders including subrecipients, contractors, developers, and nonprofit and for profit partners. This action will address the impediment of lack of knowledge by providing fair housing training to educate and ensure stakeholder compliance under fair housing laws of agencies and subrecipients that partner with HCDD.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p> <p>2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HUD FHEO • HCDD subrecipients • Developers • HCDD contractors • Nonprofit and for profit partners 	<ul style="list-style-type: none"> • Reach 200 HCDD stakeholders with information about fair housing
<p>5. Increase the fair housing knowledge of government staff HCDD will provide education and outreach to city staff through trainings, presentations, informational brochures, and other methods of outreach. HCDD may work with partners to create a fair housing training program to implement city-wide for executive city staff during the first 12 months of employment. This action will address the impediment of lack of knowledge by providing fair housing training and resources to educate city employees about federal requirements to comply with fair housing law within the city's policies and procedures.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p> <p>2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HUD-FHEO • City departments • Fair housing organizations 	<ul style="list-style-type: none"> • Reach 1,000 staff members with fair housing training or information • Seek approval to institute fair housing training for executive city staff
<p>6. Increase fair housing knowledge of HHA staff HHA will provide at least four hours of fair housing training for existing HHA staff. It is important to train all staff in fair housing to ensure compliance with fair housing laws and enhance knowledge about fair housing.</p> <p style="text-align: right;">Priority: High</p>	<p>1. Discrimination in Housing</p> <p>2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • No City Funding Needed 	<p>Start: 2015 Complete: 2015</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • All HHA staff will have fair housing training
<p>7. Provide fair housing and HCDD housing program information to citizens HCDD will create a fair housing outreach plan to inform 500,000 citizens of their fair housing rights, the fair housing complaint process, and tenant and landlord relations. The outreach will likely consist of direct mailings to rental tenants and management companies about the City's Fair Housing Hotline, direct mailings to renters about the City's downpayment assistance program, and basic fair housing training to civic clubs and Super Neighborhoods. Education and outreach may be provided through trainings, presentations, informational brochures, posters, and other methods. This action will address the lack of knowledge of existing fair housing and housing resources by creating an array of targeted marketing for groups that have little or no knowledge of fair housing rights, fair housing laws, or HCDD housing programs.</p> <p style="text-align: right;">Priority: High</p>	<p>2. Lack of Knowledge about Fair Housing</p> <p>8. Lack of Financial Education</p> <p>14. Lack of Communication between government and residents</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • City departments • Civic Associations/ Clubs • Super Neighborhoods • Non-profit housing and services providers • Affordable housing providers • Managers of affordable housing • HISD 	<ul style="list-style-type: none"> • Reach 500,000 citizens with information about fair housing

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>8. Preserve affordable housing units HCDD will fund the preservation of at least 390 affordable housing rental units through the Multifamily Housing Development Program. This action will preserve the supply of existing affordable housing for low- and moderate-income households, addressing the lack of quality affordable housing options for members of protected classes. Priority: High</p>	<p>3. Lack of Affordable Housing Options</p>	<ul style="list-style-type: none"> • CDBG • HOME • TIRZ • BOND 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners • Lending institutions 	<ul style="list-style-type: none"> • Preserve 390 affordable housing rental units
<p>9. Create affordable housing units HCDD will fund the creation of 404 new affordable housing rental units using entitlement funding. This action will expand the supply of affordable housing for low- and moderate income housing, addressing the lack of affordable housing options for members of protected classes. Priority: High</p>	<p>3. Lack of Affordable Housing Options</p>	<ul style="list-style-type: none"> • CDBG • HOME • TIRZ • BOND 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners • Lending institutions 	<ul style="list-style-type: none"> • Create 404 affordable housing rental units
<p>10. Fund the creation or preservation accessible rental units Through HCDD's Multifamily Housing Development Program, rental developments must produce a minimum number of Section 504 accessible rental units. This action will increase the availability of quality accessible units for 50 low- and moderate-income households directly addressing the lack of accessible housing. Priority: High</p>	<p>4. Lack of Accessible Housing for Persons with Disabilities</p>	<ul style="list-style-type: none"> • CDBG • HOME 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Fund creation or preservation of 50 Section 504 accessible rental units
<p>11. Fund downpayment assistance loans through the Workforce Development Program HCDD's Workforce Development Program provides downpayment assistance to eligible middle-income households to purchase a home. This action will expand housing choice for middle-income households by allowing these households to seek housing in neighborhoods that may have more opportunity. Priority: High</p>	<p>7. Affordability</p>	<ul style="list-style-type: none"> • TIRZ 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Nonprofit housing and service providers 	<ul style="list-style-type: none"> • Fund 30 loans through the Workforce Development Program
<p>12. Fund public infrastructure and facility improvements in low- and moderate-income neighborhoods HCDD will provide funding for 20 infrastructure and facility improvements through its Public Facilities Program. This action will improve low- and moderate-income neighborhoods by creating new or improved amenities and services in these neighborhoods. Priority: High</p>	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG • TIRZ 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Nonprofit and for profit agencies • Transitional housing providers • Educational institutions • City departments 	<ul style="list-style-type: none"> • Fund 20 public infrastructure and public facility improvements in low- and moderate-income neighborhoods

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>13. Fund economic development activities to create 3 new or improved services benefitting low- and moderate-income neighborhoods HCDD will provide economic development funding to enhance services offered in low- and moderate-income neighborhoods. This action will improve low- and moderate-income neighborhoods by creating new or improved services in these neighborhoods that would otherwise be unavailable to residents.</p> <p style="text-align: right;">Priority: High</p>	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG • Section 108 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HBDI • HRA • Businesses 	<ul style="list-style-type: none"> • Fund economic development activities creating 3 new or improved services
<p>14. Upgrade or reconstruct homeowner housing in CRAs HCDD will continue and complete its Single Family Home Repair Program related to disaster recovery funding in city designated CRA areas by repairing, reconstructing, and demolishing substandard housing. This action will fund new residential homes or the repair of existing homes which will upgrade the housing stock in CRA neighborhoods which will enhance these neighborhoods.</p> <p style="text-align: right;">Priority: High</p>	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-DR 	<p>Start: 2015 Complete: 2016</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Complete repair or reconstruct 275 homes
<p>15. Offer economic incentives for development in CRAs HCDD will continue to address revitalization in CRAs by offering economic incentives for developers, businesses, bankers, and other interested entities that assist in the revitalization efforts. This action will incentivize private development in CRAs which will spur continued private investment revitalizing the community.</p> <p style="text-align: right;">Priority: High</p>	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-DR • CDBG • Section 108 	<p>Start: 2015 Complete: 2018</p>	<ul style="list-style-type: none"> • HCDD (RE) • Businesses • Developers • Banking institutions 	<ul style="list-style-type: none"> • Fund economic incentives
<p>16. Provide downpayment assistance funds for 500 low- and moderate-income households to purchase a home HCDD's Downpayment Assistance Program provides downpayment assistance to eligible low- and moderate-income households to purchase a home anywhere in the city. This action will expand housing choice for low- and moderate-income households by allowing these households these households to seek housing in neighborhoods that may have more opportunity.</p> <p style="text-align: right;">Priority: High</p>	<p>5. Lack of Income/Funding</p>	<ul style="list-style-type: none"> • CDBG • HOME 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing counseling agencies • Private lenders • Banking institutions 	<ul style="list-style-type: none"> • Provide downpayment assistance loans to 500 households
<p>17. Provide home repair assistance for 250 low- and moderate-income households HCDD's Single Family Home Repair Program will assist qualified low- and moderate-income homeowners with needed home repairs or reconstruction to create a safe living environment. This action will address the lack of income of low- and moderate-income homeowners by assisting with home repair activities. In addition, this action helps to upgrade the housing stock in mostly low-income, minority areas.</p> <p style="text-align: right;">Priority: High</p>	<p>5. Lack of Income/Funding</p> <p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG • TIRZ 	<p>Start: 2016 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Civic association/clubs 	<ul style="list-style-type: none"> • Provide housing repair assistance to 250 households

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>18. Carry out economic development activities to create or retain jobs HCDD will continue to fund economic development activities such as businesses lending to create or retain 50 jobs. This action will address residents' lack of income by promoting ways for low- and moderate-income individuals of protected classes to become employed or retain employment.</p> <p style="text-align: right;">Priority: High</p>	<p>5. Lack of Income/Funding</p>	<ul style="list-style-type: none"> • CDBG • Section 108 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Create or retain 50 jobs
<p>19. Prioritize affordable housing proposals near transit options in RFP HCDD will prioritize housing proposals near transportation options by giving priority to proposals through the RFP process. This action will address the lack of transportation options by creating greater access to transit opportunities by locating affordable housing near transit.</p> <p style="text-align: right;">Priority: High</p>	<p>11. Lack of transportation options</p>	<ul style="list-style-type: none"> • None 	<p>Start: 2015 Complete: 2019</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners 	<ul style="list-style-type: none"> • 100% of RFPs will have priority for proximity to transit
<p>20. Promote multifamily affordable housing development in high opportunity areas HCDD will prioritize housing proposals in high opportunity areas or CRAs by giving preference to proposals through the RFP process. This action will address patterns of segregation by locating affordable housing in areas with more opportunity.</p> <p style="text-align: right;">Priority: High</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • None 	<p>Start: 2015 Complete: 2019</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners 	<ul style="list-style-type: none"> • 100% of RFPs will have priority for location
<p>21. HCDD will pursue additional financial resources to support fair housing activities HCDD will pursue additional resources by applying for grants such as the FHIP to support its continued fair housing efforts. This action is intended to lead to an increase in fair housing funding which will help to implement these actions while the city continues to receive dwindling entitlement funding.</p> <p style="text-align: right;">Priority: High</p>	<p>5. Lack of Income/Funding</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Apply for 5 grants • Increase in funding available
<p>22. Create education material, or electronic access to material, in support of other actions as a way to educate government staff and community residents in fair housing HCDD will create original educational material including posters, flyers, brochures, and presentations that can be easily dispersed or can be available on-demand on the city's website to government staff and/or the community. By creating unique fair housing materials, HCDD can better tailor its outreach efforts to reach different groups with specific information needed.</p> <p style="text-align: right;">Priority: High</p>	<p>2. Lack of Knowledge about Fair Housing</p> <p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • CDBG-Outreach Material 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • 10 materials created • 10 materials updated

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>23. Translate HCDD's public notices about the consolidated planning process and other documents, as needed, into languages other than English HCDD will continue to translate its planning and housing program information documents prioritizing the documents most requested. This action will address the lack of communication between government and residents by ensuring HCDD documents are accessible to non-English speakers.</p> <p style="text-align: right;">Priority: High</p>	<p>2. Lack of Knowledge about Fair Housing</p> <p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • CDBG • CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • City departments 	<ul style="list-style-type: none"> • 10 of documents translated per language
<p>24. Review fair housing impediments and strategies annually and report on the progress in the CAPER HCDD will continue to offer a transparent review for the public of the actions taken to further fair housing. The draft CAPER is open for public comment for at least 15 days before submission to HUD. This action provides a way for citizens to review and comment on the progress of furthering fair housing.</p> <p style="text-align: right;">Priority: High</p>	<p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Update CAPER annually
<p>25. Add a Spanish webpage to HHA's website HHA will provide a webpage in Spanish on HHA's website. This action will address the lack of communication between government and residents by ensuring Spanish speakers have access to information about HHA's housing programs.</p> <p style="text-align: right;">Priority: High</p>	<p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • HHA 	<p>Start: 2015 Complete: 2015</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • Create a Spanish webpage through HHA's website
<p>26. Translate HHA documents into languages other than English HHA will continue to translate its documents prioritizing the documents requested. This action will address the lack of communication between government and residents by ensuring HHA documents are readable by non-English speakers.</p> <p style="text-align: right;">Priority: High</p>	<p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • HHA 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • 10 documents translated per language
<p>27. Update HHA's Language Assistance Plan annually HHA will continue to update its Language Assistance Plan yearly in the Annual Plan. This action will ensure that approaches to reach out to persons with limited English proficiency are analyzed and updated periodically and promote communication between HHA and LEP residents.</p> <p style="text-align: right;">Priority: High</p>	<p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> • HHA 	<p>Start: 2015 Complete: Annually</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • Update Language Assistance Plan annually
<p>28. HHA will place 50 units under the Annual Contributions Contracts (ACC) in tax credit developments HHA plans to increase the number of ACC units by placing these units at existing tax credit developments. This action promotes desegregation and the deconcentration of poverty.</p> <p style="text-align: right;">Priority: High</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • No City Funding Needed 	<p>Start: 2015 Complete: 2016</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • 50 ACC units

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>29. HHA will expand the Opportunity Center’s activities HHA will pursue partnerships and/or financing to expand resources available at the HHA Opportunity Center which provides meaningful and extensive mobility counseling for its voucher program participants. This action will ensure that voucher participants understand opportunities for housing in areas outside of their neighborhood promoting desegregation and the deconcentration of poverty.</p> <p style="text-align: right;">Priority: High</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • No City Funding Needed 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • Additional resources secured
<p>30. HHA will affirmatively market housing programs to families least likely to be served HHA will affirmatively market HHA waiting lists to families that are least likely to be served and monitor site and central waiting lists to identify practices that positively and negatively impact affirmatively furthering fair housing. This action will help to integrate HHA's housing programs.</p> <p style="text-align: right;">Priority: High</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • No City Funding Needed 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • Change in waiting list demographics
<p>31. Monitor lending data HCDD will collect and analyze HMDA lending data to monitor lending trends for patterns of potential discrimination. This analysis may be shared with the community to promote understanding of fair housing needs in the city. This action will result in updated analysis that will be utilized to better allocate future resources to address and decrease private lending discrimination and educate the public about fair housing discrimination.</p> <p style="text-align: right;">Priority: Medium</p>	<p>1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: Annually</p>	<ul style="list-style-type: none"> • HCDD (RE) • FFIEC 	<ul style="list-style-type: none"> • Update and maintain database of longitudinal lending data
<p>32. Monitor HUD Fair Housing Complaint Data HCDD will collect and analyze HUD fair housing complaint data to monitor trends for patterns of potential housing discrimination. This analysis may be shared with the community to promote understanding of fair housing needs in the city. This action will result in updated analysis that will be utilized to better allocate future resources to address and decrease housing discrimination and educate the public about fair housing discrimination.</p> <p style="text-align: right;">Priority: Medium</p>	<p>1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: Annually</p>	<ul style="list-style-type: none"> • HCDD (RE) • HUD • Texas Workforce Commission 	<ul style="list-style-type: none"> • Update and maintain database of longitudinal complaint data
<p>33. Develop or update datasets to describe the local supply and demand for accessible housing units HCDD will work with partners to develop or update datasets regarding housing for persons with disabilities because there is little detailed data available regarding the supply of housing and the various needs of persons with disabilities at the community or neighborhood level. This action will help to develop data that will better describe local accessible housing supply and local needs of persons with disabilities. This data will then be used to more efficiently allocate resources to address the lack of accessible housing and to create more accessible housing options.</p> <p style="text-align: right;">Priority: Medium</p>	<p>4. Lack of Accessible Housing for Persons with Disabilities</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: 2016</p>	<ul style="list-style-type: none"> • HCDD (RE) • MOPD • TIRR • HCIL 	<ul style="list-style-type: none"> • Update or collect 5 local datasets • Partner with 3 organizations

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>34. Identify areas where the cost of land is increasing and areas outside minority areas that would support affordable housing HCDD will gather research to perform its second Market Value Analysis, first completed in the previous consolidated planning period. Performing a second analysis will help to identify areas that have had market value increases so that funding can be best utilized by maintaining affordability in areas with growing opportunity and increased market development.</p> <p style="text-align: right;">Priority: Medium</p>	<p>3. Lack of Affordable Housing Options</p> <p>5. Affordability</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • CDBG • TIRZ 	<p>Start: 2015 Complete: 2017</p>	<ul style="list-style-type: none"> • HCDD (RE) • The Reinvestment Fund • City departments 	<ul style="list-style-type: none"> • Perform market value analytics • Produce the second Market Value Analysis for Houston
<p>35. Monitor code enforcement activities and address imbalances in implementation if needed HCDD will monitor code enforcement activities. This action will ensure that city services, specifically code enforcement, are not unfairly targeting housing occupied primarily by residents of various protected classes.</p> <p style="text-align: right;">Priority: Medium</p>	<p>1. Discrimination in Housing</p> <p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-staff time 	<p>Start: 2015 Complete: Annually updated</p>	<ul style="list-style-type: none"> • HCDD (RE) • DON 	<ul style="list-style-type: none"> • Update analysis annually • Meet with DON if any concerns found
<p>36. Conduct an analysis of Community Reinvestment Act funding in Houston and meet with banks to coordinate efforts for reinvesting in the community Banks are required by the Community Reinvestment Act to invest in certain communities. HCDD will research and analyze how banks have utilized funds to satisfy the Community Reinvestment Act's requirements. After research is completed, HCDD or other city staff will meet with banking institutions to discuss ways in which funding could be used to increase housing choice and opportunity, especially related to the city's efforts. Banking institutions have funding required to be reinvested in minority and low-income neighborhoods and this funding could be used to address imbalanced distribution of neighborhood assets while supporting housing affordability in all neighborhoods.</p> <p style="text-align: right;">Priority: Medium</p>	<p>5. Affordability</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p> <p>9. Imbalanced distribution of amenities, services, and infrastructure between neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-staff time 	<p>Start: 2016 Complete: 2018</p>	<ul style="list-style-type: none"> • HCDD (RE) • Banking institutions 	<ul style="list-style-type: none"> • Analyze local use of Community Reinvestment Act funding • Increase quality of relationships with banks • Increase number of partnerships with banks
<p>37. Meet with banking institutions to promote locating branches in minority areas HCDD will meet with banking institutions to discuss how they can better serve minority families by locating their services in minority neighborhoods. This action will promote a balance distribution of access to private financial services in the city.</p> <p style="text-align: right;">Priority: Medium</p>	<p>8. Lack of Financial Education</p> <p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-staff time 	<p>Start: 2015 Complete: 2017</p>	<ul style="list-style-type: none"> • HCDD (RE) • Banking institutions 	<ul style="list-style-type: none"> • Meet with banking institutions • Increase number of branches and financial services available in minority areas
<p>38. Meet with developers to promote private development in minority areas HCDD will promote development in minority areas by meeting with business owners or residential or commercial developers. This action will encourage increased private investment in neighborhoods currently lacking private investment.</p> <p style="text-align: right;">Priority: Medium</p>	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-staff time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Private residential or commercial developers or businesses 	<ul style="list-style-type: none"> • Increase private development in minority areas

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>39. Host and work with the Fair Housing Interdepartmental Leadership Team HCDD will continue to host city departments at the Fair Housing Interdepartmental Leadership Team meetings to discuss AFFH and coordinate various fair housing efforts. These meetings will be held at least three times annually. By coordinating fair housing outreach efforts with other city departments, the city can more efficiently reach city staff and citizens with appropriate fair housing materials ultimately promoting fair housing knowledge as well as ensuring that the development of policies and programs citywide consider fair housing issues.</p> <p style="text-align: right;">Priority: Medium</p>	<p>2. Lack of Knowledge about Fair Housing</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time ● City Department-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> ● HCDD (RE) ● Legal Department ● Planning ● DON ● HHSD ● MOPD ● PWE ● PRD ● Citizen's Assistance Office ● SWMD 	<ul style="list-style-type: none"> ● Hold three meetings annually
<p>40. Provide outreach to about the MWSBE and Section 3 Programs HCDD will promote available job opportunities to low-income and minority persons through the MWSBE / Section 3 Program while conducting 50 outreach activities reaching 10,000 individuals. This action will address residents' lack of income by promoting ways for low- and moderate-income individuals of protected classes to become employed.</p> <p style="text-align: right;">Priority: Medium</p>	<p>5. Lack of Income/Funding</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> ● HCDD (RE) 	<ul style="list-style-type: none"> ● Conduct 50 outreach activities ● Reach 10,000 individuals
<p>41. Promote HCDD's Homebuyer Assistance Program HCDD will promote the Homebuyer Assistance Program, which requires the completion of an 8-hour homebuyer course. Conducting outreach activities specifically about this program, such as mailings to renters, may promote families to engage in financial literacy to qualify for the Homebuyer Assistance Program which will help families build assets and improve their financial standing.</p> <p style="text-align: right;">Priority: Medium</p>	<p>5. Lack of Income/Funding</p> <p>8. Lack of Financial Education</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time ● CDBG-Outreach materials 	<p>Start:2018 Complete: 2018</p>	<ul style="list-style-type: none"> ● HCDD (RE) ● Housing counseling agencies 	<ul style="list-style-type: none"> ● Reach 5,000 persons
<p>42. Attend events to provide information about HCDD and housing programs HCDD staff will attend city and non-city events to spread the word about the number of people HCDD assists and how HCDD and other affordable housing programs work.</p> <p style="text-align: right;">Priority: Medium</p>	<p>10. NIMBY Resistance</p> <p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time ● CDBG-Outreach materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> ● HCDD (RE) ● City departments ● Non-profit housing and service providers 	<ul style="list-style-type: none"> ● Attend 50 events
<p>43. Encourage affordable housing developers to conduct community engagement activities HCDD will promote community engagement activities by suggesting housing developers funded by HCDD conduct outreach activities such as public meetings, charettes, open houses, or informational process during project development. These meetings would allow developers to discuss existing conditions and the future neighborhood vision. This action will directly engage communities to alleviate fears and address misconceptions about affordable housing.</p> <p style="text-align: right;">Priority: Medium</p>	<p>10. NIMBY Resistance</p> <p>14. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> ● HCDD (RE) ● Housing developers/owners 	<ul style="list-style-type: none"> ● Create 100% of RFPs with community engagement notification

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>44. Develop an Anti-NIMBYism policy and/or action statement HCDD will develop an Anti-NIMBYism departmental policy or action statement. This action will decrease NIMBY resistance by clearly outlining the myths and realities of affordable or assisted housing.</p> <p style="text-align: right;">Priority: Medium</p>	10. NIMBY Resistance	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2016 Complete: 2016</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners 	<ul style="list-style-type: none"> • Create a policy or action statement
<p>45. Work to dispel misconceptions about assisted housing HCDD and HHA will work to dispel the perception that assisted housing is just for minorities by conducting outreach to inform the public on assisted housing opportunities. Non-minority households will be targeted. This action will target nonminority households to reduce NIMBY sentiment and misconceptions about assisted housing.</p> <p style="text-align: right;">Priority: Medium</p>	10. NIMBY Resistance	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach materials 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HHA 	<ul style="list-style-type: none"> • Continue to be involved in national education campaign • Hold meetings
<p>46. Establish goal that addresses reducing existing economic and racial/ethnic stratification and fostering socio-economic diversity in the general plan The City's general plan is intended to guide future development through a number of policy directives. By establishing a goal or directive in the plan related to reducing economic, racial, and ethnic stratification and promoting diversity throughout the city, the general plan will reinforce its commitment to AFFH and addressing discrimination, affordability, and segregation in the city.</p> <p style="text-align: right;">Priority: Medium</p>	1. Discrimination in Housing 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status 7. Affordability	<ul style="list-style-type: none"> • None 	<p>Start: 2015 Complete: 2015</p>	<ul style="list-style-type: none"> • Planning (RE) • HCDD 	<ul style="list-style-type: none"> • Establish goal(s) addressing economic and racial/ethnic stratification and fostering socio-economy diversity in the general plan
<p>47. Seek clarification about whether state law prohibits affordable housing density bonus requirements Houston and other municipalities in Texas should seek clarification whether Section 214.905(B)(1) prohibits mandatory affordable housing/density bonus requirements. If the law is determined to allow only voluntary affordable housing/density bonus requirements, Houston should seek to amend the state statute to allow local governments to establish mandatory requirements. A state law that prohibits local governments from establishing mandatory affordable housing/density requirements could be an obstacle to achieving fair housing choice. This action will determine and suggest a remedy if state law is found to limit housing choice.</p> <p style="text-align: right;">Priority: Medium</p>	1. Discrimination in Housing 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: 2016</p>	<ul style="list-style-type: none"> • HCDD (RE) • Other municipalities • State of Texas • Fair housing advocates • Legal 	<ul style="list-style-type: none"> • Research and receive clarification about state law • Show that Houston is in favor of changing a state law if it is determined to prohibit housing choice
<p>48. Fund youth enrichment and afterschool programs to children in low- and moderate-income areas HCDD will continue to fund youth enrichment and afterschool programs through its public services program for 34,750 children in low- and moderate-income areas of the city over the next five years. This action increases the number of activities available for youth in the city.</p> <p style="text-align: right;">Priority: Medium</p>	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods 12. Low educational Attainment Among Minorities	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • City departments • Non-profit social service provider 	<ul style="list-style-type: none"> • Fund youth enrichment and education programs for 34,750 children

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>49. Fund programs that provide job training to low- and moderate-income individuals and individuals from protected classes HCDD will continue to fund job training for 1,335 persons through its public services program for low- and moderate-income individuals and persons from protected classes. This action will help to improve the skills of residents enhancing their previous education while preparing them for the workforce. Priority: Medium</p>	<p>5. Lack of Income/Funding 12. Low educational Attainment Among Minorities</p>	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Non-profit social service provider 	<ul style="list-style-type: none"> • Support job training for 1,335 persons
<p>50. Work with partners to explore ways to increase knowledge of health hazards HCDD will work with partners to disseminate fair housing and health hazard information, which may include making materials available in city facilities maintained by HHSD. This action will address health hazard exposure in certain areas by making citizens aware of their neighborhood's health conditions related to fair housing issues, such as communities that have historically and continually been exposed to poor air quality, lead-based paint hazards, and other hazardous conditions or poor infrastructure. Priority: Medium</p>	<p>13. Increased Health Hazard Exposure in Certain Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials • HHSD 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHSD (RE) • HCDD 	<ul style="list-style-type: none"> • Reach 500 people
<p>51. Provide lead-based paint information to families who might be at risk lead poisoning HCDD and HHSD will provide information about lead-based paint hazards to families who might be at risk. This action will help to educate residents, including those of certain protected classes, about possible health hazards in their community. Priority: Medium</p>	<p>13. Increased Health Hazard Exposure in Certain Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach Materials • HHSD 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHSD (RE) • HCDD 	<ul style="list-style-type: none"> • Reach 500 people
<p>52. Expand where people look for housing by creating a long-term educational publicity campaign HCDD will partner with developers to provide a long-term educational publicity campaign to help broaden the locations where residents of various races and ethnicities think to look for housing. This action will encourage residents to look in more neighborhoods when seeking housing and this could decrease segregation and deconcentrate poverty. Priority: Medium</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • CDBG-Staff time • CDBG-Outreach Materials 	<p>Start: 2017 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners 	<ul style="list-style-type: none"> • Reach 2,000 people
<p>53. HHA will prioritize capital improvements of public housing properties HHA will annually undertake a physical needs assessment to prioritize capital improvements at properties that would be designed to attract those residents least likely to apply. This action will attract more residents to apply for HHA's housing assistance which will help desegregate its housing programs. Priority: Medium</p>	<p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • No City Funding Needed 	<p>Start: 2015 Complete: Annually</p>	<ul style="list-style-type: none"> • HHA (RE) 	<ul style="list-style-type: none"> • Review assessment annually

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>54. HHA will review market analysis to determine if payment standards need updating Conduct a market analysis of fair market rents by zip code and area of the community and evaluate the distribution of vouchers to determine if payment standards should be reevaluated. This action will ensure that HCV holders can access communities that are not traditionally leased by HCV holders.</p> <p style="text-align: right;">Priority: Medium</p>	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	<ul style="list-style-type: none"> No city funding needed 	<p>Start: 2015 Complete: Annually</p>	<ul style="list-style-type: none"> HHA (RE) 	<ul style="list-style-type: none"> Review analysis annually
<p>55. Develop a bike plan for the City The city will update its bike plan using various methods of citizen engagement. This action will promote bike use as an alternative form of transportation by creating more convenient and efficient ways to use a bike as transportation.</p> <p style="text-align: right;">Priority: Low</p>	11. Lack of Transportation Options	<ul style="list-style-type: none"> Planning-Staff Time 	<p>Start: 2015 Complete: 2015</p>	<ul style="list-style-type: none"> Planning (RE) 	<ul style="list-style-type: none"> Complete a revised bike plan
<p>56. Monitor and comment on changes to public transportation related to fair housing HCDD will provide input on fair housing implications related to planned actions by METRO during appropriate public comment processes. This action will help to ensure fair housing was incorporated into any policy decisions made to public transportation in Houston.</p> <p style="text-align: right;">Priority: Low</p>	11. Lack of Transportation Options	<ul style="list-style-type: none"> CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> HCDD (RE) METRO 	<ul style="list-style-type: none"> Submit 2 comments
<p>57. Conduct an analysis of infrastructure deficiencies The city will conduct an analysis of infrastructure to identify deficiencies in minority areas. This research and analysis action will help in the allocation of future infrastructure resources in minority neighborhoods.</p> <p style="text-align: right;">Priority: Low</p>	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> CDBG-staff time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> PWE (RE) HCDD Planning 	<ul style="list-style-type: none"> Better understand infrastructure deficiencies in minority areas
<p>58. Analyze METRO's New Bus Network for fair housing concerns Analyze METRO's New Bus Network to determine if there are any fair housing concerns. If concerns are found, recommendations will be relayed to METRO. This action will help to understand the new distribution of bus services related to various neighborhoods and some protected classes.</p> <p style="text-align: right;">Priority: Low</p>	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> CDBG-Staff Time 	<p>Start: 2015 Complete: 2015</p>	<ul style="list-style-type: none"> HCDD (RE) METRO 	<ul style="list-style-type: none"> Recommend updates to New Bus Network if concerns are found
<p>59. Partner with 25 other organizations to promote asset building programs and financial literacy programs HCDD will partner with other agencies such as the United Way, City departments, local government counterparts, and housing counseling agencies by providing fair housing resources and information about the City's downpayment assistance program. This action will address the lack of income and the lack of financial literacy of residents by working with partners to direct families that are interested in the downpayment assistance program but aren't yet ready for homeownership to the resources available to improve their financial standing.</p> <p style="text-align: right;">Priority: Low</p>	5. Lack of Income/Funding 8. Lack of Financial Education	<ul style="list-style-type: none"> CDBG-Staff Time 	<p>Start: 2015 Complete: Ongoing</p>	<ul style="list-style-type: none"> HCDD (RE) United Way City departments Local government counterparts Housing counseling agencies BankOn Houston 	<ul style="list-style-type: none"> Partner with 20 organizations

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>60. Research changes to integrate AFFH into subdivision process HCDD will research and recommend including the following in the City's subdivision process:</p> <ul style="list-style-type: none"> • Developers should agree to produce print and Internet advertising targeted to certain racial/ethnic groups that are not represented in the community currently to receive subdivision approval • Developers and sales agents should give every client a brochure that identifies illegal discriminatory practices • All advertising should display fair housing logo <p>This action will decrease segregated housing patterns by encouraging private residential developers to AFFH and make housing opportunities known to racial/ethnic groups that are not represented currently in a specific community or neighborhood. Priority: Low</p>	<p>2. Lack of Knowledge about Fair Housing</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2016 Complete: 2018</p>	<ul style="list-style-type: none"> • Planning (RE) • HCDD 	<ul style="list-style-type: none"> • Recommend updates to subdivision process • Update subdivision process
<p>61. Amend Chapter 42 to provide an appropriate density bonus to sell or rent at least 5% of the units in all multifamily buildings with a certain amount of dwelling units affordable to low- and moderate-income households HCDD will recommend amending Chapter 42 to provide an appropriate density bonus to sell or rent at least 5% of the units in all multifamily buildings with a certain amount of dwelling units to an affordable to low- and moderate-income household. This action will encourage the production of new affordable housing units. Priority: Low</p>	<p>3. Lack of Affordable Housing Options</p> <p>7. Affordability</p>	<ul style="list-style-type: none"> • CDBG-staff time 	<p>Start: 2017 Complete: 2019</p>	<ul style="list-style-type: none"> • HCDD (RE) • Planning 	<ul style="list-style-type: none"> • Recommend amending Chapter 42 • Meet with Planning and Development staff
<p>62. Encourage the addition of a scope of work for accessibility features for all residential permit approvals HCDD will meet with the Plan Review staff to encourage the inclusion of an accessibility features scope of work in the plan submittal for all residential permits. This action will address the lack of accessible housing for persons with disabilities by ensuring accessibility features are present in residential plans. Priority: Low</p>	<p>4. Lack of Accessible Housing for Persons with Disabilities</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2016 Complete: 2016</p>	<ul style="list-style-type: none"> • HCDD (RE) • Planning 	<ul style="list-style-type: none"> • Research ways to implement through the plan submittal process • Meet with Planning and Development staff

Summary of Recommended Actions and Fair Housing Implementation Plan

Recommended Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>63. Amend Section 10-551 of the city code HCDD will encourage amending Section 10-551 of the city code to add all nationally protected classes including disability and familial status as well as deed restrictions that have an exclusionary impact that precludes the construction of housing affordable to households with modest incomes to the list of protected classes for which the city will not enforce deed restrictions. Section 10-553(c) of City code authorizes the city attorney to establish guidelines for any activity or category of activity the city attorney believes is an appropriate subject for an action to abate or enjoin through a lawsuit to enforce a restrictive covenant, like deed restrictions. Section 10-551 lists instances which the city will not enforce deed restrictions. Currently, this list only contains five of the seven protected classes. Although the city attorney has not yet promulgated these guidelines, amending this Section of the code would ensure that the City would not be involved in any legal action defending discrimination based on protected classes or reinforcing NIMBY attitudes about affordable or modest income housing.</p> <p style="text-align: right;">Priority: Low</p>	<p>1. Discrimination in Housing 10. NIMBY Resistance</p>	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2015 Complete: 2016</p>	<ul style="list-style-type: none"> • Legal Department (RE) • HCDD 	<ul style="list-style-type: none"> • Update Section 10-551 of the City's Code of Ordinances
<p>64. Review restrictive covenants and homeowner association bylaws to ensure community residences for persons with disabilities are allowed Adopt and implement a written policy to review all restrictive covenants and homeowner association bylaws submitted to the city for any reason that would effectively exclude community residences for people with a disability. The city will inform a community when restrictions cannot be enforced and take action by filing a discrimination complaint if community tries to enforce identified discriminatory covenants. A restrictive covenant, such as a deed restriction, is a way in which the private housing market can discriminate against protected classes and influence the kinds of housing in a neighborhood. If the city reviews deed restrictions and homeowner bylaws and notifies the public about discriminatory language identified, it may be able to prevent housing discrimination against persons with disabilities.</p> <p style="text-align: right;">Priority: Low</p>	<p>1. Discrimination in Housing 4. Lack of Accessible Housing for Persons with Disabilities 10. NIMBY Resistance</p>	<ul style="list-style-type: none"> • CDBG-Staff Time • Other Department-Staff Time 	<p>Start: 2017 Complete: 2019</p>	<ul style="list-style-type: none"> • Planning (RE) • HCDD • Legal Department 	<ul style="list-style-type: none"> • Research, write, fund, and implement a new policy
<p>65. HHA will encourage formal cooperation agreements with neighboring agencies to allow mobility for HCV holders across jurisdictions. Currently, HHA and surrounding agencies informally collaborate and work across jurisdictions. HHA will work to formalize this process to allow additional mobility for HCV vouchers. This action will promote desegregation and the deconcentration of poverty by reducing barriers to use vouchers between jurisdictions.</p> <p style="text-align: right;">Priority: Low</p>	<p>6. Segregated housing Patterns Based on Race, Ethnicity, and Economic Status</p>	<ul style="list-style-type: none"> • No city funding needed 	<p>Start: 2016 Complete: 2016</p>	<ul style="list-style-type: none"> • HHA (RE) • Nearby jurisdictions • Nearby public housing authorities 	<ul style="list-style-type: none"> • Implement 3 agreements

Acronyms – AFFH: Affirmatively Furthering Fair Housing, CRA: HCDD's Community Reinvestment Area, DON: Department of Neighborhoods, GHFHC: Greater Houston Fair Housing Center, HCDD: Housing and Community Development Department, HCIL: Houston Center for Independent Living, HCV: Housing Choice Voucher, HHA: Houston Housing Authority, HHS: Houston's Health and Human Services Department, HUD: U.S. Department of Housing and Urban Development, HUD-FHEO: HUD's Office of Fair Housing and Equal Opportunity. MOPD: Mayor's Office Persons with Disabilities, Planning: Planning and Development Services Department, PRD: Parks and Recreation Department, PWE: Public Works and Engineering Department, SWMD: Solid Waste Management Department, TIRR: The Institute from Rehabilitation and Research

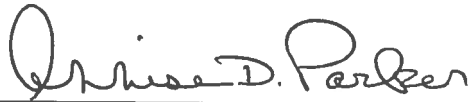
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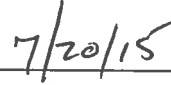
Appendix 1: Signature Page

SIGNATURE PAGE

I, Mayor Annise Parker, hereby certify that the Houston 2015 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the regulations of Affirmatively Furthering Fair Housing (AFFH) and the AFFH certification. This document represents conclusions about impediments to fair housing choice, as well as actions necessary to address the identified impediments.



Signature of Authorizing Official



Date

Mayor

Title

Appendix 2: Analysis of Houston's Development Controls for Exclusionary Impacts

Analysis of Houston's Development Controls For Possible Exclusionary Impacts

Prepared for the City of Houston, Texas
by

PLANNING/COMMUNICATIONS

River Forest, Illinois

June 2015

Prepared for the City of Houston, Texas
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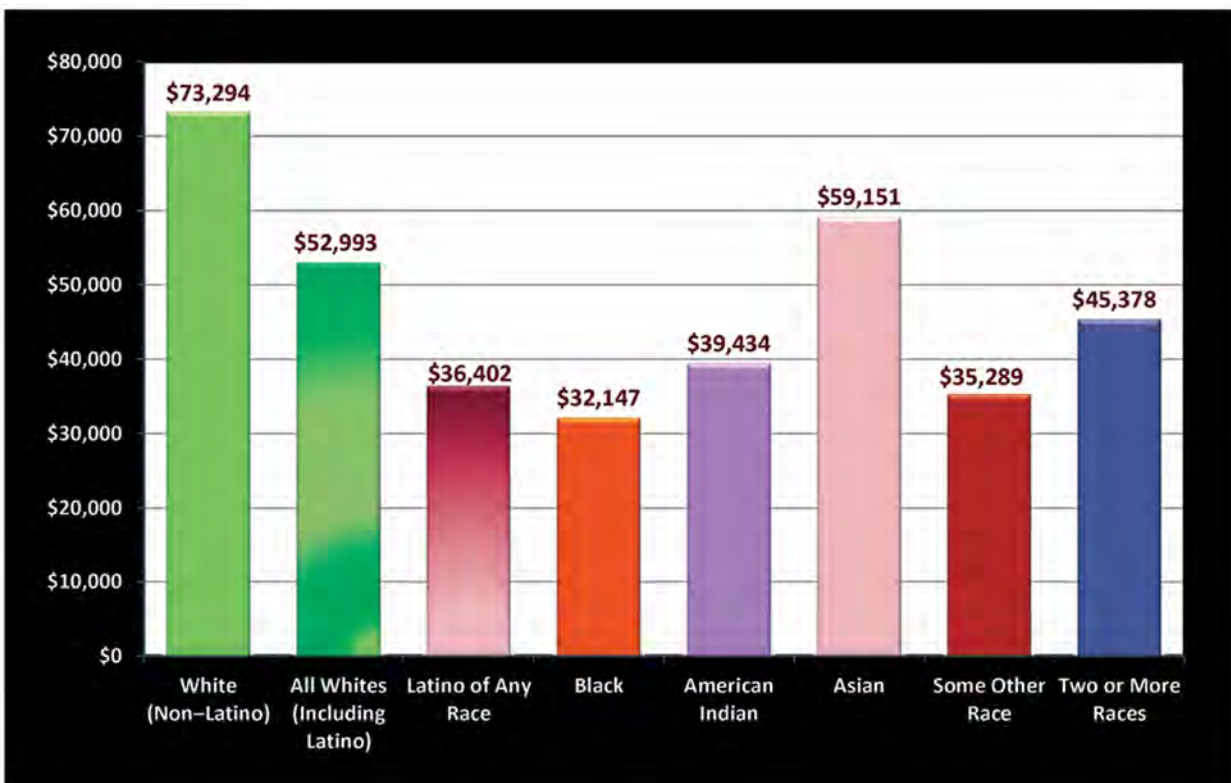
June 2015

Analysis of Houston’s Development Controls For Possible Exclusionary Impacts

The Impact of Development Controls on Housing Affordability

Development controls can affect the cost of housing within any city and act as a barrier to fair housing choice by imposing regulations and/or procedures that effectively prevent the new construction of ownership and rental housing that households with modest incomes can afford — especially when the median household

Figure 1: Houston Median Household Incomes by Race and Latino: 2009–2013



Source: Table S1903: Median Income in the Past 12 Months (in 2013 inflation-adjusted dollars), 2009–2013 American Community Survey 5–Year Estimates.

incomes of minority populations are significantly lower than for Caucasian households as illustrated in Figure 1 above.

These disparities in median household income create major differences in how much a median income household can afford to spend on housing in Houston. Economists and housing experts have long used the rule of thumb that a home is affordable when its purchase price is no more than two and a half or three times the buyer’s gross annual income. Their other test that applies to both owner and tenant households is that housing is affordable if the household spends less than 30 percent of its gross monthly income on housing. According to the U.S. Department of Housing and Urban Development, a household is considered “cost burdened” when it spends 30 percent or more of its gross income on its housing.

These are not arbitrary figures. Spending more than 30 percent on housing, leaves a typical household less money for essentials such as food, clothing, furniture, transportation, health care, savings, and health insurance. Local businesses suffer the most from this reduction in discretionary spending money due to high housing costs. Spending more than 30 percent on housing denies monies to other sectors of the economy unless households strapped for cash go into serious debt.

Table 1: Maximum Affordable Purchase Price and Rent for Median Income Households in Houston

Table 1: Maximum Affordable Purchase Price and Rent for Median Income Households in Houston			
Race or Ethnicity	Median Household Income 2009–2013	Maximum Affordable Purchase Price	Maximum Affordable Rent
White (Non-Hispanic)	\$73,294	\$219,882	\$1,832
All Whites (Including Hispanic)	\$52,993	\$158,979	\$1,325
Hispanic of Any Race	\$36,402	\$109,206	\$910
African American	\$32,147	\$96,441	\$804
American Indian	\$39,434	\$118,302	\$986
Asian	\$59,151	\$177,453	\$1,479
Some Other Race	\$35,289	\$105,867	\$882
Two or More Races	\$45,378	\$136,134	\$1,134

Source: Table S1903: Median Income in the Past 12 Months (in 2013 inflation-adjusted dollars), 2009–2013 American Community Survey 5-Year Estimates. "Maximum Affordable Purchase Price" is three times the median household income. "Maximum Affordable Rent" is 30 percent of gross monthly median household income.

In the fourth quarter of 2014, the gross income needed to buy the median-priced home in the Houston metropolitan area (\$199,000) was approximately \$49,983 according to a study by HSH.com, publisher of mortgage and consumer loan

information.¹ As Table 1 shows, nearly all median-income minority households cannot afford to buy the median-priced home in the Houston metropolitan area. This disparity has serious implications for reducing economic stratification and housing segregation.

Recommendation

To better understand the impacts of these different median household incomes by race and Latino ethnicity on economic stratification and racial and ethnic segregation, the City of Houston needs to identify the median sale price of different types of ownership housing (single-family detached, duplex, townhomes, condominiums) and the median rental for rentals by number of bedrooms. These data will illustrate the impact of economic stratification on racial and Hispanic integration in Houston and further enable the city to craft strategies to affirmatively further fair housing.

Land use controls that increase housing prices can strongly influence racial and ethnic segregation. A study of the 25 largest metropolitan areas from 1980 to 1990 found that development controls that established low density housing (defined as less than eight dwelling units per acre) consistently reduced rental housing, which in turn limited the number of Black and Hispanic residents who could live in these communities.²

Drawing on census data for 1990 and 2000 for the 25 largest metropolitan statistical areas and local regulatory indicators, a study conducted by Jonathan Rothwell and Douglas Massey found that development controls that established low density housing increased the segregation of African Americans by reducing the quantity of affordable housing in predominantly white jurisdictions.³ In a subsequent article, Rothwell conducted a statistical analysis of the 25 largest metropolitan statistical areas. The data showed that anti-density regulations were responsible for a large share of the observed patterns in segregation between 1990 and 2000. Minority groups are more segregated from whites in metropolitan areas with prevalent exclusionary development controls no matter what their relative incomes and population sizes. The study estimated that switching from the most exclusionary development controls to

¹ Full details on methodology and assumptions made are available at http://www.hsh.com/finance/mortgage/salary-home-buying-25-cities.html#_. To provide some perspective, the household income needed to buy a median-priced home in the Dallas metropolitan area was \$48,787 and in San Antonio \$45,374. Houston was in the middle of the 27 metropolitan areas studied.

² Rolf Pendall, "Local Land Use Regulation and the Chain of Exclusion," *Journal of the American Planning Association* (66) (2) (2000): 124–142.

³ Jonathan Rothwell and Douglas S. Massey, "The Effect of Density Zoning on Racial Segregation in U.S. Urban Areas," *Urban Affairs Review* (14) (6) (2009): 779–806.

the least exclusionary would reduce the gap between the most and least racially segregated metropolitan statistical areas by at least 35 percent.⁴

A number of development controls can artificially prevent the construction of housing affordable to household with modest incomes, effectively eliminating residential access to members of lesser-income groups who are often disproportionately racial or ethnic minorities. Such practices may affect the ability to integrate a city racially and can foster economic stratification by limiting the range of housing opportunities available in substantial areas of a city and its surrounding metropolitan area.

Some of the most common development controls that can produce this exclusionary effect include:

- (1) Designating extensive areas of a community for large lots (generally ½ acre and above) without providing sufficient lands that allow smaller lots.
- (2) Excluding multiple-family dwellings totally or greatly restricting the land available for them and limiting the type of multiple-family dwellings available, such as a preference for townhouses over garden apartments and high-rises.
- (3) Imposing restrictions on the number of bedrooms in multiple-family dwellings to discourage families with children such as requiring that a substantial number of dwelling units in a multiple-family complex be one-bedroom units or studio apartments.
- (4) Prohibiting or severely limiting mobile homes and manufactured housing, which are forms of affordable housing.
- (5) Imposing large lot width requirements which drive up development costs because they require additional street, curb, gutter, and sidewalk length, reducing the number of lots in a block. These practices can combine with extensive requirements for large lots to produce an exclusionary effect.
- (6) Requiring minimum building sizes unrelated to health and safety standards for residential construction which effectively mandate larger residences, where smaller ones would suffice.⁵
- (7) Arbitrarily lengthy review and approval times for residential buildings, and subdivisions⁶

⁴ Jonathan Rothwell, "Racial Enclaves and Density Zoning: The Institutionalized Segregation of Racial Minorities in the United States," *American Law and Economics Review* (13) (1) (2011): 290–358, 291.

⁵ See generally, Norman Williams, Jr. and Thomas Norman, "Exclusionary Land Use Controls: The Case of Northeastern New Jersey," 22 *Syracuse L. Rev.* 475, 481, 484–97 (1971). For a discussion of the impact of these devices on housing costs, see Lynn Sagalyn and George Sternlieb, *Zoning and Housing Costs: The Impact of Land-Use Controls on Housing Price* (New Brunswick, NJ: Center for Urban Policy Research, 1973), 16–19, 48–58.

⁶ It is difficult to evaluate the impact of processing times on developments without analyses of sample residential projects of varying housing types, sizes, and densities, and this review does not attempt to do so.

- (8) Numerous or sequential public hearings which add to the carrying costs of the development.
- (9) Development standards not rationally related to the nature of the land use, such as requiring three parking spaces for a one bedroom apartment.⁷

Sponsored by the U.S. Department of Housing and Urban Development, the National Association of Home Builders (NAHB) Research Center conducted a statistical study in 2007 of subdivision requirements in 469 communities from a nationwide sample of single-family dwellings. The purpose of this study was to establish a methodology to determine when exceeding particular benchmarks created a regulatory cost barrier in a community.

The study focused on a number of variables: lot size, floor space requirements, lot width, pavement width, sidewalk requirements, curb and gutter drainage, front yard setbacks, and off-street parking requirements. *The study found that excessive lot size, lot width, and floor area requirements accounted for the largest percentage of total costs.* While only 8 percent of the jurisdictions had excessive floor area requirements, the regulatory cost barriers for floor area in those jurisdictions accounted for 17 percent of the total regulatory cost barriers for all land development variables for all jurisdictions in the study. Finally, the study found that the average cost of excessive regulation from subdivision standards was about five percent of the average cost of a new single-family home.⁸ Of all of the studies referenced here, this is most relevant to the City of Houston, and will be used later in this analysis to provide benchmarks for evaluating the City's subdivision ordinances.

Quigley and Rosenthal conducted an extensive review of the empirical literature on the effects of land use regulation on the price of housing and found that it varied widely in quality of research method and strength of result, but with a number of credible papers bearing out theoretical expectations. They reported that when local regulators effectively withdraw land from buildable supplies whether under the rubric of development control, 'growth management,' or some other regulation, the land factor and the finished product can become pricier. "Caps on development, restrictive zoning limits on allowable densities, urban growth boundaries, and long permit processing delays have all been associated with increased housing price." But they observed that because of variations in both observed regulation and methodological precision, the literature failed to establish a strong, direct causal effect.⁹

⁷ For a survey of parking standards used by local governments, see Michael Davidson and Fay Dolnik, *Parking Standards*, Planning Advisory Service Report No. 510/511 (Chicago: American Planning Association, November 2002).

⁸ NAHB Research Center, *Study of Subdivision Requirements as a Regulatory Barrier*, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research (OPD&R) (Washington, D.C.: OPD&R, November 2007), 1–3.

⁹ John M. Quigley and Larry A. Rosenthal, "The Effect of Land Use Regulation on the Price of Housing. What Do We Know? What Can We Learn?" *Cityscape* (8) (1) (2005): 69–110, at 69.

There have also been a number of empirical and descriptive studies of the City of Houston's system of development control, and at least one, a comparative study between residential development in Houston and Dallas, assessed the comparative effect on housing costs (see footnote).¹⁰

Analysis of Houston's Development Controls

This analysis examines provisions in the City of Houston Code of Ordinances that affect residential development for possible exclusionary impacts on housing affordable to households with modest incomes as well as protected classes under the nation's Fair Housing Act. Recommendations to mitigate any potential exclusionary impacts are proffered.

This analysis addresses these chapters and articles:

- ◆ Chapter 42, Subdivisions, Developments, and Platting
- ◆ Chapter 29, Article III, Manufactured Home Parks
- ◆ Chapter 29, Article IV, Manufactured Home Subdivisions
- ◆ Chapter 10, Article VI, Modular Housing
- ◆ Chapter 10, Article IV, Houston Multi-Family Habitability Code
- ◆ Chapter 10, Article IX, Building Standards
- ◆ Chapter 19, Flood Plain

This analysis also examines the responsibilities of the city's building official and city attorney under Chapter 10, Articles I and XV.

¹⁰ Richard P. Peiser, "Land Development Regulation: A Case Study of Dallas and Houston, Texas," *AREUEA Journal* 9 (1981), 397–417 (finding that, in a comparison of subdivision development, costs of regulation in Dallas added \$1,000 to the cost of a lot in 1981, as compared to Houston). See also Janet F. Speyrer, "The Effects of Land-Use Restrictions on Market Values of Single-Family Homes in Houston," *Journal of Real Estate Finance and Economics* 2 (1989), 117–130 (in an analysis of the effects of zoning and restrictive covenants on single-family home prices in Houston and its suburbs, finding, through the calculation of a hedonic price index, that higher prices are paid for homes in neighborhoods with either type of land use control than for comparable houses without these controls); Zhu Qian, "Without Zoning: Urban Development and Land Use Controls in Houston," *Cities* 27 (2010), 31–41 (in a descriptive study, concluding that "[t]he private land use control system shows its weakness in terms of consistency, vulnerability to neighborhood socio-economic status, and subservience to special interests under market pressure"); Teddy M. Kapur, "Land Use Regulation in Houston Contradicts the City's Free Market Reputation," 34 *Environmental Law Reporter* 10045 (2004) (describing in detail the Houston system and arguing that "contrary to its free market reputation, the city of Houston (the City) has directed land use allocations by intervening in private deed restrictions and enacting land management controls such as subdivision regulations, street design standards, tax increment reinvestment zones, and prevailing lot size requirements").

① Chapter 42, Subdivisions, Developments and Platting

The City of Houston is the only large city in the United States without a zoning ordinance to regulate land use. To compensate, Houston’s subdivision regulations, in Chapter 42, contain some elements typical of a zoning ordinance, such as minimum lot size, lot width, parking requirements, and building line or setback provisions. It also relies on a system of compliance with certain private deed restrictions that the city attorney may enforce.

To obtain a building permit, an applicant must submit, with the permit application, an affidavit to the building official “stating that the construction, alteration, or repair for which the building permit is sought, and the use to which the improvement or building will be put will not violate deed restrictions or restrictive covenants running with the land...”¹¹ According to a City of Houston Planning and Development Department staff member, either a title report or a letter of compliance from the department, which has copies of recorded plats and their deed restrictions, can provide support for such an affidavit.¹² Further, Sec. 10–553 authorizes the city attorney to become a party to a restriction suit under certain conditions, after conducting “a careful investigation of the facts and the law.” Sec. 10–551 lists the types of private restrictions the city attorney may enforce, but contains the limitation that the restrictions “do not include provisions that restrict the sale, rental, or use of property on the basis of race, color, religion, or national origin and do not include any restrictions that by their express provisions have terminated.”¹³ Sec. 10–553(c) authorizes the city attorney to establish guidelines for any activity or category of activity that the city attorney believes is the appropriate subject for an action to abate or enjoin through a restriction suit.

An Assistant City Attorney in the Neighborhood Services Section the city’s Legal Department, said she was unaware of any written guidelines for restriction suits.¹⁴

¹¹ City of Houston Code of Ordinances Sec. 10–3 (Affidavit concerning deed restrictions on property—Prerequisite to issuance of building permit).

¹² Telephone interview with Landell Ramagos, Houston Department of Planning and Development staff, February 2, 2015.

¹³ These enforceable restrictions include “a limitation that: (1) Affects the character of the use to which real property, including residential and rental property, may be put; (2) Fixes the distance that a structure must be set back from property lines, street lines, or lot lines; (3) Affects the size of a lot or the size, type, and number of structures that may be built on the lot; (4) Regulates orientation or fronting of a structure; or (5) Regulates construction of a fence . . .” City of Houston Code of Ordinances Sec. 10–551. Arva L. Howard, Assistant City Attorney, described the meaning of “character” in (1) above. “This means restrictions that pertain to single family, residential use, multi-family use, number of structures permitted on the property.” Howard stated that the City of Houston does not enforce private deed restrictions involving architectural design controls. Email from Arva L. Howard to Stuart Meck, February 24, 2015.

¹⁴ Email from Arva L. Howard to Stuart Meck, February 24, 2015.

Further, the city attorney's office does not review private deed restrictions for provisions that restrict the sale, rental, or use of property on the basis of race, color, religion, or national origin.¹⁵

Chapter 42 covers standards and procedures for reviewing and approving subdivision plats (both tentative and final), general plans, street dedication plats, and development plats by the planning and development staff and the city planning commission. Its provisions apply to all land in the city as well as its extraterritorial jurisdiction.¹⁶ In addition, the planning commission has the authority to grant variances and special exceptions, at Sections. 42–81 and 42–82, respectively from any of the requirements of the chapter. Infrastructure design requirements are contained in a manual published by the Department of Public Works and Engineering.¹⁷

Subdivision plats fall into three classes under Chapter 42: a class I plat, a class II plat, and a class III plat. Class I and class II plats are optional and may be used in lieu of a class III plat if plat meets the qualification of Sec. 42–23. In that section the three plats are defined as follows:

(b) A class III plat is required for subdivisions that require or propose the creation of any new street or the dedication of any easement for public water, wastewater collection or storm sewer lines. A class III plat is also required for a vacating plat.¹⁸ Subdivisions that do not require or propose the creation of any new street or the dedication of any easement for public water, wastewater collection or storm sewer lines, at the option of the applicant, may be submitted as either a class I plat or a class II plat as determined by the respective applicable criteria, or may be submitted as a class III plat.

(c) A class II plat is a subdivision plat that:

- (1) Does not require or propose the creation of any new street;
- (2) Does not require or propose the dedication of any easement for public water, wastewater collection or storm sewer lines; and
- (3) Is not a replat that requires notification of adjacent property owners pursuant to chapter 212.

¹⁵ Telephone interview with Arva L. Howard, February 23, 2015.

¹⁶ The extraterritorial jurisdiction (ETC) is a five-mile band around the City's general-purpose boundaries, with the exception of instances when that band intersects another municipality or its ETJ.

¹⁷ City of Houston Department of Public Works and Engineering, *Infrastructure Design Manual* (Houston, TX: The Department, December 2014).

¹⁸ A "vacating plat" is a replat that eliminates a subdivision that a previous platting created — a procedure that is rarely used. For example, if a subdivision fails to sell, the owner can seek to return the land to a single plat via a vacating plat. All property owners within a subdivision must agree to this action. *Texas Local Government Code* §212.013(d).

- (d) A class I plat is a subdivision plat that either meets the four criteria below or is an amending plat:
- (1) Creates no more than four lots each fronting on an existing street;
 - (2) Does not require or propose the creation of any new street;
 - (3) Does not require or propose the dedication of any easement for public water, wastewater collection or storm sewer lines; and
 - (4) Is not a replat.

Sec. 42–24 requires a general plan to be submitted when property is proposed to be subdivided into sections, along with the subdivision plat for the first section; it shows any freeways, major thoroughfares and collector streets, and may also show the number of sections and the uses of the sections and restricted or unrestricted reserves—parcels of land that are not a lot but created within a subdivision plat for other than single–family use and established to accommodate some purpose for which a division into lots is not suitable or appropriate.

Under Sec. 42–55, an optional street dedication plat dedicating streets to the city may be submitted when there is an approved general plan.

A development plat is a site plan prepared and approved pursuant to Sec. 42–22 of the Code. All multiple–family developments are reviewed and approved via a development plat and there are no limits on density.¹⁹

This summary will not detail the review procedures for the plats described above. Sec. 42–52 describes the responsibility of the director of planning and development to review applications for completeness. If the director determines that the application is incomplete, he or she must return the application with an explanation of the deficiency, but there is no time limit for the completeness review in the Code. The policy of the department is to review subdivisions for completeness within 30 days.²⁰ However, Sec. 42–53 describes when completed applications are to be reviewed by the city planning commission, but the duration of the review is not stated in the section. Instead, the Texas Local Government Code establishes the deadline: “The municipal authority responsible for approving plats shall act on a plat within 30 days after the date the plat is filed. A plat is considered approved by the municipal authority unless it is disapproved within that period.”²¹

In order to evaluate Chapter 42’s development standards for their effect on affordability, this memorandum uses a set of benchmarks for single–family subdivisions contained in the HUD report described above, *Study of Subdivision Requirements as a Regulatory Barrier*. The benchmark standards are based on 12 individuals who responded to a survey of 25 land development professionals, civil

¹⁹ City of Houston Code of Ordinances, Sections. 42–230 to 42–426.

²⁰ Telephone interview with Landell Ramagos, Houston Department of Planning and Development staff, February 2, 2015.

²¹ Tex. L.G. Code Ann. § 212.009 (a).

engineers, architects, land planners in private practice, and land planners working for planning jurisdictions. The National Association of Home Builders and the National Association Counties recommended the individuals solicited in the survey.²²

The benchmark standards show a mean, minimum, and maximum, which represent the range of opinions of the respondents in the survey above. The respondents were asked to submit benchmark standards appropriate to metropolitan statistical areas with “more dense” development. The more dense development scenario was defined as a median lot size of 7,000 square feet or 0.16 acre.²³

Table 2: Land Development Benchmarks for “More Dense” Developments, Statistical Summary of Responses Used for Comparisons in MSAs (N=12)

Land Development Standard	Mean	Minimum	Maximum
Lot size (feet)	4,250	2,750	7,000
Lot width (feet)	39	30	60
Front setback in feet	13	0	30
Side setback in feet	5	3.5	6
Rear setback in feet	16	10	30
Floor area minimums in square feet	981	400	1,750
Paved roadway width in feet			
On-street parking allowed one side only	24	21	28
On-street parking allowed on both sides	27	22.5	32
Width of planting strip required (feet)	5.1	3.5	10
Sidewalk width (feet)	3.94	3	5
Number of off-street parking spaces required	1.56	1	2

Source: NAHB Research Center, *Study of Subdivision Requirements as a Regulatory Barrier*, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research (OPD&R) (Washington, D.C.: OPD&R, November 2007), 36, Table 14.1.

²² NAHB Research Center, *Study of Subdivision Requirements as a Regulatory Barrier*, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research (OPD&R) (Washington, D.C.: OPD&R, November 2007), 35. The small sample universe and low number of respondents are of some concern.

²³ Ibid.

How do Houston’s minimum standards compare to these benchmarks?

■ **Lot size.** Under Sec. 42–181, the minimum lot size for a single–family lot with wastewater collection service is 5,000 square feet in the extraterritorial jurisdiction (more than the mean of 4,250 square feet) or 3,500 square feet (less than the mean) within the city, so an extraterritorial lot is somewhat above the mean and a city lot is below the mean. Under certain circumstances, it is possible to reduce the lot area even more; a city lot in a subdivision can be as small as 1,400 square feet when certain conditions are satisfied.²⁴ For tracts of land that are not restricted to single–family use to be designated reserves on the plat, the applicant may designate the type of use, such as multiple–family use, on the tract. The minimum lot size of a reserve tract is 5,000 square feet.²⁵

■ **Lot width.** Sec. 42–185(a) provides that the minimum width of any lot along a street or shared driveway shall be 20 feet, placing it under the mean. Sec. 42–185(b) allows a city lot to be 15 feet wide if the subdivision conforms to certain standards. The minimum width of a reserve tract is 60 feet.²⁶

■ **Setbacks.** Chapter 42 uses the term “building line” rather than “setback.” The building line requirements in Chapter 42 are minimum standards; where private deed restrictions establish a greater building line, the deed restrictions control under Sec. 42–150.

Sec. 42–156 provides the follows for single–family homes:

- (a) Except as otherwise required or authorized by this chapter, the building line requirement for a lot restricted to single–family residential use shall be 25 feet along the front of a lot and ten feet along the back and sides of a lot adjacent to a collector street that is not an alley.
- (b) Except as otherwise required or authorized by this chapter, the building line requirement for a lot restricted to single–family residential use along a local street that is not an alley shall be:
 - (1) Twenty feet along the front of a lot and ten feet along the back and side of a lot adjacent to a local street; or
 - (2) Ten feet if the subdivision plat contains a typical lot layout and the subdivision plat contains plat notations that reflect the requirements of this section....

Under certain circumstances, the front building line may be even less. Sec. 42–157 contains optional performance standards for single–family homes on city lots that satisfy certain criteria. Under these performance standards, the front building line on a collector or local street may be reduced to ten, five, or zero feet.²⁷

²⁴ City of Houston Code of Ordinances, Sec. 42–181 (b) and (c).

²⁵ Ibid. Sec. 42–190.

²⁶ Ibid.

²⁷ Ibid. Sections. 42–157 (b), (c), and (d), respectively.

Collectively, these provisions would place the front yard building line for single-family homes on a collector street both above and below the median benchmark figures, depending on whether the lot was in the city or its area of extraterritorial jurisdiction. For a single-family home on a local street, the same would apply. Side and rear building lines are also mixed.

Sec. 42-155 establishes building lines for tracts, such as a tract containing multi-family residential land uses:

- (a) The building line requirement for a tract used or to be used for other than single-family residential purposes adjacent to a street that is a collector street or local street that is not an alley shall be ten feet unless otherwise required or authorized by this chapter.
- (b) The building line requirement for property used or intended to be used for other than single-family residential purposes adjacent to a street that is a collector street or local street and that is not an alley and across which street are located single-family residential lots having platted building lines greater than ten feet shall be the lesser of 25 feet or the greatest building line on the single-family residential lots directly across the street from the property.

■ **Minimum floor area requirements.** Chapter 42 does not contain minimum floor area requirements.

■ **Paved roadway width.** The City of Houston’s Department of Public Works and Engineering groups local streets—the kind of streets that would be in a conventional single-family subdivision—into three classifications, with different widths depending on density and average daily traffic. The following table shows the classification scheme.

Table 3: City of Houston Local Street Classification

Local Street Classification	Gross Density in dwelling units per acre	Average Daily Traffic	Minimum Pavement Width	Traffic Flow Conditions ¹
Residential Standard Density ²	0-6	250-350	27 feet	Yield
Residential High Density ³	6-27	350-750	32 feet	Slow
Residential Main ⁴	0-27	1,500 or more	36 feet	Free

Notes: 1. Based on parallel on-street parking on both sides of the street. 2. Lot widths equal to or greater than 40 feet. 3. Lot widths less than 40 feet. 4. Serves multiple streets and can be described as a “neighborhood feeder/collector.”

Source: City of Houston Department of Public Works and Engineering, *Infrastructure Design Manual* (Houston, TX: The Department, December 2014), 10-5 to 10-6.

Table 3 above shows that the “Residential Standard Density” classification is on the mean of the benchmarks, the “Residential High Density” classification is at the

maximum range of the benchmarks, and the “Residential Main” exceeds the benchmarks (which is to be expected because it functions as a collector street).

■ **Width of planting strip required.** Chapter 42 does not specifically require a planting strip (also known as a tree lawn) by name. However, the City of Houston’s Department of Public Works maintains a set of standard drawings for different types of infrastructure. Standard Drawing 02775–01, “Concrete Sidewalk Details for Streets with Curb,” shows what appears to be a two-foot strip between the sidewalk and the edge of the right of way (and the front property line). This would be below the minimum benchmark.

■ **Sidewalk width.** As established by the Department of Public Works and Engineering, minimum sidewalk width is five feet, which is at the maximum range of the benchmark.²⁸

■ **Parking.** Section 42–186 (a) requires a minimum of two parking spaces per single-family dwelling. Where there is a secondary dwelling unit of not more than 900 gross square feet on the same lot, only one additional parking space need be provided. While the single-family standard is at the maximum range of the benchmarks, it is typical. Indeed, a HUD research publication on land development standards recommends this standard.²⁹

Sec. 42–234 (a) sets forth minimum off-street parking requirements for multi-family residential development as shown in the table below:

Table 4: City of Houston Parking Requirements for Multi-Family Residential Development

Unit Size	Parking Spaces Per Dwelling Unit
Efficiency	1.25 parking spaces
One bedroom	1.333 parking space
Two bedrooms	1.666 parking space
Three or more bedrooms	2 parking space

²⁸ City of Houston Department of Public Works and Engineering, *Infrastructure Design Manual* (Houston, TX: The Department, December 2014), 10–13. For comparison purposes, see the HUD publication cited at footnote 29, *infra*, which recommends a *minimum* sidewalk width of four feet and noting that three feet is the minimum width necessary to accommodate a wheelchair, at 23.

²⁹ NAHB Research Center, *Proposed Model Land Development Standards and Accompanying Model State Enabling Legislation*, 1993 Edition, prepared for the U.S. Department of Housing and Urban Development Office of Policy Development and Research (OPD&R) (Washington, D.C.: OPD&R, June 1993), 12, Table 3, Parking Requirements.

These are above, below, and at the median of the benchmarks included in the HUD publication, which calls for 1 parking space for an efficiency unit, 1.5 parking spaces for a one-and two-bedroom unit, and 2 parking spaces for a unit with three or more bedrooms.³⁰

Impediments and Recommendations

Chapter 42 *appears* to lack any provisions that would adversely affect construction of affordable housing. As noted, the HUD study of subdivision requirements found that the most significant of these provisions were excessive lot size, lot width, and floor area requirements, which accounted for the largest percentage of total costs of subdivision development. By contrast, Houston’s minimum lot area and lot width requirements are substantially below the median benchmarks in that study and the City has no minimum house size requirements in Chapter 42.

Impediment

The ability of the City of Houston to mitigate economic stratification is blocked in part by the lack of information about the impacts of Chapter 42 and its enforcement and the cost of housing under deed restrictions and without deed restrictions.

What is unknown, however, is the impact of Chapter 42 and its enforcement on the ability to integrate the city racially and on the ability to mitigate the economic stratification that exists in certain neighborhoods. Chapter 42 and related sections enforce the city’s minimum requirements, but allow the city attorney to enforce certain types of private deed restrictions, giving the private deed restrictions priority in stature to the city’s own development standards.

As Janet Speyrer found, it appears that deed restrictions in Houston may lead to higher home prices compared to areas *not* under deed restrictions.³¹ The problem is that the city does not have a database of the deed restrictions of the city’s 27,000 subdivisions. It appears that the city does not know which properties are under deed restrictions and which are not — not to mention a lack of knowledge of the nature of the existing deed restrictions.

Recommendations

To mitigate these possible barriers to fair housing choice, the City of Houston should:

- ◆ Identify existing deed restrictions that effectively exclude housing affordable to households with modest incomes. To do this, the city needs to establish a database

³⁰ Ibid.

³¹ Janet F. Speyrer, *supra* note 10.

of existing deed restrictions within the city and any extraterritorial territory it regulates. The city could start with all of the deed restrictions that it has been asked to enforce. New deed restrictions should be added to the data as they are recorded with the proper city or county office. It is possible that the U.S. Department of Housing and Urban Development could fund such a project through a research grant to identify the impact, if any, of private deed restrictions on racial integration and economic stratification in the city and metropolitan area. This activity might be eligible for funding under the city's Community Development Block Grant. Time frame: Start in year one and complete within five years.

- ◆ Officially expand the types of private deed restrictions that the city attorney will *not* enforce, described in Sec. 10–551, to include restrictions that adversely affect *all* protected classes under the nation's Fair Housing Act including people with disabilities and familial status,³² as well as deed restrictions that have an exclusionary impact that precludes the construction of housing affordable to households with modest incomes. Time frame: Year one.
- ◆ Have the city attorney promulgate written guidelines for any activity or category of activity that the city attorney believes is an appropriate subject for an action to abate or enjoin through a restriction suit, as authorized in Sec. 10–533(c). Time frame: Year one.
- ◆ Amend the Code at Sec. 42–52 (Initial review by director) to establish a maximum review time for the completeness review of subdivisions, now a policy of the Department of Planning and Development, and a similar maximum review time for building permits at Sec. 10–2 (Code compliance review) or elsewhere. Time frame: Complete in year two.
- ◆ Amend the Code at Sec. 42–61 (Commission consideration and action) to make clear the period in which the city planning commission has to review and approve subdivisions and other types of plats, even though the 30–day period is controlled by the state's Local Government Code. This change will make clear to the lay reader how long the review will take. Time frame: Complete in year two.

② Chapter 29, Article III, Manufactured Home Parks

Sec. 29–1 defines a manufactured home park as a “contiguous development of land that has been planned and approved by the city planning commission in accordance with this Code and all other applicable laws, rules, and regulations.” The Houston Code of Ordinances uses the definition of manufactured home as set forth in Texas Revised Civil Statutes, which appears in the Occupations Code, Sec. 1201.003: “‘Manufactured home’ or ‘manufactured housing’ means a HUD–code manufactured home or a mobile home.”

³² 42 U.S.C. §§ 3601 et seq.; 42 U.S.C. § 3602(k) (defining “familial status”); 42 U.S.C. § 3602 (h) (defining “handicapped”).

The provisions for approval of a manufactured home park are straight-forward. Under Sec. 29-72, an application for approval of a park must be submitted to the city planning commission for approval, before the city's building official can approve buildings located in them. Sec. 29-73 describes the contents of the application, which are similar to the contents of a subdivision application, except that the park is a tract rather than a lot. Sec. 29-87 is a series of six locational criteria, the most significant of which is a two-acre minimum area requirement with at least ten manufactured home stands. Another is a requirement that any valid and applicable deed restrictions or other land use restrictions do not prohibit the development or use of the site as a manufactured home park. Provided that the manufactured home parks satisfy these criteria, they may be located upon any property in the city.

The Code indirectly places limits on density, which is governed by the following three standards:

- ◆ No manufactured home can be located closer than 10 feet from any other manufactured home or building or temporary structure
- ◆ The accumulated occupied area of the manufactured home and its accessory structures cannot exceed two-third of its lot area
- ◆ At least eight percent of the gross site area of the park must be devoted to recreational facilities, generally centralized³³

Finally, all manufactured homes must be located at least 25 feet from any park property lines abutting a public street and at least five feet from other property lines.³⁴

Manufactured homes are an important source of affordable housing. Nothing in these requirements for manufactured home parks appears to erect regulatory barriers to establishing these parks.

③ Chapter 29, Article IV, Manufactured Home Subdivisions.

This part of the Code allows the creation of subdivisions with lots which are to be deed restricted so that only manufactured homes — not “permanent type residential dwellings” — may be located on them. A manufactured home subdivision must be at least four acres with at least 20 lots. The procedures for approving manufactured homes subdivisions are the same as conventional residential subdivisions.³⁵

④ Chapter 10, Article VI, Modular Housing.

In contrast to manufactured homes placed on temporary foundations, a modular home, is “a structure or building module that is manufactured at a location other the

³³ Ibid. Sections. 29-90 (Density) and 29-91(Recreational Area).

³⁴ Ibid. Sec. 29-92 (Location).

³⁵ Ibid. Sec. 29-135 (Plat approval).

location where it is installed and used as a residence by a consumer, transportable in one or more sections on a temporary chassis or other conveyance device, and designed to be used as a permanent dwelling when installed and placed upon a permanent foundation system.”³⁶ Modular housing is built on an assembly–line basis, allowing lower costs than site–built housing.³⁷ Sec. 10–233 requires that a modular home must comply with Houston’s Construction Code. Sec. 10–237 mandates that, in order to place a modular home on property in the city, the owner of the property must apply for a permit. When the modular home is completed, under Sec.10–242, the owner must apply for a certificate of compliance. Parking standards for modular homes are the same as the standards for other residential uses in the Code.³⁸

Impediment

Deed restrictions that greatly restrict or bar altogether manufactured homes and modular or industrialized housing.

Manufactured home parks, manufactured home subdivisions, and modular or industrialized housing are considered together. Rather than greatly restricting or prohibiting them, as some communities do, the City of Houston Code allows manufactured homes and modular housing anywhere in the city, unless barred by a private deed restriction. Both of these are sources of affordable housing. Exclusion of these homes would eliminate a source of housing affordable to households with modest incomes and effectively pose a barrier to many African American and Latino households whose collective median household incomes are significantly lower than that of non–Hispanic Caucasians.

Recommendation

Identify existing deed restrictions that effectively greatly restrict or completely bar manufactured homes and modular or industrialized housing. To do this, the city needs to establish a database of existing deed restrictions within the city and any extraterritorial territory it regulates. The city could start with all of the deed restrictions that it has been asked to enforce. New deed restrictions should be added to the data as they are recorded with the proper city or county office. It is possible that the U.S. Department of Housing and Urban Development could fund such a project through a research grant to identify the impact, if any, of private deed restrictions on racial integration and economic stratification in the city and

³⁶ Ibid. Sec. 10–15 (4).

³⁷ It should be noted that HUD, under Secretary George Romney, launched Operation Breakthrough, an attempt to promote industrialized housing in 1969 on a nationwide basis. For an account of this effort, see Robert McCutcheon, “Operation Breakthrough,” in *The Encyclopedia of Housing*, 2nd edition, Andrew T. Carswell, ed. (Thousand Oaks, CA: Sage Publications, 2012), vol. 2, 536–538.

³⁸ City of Houston Code of Ordinances, Sec. 10–246 (Parking spaces required if used as residence).

metropolitan area. This activity might be eligible for funding under the city's Community Development Block Grant. Time frame: Start in year one and complete within five years.

⑤ Chapter 10, Article IV, Houston Multi-Family Habitability Code

The Multi-Family Habitability Code (MFHC) establishes a program of registration and inspection of multi-family rental buildings that contain three or more units. The building owner must register it with the city's building official and pay an inspection fee.³⁹ The building official is responsible for formulating an MFRC checklist that is to be used in the inspection program. The checklist incorporates a series of habitability standards from Sec. 10-155 that address fire, life, safety, swimming pools, and security devices. The MFRC requires that the owner post a valid certificate of occupancy or valid life safety compliance certificate and a notice to all residents advising them that if any condition in the building creates a hazard, they are to report the condition to the building's manager or owner and may also report the condition to the City of Houston.⁴⁰ The MFRC does not state how often inspections are to be conducted.

⑥ Chapter 10, Article IX, Building Standards

The Building Standards article is essentially a property maintenance code. Enforcement is split between the city's neighborhood protection official (for dwellings) and the building official (for all other structures). The article gives these officials the authority to enter and conduct inspections of vacant and occupied property. When the inspector finds a violation of the building standards, the official may request an administrative hearing before a hearing officer or a building and standards commission may be requested to consider an order to enforce the building standards. The order can direct the owner to repair, remove, or demolish the structure or parts of it and correct any other conditions that constitute a violation of the building standards, or for the city to undertake any of these actions and assess the owner. Sec. 10-361 contains minimum building standards regarding general maintenance and conditions of property, structures, utilities, health, light, and ventilation. The obligations for complying with the standards lie with both the owner and, to a lesser degree, the occupants. Under certain emergency circumstances, the building standards official may conclude that the property's condition constitutes a serious and immediate hazard and can engage the hearing officer in a conference, the outcome of which can be a notice to vacate the property and a notice of a corrective action hearing before the building and standards commission.⁴¹

³⁹Ibid. Sec. 10-154 (MFRB registration); Sec. 10-157 (MFRB inspection).

⁴⁰Ibid. Sec. 10-155(2).

⁴¹Ibid. Sec. 10-393 (Notice to vacate); Sec. 10-394 (Notice of corrective action; hearing).

⑦ Chapter 19, Flood Plains

Chapter 19 of the Code of Ordinances creates a regulatory framework to ensure that buildings are either:

- ◆ Not located in “special flood hazard areas,” which are areas that have a one percent chance or greater of flooding in a given year as designated by the Federal Emergency Management Agency (FEMA) in order to obtain insurance for the property, or
- ◆ Built in a way that elevates the structure above the base flood by a foot or more, ensuring minimum flood protection

Division 3 describes the development permit process; Sec. 19–16(a) declares that “[a]ny development within a special flood hazard area shall be unlawful without a development permit, regardless of whether a plat is required under chapter 42 of this code. The special flood hazard areas are shown on a Flood Insurance Rate Map (FIRM), published by FEMA. A development permit is required in addition to any other permit that may be required for the development activities.” Under Sec. 19–19, the city engineer is responsible for reviewing and approving or denying the development permit, based on information submitted by the applicant and other information the city engineer may request. Chapter 19 contains standards for development in special flood hazard areas (Sec. 19–32) and generally prohibits any type of development in floodways and watercourses (the channels through which water flows) (Sec. 19–42 to 19–43). The city engineer may deny or revoke the development permit and this decision is subject, after notice is given to the applicant or permit holder, to a hearing before the City of Houston’s general appeals board and then to the city council.⁴² Under Article III, Division 4, the chapter also addresses building restrictions in coastal high hazard areas, which have special flood hazards associated with high velocity waters.⁴³ In order to receive a development permit in coastal high hazard areas, there are additional requirements for manufactured homes, including anchors, tie-downs, frame ties, and elevation.⁴⁴

Conclusions and Recommendations

Collectively, the Houston Multi-Family Habitability Code, and Building Standards and Flood Plain provisions constitute life/safety ordinances that appear to establish no obstacles to building housing affordable to households with modest incomes or achieving racial or economic integration. The Multi-Family Habitability Code establishes an inspection program for multi-family rental housing to ensure that such housing remains habitable and free from hazards. The Building Standards provisions

⁴² Ibid. Sec. 19–23 (Revocation of permits).

⁴³ Ibid. Sec. 19–51 (Generally).

⁴⁴ Ibid. Sec. 19–52 (Building restrictions), Sec. 19–74 (Special requirements for manufactured homes); see generally, Chapter 19, Article IV, Division 2 (Placement standards), especially Sec. 19–74.

ensure that *all* property is subject to a type of property maintenance code. Finally, the city has in place a detailed article on regulating development in flood plains, floodways, and coastal hazard areas, which applies to *all* types of buildings and structures.

While no impediments to fair housing choice were identified in the Houston Multi-Family Habitability Code, Building Standards, and Flood Plain regulations, the city can further improve these codes by implementing the following recommendations:

- ◆ Amend the Multi-Family Habitability Code at Sec.10-157 (MFRB inspection program) to specify how often registered multi-family dwellings must be inspected. The city needs to ensure that it has an adequate number of trained inspectors to conduct the program.
- ◆ While unrelated to the purpose of this report, it is useful to conduct a periodic independent management audit of all inspection programs to determine whether they are meeting their objectives.

Appendix 3: Impacts of Development Regulations and Practices on Housing for People with Disabilities

Impacts of Development Regulations and Practices on Housing for People With Disabilities

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June 2015

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Impacts of Development Regulations and Practices on Housing for People With Disabilities

Development Controls and Building Codes

Housing for People With Disabilities

All people with disabilities are protected from housing discrimination under Houston,¹ Texas,² and federal law.³ As noted in this Analysis of Impediments, discrimination due to a disability is the one of the two most common bases for fair housing complaints filed in Houston as well as across the nation. The disabilities of the vast majority of Houston residents are mild enough that they are able to live on their own or with family, with or without supportive services. For many others with more severe disabilities, the family-like, supportive living arrangement of a community residence is the most appropriate housing available so they can live in the community rather than in a more restrictive and often inappropriate institutional setting.

Community Residences for People With Disabilities

Community residences are crucial to achieving the adopted goals of the State of Texas and the United States of America to enable people with disabilities to live as normal a life as possible in the least restrictive living environment. We have made great strides from the days when people with disabilities were warehoused in inappropriate and excessively restrictive institutions, out of sight and out of mind.

People with substantial disabilities often need a living arrangement where they receive staff support to engage in the everyday life activities most of us take for granted. These sorts of living arrangements fall under the broad phrase “community residence” — a term that reflects their *residential nature* rather than the institutional nature of a nursing home or hospital. A community resi-

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1. City of Houston, Texas, Chapter 17, Article VI, *Code of Ordinances*.
 2. Title 15, Fair Housing Practices, Chapter 301, Texas Fair Housing Act, Texas Property Code.
 3. *Fair Housing Amendments Act of 1988*, 42 U.S.C. §3601.

dence's primary use is as a residence or a home like yours and mine, not a treatment center nor an institution.

One of the core elements of community residences is that they seek to emulate a family in how they function. The staff (or in the case of a recovery community, the officers) function as parents, doing the same things our parents did for us and we do for our children. The residents with disabilities are in the role of the siblings, being taught or retaught the same life skills and social behaviors our parents taught us and we try to teach our children.

Community residences seek to achieve “normalization” of their residents and incorporate them into the social fabric of the surrounding community. They are operated under the auspices of a legal entity such as a non-profit association, for-profit private care provider, or a government entity.

Interaction between the people who live in a community residence is essential to achieving normalization. The relationship of a community residence's inhabitants is much closer than the sort of casual acquaintances that occur between the residents of a boarding home where interaction between residents is merely incidental. In community residences, the residents *share* household chores and duties, *learn* from each other, and *provide* one another with emotional support — family-like relationships not essential for, nor present in lodging houses, boarding homes, fraternities, sororities, nursing homes, or institutional uses. Table 1 on the next page illustrates the many functional differences between community residences for people with disabilities, institutional uses like nursing homes, and boarding homes or rooming houses.

The number of people who live in a specific community residence tends to depend on its residents' types of disabilities as well as therapeutic and financial reasons.⁴ Like other cities across the nation, any regulations Houston establishes for community residences for people with disabilities need to actually achieve a legitimate government interest in the least drastic manner.

Community residences have probably been studied more than any other small land use. To understand the rationale for the guidelines to regulate community residences that are suggested here, it is vital to review what is known about community residences, including their appropriate location, number of residents needed to succeed both therapeutically and financially, means of protecting their vulnerable populations from mistreatment or neglect as well as excluding dangerous individuals from living in them, and their impacts, if any, on the surrounding community.

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4. While the trend for people with developmental disabilities is toward smaller group home households, valid therapeutic and financial reasons lead to community residences for people with mental illness or people in recovery from drug and/or alcohol addiction to typically house eight to 12 residents. However, a community residence must comply with minimum floor area requirements like any other residence. If the local building code or property maintenance code would allow only eight people in a house, then eight is the maximum number of people who can live in that house whether it's a community residence for people with disabilities or a biological family.

Differences Between Community Residences, Institutions & Nursing Homes, and Boarding Homes			
Characteristic	Community Residence for People With Disabilities	Institutional Uses Including Nursing Homes	Boarding Homes (or Rooming Houses)
Proper Environment	Residential Home-like	Institutional Hospital-like	Residential Hotel-like
Appropriate Land-Use District	Single-family residential Multiple-family in limited instances	Commercial, medical, institutional	Multiple-family residential
Relationship of Residents	Sibling-like relationships essential Single housekeeping unit emulating a biological family	Relationships not planned nor essential Incidental friendships may develop	No dependency on other residents Incidental friendships may develop Relationships not planned nor essential
Supervision	Staff in the role of the parents	Total staff supervision	Landlord-tenant relationship
Values Fostered	Family values	None	None
Primary Functions	Emulate a biological family Provides support in a family-like residential setting; residents dependent on each other like in a biological family Share family and household tasks Educate residents in areas in which parents normally educate their children: Personal health and hygiene Eating habits Dressing/clothing care Household duties and chores House maintenance House safety Developing social and interpersonal skills Developing shopping skills Developing public behavior skills Developing recreational skills Using public transportation Use and value of money Using public facilities (stores, restaurants, theaters, recreational facilities)	Provide medical treatment and institutional care No family-like living; not residential No family tasks; patients are cared for No educational role	No attempt to emulate a biological family; each boarder functions individually Residents are completely independent of each other Residents do not share household tasks No educational role

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Protecting the residents and neighbors. People with disabilities who live in community residences constitute a vulnerable population that needs protection from possible abuse, neglect, and exploitation. Community residences for these vulnerable individuals need to be regulated to assure that their residents receive adequate care and supervision. Licensing and certification are the regulatory vehicles generally used to assure adequate care and supervision. Texas, like many other states, has not established licensing or certification for some populations with disabilities that community residences serve. In these situations, certification by an appropriate national certifying organization or agency that is more than simply a trade group can be used in lieu of formal licensing. Licensing or certification also tends to exclude from community residences people who pose a danger to others, themselves, or property — such people are *not* covered by the Fair Housing Act.

Therefore, there is a legitimate government interest in requiring that a community residence or its operator be licensed by the State of Texas in order to be allowed as of right. If state licensing does not exist for a particular type of com-

munity residence, the residence can meet the certification of an appropriate national certifying agency, if one exists, or is otherwise sanctioned by the federal or state government.⁵ If Texas law allows, Houston could adopt its own licensing or registration ordinance for community residences for people with disabilities.

Fair Housing and Community Residences

Twenty-seven years ago the Fair Housing Amendments Act of 1988 added people with disabilities to the classes protected by the nation's Fair Housing Act. The amendments recognized that many people with disabilities need a community residence (group home, halfway house, recovery community) in order to live in the community in a family-like environment rather than being forced into an inappropriate institution. The Fair Housing Amendments Act's legislative history stated that:

The Act is intended to prohibit the application of special requirements through land-use regulations, **restrictive covenants**, and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice with in the community.⁶ [*Emphasis added*]

While many fair housing advocates suggest the Fair Housing Amendments Act prohibits all land-use regulation of community residences, the Fair Housing Amendments Act's legislative history suggests otherwise:

Another method of making housing unavailable has been the application or enforcement of otherwise neutral rules and regulations on health, safety, and land-use in a manner which discriminates against people with disabilities. Such discrimination often results from false or over-protective assumptions about the needs of handicapped people, as well as unfounded fears of difficulties about the problems that their tenancies may pose. These and similar practices would be prohibited.⁷

Many states, counties, and cities across the nation continue to base their zoning regulations for community residences on these "unfounded fears." The 1988 amendments to the Fair Housing Act require all levels of government to make a *reasonable accommodation* in their rules and regulations to enable community residences for people with disabilities to locate in the same residential areas as any other residential use.⁸

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5. For example, the U.S. Congress has recognized and sanctioned the recovery communities that operate under the auspices of Oxford House.
 6. H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173.
 7. *Ibid.*
 8. 42 U.S.C. §3604(f)(B) (1988).

Alone among large American cities, Houston does *not* include a zoning ordinance among its land–use controls. The discussion that follows, however, frequently refers to zoning districts and definitions because the case law under the Fair Housing Act invariably addresses land–use restrictions on community residences for people with disabilities that appear in local zoning codes.

The planning and legal principles that apply to zoning, however, are equally applicable to all land–use controls, including Houston’s, such as Chapter 42 of the Houston City Code, “Subdivisions, Developments, and Platting.”

Restrictive Covenants

In the absence of local zoning, restrictive covenants on residential property take on an extra regulatory dimension. Even before passage of the Fair Housing Amendments Act of 1998, it was well settled that a community residence is a residential land use and *not* a business or commercial land use. The Fair Housing Amendments Act of 1988 codified the majority opinion of the courts to specifically invalidate restrictive covenant provisions that effectively exclude community residences from residential areas. The Fair Housing Act renders these covenants unenforceable against community residences for people with disabilities.⁹

The addition to the language quoted earlier, the legislative history of the Fair Housing Amendments Act of 1988 makes it rather clear that new subsection 804(f)(2) of the Fair Housing Act

...is intended to prohibit special restrictive covenants or other terms or conditions, or denials of service because of a person’s handicap and which have the effect of excluding, for example, congregate living arrangements for persons with handicaps.¹⁰

The act invalidates restrictive covenants in property deeds and homeowner association bylaws that limit the uses within a subdivision to single–family residential uses and/or structures to single–family residential structures. Under the Fair Housing Act — as well as many states’ statutes — these private restrictions cannot exclude community residences (group homes, small halfway houses, recovery communities, sober living homes) for people with disabilities.

Among the vast majority of court decisions in validating the application of restrictive covenants to community residences for people with disabilities, is *Deep East Texas Regional Mental Health and Mental Retardation Services v. Kinnear*

9. H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2184.

10. Preamble I, 53 Federal Register 35001 (Nov. 7, 1988) and *U.S. House of Representatives, Committee on the Judiciary*, Report 100–711: the Fair Housing Amendments Act of 1988 at 23, 100th Congress, 2d Session (1988), published at 1988 U.S. Code Congressional and Administrative News 2173–2230 (1988).

where the Texas Court of Appeals ruled that a group home for six women with mental disabilities plus two supervisory staff is *not* excluded by a restrictive covenant that limits use of a property to “single family residence.” In distinguishing cases that involve use limitations, the court accurately wrote that the term “single family residence” referred to architectural type and character of the structure.¹¹

Even before President Reagan signed the Fair Housing Amendments Act of 1988, Texas courts had invalidated application of these restrictive covenants to community residences for people with disabilities in *Collins v. City of El Campo, Texas*¹² and *Permian Basin Centers for Mental Health and Mental Retardation v. Alsobrook*.¹³

Through the “Community Homes for Disabled Persons Location Act,” the State of Texas itself has prohibited exclusion of some types of community residences for people with disabilities from residential zoning districts or by restrictive covenants:

§123.003. Zoning and Restriction Discrimination Against Community Homes Prohibited

(a) The use and operation of a community home that meets the qualifications imposed under this chapter is a use by right that is authorized in any district zoned as residential.

(b) A restriction, reservation, exception, or other provision in an instrument created or amended on or after September 1, 1985, that relates to the transfer, sale, lease, or use of property may not prohibit the use of the property as a community home.¹⁴

However, the *Texas Human Resources Code* proceeds to limit the types of “community homes” covered:

To qualify as a community home, an entity must comply with Sections 123.005 through 123.008 and be:

(1) a community-based residential home operated by:

(A) the Texas Department of Mental Health and Mental Retardation;

(B) a community center organized under Subchapter A, Chapter 534, Health and Safety Code, that provides services to persons with disabilities;

(C) an entity subject to the Texas Non-Profit Corporation Act (Article 1396-1.01 et seq., Vernon’s Texas Civil Statutes); or

(D) an entity certified by the Texas Department of Human Services as a provider under the medical assistance program serving persons in intermediate care facilities for persons with mental retardation; or

11. 877 S.W.2d 550 (Tex. Ct. Appl. 1994).

12. 684 S.W. 756 (Tex. Ct. App. 1981).

13. 723 S.W.2d 774 (Tex. Ct. App. 1986).

14. *Texas Human Resources Code*, §123.003 (2005).

(2) an assisted living facility licensed under Chapter 247, Health and Safety Code, provided that the exterior structure retains compatibility with the surrounding residential dwellings.¹⁵

The Texas statute goes on to limit the number of residents of a “community home” to six people with disabilities plus two supervisors.¹⁶

However, the nation’s Fair Housing Act renders these restrictive covenants invalid as applied to all community residences for people with disabilities *regardless of their disability or number of residents or live-in supervisors. Federal law, of course, prevails over a state statute.*

Restrictive covenants as applied to community residences for people with disabilities takes on the aforementioned added dimension because applications for a building permit must include an affidavit to the city’s building official “stating that the construction, alteration, or repair for which the building permit is sought, and the use to which the improvement or building will be put will not violate deed restrictions or restrictive covenants running with the land....”¹⁷

The city code authorizes the city attorney to become a party to a lawsuit to enforce restrictive covenants under certain conditions after conducting “a careful investigation of the facts and the law.”¹⁸

The city code explicitly says that the city attorney can enforce such covenants only if they “do not include provisions that restrict the sale, rental, or use of property on the basis of race, color, religion, or national origin and do not include any restrictions that by their express provisions have terminated.”¹⁹

Note that this list does *not* include disability and familial status, the two protected classes added to national law by the Fair Housing Amendments Act of 1988.

Recommendation

The City of Houston should, without delay, amend Section 10–551 of the city code to add the nationally–protected classes “disability” and “familial status” to the list of protected classes for which the city will *not* enforce deed restrictions. Time Frame: One year

The city code authorizes the city attorney to establish guidelines for any activity or category of activity the city attorney believes is an appropriate subject for an action to abate or enjoin through a lawsuit to enforce a restrictive covenant.²⁰ The city attorney has not yet promulgated such guidelines.²¹ The city attorney’s office does not review private deed restrictions for provisions that restrict the sale,

15. Ibid. §123.004.

16. Ibid. §123.006.

17. *City of Houston Code of Ordinances*, Chapter 10, Article XV, Section 10-553, Section 10–3 (Affidavit concerning deed restrictions on property—Prerequisite to issuance of building permit).

18. Ibid. Section 10–533.

19. Ibid. Section 10–551.

20. Ibid. Section 10–553(c).

21. Email from Assistant City Attorney Arva L. Howard, City of Houston Legal Department, Neighborhood Services Section, Stuart Meck, February 24, 2015.

rental, or use of property on the basis of race, color, religion, or national origin.²²

Impediment #1 Restrictive covenants and private deed restrictions that prohibit nonresidential, commercial, or business uses have been misused to exclude community residences for people with disabilities from subdivisions. The nation's Fair Housing Act and, to a limited extent, Texas law, prohibit such restrictions as applied to community residences for people with disabilities.

Recommendation The City of Houston should adopt and implement a written policy to review all restrictive covenants and homeowner association bylaws submitted to the city for any reason to identify any provisions that would effectively exclude community residences for people with disabilities. The city should inform the property owner and/or homeowners association that such restrictions are illegal and cannot be enforced. If a homeowners association or other party seeks to enforce such a restriction against community residences for people with disabilities, city staff should first explain the law to the association or other party and obtain a written statement that the association understands that its restriction does not apply to community residences for people with disabilities. If declined, the city's fair housing administrator should file a housing discrimination complaint under the city's own fair housing ordinance, and/or with the U.S. Department of Housing and Urban Development under the nation's Fair Housing Act, and/or the Texas Workforce Commission Civil Rights Division under the Texas Fair Housing Act. Time Frame: Initiate in year one; complete notification of associations by year five.

The city attorney's office reports that it has received about 52 complaints during the past four years that objected to community residences for people with disabilities locating in a subdivision with either a restrictive covenant or bylaw that would effectively exclude the community residence as a business or commercial use or as something other than a single-family residence. When confronted with such complaints, the city attorney's office reports that it routinely declines to enforce the restriction. The City Attorney Office explains, "When we receive these complaints they are invariably a complaint of a business in the community which is restricted to residential use. We explain that the use is protected and the federal Fair Housing Act provides that people in the homes may live there and nothing is in violation of the residential use restriction. Sometimes we attend meetings, large and small, and talk about the protection afforded certain individuals and how that is not commercial use of the property."²³

As discussed earlier, Texas law also prohibits application of these restrictions, albeit to only some types of community residences and only if there are no more than six residents plus up to two live-in staff. However, as noted above, the provisions of the nation's Fair Housing Act that cover all community residences for people with disabilities extends beyond the coverage of the state statute and is

22. Telephone interview of Arva L. Howard by Stuart Meck, February 23, 2015.

23. Email from Sandra Eidson, Assistant City Attorney, Section Chief of Neighborhood Services, to Daniel Lauber, Planning/Communications (March 27, 2015, 5:58 p.m., CST).

the proper law to enforce.

Recommendation The City of Houston should devise a systematic procedure to inform in writing all homeowner and neighborhood associations that community residences for people with disabilities are residential uses and that restrictive covenants, deed restrictions, and association bylaws including those that prohibit non-residential uses, do not, as a matter of law, exclude community residences for people with disabilities. Time frame: Two years.

Impediment #2 The definition of “community homes” used in the *Texas Human Resources Code* is so narrow and restrictive that it excludes many types of community residences for people with disabilities from the coverage of the “Community Homes for Disabled Persons Location Act.” In addition, the overly simple language of the act fails to take into account the need to prevent clustering to enable community residences to achieve their core purposes of normalization and community integration and the different treatment appropriate for relatively permanent community residences and temporary community residences.

Recommendation The City of Houston and other Texas municipalities should seek amendments to the *Texas Human Resources Code* by replacing the state’s definition of “community homes” with a broader definition that includes all types of community residences for people with disabilities and allows for more than six residents plus supervisory personnel. Time frame: Four years.

As discussed earlier, some types of community residences need more than six residents for valid therapeutic and financial reasons. In addition it appears that the state law does not include people in recovery and some other types of disabilities. It needs to be broadened to provide for all types of disabilities and community residences that house more than six people with disabilities.

Recommendation The City of Houston and other Texas municipalities should seek amendments to the state’s “Community Homes for Disabled Persons Location Act” to replace the overly simple language “use by right that is authorized in any district zoned as residential” with more precise language that allows for local land-use controls to prevent clustering and allows for appropriate land-use control treatment of relatively permanent community residences and temporary community residences. Time frame: Four years.

While any community residence for people with disabilities that meets the cap on unrelated people in a jurisdiction’s definition of “family” must be treated the same as any other family, land-use controls (whether at the state or local level) must make a reasonable accommodation for those community residences that exceed that cap. The existing language that requires local zoning to allow “community homes” for six or fewer people with certain disabilities needs to be replaced with language that allows cities and counties to establish land-use controls that prevent clustering and require licensing for a community residence to be allowed as of right in residential districts. In addition, the state statute needs to be amended to allow appropriate land-use control treatment of community residences that are relatively permanent in nature and different treatment

for those that are temporary with limitations on length of tenancy.

Development Controls

Even though Houston does not have a zoning ordinance, it is necessary to review the sound planning and land-use control principles and Fair Housing Act requirements established by the case law that invariably deals with zoning, a land-use control. These planning and legal principles are still applicable to any city without a zoning ordinance.

Typically, a local zoning ordinance places a cap on the maximum number of unrelated people allowed to live together in a dwelling unit.²⁴ If a proposed community residence complies with the cap in a city's applicable definition of "family," any community residence that abides with that cap must be allowed as of right as a permitted use.²⁵ The courts have made it abundantly clear that imposing any additional land-use requirements on a community residence that complies with the cap in the definition of "family" would clearly constitute illegal discrimination under the Fair Housing Act. When a definition of "family" places no limit on the number of unrelated individuals who can dwell together, then *all* community residences must be allowed as of right in *all* residential districts.²⁶ No additional regulations can be imposed under these circumstances.

When a proposed community residence would house more unrelated people than the definition of "family" allows, jurisdictions must make the "reasonable accommodation" that the Fair Housing Act requires to allow such community residences for people with disabilities to locate everywhere a residence can be located.²⁷ However, different types of community residences have dissimilar characteristics that warrant varying treatment depending on the type of tenancy.

Community residences that offer a relatively permanent living arrangement in which there is no limit to how long somebody can live there (group homes and recovery communities) should be allowed as of right in all residential areas. There continues to be some debate in legal circles on whether a rationally-based

24. The U.S. Supreme Court sanctioned this type of restriction in *Village of Belle Terre v. Borass*, 416 U.S. 1 (1974) and later modified its ruling in *Moore v. City of East Cleveland, Ohio*, 431 U.S. 494 (1977).

25. Some jurisdictions use the term "household" instead of "family." For the sake of brevity, this discussion employs only the term "family" even though it applies equally to the use of the term "household."

26. This principle is most clearly articulated in *United States v. City of Chicago Heights*, 161 F.Supp.2d 819 (N.D.Ill. 2001). Also see *Marbrunak, Inc. v. City of Stow, Ohio*, 974 F.2d 43 (6th Cir. 1992). If a jurisdiction does *not* define "family" or "household," the legal effect is the same as when a jurisdiction's definition of "family" allows any number of unrelated individuals to dwell together as a single housekeeping unit.

27. The vast majority of community residences for people with disabilities house more than four people. While the trend for people with developmental disabilities is towards smaller group home households, valid therapeutic and financial reasons lead to community residences for people with mental illness and people in recovery from drug and/or alcohol addiction to house eight to 12 residents.

spacing distance or a license can be required.

On the other hand, community residences such as a halfway house that sets a limit on length of residency are more akin to multifamily housing and may be subject to regulatory review such as a special permit in single-family districts, although this too is subject to debate in legal circles. There is little doubt that they should be allowed as of right in multifamily areas although there is still debate over whether a spacing distance from other community residences or a license can be required.

While a jurisdiction can certainly exclude transitional homes for people without disabilities from the residential areas of its choosing, the Fair Housing Act prohibits this kind of regulatory treatment for halfway houses and recovery communities that house people with disabilities.²⁸ The key distinction between halfway houses and recovery communities is that tenancy in the former is temporary. Halfway houses impose a limit on how long residents can live there. Tenancy is measured in weeks or months.

On the other hand, residency in a recovery community is relatively permanent, like a group home. There is no limit to how long a recovering alcoholic or drug addict who is not using can live there. Tenancy is measured in years just as it is for conventional rental and ownership housing. Consequently, it is rational for development controls to treat recovery communities like group homes which also offer relatively permanent living arrangements and to treat halfway houses more like multifamily rental housing. Halfway houses should be allowed as of right in multifamily areas. In single-family districts, the heightened scrutiny of regulatory review is warranted for a halfway house.

These principles do *not* apply to community residences for people *without* disabilities or to people with disabilities “whose tenancy would pose a direct threat to the health or safety of other individuals.... there must be objective evidence from the person’s prior behavior that the person has committed overt acts which caused harm or which directly threatened harm.”²⁹

The review of a jurisdiction’s regulatory treatment of community residences begins with its definition of “family” or “household.”

In Houston’s case, “family” is defined in “Chapter 10, Buildings and Neighborhood Protection, Article IX – Building Standards:”

Family means an individual; or two or more individuals related by blood or by marriage; or a group of not more than ten individuals, who need not be related by blood or marriage, living together in a dwelling unit.³⁰

28. It is extremely well-settled that people with drug and/or alcohol addictions who are not currently using an illicit drug are people with disabilities under the *Fair Housing Act* and the *Americans With Disabilities Act*. See 42 U.S.C. 3602(h) and 24 C.F.R. 100.201(a)(2). See, also, *City of Edmonds v. Washington State Building Code Council*, 115 S. Ct. 1776 (1995).

29. H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2189–2190.

30. *Houston City Code*, Chapter 10, Buildings and Neighborhood Protection, Article IX – Building Stan-

Because this definition of “family” allows up to ten unrelated individuals to live together in a dwelling unit, the City of Houston cannot impose any additional land-use regulations on community residences for ten or fewer people with disabilities. These community residences for people with disabilities must be treated the same as all other families. Treating them differently constitutes facial discrimination.³¹

Several definitions in the ordinance, however, are a bit confusing due to the language highlighted in bold below:

Dwelling unit means a single unit providing complete independent living facilities for one or more individuals, including permanent provisions for living, sleeping, eating, cooking, and sanitation. Notwithstanding the foregoing, units in the following buildings are not dwelling units:

- (a) Jails;
- (b) Hotels (as defined by article III of chapter 44 of this Code); and
- (c) **Buildings providing sleeping facilities primarily for the purpose of rendering services regulated by a department or agency of the federal government or of the State of Texas (including, but not limited to, the Texas Department of State Health Services).**

Congregate living facility means a building containing facilities for living, sleeping, and sanitation for occupancy by other than a family. Examples of congregate living facilities include shelters, convents, monasteries, dormitories, boarding and rooming houses, and fraternity and sorority houses. Notwithstanding the foregoing, the following buildings are not congregate living facilities:

- (a) Jails;
- (b) Hotels (as defined by article III of chapter 44 of this Code); and
- (c) **Buildings providing sleeping facilities primarily for the purpose of rendering services regulated by a department or agency of the federal government or of the State of Texas (including, but not limited to, the Texas Department of State Health Services).**³²

Whatever the uses are to which the highlighted language refers, it is important to remember that a community residence for people with disabilities is a residential use and a “dwelling unit” in every sense of the phrase. The city needs to precisely identify what these exclusions are to make sure that they do not inadvertently exclude community residences for people with disabilities from the definition of “dwelling unit.” It remains unclear how the definition of “congregate living facilities” and the highlighted exclusions interface.

dards, Section 10–317.

- 31. For a detailed review of the case law on which this conclusion is based, see Daniel Lauber, “A Real LULU: Zoning for Group Homes and Halfway Houses Under the Fair Housing Amendments Act of 1988,” *The John Marshall Law Review* (Winter 1996, Vol. 29, No. 2) 369–407.
- 32. Houston City Code, Chapter 10, Buildings and Neighborhood Protection, Article IX – Building Standards, Section 10–317. *Emphasis added.*

Boarding Homes

Thanks to inadequate state funding and regulation of housing for people with disabilities, boarding homes have become a growth industry in numerous Texas cities. Boarding homes, however, are *not* community residences. They do not attempt to emulate a family like a community residence does and few even try to achieve normalization and community integration of their residents, the three core characteristics of a community residence for people with disabilities.

There is a lack of serious state licensing and enforcement of boarding homes — whether occupied by people with disabilities or without disabilities — and no state oversight to protect the rights of residents, prevent abuse, prevent operators from stealing residents' benefits checks, prevent exploitation, or enforce compliance with building codes.³³

Like Dallas, where *The Dallas Morning News* ran a multi-year exposé of abusive treatment of disabled boarding house residents, theft of their assets, and deplorable substandard living conditions, the City of Houston has sought to curb these abuses by adopting an ordinance that regulates boarding homes occupied by people with disabilities.³⁴ The city's ordinance does not include uses that the state regulates or living arrangements where "personal care services" are provided.³⁵

The ordinance, which was adopted in July 2013, requires operators to annually register with the city, consent to a criminal background check of herself and employees; post a very legible notice of how to report abuse, neglect, and exploitation; provide extensive documentation; maintain records; provide emergency precautions; and allow an annual inspection by the fire marshal.

Locations of Community Residences and Boarding Homes

While community residences for people with disabilities seek to emulate and function like a biological family, the very nature of community residences requires that they not locate close to one another.

For at least 40 years, researchers have found that some community residence operators will locate their community residences close to other community residences, especially when zoning does not allow community residences for people with disabilities as of right in all residential districts. They tend to be clustered in a community's lower cost or older neighborhoods and often in areas around colleges.³⁶ See below for an analysis of clustering in Houston.

33. Telephone interview of Senior Police Officer Douglas Anders, Houston Police Department, Mental Health Unit, by Daniel Lauber, February 19, 2015. Officer Anders administers Houston's Boarding Homes Ordinance.

34. *Houston Code of Ordinances*, Chapter 28, Article XIV.

35. *Ibid.* Sections 28-451 and 28-452.

36. See General Accounting Office, *Analysis of Zoning and Other Problems Affecting the Establishment of Group Homes for the Mentally Disabled* (August 17, 1983) which found that 36.2 percent of the group homes for people with developmental disabilities surveyed were located within two blocks of another community residence or an institutional use. At 19. Also see D. Lauber and F.

Why clustering is detrimental. Placing community residences too close to each other can create a *de facto* social service district and can seriously hinder their ability to achieve normalization for their residents — one of the core foundations on which the concept of community residences is based. In today’s society, people tend to get to know nearby neighbors on their block within a few doors of their home (unless they have children together in school or engage in walking, jogging, religious services, or other neighborhood activities). Neighbors that close to a community residence serve as role models to the community residence dwellers.

For normalization to occur, it is essential that community residence residents have such so-called “able-bodied” neighbors as role models. But if another community residence is opened very close to an existing community residence — such as next door or within a few doors of it — the residents of the new home may replace the “able-bodied” role models with other people with disabilities and quite possibly hamper the normalization efforts of the existing community residence. Clustering three or more community residences on the same block not only undermines normalization but could inadvertently lead to a *de facto* social service district that alters the residential character of the neighborhood. All the evidence recorded to date shows that one or two nonadjacent community residences for people with disabilities on a block do *not* alter the residential character of a neighborhood.³⁷

As long as community residences are *not* clustered on the same block (the idea is to assure there are at least several structures between community residences on a linear block) it is *extremely unlikely* that they will generate these adverse impacts. Consequently, when community residences are allowed as of right, it is most reasonable to impose a spacing distance between community residences that keeps them about a block apart in terms of actual walking distance.

While community residences and boarding homes are in nearly every Houston super neighborhood, some disconcerting patterns have emerged.

Houston is one of those cities that does *not* have a regulatory tool in place to prevent clustering of community residences. As a result, clusters of community residences and boarding homes for people with disabilities appear to be creating *de facto* social service districts in several super neighborhoods as shown in Figure 1 below. In addition to their locations, the mere existence of these clusters fails to affirmatively further fair housing choice.

In Houston’s southeast quadrant, the larger clusters are in these three super neighborhoods:

- Greater OST/South Union (68) which is nearly all African American and where the annual median household income was just \$27,785 in 2012

Bangs, Jr., *Zoning for Family and Group Care Facilities*, American Society of Planning Officials Planning Advisory Service Report No. 300 (1974) at 14; and *Family Style of St. Paul, Inc., v. City of St. Paul*, 923 F.2d 91 (8th Cir. 1991) where 21 group homes that housed 130 people with mental illness were established on just two blocks.

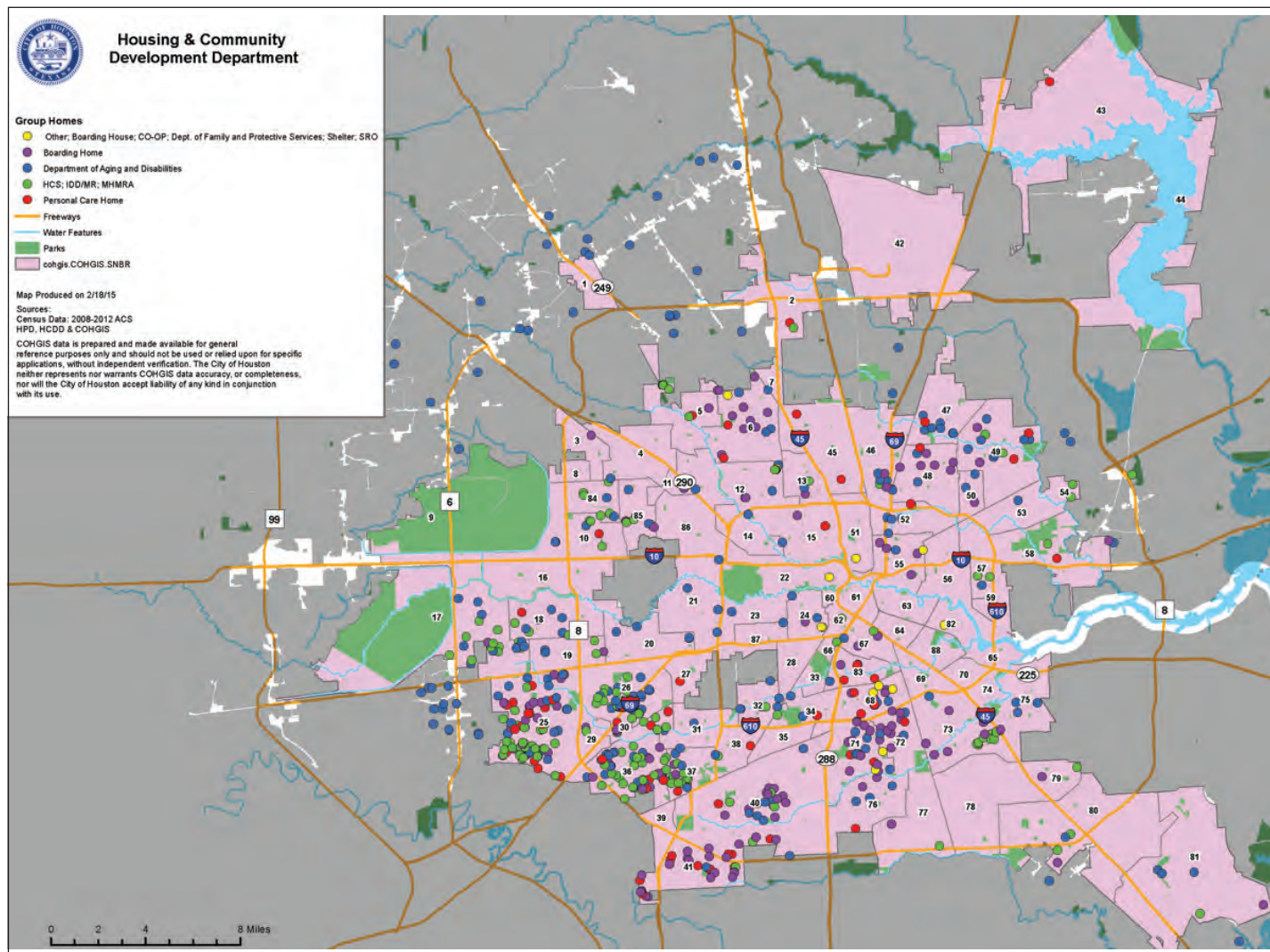
37. See General Accounting Office, *Analysis of Zoning and Other Problems Affecting the Establishment of Group Homes for the Mentally Disabled* 27 (August 17, 1983).

- Sunnyside (71) which is nearly all African American and where the annual median household income was just \$24,056 in 2012
- South Park (72) which is nearly all African American and where the annual median household income was \$36,616 — \$8,032 less than the city-wide median

In the southwest quadrant, the larger clusters are in these five super neighborhoods:

- Alief (25) where there has been considerable white out-migration and sizeable minority in-migration since 2000 and the median annual household income, which had been above the citywide median in 2000 fell to \$37,237 which was \$7,411 below the city's median in 2012
- Sharpstown (26) with Hispanic and Asian concentrations and a modest annual median household income of \$32,271 in 2012
- Brays Oaks (36) where some census tracts are shifting in a pro-integrative direction and others have higher percentages of African American households than would be expected in a discrimination-free housing market and the annual median household income barely rose from \$36,122 in 2000 to \$38,579 in 2012
- Westbury (37) where the median annual household income declined from \$39,792 in 2000 to \$28,078 in 2012, portions of which may be gentrifying and portions of which are nearly all Caucasian and the percentage of African Americans households has declined in every census tract since 2000
- Central Southwest (40) which is part of the extensive concentration of Black households south of U.S. 10 where the 2012 median annual household income was \$42,829, \$1,819 less than the city's median in 2012

Figure 1: Map of Community Residences and Boarding Homes In and Around Houston



Source: Houston Housing & Community Development Department based on information provided by the Houston Police Department, February 18, 2015.

Zoning is not among the tools Houston could employ to affirmatively further fair housing by preventing or at least minimizing additional clustering and development of *de facto* social service districts that segregate people with disabilities in lower-income minority neighborhoods.

In lieu of zoning, the city still *may* be able to adopt an ordinance that establishes a rationally-based spacing distance between community residences and boarding homes as well as a licensing, certification, and/or registration requirement so the city can actually achieve the legitimate government purposes of facilitating the successful functioning of community residences for people with disabilities.

However, as explained earlier, because the city’s definition of “family” allows up to ten unrelated people to dwell together, the city *cannot* legally treat commu-

nity residences for up to ten people with disabilities any differently than all other “families.” Requiring a spacing distance and licensing/certification would be discriminatory on its face under the Fair Housing Act and possibly under the fair housing laws of the State of Texas and Houston.

To be able to require a spacing distance and licensing/certification, the City of Houston would have to go through a somewhat complicated process.

First, Houston would need to amend its Building Standards definition of “family” to reduce the number of unrelated people who can constitute a “family” to a lower number.³⁸ For the sake of illustration, we will use four. This would effectively prohibit more than four unrelated people from living together in a dwelling unit and enable the city to regulate community residences that house more than four unrelated people with disabilities. Community residences that still fit within the cap of four unrelated people would still have to be treated the same as all other families and be free from spacing and licensing requirements.

But since so many community residences for people with disabilities need to house more than four people for legitimate therapeutic and/financial reasons, the city makes a “reasonable accommodation” for them by allowing them as of right as long as they meet two objective criteria that actually achieve the legitimate government interests discussed above in the least drastic manner:

- ◆ The proposed community residence for five or more people with disabilities is at least one typical city block³⁹ from any existing community residence for five or more people with disabilities
- ◆ The proposed community residence for five or more people with disabilities is licensed, certified, or recognized by Congress

When the proposed community residence for five or more people with disabilities does not meet both criteria, the heightened scrutiny akin to a special use permit under zoning is warranted and should be required. Review standards rationally related to this land use would need to be developed. This back up provision is essential to not run afoul of the Fair Housing Act.

While this approach has been used throughout the nation and it emulates model land–use controls,⁴⁰ it must be carefully crafted for a city like Houston that does not have zoning. Before writing such an ordinance, the city needs to have a study conducted that provides the justification for these regulations or else the validity of the ordinance would be very much at risk if challenged in court.

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38. The number chosen determines the threshold at which community residences for people with disabilities can be regulated. Remember that community residences that fall within the cap on the number of unrelated people who constitute a “family” *cannot* be subjected to additional regulations not applicable to all families. The court decision that explains this principle most clearly is *United States v. City of Chicago Heights*, 161 F.Supp.2d 819 (N.D.Ill. 2001)
 39. A typical city block is 660 linear feet in the United States. However, it might be different in Houston and the length of a typical Houston city block should be used.
 40. See American Planning Association, *Policy Guide on Community Residences* (Sept. 22, 1997) and Daniel Lauber, “A Real LULU: Zoning for Group Homes and Halfway Houses Under the Fair Housing Amendments Act of 1988,” *The John Marshall Law Review* (Winter 1996, Vol. 29, No. 2) 369–407.

Impediment #3 The clustering of community residences interferes with their ability to achieve two of their core functions, normalization and community integration. Clustering has also led to the creation of *de facto* social service districts in Houston and elsewhere, especially in mostly minority neighborhoods with lower-cost housing.

Recommendation As described in detail earlier, to affirmatively further fair housing by reducing the segregation of people with disabilities due to community residences clustering together and creating *de facto* social service districts largely in lower-income minority neighborhoods, the City of Houston should revise its definition of “family” and adopt an ordinance that establishes a rationally-based spacing distance between community residences for people with disabilities and a requirement for licensing/certification. To implement this ordinance, the City of Houston will need to maintain an up-to-date map of where each community residence is located. This map should show only those community residences that do not fit within the city's new definition of “family.”⁴¹ Time frame: Two years.

Again, it is not known for certain that the City of Houston can establish this set of development controls in the absence of zoning. The city will need to conduct some thorough legal research to determine whether it can even adopt such an ordinance.

If the city decides to craft an ordinance as suggested above, it would be imprudent if it relied primarily on state statutes to define what constitutes a community residence. Legislatures change state definitions and do not necessarily include all types of community residences or all types of disabilities. If state statutes are to be referenced it should be done along the lines of “community residences including, but not limited to, community homes licensed by the State of Texas.”

The City of Houston would also be prudent to include a provision like “A community residence shall be considered a residential use of property for purposes of all city codes.” Such a provision provides guidance to building inspectors so they apply residential rather than inappropriate institutional codes to community residences for people with disabilities.

Recommendation The City of Houston should conduct additional legal research to determine whether it can legally establish a similar regulatory regime for boarding homes. Time frame: One year.

41. As explained in *United States v. City of Chicago Heights*, 161 F.Supp.2d 819 (N.D.Ill. 2001), community residences that fit within the cap on unrelated persons in the definition of “family” must be treated as a “family” and cannot be used when measuring spacing distances between community residences for people with disabilities.

Recommendation The City of Houston should look into leveraging some of its Community Development Block Grant funds and other revenues to provide grants or extremely-low or no-interest loans to operators of community residences for people with disabilities to locate them outside of neighborhoods in which these homes are clustering and instead in higher opportunity neighborhoods. Time frame: Two years.

Impediment #4 The State of Texas has imposed a clearly illegal and unjustifiable half-mile spacing distance between community residences for people with disabilities that could prevent the City of Houston from adopting a justifiable, much shorter spacing distance in compliance with the nation's Fair Housing Act.

In 1991, the State of Texas amended its "Community Homes for Disabled Person's Location Act" to impose the following spacing distance, with no exceptions, between "community homes:"

A community home may not be established within one-half mile of an existing community home.⁴²

When it has been tested in court, this distance of more than 2,500 feet has been ruled invalid under the nation's Fair Housing Act.⁴³ As creator of the spacing distance concept as applied to community residences, your author must report that this great a distance perverts the spacing distance concept and that there is no factual evidence available to suggest any rational basis for such a lengthy spacing distance. The failure to allow for exceptions to the half-mile spacing distance prevents localities from making the required reasonable accommodation for community residences and, when applied to "community homes" that fit within a local definition of "family," is facially discriminatory.

Recommendation The City of Houston and other Texas municipalities should seek to amend the state's "Community Homes for Disabled Person's Location Act" to abolish this half-mile spacing distance or at least reduce it to a justifiable 660 feet (length of a typical block). They should also seek to amend the state statute to allow localities to waive the spacing distance to make a reasonable accommodation and specify that the spacing distance does not apply to "community homes" that do not exceed the number of unrelated residents allowed by a locality's definition of "family." Time frame: Two years.

Restrictions on the Maximum Number of Residents

Usually a community regulates the number of residents in a community residence for people with disabilities through the occupancy standard in the city's

42. Texas Human Resources Code, §123.008 (2005).

43. *Oconomowoc Residential Programs, Inc. v. City of Greenfield*, 23 F.Supp.2d 941, 958 (E.D.Wis.1998). Also see *Oconomowoc Residential Programs Inc. v. City of Milwaukee*, (7th Cir., No. 01-1002, Aug. 8, 2002).

building or property maintenance code that applies to *all* residential uses. The purpose of this standard is to prevent overcrowding. Such codes typically require, for example, 70 square feet of space for the first occupant of a bedroom and 50 additional square feet for each additional bedroom occupant. Many use 70 square feet instead of 50 for each additional bedroom occupant. It is important to stress that this standard must apply to *all* residential uses and that it applies to community residences for people with disabilities because they are residential uses.

Houston uses its Building and Neighborhood Protection code to set its standards to prevent overcrowding:

Overcrowded describes:

- (1) A dwelling unit or a congregate living facility not containing at least 150 square feet of net floor area for the first resident and at least 100 square feet of additional net floor area for each additional resident; or
- (2) A dwelling unit or a congregate living facility of two or more rooms not containing at least 70 square feet of net floor area in each room occupied by one resident for sleeping purposes; or
- (3) A dwelling unit or a congregate living facility of two or more rooms not containing at least 50 square feet of net floor area per resident in each room occupied by more than one resident for sleeping purposes;

provided that, in a calculation of net floor area for the purposes of this article, children younger than one year old shall not be considered residents; children at least one year old but younger than six years old shall be considered one-half of one resident; and floor area in a room with a ceiling height of less than seven feet shall not be included in the calculation.⁴⁴

As long as these standards apply to *all* residential uses including community residences for people with disabilities, this approach is a legitimate, legal means to establish the maximum number of occupants of a community residence for people with disabilities.⁴⁵ There should be no distinction between the number of people with disabilities living in the dwelling and live-in staff — they all count the same toward the maximum number of occupants allowed.

Possible cap on the number of residents. As emphasized throughout this report, emulating a biological family is an essential core characteristic of every community residence. It is difficult to imagine how more than ten to 12 individuals can successfully emulate a biological family. Once the number of occupants exceeds a dozen, the home tends to take on the characteristics of a mini-institution rather than a family or a residential use. The City of Houston should consider defining community residences as housing no more than a dozen people, while adopting a further reasonable accommodation process for proposed community residences that demonstrate they can emulate a family and need more than 12 residents for therapeutic and/or financial reasons.

44. *Houston City Code*, Chapter 10, Buildings and Neighborhood Protection, Article IX – Building Standards, Section 10–317.

45. *City of Edmonds v. Oxford House, Inc.*, 514 U.S. 725, 115 S.Ct. 1776 (1995).

Housing Discrimination Lawsuits Against Houston

The city reports that the two housing discrimination lawsuits filed against the city by operators of community residences were dismissed with prejudice.⁴⁶

46. Email from Senior City Attorney Barbara Pierce, Houston Legal Department to Daniel Lauber March 31, 2015 5:13 p.m. CST.

Appendix 4: Free Market Analysis™

Extent of Racial and Latino Concentrations in Houston, Texas

Prepared by

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River Forest, Illinois

June 2015

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Part 1: Free Market Analysis™ of Houston's Housing Patterns

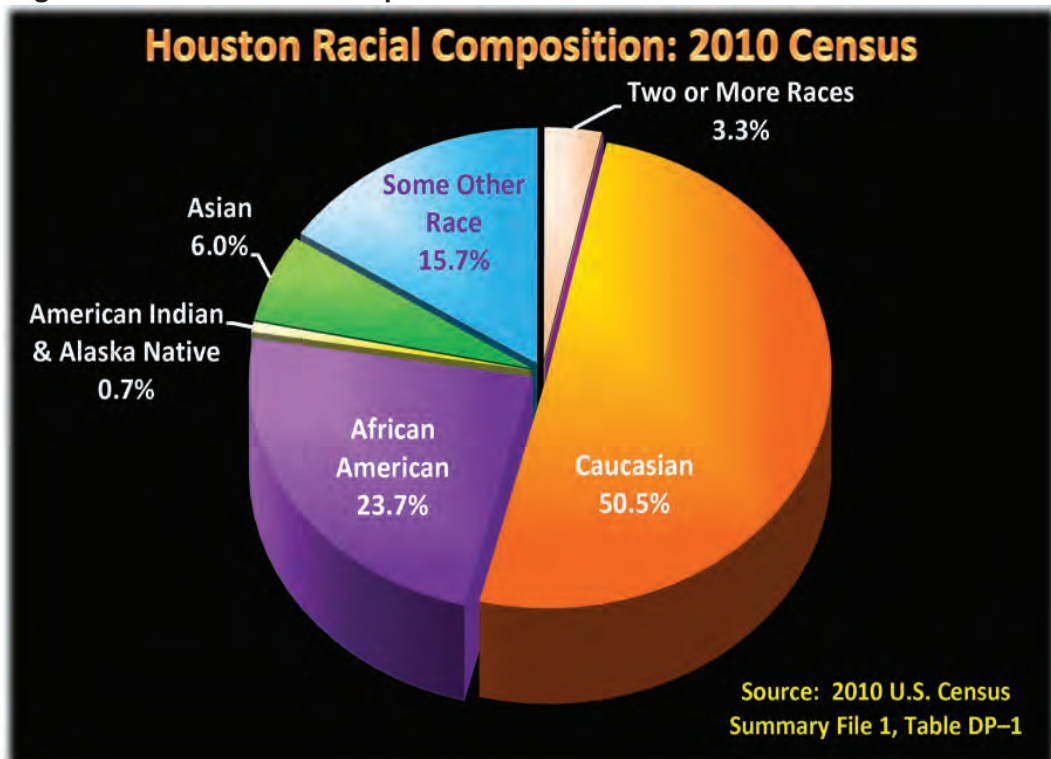
Affirmatively furthering fair housing requires a municipality to take the steps necessary to mitigate the public and private sector practices and policies that have imposed racial, ethnic, and economic stratification upon the city and to take steps to reduce this segregative stratification and instead foster racial, ethnic, and economic integration throughout the jurisdiction.

To accomplish this, a city needs to first identify the actual extent of housing segregation in all its neighborhoods. This Free Market Analysis™ seeks to provide the City of Houston with an accurate picture of the extent of actual racial and ethnic stratification so Houston can adopt the policies and programs that remove the artificial barriers to racial, economic, and Latino integration.

Racial and Hispanic Composition

Like America as a whole, Houston has become very racially and ethnically diverse over the decades as noted in the “Community Profile” of this Analysis of Impediments.

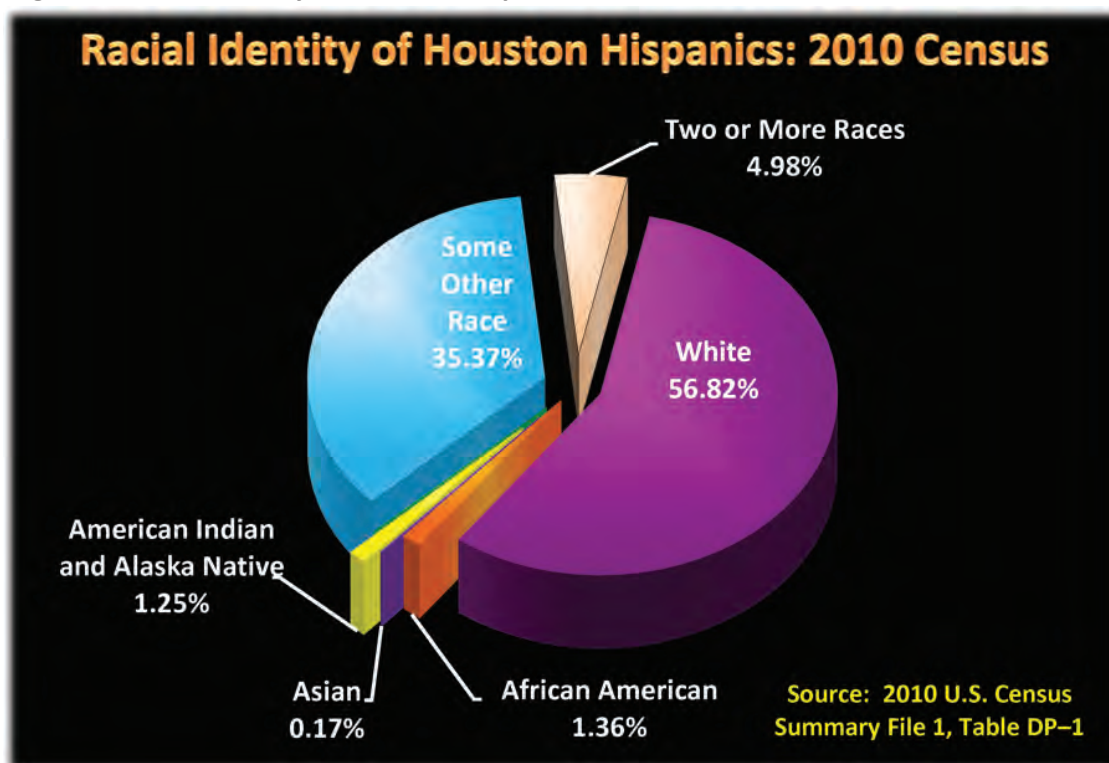
Figure 1: Houston Racial Composition: 2010 Census



Of the city's 1,060,491 Caucasian ("alone") residents, 522,590 or 49.3 percent were Hispanic in 2010.¹ So overall, most of Houston's residents are members of minority groups and the city may be described as a "majority-minority" city.

It is important to remember that "Hispanic" is not a race, but an ethnicity that can be of any race. As the figure below shows, nearly 57 percent of the city's 919,668 Latino residents identified themselves as "white" in 2010. A very substantial proportion of Hispanics in Houston — 35.37 percent — and throughout the nation have blurred race and ethnicity to identify themselves to the census as "some other race."

Figure 2: Racial Identity of Houston Hispanics: 2010 Census



The *actual* extent of racial stratification in Houston differs from that depicted in the maps in Section 5 "Segregation, Integration, and Concentration" of this Analysis of Impediments and the "Dissimilarity Index." As the tables in the Free Market Analysis™ that follows show, the racial and/or Hispanic composition of many a census tract that at first glance appears to be segregated is actually about what would be expected in a free market that is not distorted by housing discrimination.

1. Table DP-1, Profile of General Population and Housing Characteristics: 2010, 2010 Summary File 1, U.S. Census 2010. Throughout this appendix, data for different racial groups and for Latinos is for the group "alone," not in combination with any other race.

Before arriving at any conclusions as to the degrees of segregation and integration in Houston, it is essential to take into account household income and the cost of housing as is done in the Free Market Analysis™ that follows.

This approach requires a more nuanced, complex, and realistic approach to identifying housing discrimination and segregation. Discrimination is the likely cause of an area's racial and ethnic composition when the actual racial and Latino composition differs significantly from what the composition would be in a free housing market not distorted by discrimination. For example, it is very likely that past and/or present discrimination based on race or ethnicity significantly contributes to a census tract being 85 percent white when the tract would be expected to be 55 percent Caucasian when taking household income and the cost of housing into account.

The approach used in this analysis compares the actual racial and Hispanic composition of a census tract with what the *approximate* racial and Latino composition would be in a free housing market *not distorted* by practices such as racial steering, mortgage lending discrimination, discriminatory advertising, discriminatory rental policies, mortgage and insurance redlining, or discriminatory appraisals.

Racial and ethnic or national origin discrimination badly warps the free market in housing by *artificially* reducing demand for housing in some neighborhoods and *artificially* increasing demand in others, helping to thwart efforts to affirmatively further fair housing. Research has found that thanks to lingering stereotypes about African Americans and other elements of racism, Caucasians tend to limit their home search to neighborhoods that are virtually all white and won't even look at housing in integrated neighborhoods that are more than 15 percent Black. If whites won't even consider living in an integrated neighborhood, then resegregation becomes inevitable if nearly every new resident is African American.²

Researchers have reported that African Americans strongly prefer living in an integrated neighborhood rather than an all-black or virtually all-white neighborhood and that more than one-third of Blacks say they are willing to be the first African American family to move into an exclusively white neighborhood. But over 150 years of housing discrimination have led to self-steering, especially among African Americans who report they are apprehensive and even fearful of moving into a neighborhood where their numbers are very low.³

-
2. See the discussion and sources cited on pages 12–15 in Daniel Lauber, *Racially Diverse Communities: A National Necessity* (River Forest, Illinois: Planning/Communications, 1990, 2015) available at <http://www.planningcommunications.com/publications>.
 3. See M. Krysan, M. Couper, R. Farley, T. Forman, "Does Race Matter in Neighborhood Preferences? Results from a Video Experiment," in *American Journal of Sociology* (Sept 2009) 527–559; Robert Adelman, "The Roles of Race, Class, and Residential Preferences in the Neighborhood Racial Composition of Middle-Class Blacks and Whites" in *Social Science Quarterly*, (Vol. 86, No. 1, March 2005) 209–228; Anti-Discrimination Center, *They're Our Neighbors, Too: Exploding the Myth That Most Affordable Housing Seekers in Highly Segregated New York City Insist on Staying Close to Home* (New York, NY: Anti-Discrimination Center, June 2015), available to download at

A pre-eminent study of this subject explains further:

We must strongly caution that while people of color often decide to buy or rent in segregated minority communities this should not be seen as representing a widespread African American or Latino desire to live in separate communities. Quite to the contrary, even where there is self-selection and an attraction to substantial African American or Latino communities, *it is a function of the discomfort that many minority group members have felt or believe they will feel if they move into a predominantly-white, Anglo community.* It is a result of the continued perception and experience of discriminatory behavior.⁴

We have observed a historic pattern among immigrants of all races and ethnicities throughout the nation in which the first immigrant generation seeks to live in neighborhoods where their native tongue is widely spoken and their native culture is the norm. In a metropolitan area that affirmatively furthers fair housing, these intensely concentrated immigrant neighborhoods generally dissipate over time as subsequent generations achieve socioeconomic mobility and are assimilated into the American culture, enabling the descendants of the first generation immigrants to find greater opportunities and upward mobility. Housing discrimination, however, often contributes to the maintenance and even expansion of these enclaves long after the first generation has passed away.

Racial and ethnic or national origin discrimination in housing also distorts property values. When African Americans or Hispanics, for example, move to Black or Latino enclaves, they pay a substantial price in lost housing value. It is well documented that the value and appreciation of homes in segregated minority neighborhoods is generally less than in stable integrated areas and predominantly white areas. Segregated minority neighborhoods also often lack jobs and business investment opportunities, making them economically unhealthy compared to stable integrated and predominantly white areas.⁵ For the Black and Latino middle and upper classes which had grown so much prior to the Great Recession, living in segregated minority neighborhoods denies them the full economic and educational benefits of middle- and upper-class status enjoyed in stable integrated neighborhoods and in predominantly Caucasian areas.

For both 2000 and 2008–2012, the tables in this study show (1) the actual racial and Hispanic composition of households and (2) the approximate racial composition if household income were the predominant determinant of residency and housing constituted a genuine free market *without* the distortions caused by discriminatory housing practices. By using both sets of years, the tables show whether the beginning of the twenty-first century has resulted in movement toward or away from sta-

<http://www.antibiaslaw.com/mobility>; M. Krysan and R. Farley, "The Residential Preferences of Blacks: Do They Explain Persistent Segregation?" in *Social Forces* (Vol. 80, No. 3, March 2002), 937-980; Maria Krysan, "Community Undesirability in Black and White: Examining Racial Residential Preferences through Community Perceptions," *Social Problems* (Vol. 49 No. 1) 521–543.

4. D. Coleman, M. Leachman, P. Nyden, and B. Peterman, *Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region* (Chicago: Leadership Council for Metropolitan Open Communities, February 1998) 29.
5. *Ibid.*, 28–29.

ble racial and Hispanic integration. *When the actual proportions of minorities are significantly less than the proportions that would exist in a free housing market, it is very likely that factors other than income, social class, or personal choice are influencing who lives in the community.* Researchers have concluded “that race and ethnicity (not just social class) remain major factors in steering minority families away from some communities and toward others.”⁶

All too often, analyses of the degree of segregation and integration in a city are confounded by the rather significant differences in household median income between different racial and ethnic groups. Many people mistakenly assume that housing segregation is due primarily to different income levels and self-steering, assumptions not borne out by data and well-informed research and analysis. *Analyses that do not control for differences in household income and the cost of rental and ownership housing are unable to accurately determine the extent of segregation and integration in a jurisdiction.*

The Dissimilarity Index does not control for these differences in household income. The basic premise of the Dissimilarity Index measures the percentage of households of each race and Latino ethnicity that would have to move to produce an even distribution of each throughout the city. That may be a useful way to measure relative levels of segregation and racial and Latino isolation between different cities, but that is *not a realistic tool for identifying real world segregation or integration.* It's an approach that fails to take into account the cost of housing and the significantly different household incomes of the different racial and Hispanic ethnicity groups.

The Free Market Analysis™ that follows avoids these limitations by identifying whether the actual racial and Hispanic composition of each census tract within Houston is probably due to differences in household income or to possible discriminatory private and/or public sector practices that distort the free housing market.

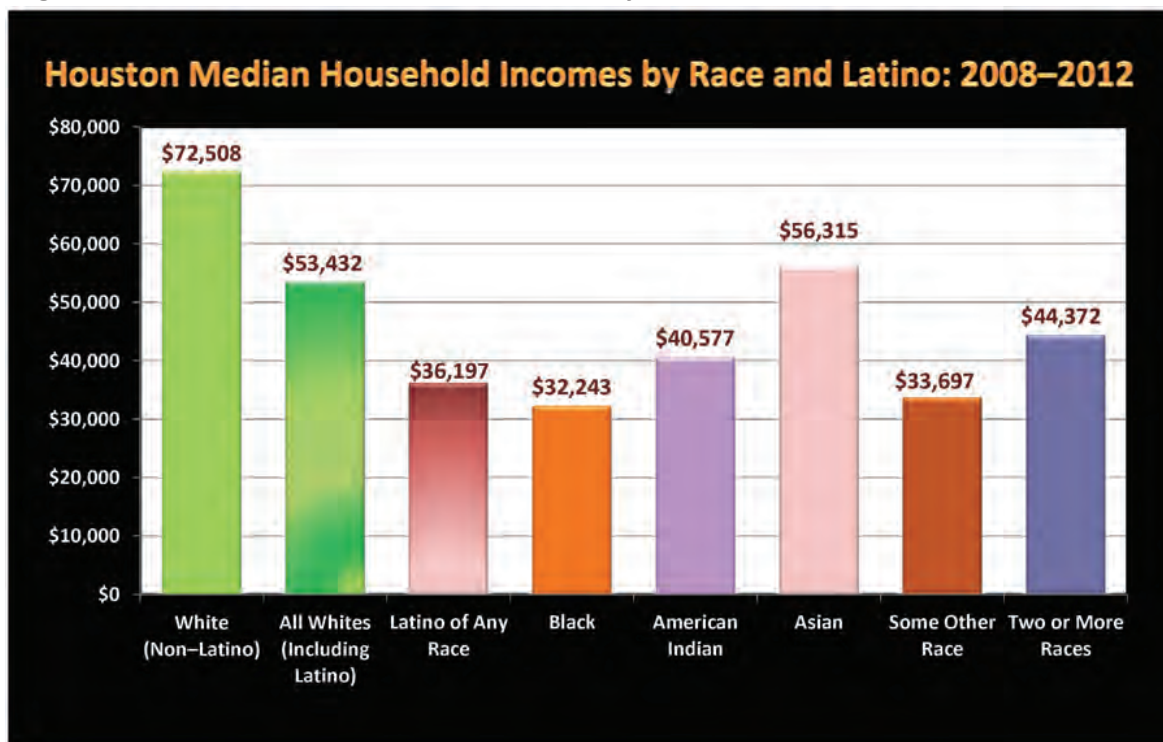
How the Free Market Analysis™ Works and What It Shows

By taking household income into account, the analysis that follows more accurately identifies possible racial and Latino concentrations than simply reporting the proportions of each racial or ethnic group within a super neighborhood or census tract.⁷ As noted above, there is a common misconception that housing is segregated largely because, as a whole, minority households earn less than white households.

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6. Ibid., v. The methodology, first developed by Harvard economist John Kain, is explained in detail beginning on page 17 of the study cited immediately above. You can download the study at http://www.planningcommunications.com/black_white_and_shades_of_brown.pdf.
 7. Determining the approximate racial and ethnic composition of a geographic area like a census tract, super neighborhood, or entire city is a fairly straightforward, albeit a lengthy and labor intensive, process. Here is the step-by-step procedure using a census tract as an example. First we obtain from the U.S. Census' *American Community Survey* the number of households for the census tract that are in each of 16 income cohorts starting with “Less than \$10,000” and “\$10,000 to \$14,999” and ending with “\$150,000 to \$199,999” and “\$200,000 or more.” Within each income range, the census specifies the number of Caucasian, African American, Asian, and Hispanic households of any race. We obtain the same data for the entire housing market within which the census tract is located. *The housing market here consists of the Houston Metropolitan Statistical Area.*

As the figure below shows, the median annual household income in Houston varies substantially by race and Hispanic ethnicity with non-Latino Caucasians having the highest median household income. Asians, whose presence is nearly nonexistent in most of Houston, have the second highest median household income.

Figure 3: Houston Median Household Incomes by Race and Latino: 2009–2013



Source: Table S1903: Median Income in the Past 12 Months (in 2013 inflation-adjusted dollars), 2008–2012 American Community Survey 5–Year Estimates.

The lower annual median incomes of the city's African American and Hispanic households certainly contribute to the demographic patterns shown on the maps in Section 5 of the Analysis of Impediments. However, the analysis that follows controls for these income differences by explicitly taking into account

We then, for example, multiply the number of Caucasian households in an income category in that census tract by the percentage of white households in that income bracket for the full housing market. This gives us a good approximation of the number of white households in each income bracket who would live in this census tract if income were the prime determinative factor of who lives there. We calculate these figures in all 16 income brackets for whites, Blacks, Asians, and Hispanics of any race. *This procedure assures that the census tract income of residents in a free market without discrimination is the same as the income of actual residents.* We then add up the number of households in each racial or ethnic group to get the approximate racial and Hispanic composition of the census tract if income were the prime determinant of who lives there. From this we calculate the percentages of the census tract that each group comprises. These percentages are then compared to the actual proportion of each racial or ethnic group within the census tract to identify the difference between actual proportions of each group and the proportions of each group in a free housing market not distorted by discrimination.

household income to *approximate* the racial and ethnic composition of each super neighborhood and its census tracts if racial and ethnic discrimination were absent and household income was the primary determinant of where a household lives.

While the absence of housing affordable to households with modest incomes certainly contributes to the lack of diversity in Houston's wealthier neighborhoods, this Free Market Analysis™ identifies the extent of racial and Latino segregation under current housing costs and household incomes that is probably due to discrimination against the households that can afford to live in each census tract and super neighborhood, *not* due to different household income by race or Latinos of any race.

As the table below shows, a significant percentage of households of each group are in every income range. So while disproportionately larger percentages of Hispanic and African American households have annual incomes under \$50,000, nearly a third of Black households and a bit more than a third of Latino households have annual incomes of \$50,000 or more. The city's median household income for this time period was \$44,648.

Table 1: Percentage of Each Race or Ethnicity By Income Range: City of Houston

Percentage of Each Race or Ethnicity By Income Range: City of Houston				
Annual Household Income	Percentage of Each Group in Each Income Range			
	White	African American	Asian	Hispanic of Any Race
Up to \$24,999	22.5%	39.4%	22.6%	32.7%
\$25,000 to \$49,999	24.6%	29.0%	22.6%	33.1%
\$50,000 to \$74,999	16.5%	15.6%	17.4%	16.7%
\$75,000 to \$99,999	11.1%	7.9%	12.2%	8.5%
\$100,000 and more	25.5%	8.1%	25.3%	9.0%

Source: Table B19001: Household Income in the Past 12 Months (in 2012 inflation-adjusted dollars), *American Community Survey, 5-Year Estimates 2008–2012*.

So, for example, when the actual proportions of African American or Hispanic households in the wealthier areas of Houston are close to zero, it is very likely that housing discrimination in at least one of its many forms is at play. And when the percentage of Caucasian households in a neighborhood of lower-cost housing is far less than 22 percent, something is amiss. This study identifies these anomalies.

Understanding the Free Market Analysis™

The tables that constitute this Free Market Analysis™ provide the following information for each Houston super neighborhood and each census tract for 2008–2012 and 2000:⁸

8. The household incomes for 2000 are from the 2000 U.S. Census. Because the 2010 U.S. Census did not ask for household income, we used household income from the *American Community Survey 2012. Five-Year Estimates* for 2008–2012. Due to the larger sample size, these are more

- 💧 “HHs Actual proportions” = Actual proportion of households of each race and Hispanic ethnicity of any race
- 💧 “HHs Free Market” = Approximate proportion of households of each race and Latino ethnicity of any race when income is the primary determinant of residency in a free market not distorted by housing discrimination.
- 💧 “HHs Difference” = For each race and Hispanics of any race, the difference between the actual proportion of households and the proportion in a free market not distorted by housing discrimination.

In the tables that follow, “HH Differences” between actual and expected proportions that suggest distortions of the free housing market likely due to racial discrimination are highlighted with a red cell.

A “HHs Difference” that is 15 or more percentage points is a “substantial” or “significant” enough gap that it likely reflects the current or past presence of housing discrimination. The greater the difference is, the greater the likelihood that housing discrimination has been and may still be at play. While other researchers have concluded that differences of just five percentage points indicate that discrimination is distorting the housing market,⁹ we have set the threshold at 15 percentage points as more likely to be indicative of possible discrimination. We are also factoring in those minority households that deliberately choose to live in a predominantly minority neighborhood, including first generation immigrants. We are also allowing for the margins of error in the household income data because it comes from the five–years estimates in the *American Community Survey*.¹⁰ Unfortunately the Census Bureau no longer asks for household income in the 100 percent universal decennial census.

We may be allowing for a higher proportion of households that prefer to live in a racially or ethnically homogeneous community than actually exists. According to the Census Bureau, the primary reasons households move have been for better housing or less expensive housing, for a new job or job transfer, to live closer to work and for an easier commute, change in marital status, and to live in a better neighborhood or one with less crime. Wishing to live in a homogeneous neighborhood did not even register in the Census Bureau’s most recent survey.¹¹ Over half of the African American households moved for housing–related rea-

reliable than the one–year and three–year estimates.

9. See *Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region*.
10. We have previously set the threshold at ten percent. Because we are using 5–Year Estimates reported in the *2008–2012 American Community Survey*, we concluded it is best to err on the conservative side and alert readers that discrimination may be at work when there is a gap of at least 15 percentage points between the actual proportions and the proportions expected in a free housing market devoid of discrimination. We wanted to better allow for the margins of error in the 5–Year Estimates of the *2008–2012 American Community Survey*.
11. David Ihrke, *Reason for Moving: 2012 to 2013 Population Characteristics* (Washington, DC: United States Census Bureau, June 2014).

sons, a higher percentage than any other group.¹²

A jurisdiction seeking to affirmatively further fair housing cannot achieve housing integration overnight; the dynamics of the housing market do not work that way. It is not surprising that mitigating housing segregation is such a slow, incremental process. As the research shows, a neighborhood’s racial or ethnic composition is rather low on the list of reasons households move. In addition, not that many households move each year, especially homeowners. Given all the higher priority reasons households move to a particular home, it would be unrealistic to expect that a large proportion of households would deliberately make pro-integrative moves.

Caveats: A high proportion of minority households in a census tract is *not necessarily* a segregative concentration. For example, if a census tract’s actual proportion of Hispanic households is 40 percent, that is *not* a concentration when the proportion expected in a free housing market is 47 percent. Allowing for the factors discussed above, differences between actual and expected proportions of households that are *less than 15 percent* are close to what would be expected if household income were the predominant determinant of where households live in a free market without housing discrimination. Consequently, this report does not flag such census tracts as having a concentration of a race or ethnicity.

As you peruse the data that follow, note that the 15 point threshold *cannot* even be applied to Asian households in many census tracts because the expected proportion of Asian households is well below 15 percent. That’s not surprising given that just 6.1 percent of Houston households are Asian. While we do not highlight the cells in these situations, the analysis for the super neighborhood notes when the actual proportion of Asian households is a mere fraction of the expected proportion. It also notes when the actual proportion is significantly greater than the percentage expected in a free housing market absent discrimination. The same situation applies to Black households in some census tracts.

The actual and expected proportions of each group for the whole City of Houston appear below.

Table 2: Actual and Free Market Composition 2008–2012: City of Houston

Actual and Free Market Composition 2008–2012: City of Houston				
Entire City of Houston	White	Black	Asian	Hispanic of Any Race
Households Actual Proportion	58.1%	25.3%	6.1%	33.2%
Households Free Market	65.7%	19.5%	5.7%	29.1%
Difference	-7.6%	5.7%	0.3%	4.1%

Source: Tables B19001, B19001A, B19001B, B19001D, B19001I, 2008–2012 American Community Survey 5–Year Estimates.

12. Ibid. 4.

As the above table shows, the proportions of each group in the entire City of Houston are roughly what would be expected in a free housing market.¹³ This analysis looks at the racial and Latino composition of households in each census tract and super neighborhood.

Fostering Affordable Housing Does Not Reduce Opportunities

Subdivisions that include housing with a full range of housing costs constitute a primary route to affirmatively furthering fair housing, reducing economic stratification by enabling households of modest incomes to live where they have access to greater opportunities, and facilitating upward mobility.

Adding housing affordable to households with modest incomes to areas that offer their residents high opportunities does not reduce those opportunities. The introduction of affordable housing and households with modest incomes does not reduce existing opportunities — as long as these affordable dwelling units are scattered throughout a development and throughout a neighborhood.

Free Market Analysis™

To recap: For each census tract, this study identifies the actual proportions of households (“HHs Actual proportions,” where “HH” is an abbreviation for “Households”) of Caucasian, African American, Asian, and Hispanic of any race in 2008–2012 and the approximate proportions that would be expected in a genuinely free housing market that is not distorted by racial or ethnic discrimination (“HHs Free Market”). The differences between the actual proportions and free market proportions are shown in the rows labeled “HHs Difference.” A red cell highlights differences of at least 15 percentage points between actual and free market proportions.

Note that many census tracts that existed in 2000 no longer exist by 2008–2012. Some Census 2000 tracts were divided into multiple tracts by 2010. Some new tracts were created by 2010 by merging all or parts of several Census 2000 tracts. These are noted in the tables that follow. Since the sample data for 2008–2012 (using 2010 tracts) would not be reliable enough if broken down to block groups, the tables that follow use the entire 2000 census tract or tracts for comparison to 2008–2012.

Organization of the Super Neighborhoods and Census Tracts

It is important to remember that the household income data for 2008–2012 is

13. As with the rest of this Free Market Analysis™, the proportions expected in a free housing market are based on the entire housing market which encompasses the whole Metropolitan Statistical Area in which Houston is located.

based on data collected through the *American Community Survey*, not the decennial census. While the decennial census surveys *all* households, the *American Community Survey* is based on a *sample*. Consequently, margins of error can be substantial when the number of households in a census tract is relatively small. To err on the safe side, we have excluded from this study census tracts with fewer than 20 households because data were not available for some races (remember, this is a sample) and we concluded that such a small sample size was not reliable enough to use in this study.

We have organized the census tracts as closely as possible by super neighborhood and have noted when less than 25 percent of a tract is within a super neighborhood. Solely for the sake of presentation, we have organized the super neighborhoods into four quadrants created by dividing the city along its north/south axis by U.S. 60 and its east/west axis by U.S. 45 and Route 288.

Most of the City of Houston is divided into 88 super neighborhoods. Many of these super neighborhoods are *not* coterminous with census tract boundaries. In addition, the city has not assigned 146 census tracts to any super neighborhood.

Parts of some census tracts are in more than one super neighborhood. Because we include the data for the entire census tract in the compilation of data for the whole super neighborhood, the totals for such a super neighborhood should be viewed as a ball park approximation, not a precise measurement. We concluded that larger margins of error for household income at the block group level rendered block group level data too unreliable for this study.

In each city quadrant, the data for each super neighborhood is analyzed along with the data for the census tracts closest to it that are not assigned to a super neighborhood. The data for the census tracts outside super neighborhoods are presented in tables that follow the super neighborhoods in the same geographic quadrant.

Within each quadrant, super neighborhoods are reported upon starting at the center of the city and moving out and around the geographic quadrant so that readers can more easily see the breadth of any demographic patterns that might exist.

This study includes only census tracts that are part of the City of Houston.

How to Use This Analysis to Measure Progress

In five or ten years the data in this Free Market Analysis™ can be used to objectively measure progress toward affirmatively furthering fair housing choice by examining the gap between the actual racial and Latino compositions of a census tract with the compositions expected in a free housing market. The city is achieving good progress — which is inherently incremental — when this gap shrinks by about 2.5 to 5 percentage points after five years or about 5 to 10 percentage points after ten years. A new Free Market Analysis™ will be needed to make these comparisons.

Why the percentages do not equal 100 percent

The percentages in these Free Market Analysis™ tables will not equal 100 percent for several reasons.

The category “Hispanic of Any Race” is an ethnicity. Latinos can be of any race. Adding up all the percentages in a row in the super neighborhood tables count Hispanics twice. As shown earlier in Figure 2, nearly 57 percent of Houston's Latino population report themselves to be Caucasian with just 1.36 percent reporting as African American, and 0.17 percent as Asian.

The tables do not include “Native Hawaiian and Other Pacific Islander” and “American Indian and Alaska Native” because the number of households in these racial classifications is so small that they would not alter the findings and analysis.

The tables do not include “Some other race” or “Two or more races” because they would make the tables impossibly complicated and we have found in the past that they would not affect the findings and analysis.

Note also that these tables report on proportions of households, not individuals. Over the years we have found that the percentages of households in each of the four groups has been consistently within one to three percentage points of the proportions of individuals. But this study uses households rather than individuals because income is reported, logically enough, by household.

How to Get the Most Out of This Analysis

As noted above, census tracts are not necessarily coterminous with the boundaries of the super neighborhoods. We have done our best to match tracts with super neighborhoods and have included in each super neighborhood table census tracts that are partially in a super neighborhood. Each table notes when less than 25 percent of a tract is in a super neighborhood. Each table also notes which tracts from the 2000 census are now part of a 2010 census tract. So a Census 2000 tract can be part of more than one Census 2010 tract.

There are two sets of data in each table that help determine whether the racial and Latino composition of each census tract constitutes a segregative or integrative condition

- First compare the proportions of each group of households from the 2000 census (“Householders (2000 Census)”) with the actual proportion of householders from 2008–2012 (“2008–2012 Households Actual Proportion”). Those figures show the direction in which the tract has been moving since 2000, namely whether it has become more or less diverse. But that's not the full picture. It's still necessary to take into account household incomes and the cost of housing in each census tract.

- ◆ Next look at the “2008–2012 Households Difference” for each category in the census tract. That figure reveals how closely the actual racial or Hispanic composition of the tract matches the composition that would be expected in a free housing market not distorted by discrimination. As discussed earlier, the cell is highlighted in red when the gap between actual and expected composition is at least 15 percentage points: the larger the gap, the more off kilter the proportion is and the greater the intensity of the racial or Latino concentration is, a condition that reflects probable housing segregation.
- ◆ While these data alone cannot directly reveal whether past “historic” or current discrimination accounts for the current levels of segregation or integration, they can provide some strong hints:
 - ◆ When the gap between the actual and expected racial or Hispanic composition of a census tract is a positive number of 15 or more percentage points and the figure in the “2008–2012 Households Actual Proportions” row has grown since 2000, it is probably likely that the housing discrimination is ongoing.
 - ◆ When the 2008–2012 actual figure for a race or Hispanic ethnicity is less than the 2000 figure, it is *very possible* that the tract is moving toward integration and affirmatively furthering fair housing. But these figures for each census tract need to be evaluated within the context of the composition expected in a free housing market absent discrimination. The narrative for each super neighborhood identifies the direction, if any, in which each census tract is moving.
 - ◆ When the gap between the actual and expected racial or Hispanic composition of a census tract is at least negative 15 percentage points and the percentage in 2008–2012 has increased since 2000, the tract is probably integrating. When the actual percentage has decreased since 2000, it is likely that ongoing housing discrimination continues to distort the housing market in that tract as concentrations intensify.
 - ◆ When the expected proportion of a group is no more than 15 percent and the actual proportion is just a fraction of the expected proportion, it is probable that housing discrimination has been or is being practiced.
 - ◆ When the expected proportion of a group is small, like 5 percent and the actual proportion is several multiples of that, like 20 percent, it is very likely that discrimination has contributed to this difference.

Keep in mind that the figures for 2008–2012 are carefully calculated approximations. By allowing for a 15 percentage point difference between the actual and expected free market racial or Latino composition before flagging a census tract as having an unnaturally high concentration or an unnatural dearth of members of a particular race or ethnicity, we are erring on the conservative side.

The data shown for each census tract give the city a baseline from which to measure progress toward affirmatively furthering fair housing over the coming years.

However, it is vital to remember that movement toward stable, racially and ethnically integrated neighborhoods is an incremental process that will take generations to achieve. As noted earlier, households have many more reasons to move to another home that have nothing to do with racial or ethnic homogeneity. In addition, not that many households move each year. As a result, it will take many generations to overcome the centuries of the segregation that housing discrimination has wrought to achieve integrated neighborhoods. Consequently, ***it is a very positive sign when the gap between the actual proportion of a racial or ethnic group and the proportion expected in a free market undistorted by housing discrimination shrinks by even just five percentage points over a decade.***

Much more rapid racial or Latino change during a decade is likely to reflect re-segregation where the predominant race or ethnicity in a segregated neighborhood is replaced by a different race or ethnicity — the opposite of affirmatively furthering fair housing. Such a change is almost always the result of housing discrimination in its many forms.

The description of each super neighborhood used here is adapted from the City of Houston's "Super Neighborhood Resource Assessment" for that neighborhood which provides select 2010–2012 demographic information and maps of the area.¹⁴ Note that the demographic information posted there by the Planning & Development Department is *not* identical to the demographic information used in this Free Market Analysis™. For example, the city excludes Hispanics from its totals of Caucasian residents and its demographic data are for individuals, not households.

To provide more context, at the end of each super neighborhood's description are the 2000 census counts of individuals and 2008–2012 *American Community Survey* counts of individuals as well as the 2000 census and 2008–2012 *American Community Survey* median household income for the super neighborhood.

Following each super neighborhood's description are an analysis of the data and any needed recommendations for further action.



Before You Read Any Further

Readers of long documents are often tempted to skip right to the data or to the conclusions and recommendations, sometimes leaving them wondering, "How did the authors ever arrive at that conclusion?" You can avoid this possibility if you read the introductory narrative to this appendix *before* looking at any of the tables that follow.

14. Links to each super neighborhood's web page are at <http://www.houstontx.gov/planning/snh>.

Real Estate Testing: Essential Tool To Identify Housing Discrimination

Given the growing sophistication in discriminatory practices, housing discrimination can be quite difficult to root out and prove. The home seeker responding to an advertisement may be told the dwelling unit is no longer available when it actually is available. A real estate agent might suggest that the Asian home seeker might be happier living in a neighborhood where more Asians live. A real estate agent may steer a white home seeker away from an integrated neighborhood — an illegal discriminatory practice that forces resegregation on an integrated community.

When the challenged real estate person responds, the issue often becomes like that tired “he said/she said” cliché. In the absence of adequate documented evidence, it is quite difficult to prove housing discrimination.

That documented evidence can be found using real estate testing, one of the most accurate and effective tools to identify and prove housing discrimination. Testing brings the private sector's sound risk management and quality control practices to real estate. Testing is a lot like the quality control tool called “secret shoppers” that the savviest retail businesses use to discover and root out bad customer service practices — except that real estate testing is much more formal, focused, and conducted scientifically. Two real estate testers are paired with just a single difference — the characteristic being tested — between them such as familial status, national origin, race, gender, color, religion, disability, or source of lawful income like a Housing Choice Voucher. They receive thorough training and their results are meticulously recorded and preserved as possible evidence at trial.¹⁵

Testing may be conducted in response to a specific housing discrimination complaint or to determine the extent of housing discrimination, if any, in a jurisdiction. Testing uses a paired set of testers who assume the role of rental or purchase applicants with equivalent social and economic characteristics. The testers differ only in terms of the characteristic being tested for discrimination. The two testers in a matched pair do not have any contact with each other during or after the test.

15. There is a long history of testing being used to expose and prove housing discrimination. The nation's courts have long accepted real estate testing as a valid evidentiary tool to help prove housing discrimination. Iowa and Delaware conduct testing to uncover housing discrimination. Alexandria, VA and Seattle, WA operate their own testing programs. For a clear and fairly compact detailed explanation of real estate testing, see “Paired Testing and the Housing Discrimination Study” and “Fair Housing Enforcement Organizations Use Testing to Expose Discrimination” in *Evidence Matters*, Spring/Summer 2014 (Washington, DC: Office of Policy Development and Research, U.S. Dept. of Housing and Urban Development) 12–26. The footnotes on page 26 cite over a dozen additional sources on real estate testing. The periodical is available to download at http://www.huduser.org/portal/periodicals/em/em_archive.html. Testing of linguistic profiling can be conducted by phone. For an example, see *Analysis of Impediments to Fair Housing Choice in the City of Naperville, Illinois 2007*, (River Forest, IL: Planning/Communication, 2007) 38–39. Available at <http://www.planningcommunications.com>. The U.S. Department of Justice has been helping communities conduct testing since 1991. Details are available at http://www.justice.gov/crt/about/hce/housing_testing.php. The National Fair Housing Alliance conducts real estate testing for cities around the nation and provides training in testing to localities.

To illustrate how testing works, imagine a Latino husband and wife with two young children. They saw an advertisement to rent a three-bedroom apartment located in a predominantly non-Hispanic Caucasian neighborhood served by very good public schools. They call to make sure the unit is still available. Assured that it is, they arrive 30 minutes later and, upon the landlord seeing them, are told that the apartment was no longer available, but the landlord has similar vacant apartments at another building (which just happens to be in a census tract that is 80 percent Latino). Suspicious, they contact a local fair housing organization for guidance and assistance.

Faced with a possible “he said/she said” situation, the fair housing organization decides to conduct a test of the accused landlord.

To test this landlord, the fair housing organization assigns virtually identical profiles to a Latino tester and a “control” tester who is a non-Hispanic Caucasian — the only difference being the ethnicity of their names. Both testers have about the same income, assets, and employment.

When the same landlord advertises another unit in that same building, the Hispanic tester is the first tester to contact and visit the landlord. The control tester contacts the landlord an hour or so later. After each test is conducted, the tester returns to the fair housing organization to be debriefed by trained staff who document what transpired in each attempt to rent the apartment. The experiences of the two testers are compared.

Suppose the landlord told the Latino tester that the advertised apartment was no longer available but showed the advertised apartment an hour or so later to the control tester. That behavior constitutes illegal housing discrimination and the fair housing organization would help the actual Latino couple that was not shown the apartment file a housing discrimination complaint.

But suppose that the landlord showed the apartment to the Hispanic couple, but told them that the security deposit is three months rent while later telling the control tester that the security deposit is 1½ months rent. That differential term would also constitute illegal housing discrimination.

A landlord who treats both testers the same is not engaging in discrimination.

Whatever the first test finds, the fair housing organization may still choose to conduct additional tests of the landlord before deciding whether to file the housing discrimination complaint.

The systemic real estate testing recommended in the pages that follow can involve conducting a dozen or more paired tests in a geographic area to discover and document the extent of any discriminatory housing practices that may exist. The testing may help explain why the subject geographic area exhibits demographic characteristics of segregation. Like a retail store's secret shoppers, systemic testing identifies “bad customer service practices” which, in the case of real estate testing, amounts to illegal discriminatory practices.

Of even greater relevance to Houston, systemic testing enables prosecution of real estate practitioners who engage in illegal housing discrimination. Systemic testing can also help reveal the types of illegal discriminatory practices at play and lead to effective efforts to curb them. Systemic testing can lead to effective training programs in fair housing compliance for real estate professionals.

Northwest Quadrant

Super Neighborhoods in the Northwest Quadrant

1 Willowbrook	13 Independence Heights
3 Carverdale	14 Lazybroo/Timbergrove
4 Fairbanks/Northwest Crossing	15 Greater Heights
5 Greater Inwood	84 Spring Branch North
6 Acres Home	85 Spring Branch Central
7 Hidden Valley	86 Spring Branch East
8 Westbranch	[While part of Super Neighborhood 2, Greater Greenspoint, is in this quadrant, most of it is in the Northeast Quadrant and its table is located in that section of this study.]
9 Addicks Park Ten	
10 Spring Branch West	
11 Langwood	
12 Central Northwest	

Census tracts not assigned to a super neighborhood are shown with data following the super neighborhoods.

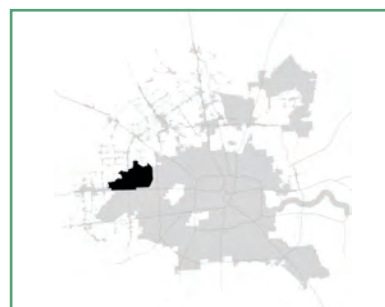
Table 3: Addicks Park Ten

Super Neighborhood 9: Addicks Park Ten				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	74.8%	8.3%	6.2%	17.8%
2008–2012 Households Actual Proportion	70.6%	10.9%	10.6%	28.6%
2008–2012 Households Free Market	69.7%	16.2%	6.4%	24.9%
2008–2012 Households Difference	0.9%	-5.3%	4.2%	3.7%
2010 Census Tract 5401 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	72.0%	5.8%	9.3%	23.0%
2008–2012 Households Actual Proportion	66.7%	5.7%	18.5%	23.6%
2008–2012 Households Free Market	74.3%	12.6%	7.2%	19.1%
2008–2012 Households Difference	-7.6%	-7.0%	11.4%	4.5%
2010 Census Tract 5405.02 (Was Tract 5405 in 2000)				
Householders (2000 Census)	77.1%	9.7%	3.4%	17.0%
2008–2012 Households Actual Proportion	88.9%	5.0%	3.2%	23.8%
2008–2012 Households Free Market	69.4%	16.4%	6.5%	25.1%
2008–2012 Households Difference	19.4%	-11.4%	-3.3%	-1.3%
2010 Census Tract 5406.01 (Was Tract 5406 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	72.1%	11.7%	6.8%	14.6%
2008–2012 Households Actual Proportion	72.1%	14.8%	10.6%	29.2%
2008–2012 Households Free Market	70.4%	15.5%	6.6%	24.2%
2008–2012 Households Difference	1.6%	-0.7%	4.0%	5.0%
2010 Census Tract 5407				
Householders (2000 Census)	67.8%	7.7%	12.0%	19.6%
2008–2012 Households Actual Proportion	60.0%	6.5%	14.1%	33.4%
2008–2012 Households Free Market	69.4%	16.4%	6.3%	25.5%
2008–2012 Households Difference	-9.4%	-9.9%	7.7%	7.9%
2010 Census Tract 5417				
Householders (2000 Census)	79.9%	6.7%	4.2%	15.3%
2008–2012 Households Actual Proportion	65.6%	20.7%	6.3%	29.4%
2008–2012 Households Free Market	67.5%	17.9%	6.1%	27.7%
2008–2012 Households Difference	-2.0%	2.8%	0.3%	1.7%

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Super Neighborhood 9: Addicks Park Ten (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5418				
Householders (2000 Census)	78.7%	7.1%	4.3%	15.9%
2008–2012 Households Actual Proportion	71.6%	11.9%	5.8%	31.8%
2008–2012 Households Free Market	67.8%	17.8%	6.1%	26.8%
2008–2012 Households Difference	3.8%	-6.0%	-0.3%	5.0%
2010 Census Tract 5419 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	80.9%	5.2%	5.2%	15.2%
2008–2012 Households Actual Proportion	76.6%	8.0%	12.3%	32.9%
2008–2012 Households Free Market	70.7%	15.3%	6.6%	24.1%
2008–2012 Households Difference	5.9%	-7.3%	5.7%	8.9%
2010 Census Tract 5432 (Tract consists of parts of 2000 tracts 5403 and 5404)				
Householders (2000 Census)	75.3%	15.2%	0.7%	14.8%
2008–2012 Households Actual Proportion	74.9%	11.3%	10.5%	27.4%
2008–2012 Households Free Market	66.5%	18.7%	5.8%	28.9%
2008–2012 Households Difference	8.4%	-7.4%	4.7%	-1.5%

Addicks Park Ten is located in the westernmost part of the City, north of Interstate 10. Most of the area is made up of the Addicks Reservoir, a large flood control dam. The surrounding area, which is most subject to flooding, is being developed for recreational uses, including a golf course, a wildlife sanctuary and soccer fields. Park Ten, an area between I-10 and the Reservoir, is developed as office, commercial, and light industrial. Residential development in the area includes approximately 9,000 people residing in two single-family subdivisions and several apartment complexes. Population rose considerably from 4,528 in 2000 to 11,723 in 2012 along with an increase in annual median household income from \$43,734 to \$55,262.



Nearly all of the growing Addicks Park Ten super neighborhood reflects the racial and Latino composition that would be expected in a free housing market not distorted by discrimination. The only outlier is tract 5405.02 which actually has a significantly greater proportion of Caucasian households than would be expected.

The proportions of Asian households grew quite a bit since 2000 in tracts 5401, 5419, and 5432, although the actual proportions do not excessively exceed the expected proportions. **The city might want to keep an eye on Addicks Park Ten to detect any racial steering to these census tracts.**

Nearby Census Tracts Not in Any Super Neighborhood. There are a slew of census tracts west and north of Addicks Park Ten that are not assigned to any

super neighborhood. Some of these have 25 or fewer households and were not included in this study due to the relatively low reliability of such small sample sizes. Most of the unassigned tracts in this quadrant, however, are *not* part of the City of Houston.

The actual and expected compositions of most of the unassigned Houston census tracts do not show any signs of segregation. However, several have a appreciably higher proportion of Hispanic households than would be expected in a discrimination-free housing market: 5423.01, 5423.02, 5416.02, 5415.1, and 5413. Several tracts have significantly fewer white households than would be expected although the actual proportions of other races and Latinos are not out of line with expectations: 5425, 5405.02, 5521.01, 5521.03, 5543.01, 5545.02, 5546, 5556, 5557.02,

The actual proportion of African Americans is noticeably lower than the percentage expected in the absence of housing discrimination in census tracts 5409.01 and 5520.02 while the actual and expected proportions are not out of line for other races and Hispanics.

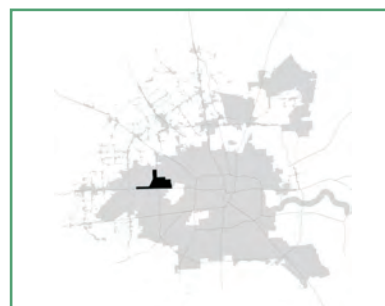
Table 4: Spring Branch West

Super Neighborhood 10: Spring Branch West				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	71.5%	5.2%	5.4%	38.1%
2008–2012 Households Actual Proportion	78.7%	5.7%	5.3%	42.6%
2008–2012 Households Free Market	65.8%	19.3%	5.7%	29.7%
2008–2012 Households Difference	12.9%	-13.6%	-0.4%	12.8%
2010 Census Tract 5222.01 (Was Tract 5222 in 2000)				
Householders (2000 Census)	72.6%	5.1%	4.7%	42.9%
2008–2012 Households Actual Proportion	67.9%	8.0%	4.3%	57.4%
2008–2012 Households Free Market	65.2%	19.6%	5.5%	31.0%
2008–2012 Households Difference	2.7%	-11.7%	-1.3%	26.4%
2010 Census Tract 5222.02 (Was Tract 5222 in 2000)				
Householders (2000 Census)	72.6%	5.1%	4.7%	42.9%
2008–2012 Households Actual Proportion	80.6%	2.6%	2.6%	47.0%
2008–2012 Households Free Market	65.0%	20.0%	5.5%	30.8%
2008–2012 Households Difference	15.6%	-17.4%	-3.0%	16.2%
2010 Census Tract 5223.01 (Was Tract 5223 in 2000)				
Householders (2000 Census)	70.8%	6.1%	5.2%	47.0%
2008–2012 Households Actual Proportion	75.1%	9.0%	2.4%	49.5%
2008–2012 Households Free Market	64.1%	20.8%	5.4%	31.5%
2008–2012 Households Difference	11.1%	-11.8%	-3.0%	18.0%
2010 Census Tract 5223.02 (Was Tract 5223 in 2000)				
Householders (2000 Census)	70.8%	6.1%	5.2%	47.0%
2008–2012 Households Actual Proportion	76.4%	5.4%	3.7%	47.3%
2008–2012 Households Free Market	66.2%	18.8%	5.7%	29.9%
2008–2012 Households Difference	10.1%	-13.4%	-2.0%	17.3%
2010 Census Tract 5224.01 (Was Tract 5224 in 2000)				
Householders (2000 Census)	71.9%	2.9%	4.8%	34.8%
2008–2012 Households Actual Proportion	88.5%	1.1%	4.5%	30.8%
2008–2012 Households Free Market	66.6%	18.8%	5.9%	28.2%
2008–2012 Households Difference	21.9%	-17.7%	-1.4%	2.6%

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Super Neighborhood 10: Spring Branch West (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5224.02 (Was Tract 5224 in 2000)				
Householders (2000 Census)	71.9%	2.9%	4.8%	34.8%
2008–2012 Households Actual Proportion	88.5%	2.3%	1.5%	38.2%
2008–2012 Households Free Market	66.3%	18.9%	5.9%	28.6%
2008–2012 Households Difference	22.2%	-16.6%	-4.5%	9.6%
2010 Census Tract 5402				
Householders (2000 Census)	64.6%	9.1%	11.9%	27.9%
2008–2012 Households Actual Proportion	78.9%	1.2%	10.8%	58.7%
2008–2012 Households Free Market	66.0%	19.3%	5.6%	29.4%
2008–2012 Households Difference	12.9%	-18.0%	5.2%	29.3%
2010 Census Tract 5432 (Tract consists of parts of 2000 tracts 5403 and 5404)				
Householders (2000 Census)	75.3%	15.2%	0.7%	14.8%
2008–2012 Households Actual Proportion	74.9%	11.3%	10.5%	27.4%
2008–2012 Households Free Market	66.5%	18.7%	5.8%	28.9%
2008–2012 Households Difference	8.4%	-7.4%	4.7%	-1.5%

Spring Branch West is located north of I-10 and west of Blalock. Gessner Road and W. Sam Houston Parkway North are the major north-south arteries in the area. Light industrial uses, including distribution centers, are located along the Parkway. The majority of retail commercial development is found along Gessner Road and Interstate 10. The area is largely deed restricted single-family residential. Multi-family uses are concentrated along Long Point Road, Gessner and Blalock. New home construction has recently resumed on small sites in the southeastern part of the community where land prices have risen dramatically. The population declined from 32,423 in 2000 to 27,360 in 2012 while annual median household income grew from \$39,645 to \$45,023.



Immediately east of Addicks Park Ten, nearly all of Spring Branch West has been consolidated into the growing Latino enclave that includes much of the north-central part of the city. In five of the eight tracts, the proportion of Hispanic households significantly exceeds the percentage expected in a free housing market absent discrimination. Two of these tracts have seen a large increase in the proportion of Latino households since 2000: a nearly 15 percentage point increase in 5222.01 and an almost 22 percentage point increase in 5224.02.

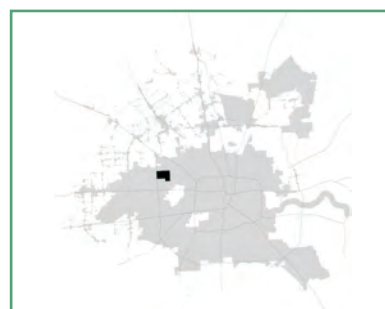
In half the tracts, the actual proportion of Black households is well below the percentages expected in a free housing market and roughly the same as in 2000.

Recommended Actions: The city should study this super neighborhood to determine whether steering or other illegal discriminatory practices are taking place.

Table 5: Spring Branch North

Super Neighborhood 84: Spring Branch North				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	73.0%	5.5%	6.7%	29.2%
2008–2012 Households Actual Proportion	73.7%	5.3%	4.5%	46.5%
2008–2012 Households Free Market	65.8%	19.2%	5.6%	30.3%
2008–2012 Households Difference	7.9%	-13.9%	-1.2%	16.2%
2010 Census Tract 5219				
Householders (2000 Census)	75.2%	4.3%	10.8%	17.5%
2008–2012 Households Actual Proportion	83.4%	4.7%	6.2%	33.7%
2008–2012 Households Free Market	67.8%	17.6%	6.0%	27.8%
2008–2012 Households Difference	15.6%	-12.9%	0.1%	5.9%
2010 Census Tract 5220				
Householders (2000 Census)	73.7%	2.5%	5.2%	28.4%
2008–2012 Households Actual Proportion	73.7%	6.2%	5.9%	39.9%
2008–2012 Households Free Market	64.8%	20.1%	5.5%	30.8%
2008–2012 Households Difference	8.9%	-13.9%	0.4%	9.1%
2010 Census Tract 5221				
Householders (2000 Census)	71.3%	9.1%	6.5%	25.4%
2008–2012 Households Actual Proportion	67.7%	4.1%	2.0%	57.6%
2008–2012 Households Free Market	64.9%	19.8%	5.4%	31.8%
2008–2012 Households Difference	2.8%	-15.7%	-3.4%	25.8%
2010 Census Tract 5222.01 (Was Tract 5222 in 2000)				
Householders (2000 Census)	72.6%	5.1%	4.7%	42.9%
2008–2012 Households Actual Proportion	67.9%	8.0%	4.3%	57.4%
2008–2012 Households Free Market	65.2%	19.6%	5.5%	31.0%
2008–2012 Households Difference	2.7%	-11.7%	-1.3%	26.4%

Spring Shadows is located north of Interstate 10, between Campbell Road and W. Sam Houston Parkway. The predominant land use in the area is single family, mostly in deed restricted subdivisions. Commercial development is found primarily along Gessner Road which bisects the area, although the recent opening of the West Belt has stimulated commercial development along Clay Road (the area's northern boundary). Multi-family residential uses are found along Hammerly Boulevard and near Gessner. A new golf course was recently developed in the northern part of the area. Population increased from 18,402 to 21,802 in 2012 while annual median household income stagnated, rising to \$44,157 in 2012 from \$43,414 in 2000.



The two census tracts on the east end of Spring Branch North are part of the growing Hispanic concentration in north-central Houston. The actual proportion of Latino households in both tracts is about 26 percentage points greater than what would be expected absent housing discrimination. The percentage of Latino households grew from 25.4 to 57.6 percent in 5221 and from 42.9 to 57.4 percent in 5222.01 suggesting that these discrepancies are likely the result of current real estate industry practices, not historic practices. In tract 5221, the proportion of African American households declined by half since 2000 and remains significantly below what would be expected absent housing discrimination.

Recommended Actions: The city should further examine tracts 5221 and 5222.01 to identify the extent of current illegal discriminatory real estate practices. If any are found, steps should be taken to end them.

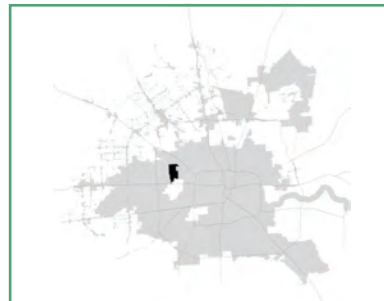
Table 6: Spring Branch Central

Super Neighborhood 85: Spring Branch Central				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	63.9%	4.7%	3.7%	50.2%
2008–2012 Households Actual Proportion	70.8%	3.2%	3.6%	61.8%
2008–2012 Households Free Market	63.8%	20.9%	5.3%	31.9%
2008–2012 Households Difference	7.0%	-17.7%	-1.7%	29.8%
2010 Census Tract 5207				
Householders (2000 Census)	79.0%	2.7%	2.8%	27.9%
2008–2012 Households Actual Proportion	82.4%	3.0%	7.8%	28.9%
2008–2012 Households Free Market	67.3%	18.0%	5.9%	28.6%
2008–2012 Households Difference	15.1%	-15.0%	2.0%	0.2%
2010 Census Tract 5210				
Householders (2000 Census)	64.3%	4.5%	1.2%	57.0%
2008–2012 Households Actual Proportion	81.6%	3.5%	1.3%	52.5%
2008–2012 Households Free Market	63.5%	21.5%	5.4%	31.2%
2008–2012 Households Difference	18.1%	-18.0%	-4.1%	21.3%
2010 Census Tract 5211				
Householders (2000 Census)	57.7%	3.9%	4.5%	64.0%
2008–2012 Households Actual Proportion	80.4%	1.6%	0.0%	74.8%
2008–2012 Households Free Market	63.3%	21.5%	5.2%	32.4%
2008–2012 Households Difference	17.1%	-19.9%	-5.2%	42.3%
2010 Census Tract 5212				
Householders (2000 Census)	58.6%	9.1%	5.1%	44.9%
2008–2012 Households Actual Proportion	68.0%	1.7%	3.5%	70.4%
2008–2012 Households Free Market	63.0%	21.6%	5.1%	33.0%
2008–2012 Households Difference	5.0%	-19.9%	-1.6%	37.4%

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Super Neighborhood 85: Spring Branch Central (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5213				
Householders (2000 Census)	67.0%	7.1%	6.7%	39.7%
2008–2012 Households Actual Proportion	71.3%	6.5%	6.7%	48.4%
2008–2012 Households Free Market	63.7%	21.2%	5.4%	31.6%
2008–2012 Households Difference	7.6%	-14.7%	1.3%	16.8%
2010 Census Tract 5214				
Householders (2000 Census)	55.8%	1.6%	1.0%	79.0%
2008–2012 Households Actual Proportion	61.9%	1.5%	0.0%	88.6%
2008–2012 Households Free Market	61.7%	22.6%	5.0%	34.3%
2008–2012 Households Difference	0.2%	-21.1%	-5.0%	54.3%
2010 Census Tract 5215				
Householders (2000 Census)	67.5%	2.6%	3.3%	42.9%
2008–2012 Households Actual Proportion	68.5%	4.5%	3.9%	56.7%
2008–2012 Households Free Market	65.0%	19.8%	5.6%	30.8%
2008–2012 Households Difference	3.4%	-15.3%	-1.7%	25.8%

Spring Branch Center is the central portion of the larger Spring Branch community. It is located north of the Village of Spring Valley, south of Clay Road, west of Bingle and east of Blalock. It includes many typical small Spring Branch subdivisions, such as Spring Branch Oaks and Timber Creek. The northern part of the community includes larger subdivisions, such as Binglewood and Holley Terrace. Many apartment complexes are scattered through the area. Some deteriorated after the real estate collapse of the 1980s. The population fell from 29,074 to 27,108 in 2012 while annual median household income declined to \$36,949 in 2012 from \$39,105 in 2000.



Spring Branch Central exhibits the same demographic characteristics of tracts 5521 and 5522.01 in adjacent Spring Branch North although the 88.6 percent concentration of Latino households in tract 5214 is far more intense and more than 54 percentage points greater than would be expected in a free housing market absent discrimination.

Recommended Actions: The city should further examine Spring Branch Central for the presence of current illegal discriminatory real estate practices and craft solutions to reverse the intensifying segregation of this super neighborhood.

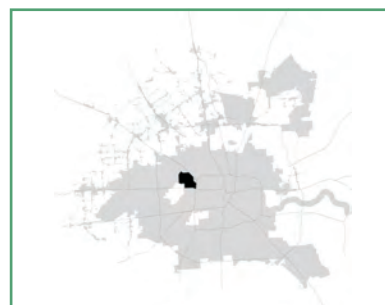
Table 7: Spring Branch East

Super Neighborhood 86: Spring Branch East				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	70.9%	4.9%	3.3%	48.4%
2008–2012 Households Actual Proportion	78.8%	5.9%	3.8%	52.1%
2008–2012 Households Free Market	64.9%	20.1%	5.5%	30.6%
2008–2012 Households Difference	13.9%	-14.2%	-1.6%	21.5%
2010 Census Tract 5201				
Householders (2000 Census)	79.2%	2.5%	0.9%	35.6%
2008–2012 Households Actual Proportion	87.9%	0.9%	6.8%	29.9%
2008–2012 Households Free Market	68.7%	16.8%	6.1%	27.5%
2008–2012 Households Difference	19.2%	-15.9%	0.8%	2.4%
2010 Census Tract 5202				
Householders (2000 Census)	78.1%	4.9%	3.2%	22.6%
2008–2012 Households Actual Proportion	83.5%	5.6%	8.9%	24.3%
2008–2012 Households Free Market	72.0%	14.4%	6.7%	22.0%
2008–2012 Households Difference	11.5%	-8.8%	2.2%	2.3%
2010 Census Tract 5203				
Householders (2000 Census)	64.1%	4.4%	3.6%	45.7%
2008–2012 Households Actual Proportion	76.2%	8.8%	3.3%	43.8%
2008–2012 Households Free Market	63.6%	21.3%	5.3%	31.7%
2008–2012 Households Difference	12.6%	-12.5%	-1.9%	12.1%
2010 Census Tract 5204				
Householders (2000 Census)	74.7%	4.0%	1.8%	65.7%
2008–2012 Households Actual Proportion	71.5%	6.4%	0.3%	71.4%
2008–2012 Households Free Market	62.1%	22.4%	5.1%	33.3%
2008–2012 Households Difference	9.4%	-16.0%	-4.8%	38.1%
2010 Census Tract 5205				
Householders (2000 Census)	61.5%	10.9%	1.0%	49.0%
2008–2012 Households Actual Proportion	75.2%	8.6%	0.9%	65.7%
2008–2012 Households Free Market	62.7%	21.7%	5.0%	33.9%
2008–2012 Households Difference	12.4%	-13.1%	-4.1%	31.8%

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Super Neighborhood 86: Spring Branch East (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5206.01 (Was Tract 5206 in 2000)				
Householders (2000 Census)	72.5%	3.1%	5.0%	59.4%
2008–2012 Households Actual Proportion	83.4%	0.0%	5.1%	79.0%
2008–2012 Households Free Market	62.2%	22.5%	5.2%	32.3%
2008–2012 Households Difference	21.2%	-22.5%	-0.1%	46.7%
2010 Census Tract 5206.02 (Was Tract 5206 in 2000)				
Householders (2000 Census)	72.5%	3.1%	5.0%	59.4%
2008–2012 Households Actual Proportion	78.3%	6.1%	1.6%	67.4%
2008–2012 Households Free Market	62.9%	21.8%	5.2%	32.5%
2008–2012 Households Difference	15.4%	-15.7%	-3.6%	34.9%
2010 Census Tract 5207				
Householders (2000 Census)	79.0%	2.7%	2.8%	27.9%
2008–2012 Households Actual Proportion	82.4%	3.0%	7.8%	28.9%
2008–2012 Households Free Market	67.3%	18.0%	5.9%	28.6%
2008–2012 Households Difference	15.1%	-15.0%	2.0%	0.2%

Spring Branch East, located east of Bingle, is the oldest part of the larger Spring Branch community. Many industrial and warehouse developments are found in the northern and eastern parts of the community near Hempstead Highway and US 290. The former site of the Cameron Iron Works on I-10, the community's southern boundary, is now being redeveloped as a retail and entertainment complex. New home construction is occurring near Wirt Road and in several gated subdivisions replacing deteriorated apartment complexes. Afton Village, Brykerwoods, Monarch Oaks, Ridgecrest, Hillendahl Acres, Long Point Oaks, Pine Terrace, and Westview Terrace are some of the other subdivisions in the area. The population rose from 26,491 in 2000 to 28,167 in 2012. Annual median household income increased from \$32,733 to \$43,080.



Just two tracts — 5202 and 5203 — in the south central end of Spring Branch East have a composition that would be expected in a free housing market. They are immediately north of tract 4301 in Greater Uptown which has a greater proportion of Caucasian households than would be expected. The rest of Spring Branch East is consolidated into the city's growing Latino enclave with four tracts having an actual proportion of Hispanics that exceeds the expected proportions by 31.8, 34.9, 38.1, and 46.7 percentage points.

In five of the eight census tracts, the actual proportion of Black households is significantly less than what would be expected in a free housing market devoid of discrimination while the actual proportion of whites in each of these tracts is greater than expected. The proportion of African Americans throughout Spring

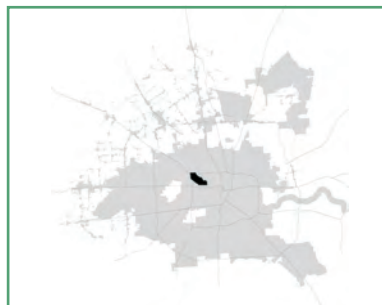
Branch East has barely budged since 2000 and may have decreased in several census tracts.

Recommended Actions: The City of Houston should further examine Spring Branch East to determine whether housing discrimination is occurring and devise means to curb it.

Table 8: Lazybrook/Timbergrove

Super Neighborhood 14: Lazybrook/Timergrove				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	70.3%	7.9%	1.5%	35.3%
2008–2012 Households Actual Proportion	75.8%	6.7%	3.8%	42.7%
2008–2012 Households Free Market	67.0%	18.3%	5.9%	28.2%
2008–2012 Households Difference	8.8%	-11.6%	-2.2%	14.5%
2010 Census Tract 5109				
Householders (2000 Census)	64.9%	1.0%	0.7%	58.0%
2008–2012 Households Actual Proportion	82.9%	2.7%	5.6%	34.9%
2008–2012 Households Free Market	70.0%	16.2%	6.8%	22.8%
2008–2012 Households Difference	12.9%	-13.5%	-1.2%	12.1%
2010 Census Tract 5110.01 (Was Tract 5110 in 2000)				
Householders (2000 Census)	83.0%	5.2%	2.3%	18.4%
2008–2012 Households Actual Proportion	93.9%	1.5%	2.9%	17.9%
2008–2012 Households Free Market	68.1%	17.5%	6.0%	27.6%
2008–2012 Households Difference	25.8%	-15.9%	-3.1%	-9.7%
2010 Census Tract 5110.02 (Was Tract 5110 in 2000)				
Householders (2000 Census)	83.0%	5.2%	2.3%	18.4%
2008–2012 Households Actual Proportion	83.1%	3.5%	3.0%	32.1%
2008–2012 Households Free Market	68.6%	16.9%	6.1%	27.4%
2008–2012 Households Difference	14.6%	-13.4%	-3.1%	4.7%
2010 Census Tract 5112 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	67.1%	9.2%	0.2%	39.5%
2008–2012 Households Actual Proportion	73.7%	2.8%	11.2%	32.4%
2008–2012 Households Free Market	71.5%	14.8%	6.9%	22.3%
2008–2012 Households Difference	2.1%	-12.0%	4.4%	10.0%
2010 Census Tract 5205 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	61.5%	10.9%	1.0%	49.0%
2008–2012 Households Actual Proportion	75.2%	8.6%	0.9%	65.7%
2008–2012 Households Free Market	62.7%	21.7%	5.0%	33.9%
2008–2012 Households Difference	12.4%	-13.1%	-4.1%	31.8%
2010 Census Tract 5301				
Householders (2000 Census)	50.6%	15.1%	1.0%	50.8%
2008–2012 Households Actual Proportion	54.2%	18.2%	0.0%	59.7%
2008–2012 Households Free Market	62.4%	22.0%	5.0%	34.0%
2008–2012 Households Difference	-8.2%	-3.8%	-5.0%	25.7%

Lazybrook and Timbergrove are deed-restricted subdivisions located along the wooded banks of White Oak Bayou in the near northwest quadrant of the city. In the pre-free-way period following World War II, this area remained undeveloped while suburban development was exploding in every other direction. This community of ranch style brick homes built in the 1950s and 1960s is easily accessible to Loop 610. The northwestern corner of the area, located outside of Loop 610 on both sides of US 290, includes Brookwood, a large lot subdivision, the Brookhollow business park, Northwest Mall and HISD's Delmar Stadium complex. From 2000 to 2012, the population grew from 11,655 to 14,978 and the annual median household income soared from \$38,783, just above the city's annual median household income in 2000 to \$59,568, nearly \$15,000 more than the city's annual median household income in 2012.



The actual composition of half the tracts in Lazybrook/Timbergrove are what would be expected in a free housing market. They are adjacent to similar tracts in adjacent super neighborhoods. Tract 5109 has moved toward greater diversity since 2000, although the proportion of African Americans remains below 3 percent, well below what would be expected which is characteristic of every tract except 5301.

In two tracts in the northwest end of this super neighborhood — 5205 and 5301 — the proportions of Latino households far exceeds the expected proportions by 31.8 and 25.7 percentage points respectively.

The actual proportions of Black households in tract 5110.01 is nearly 16 percentage points less than expected while the actual proportion of whites is 25.8 percentage points greater than expected in a free housing market absent discrimination.

Recommended Actions: The City of Houston should conduct further research to identify any illegal discriminatory real estate practices in Lazybrook/Timbergrove and devise ways to mitigate any that exist.

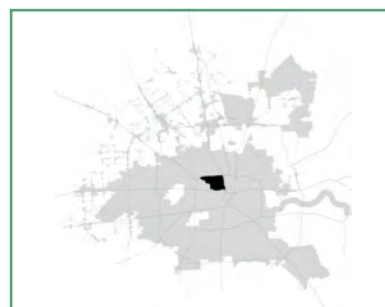
Table 9: Greater Heights

Super Neighborhood 15: Greater Heights				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	77.2%	3.6%	0.7%	34.2%
2008–2012 Households Actual Proportion	86.9%	2.9%	3.0%	26.3%
2008–2012 Households Free Market	69.1%	16.7%	6.3%	25.1%
2008–2012 Households Difference	17.8%	-13.8%	-3.4%	1.1%
2010 Census Tract 5103				
Householders (2000 Census)	89.4%	1.3%	1.0%	21.5%
2008–2012 Households Actual Proportion	90.9%	0.0%	1.3%	19.3%
2008–2012 Households Free Market	70.6%	15.6%	6.6%	23.4%
2008–2012 Households Difference	20.4%	-15.6%	-5.3%	-4.1%
2010 Census Tract 5104				
Householders (2000 Census)	83.9%	1.7%	0.9%	30.1%
2008–2012 Households Actual Proportion	89.0%	1.5%	3.8%	18.2%
2008–2012 Households Free Market	69.9%	16.0%	6.4%	24.9%
2008–2012 Households Difference	19.1%	-14.6%	-2.6%	-6.7%
2010 Census Tract 5105				
Householders (2000 Census)	57.1%	20.1%	0.8%	34.4%
2008–2012 Households Actual Proportion	81.0%	7.5%	0.9%	21.9%
2008–2012 Households Free Market	70.4%	15.8%	6.5%	24.0%
2008–2012 Households Difference	10.6%	-8.3%	-5.6%	-2.1%
2010 Census Tract 5111				
Householders (2000 Census)	65.1%	6.4%	0.0%	44.1%
2008–2012 Households Actual Proportion	78.9%	13.7%	4.0%	18.4%
2008–2012 Households Free Market	70.3%	15.8%	6.5%	24.1%
2008–2012 Households Difference	8.6%	-2.0%	-2.5%	-5.6%
2010 Census Tract 5112				
Householders (2000 Census)	67.1%	9.2%	0.2%	39.5%
2008–2012 Households Actual Proportion	73.7%	2.8%	11.2%	32.4%
2008–2012 Households Free Market	71.5%	14.8%	6.9%	22.3%
2008–2012 Households Difference	2.1%	-12.0%	4.4%	10.0%
2010 Census Tract 5113.01 (Was Tract 5113 in 2000)				
Householders (2000 Census)	80.8%	2.4%	0.9%	26.4%
2008–2012 Households Actual Proportion	90.1%	0.0%	3.0%	20.0%
2008–2012 Households Free Market	68.0%	17.7%	6.3%	25.8%
2008–2012 Households Difference	22.1%	-17.7%	-3.2%	-5.8%

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Super Neighborhood 15: Greater Heights (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5113.02 (Was Tract 5113 in 2000)				
Householders (2000 Census)	80.8%	2.4%	0.9%	26.4%
2008–2012 Households Actual Proportion	90.3%	2.6%	0.7%	18.3%
2008–2012 Households Free Market	66.8%	18.9%	6.1%	26.8%
2008–2012 Households Difference	23.6%	-16.2%	-5.3%	-8.5%
2010 Census Tract 5114				
Householders (2000 Census)	87.0%	1.2%	0.5%	29.8%
2008–2012 Households Actual Proportion	90.1%	1.7%	0.0%	26.8%
2008–2012 Households Free Market	69.9%	16.1%	6.5%	24.3%
2008–2012 Households Difference	20.3%	-14.4%	-6.5%	2.5%
2010 Census Tract 5115				
Householders (2000 Census)	70.8%	2.1%	0.5%	45.5%
2008–2012 Households Actual Proportion	89.3%	3.0%	2.4%	31.3%
2008–2012 Households Free Market	68.7%	17.0%	6.2%	26.2%
2008–2012 Households Difference	20.6%	-14.0%	-3.8%	5.1%
2010 Census Tract 5116				
Householders (2000 Census)	63.2%	1.3%	0.7%	73.9%
2008–2012 Households Actual Proportion	90.9%	1.1%	2.3%	62.3%
2008–2012 Households Free Market	64.7%	20.2%	5.6%	30.2%
2008–2012 Households Difference	26.2%	-19.1%	-3.3%	32.1%

Greater Heights centers on the old suburban town of Houston Heights which consolidated with Houston in 1919. It still retains its ban on the sale of alcoholic beverages. This has always been a community of stately mansions, comfortable bungalows and modest frame homes. Only a small number of apartment complexes replaced homes after World War II, and area construction has been of expensive townhouses and Victorian style mansions. The old commercial areas have had only a modest revival, but the many bungalows have become some of the most sought after in the city. Few of the community's oak lined streets is without a lovingly restored 75-year old home, or a brand new home in a compatible style. Population shrunk slightly to 40,001 from 41,486 in 2000. Meanwhile annual median household income skyrocketed to \$70,102 from \$41,576 in 2000.



The actual composition of the three Greater Heights census tracts — 5105, 5111, and 5112 — adjacent to the Lazybrook/Timbergrove super neighborhood is what would be expected in a free housing market. The proportion of white households in all of the other tracts exceeds the expected proportions by 19.1 to 26.2 percentage points. In three of those tracts — 5103, 5113.01, and 5113.02 — the

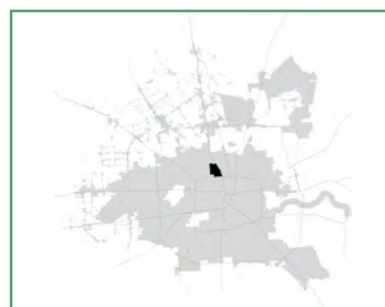
actual proportion of African American households is 15.6 to 19.1 percentage points less than would be expected. The actual proportion of Latino households in tract 5116 exceeds what would be expected by 32.1 percentage points even after the proportion of Hispanics declined since 2000.

Recommended Actions: The City of Houston should look more closely at the tracts in Greater Heights where the actual composition differs significantly from the expected composition to determine whether illegal discriminatory real estate practices are taking place and mitigate any that are occurring.

Table 10: Independence Heights

Super Neighborhood 13: Independence Heights				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	18.4%	67.5%	0.4%	23.2%
2008–2012 Households Actual Proportion	36.4%	53.4%	0.8%	38.4%
2008–2012 Households Free Market	61.4%	23.3%	5.1%	33.0%
2008–2012 Households Difference	-25.0%	30.1%	-4.2%	5.4%
2010 Census Tract 5303				
Householders (2000 Census)	3.9%	92.8%	0.0%	5.7%
2008–2012 Households Actual Proportion	18.2%	79.8%	0.0%	18.4%
2008–2012 Households Free Market	60.5%	24.1%	5.0%	33.3%
2008–2012 Households Difference	-42.3%	55.7%	-5.0%	-14.9%
2010 Census Tract 5304				
Householders (2000 Census)	13.3%	75.1%	0.1%	17.5%
2008–2012 Households Actual Proportion	25.8%	61.5%	0.0%	34.6%
2008–2012 Households Free Market	60.8%	23.7%	5.1%	33.1%
2008–2012 Households Difference	-35.1%	37.8%	-5.1%	1.5%
2010 Census Tract 5305				
Householders (2000 Census)	22.8%	60.9%	0.3%	30.3%
2008–2012 Households Actual Proportion	41.7%	49.2%	2.1%	45.0%
2008–2012 Households Free Market	61.9%	22.7%	4.9%	34.0%
2008–2012 Households Difference	-20.1%	26.5%	-2.8%	11.0%
2010 Census Tract 5306				
Householders (2000 Census)	31.1%	45.2%	1.2%	35.3%
2008–2012 Households Actual Proportion	51.7%	31.9%	0.3%	48.3%
2008–2012 Households Free Market	61.8%	23.1%	5.3%	31.3%
2008–2012 Households Difference	-10.2%	8.8%	-5.0%	17.1%

Independence Heights is an historical community located north of Loop 610 and west of I-45. After World War I, Independence Heights was the first town incorporated in Texas by African Americans. It was consolidated with Houston in 1929 and remains a predominantly African American neighborhood. Population growth after World War II led to the expansion of the community to the north. The Burlington Northern railroad tracks run through the southern section of the community. The number of residents fell from 14,026 in 2000 to 12,913 in 2012 while annual median household income barely budged at \$23,537 in 2012 from \$22,509 in 2000.



Independence Heights is the southeast corner of a intense concentration of African American residents that extends through the Acres Home and Greater Inwood super neighborhoods.

While the actual proportions of Black households in the four census tracts are 8.8, 26.5, 37.8, and 55.7 percentage points greater than expected and the actual proportions of white households are 10.2, 20.1, 35.1, and 42.3 percentage points less than expected in a free housing market not distorted by discrimination, the entire super neighborhood has become more diverse since 2000 largely due to substantial increases in the number of Latino households. These increases from 5.7 to 18.4, from 17.5 to 34.6, and from 30.3 to 45 percent have brought actual proportion of Hispanic households to roughly what would be expected in the absence of housing discrimination. In tract 5306, the proportion of Latinos increased from 35.3 to 48.3 percent, bringing the actual proportion to 17.1 percentage points more than would be expected in a discrimination-free housing market.

Recommended Actions: The City of Houston would be prudent to conduct further study to identify the factors that have led to this apparent diversification of Independence Heights and to determine whether this is the result of an absence or presence of discriminatory housing practices.

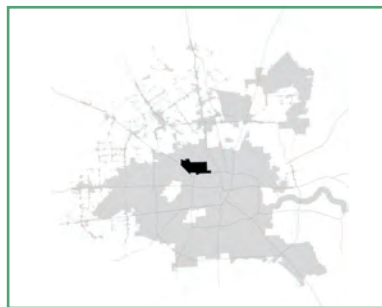
Table 11: Central Northwest

Super Neighborhood 12: Central Northwest				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	64.1%	19.1%	1.3%	25.8%
2008–2012 Households Actual Proportion	74.4%	11.5%	1.4%	32.1%
2008–2012 Households Free Market	66.4%	18.9%	5.8%	28.5%
2008–2012 Households Difference	8.0%	-7.4%	-4.4%	3.6%
2010 Census Tract 5301				
Householders (2000 Census)	50.6%	15.1%	1.0%	50.8%
2008–2012 Households Actual Proportion	54.2%	18.2%	0.0%	59.7%
2008–2012 Households Free Market	62.4%	22.0%	5.0%	34.0%
2008–2012 Households Difference	-8.2%	-3.8%	-5.0%	25.7%
2010 Census Tract 5302				
Householders (2000 Census)	78.2%	2.6%	1.3%	29.2%
2008–2012 Households Actual Proportion	92.6%	1.5%	0.5%	25.5%
2008–2012 Households Free Market	69.3%	16.6%	6.3%	25.3%
2008–2012 Households Difference	23.4%	-15.1%	-5.9%	0.2%
2010 Census Tract 5309				
Householders (2000 Census)	77.6%	10.3%	0.5%	23.0%
2008–2012 Households Actual Proportion	76.9%	15.6%	0.6%	24.6%
2008–2012 Households Free Market	66.9%	18.6%	6.0%	27.5%
2008–2012 Households Difference	10.0%	-3.0%	-5.4%	-2.9%
2010 Census Tract 5310				
Householders (2000 Census)	87.4%	2.0%	0.5%	18.7%
2008–2012 Households Actual Proportion	90.7%	0.6%	3.8%	29.1%
2008–2012 Households Free Market	70.3%	15.9%	6.6%	23.3%
2008–2012 Households Difference	20.3%	-15.3%	-2.8%	5.8%
2010 Census Tract 5311				
Householders (2000 Census)	86.7%	1.5%	0.7%	19.1%
2008–2012 Households Actual Proportion	89.0%	1.2%	0.0%	24.5%
2008–2012 Households Free Market	67.2%	18.4%	6.2%	26.3%
2008–2012 Households Difference	21.8%	-17.2%	-6.2%	-1.8%
2010 Census Tract 5312				
Householders (2000 Census)	75.9%	8.7%	0.7%	25.7%
2008–2012 Households Actual Proportion	87.2%	4.9%	0.0%	17.8%
2008–2012 Households Free Market	67.2%	18.3%	6.1%	27.1%
2008–2012 Households Difference	20.0%	-13.4%	-6.1%	-9.2%

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Super Neighborhood 12: Central Northwest (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5313				
Householders (2000 Census)	56.5%	19.2%	2.1%	34.0%
2008–2012 Households Actual Proportion	58.0%	14.3%	2.5%	47.0%
2008–2012 Households Free Market	63.6%	21.1%	5.3%	32.2%
2008–2012 Households Difference	-5.6%	-6.8%	-2.7%	14.9%
2010 Census Tract 5314				
Householders (2000 Census)	86.6%	2.2%	1.3%	18.1%
2008–2012 Households Actual Proportion	92.2%	0.7%	1.5%	21.3%
2008–2012 Households Free Market	67.2%	18.1%	5.7%	29.2%
2008–2012 Households Difference	25.0%	-17.4%	-4.2%	-7.9%
2010 Census Tract 5315				
Householders (2000 Census)	80.0%	6.8%	2.2%	23.9%
2008–2012 Households Actual Proportion	77.2%	7.9%	1.8%	27.2%
2008–2012 Households Free Market	66.9%	18.5%	6.0%	27.8%
2008–2012 Households Difference	10.3%	-10.6%	-4.2%	-0.6%
2010 Census Tract 5316				
Householders (2000 Census)	85.0%	3.1%	1.0%	18.5%
2008–2012 Households Actual Proportion	95.8%	2.3%	0.0%	22.4%
2008–2012 Households Free Market	69.6%	16.3%	6.4%	24.9%
2008–2012 Households Difference	26.2%	-14.0%	-6.4%	-2.5%
2010 Census Tract 5317				
Householders (2000 Census)	92.0%	0.9%	0.4%	10.7%
2008–2012 Households Actual Proportion	96.6%	1.1%	0.4%	13.1%
2008–2012 Households Free Market	69.8%	16.1%	6.5%	24.6%
2008–2012 Households Difference	26.9%	-15.0%	-6.1%	-11.4%
2010 Census Tract 5320.02 (Was Tract 5320 in 2000)				
Householders (2000 Census)	25.8%	62.7%	1.2%	16.1%
2008–2012 Households Actual Proportion	79.9%	18.8%	1.3%	16.0%
2008–2012 Households Free Market	71.2%	15.1%	6.7%	22.8%
2008–2012 Households Difference	8.8%	3.7%	-5.4%	-6.8%
2010 Census Tract 5321				
Householders (2000 Census)	48.8%	31.5%	3.0%	29.7%
2008–2012 Households Actual Proportion	41.4%	35.9%	3.7%	37.8%
2008–2012 Households Free Market	62.7%	22.0%	5.2%	32.2%
2008–2012 Households Difference	-21.3%	13.8%	-1.5%	5.6%

Central Northwest is located between Pinemont, Shepherd, the North Loop West and the Northwest Freeway (US 290). Just prior to World War II, Garden Oaks was laid out as a garden suburb with curvilinear streets and a full range of housing from cottages to mansions. Oak Forest was developed immediately after the war, and soon became the largest residential development in Houston at the time. Between the 1950s and the 1970s, Candlelight Estates, Shepherd Park and other surrounding subdivisions were developed. The area's thick pine trees and proximity to Loop 610 makes this community increasingly attractive to home buyers. This community is deed-restricted and served by Houston Independent School District. The population fell from 42,852 to 41,302 in 2012 while annual median household income grew from \$42,727 to \$54,324 in 2012.



The actual racial and Hispanic composition of four of the 13 census tracts is roughly the same as the composition expected in a free housing market absent discrimination. In tract 5301, the proportion of Latino households grew by another nine percentage points since 2000 and is 25.7 percentage points greater than would be expected in a free housing market.

In tracts 5302, 5310, 5311, 5314, and 5317 the actual proportions of African American households are significantly less than would be expected absent housing past or present discrimination while the reverse is true of Caucasian households in those tracts. In four other tracts the difference between actual and expected proportion of Black households was in double digits.

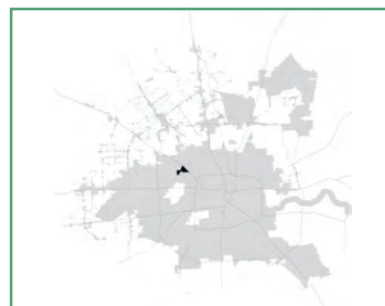
The percentage of Black households precipitously declined from 62.7 percent in 2000 to 18.8 percent, roughly what would be expected in a free housing market absent discrimination.

Recommended Actions: The City of Houston should examine Central Northwest for illegal discriminatory real estate practices, especially possible steering of African Americans from most of Central Northwest and possible steering of Latinos to tract 5301.

Table 12: Langwood

Super Neighborhood 11: Langwood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	59.0%	6.8%	1.0%	62.3%
2008–2012 Households Actual Proportion	69.1%	5.4%	0.5%	76.2%
2008–2012 Households Free Market	62.3%	22.1%	5.0%	34.1%
2008–2012 Households Difference	6.8%	-16.8%	-4.5%	42.1%
2010 Census Tract 5205				
Householders (2000 Census)	61.5%	10.9%	1.0%	49.0%
2008–2012 Households Actual Proportion	75.2%	8.6%	0.9%	65.7%
2008–2012 Households Free Market	62.7%	21.7%	5.0%	33.9%
2008–2012 Households Difference	12.4%	-13.1%	-4.1%	31.8%
2010 Census Tract 5214				
Householders (2000 Census)	55.8%	1.6%	1.0%	79.0%
2008–2012 Households Actual Proportion	61.9%	1.5%	0.0%	88.6%
2008–2012 Households Free Market	61.7%	22.6%	5.0%	34.3%
2008–2012 Households Difference	0.2%	-21.1%	-5.0%	54.3%

Langwood is a neighborhood of small tract homes built in the 1950s on both sides of Hempstead Highway, which was the primary commuting route at the time. Today, the Northwest Freeway (US 290) forms the northeastern boundary of the primarily single-family residential neighborhood. Several large apartment complexes adjacent to the freeway are also part of the community. Three school districts serve Langwood: Spring Branch Independent School District serves the area southwest of Hempstead Highway and Cypress Fairbanks Independent School District and Houston Independent School District serve the area northwest of Hempstead Highway. The population fell from 9,107 in 2000 to 6,643 in 2012 while annual median household income remained stagnant at \$32,972 in 2012 compared to \$30,267 in 2000.



This small super neighborhood is immediately west of Central Northwest. It is fully consolidated into the city's growing Latino enclave with actual proportions of Hispanic households growing from 49 to 65.7 percent and 79 to 88.6 percent in tracts 5205 and 5124 respectively. These proportions are 31.8 and 54.3 percent greater than would be expected in the absence of housing discrimination. The proportions of whites has increased since 2000 while the proportions of African Americans has declined slightly. The actual proportion of Black households is more than 21 percentage points lower than would be expected.

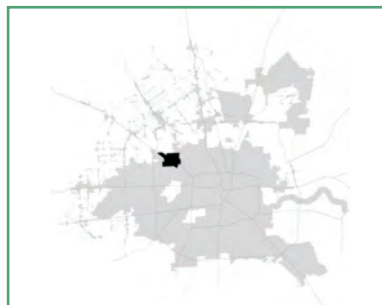
Recommended Actions: The City of Houston would be well advised

to further examine Langwood to identify any illegal real estate practices like steering that might account for these differences and apply remedies to reduce the growing segregation within this super neighborhood.

Table 13: Fairbanks/Northwest Crossing

Super Neighborhood 4: Fairbanks/Northwest Crossing				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely and Partially in This Super Neighborhood				
Householders (2000 Census)	59.8%	21.8%	2.9%	30.7%
2008–2012 Households Actual Proportion	56.4%	25.3%	2.6%	44.6%
2008–2012 Households Free Market	63.7%	21.0%	5.3%	32.3%
2008–2012 Households Difference	-7.4%	4.3%	-2.7%	12.3%
2010 Census Tract 5205 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	61.5%	10.9%	1.0%	49.0%
2008–2012 Households Actual Proportion	75.2%	8.6%	0.9%	65.7%
2008–2012 Households Free Market	62.7%	21.7%	5.0%	33.9%
2008–2012 Households Difference	12.4%	-13.1%	-4.1%	31.8%
2010 Census Tract 5216				
Householders (2000 Census)	49.6%	32.2%	1.8%	33.3%
2008–2012 Households Actual Proportion	56.9%	23.6%	4.1%	56.2%
2008–2012 Households Free Market	64.7%	20.2%	5.4%	31.4%
2008–2012 Households Difference	-7.8%	3.4%	-1.3%	24.8%
2010 Census Tract 5217				
Householders (2000 Census)	53.6%	31.4%	3.1%	29.1%
2008–2012 Households Actual Proportion	50.8%	27.4%	2.8%	51.5%
2008–2012 Households Free Market	62.8%	21.7%	5.1%	33.5%
2008–2012 Households Difference	-12.0%	5.7%	-2.3%	18.0%
2010 Census Tract 5315 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	80.0%	6.8%	2.2%	23.9%
2008–2012 Households Actual Proportion	77.2%	7.9%	1.8%	27.2%
2008–2012 Households Free Market	66.9%	18.5%	6.0%	27.8%
2008–2012 Households Difference	10.3%	-10.6%	-4.2%	-0.6%
2010 Census Tract 5321 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	48.8%	31.5%	3.0%	29.7%
2008–2012 Households Actual Proportion	41.4%	35.9%	3.7%	37.8%
2008–2012 Households Free Market	62.7%	22.0%	5.2%	32.2%
2008–2012 Households Difference	-21.3%	13.8%	-1.5%	5.6%
2010 Census Tract 5323				
Householders (2000 Census)	70.6%	15.9%	5.2%	16.1%
2008–2012 Households Actual Proportion	47.8%	38.4%	2.6%	27.1%
2008–2012 Households Free Market	64.7%	20.0%	5.4%	32.2%
2008–2012 Households Difference	-16.9%	18.4%	-2.7%	-5.1%

Fairbanks/Northwest Crossing is a combination of rural land use and scattered housing and high density urban development that followed the construction of the Northwest Freeway. Many garden apartment complexes are scattered through and around the edge of the Northwest Crossing office and retail development. Prior to the opening of the freeway, which bisects the area, access to Houston was provided by the Hempstead Highway, which still is lined with a combination of aging retail developments, light industrial facilities and agricultural service businesses. Population rose by nearly one-fourth to 16,686 in 2012 while annual median household income stagnated at \$36,284 in 2012 after being \$35,788 in 2000.



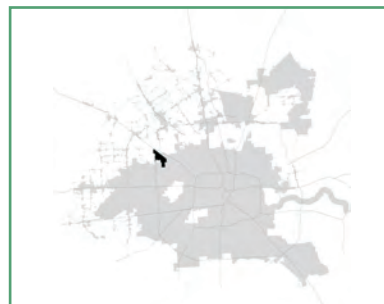
This super neighborhood continues the concentration of the city's Hispanic population moving northwest from the Langwood super neighborhood and into Carverdale to the west of Fairbanks/Northwest Crossing. The percentage of Latino households in tracts 5205, 5216, 5217 continued to increase since 2000, from 49 to 65.7 percent, 33.3 to 56.2 percent, and 29.1 to 56.2 percent respectively. These increases made the actual proportion of Hispanic households in these tracts 31.8, 24.8, and 18 percentage points greater, respectively, than what would be expected. The proportion of Latino households also grew in the other three tracts, albeit not nearly as much, and to levels that would be expected in a free market.

Recommended Actions: It appears that most of Fairbanks/Northwest Crossing is being consolidated into the city's Hispanic enclave. It would be prudent for the city to conduct testing to identify any steering of Latinos to this super neighborhood and to take steps to prevent further movement away from diversity.

Table 14: Carverdale

Super Neighborhood 3: Carverdale				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	61.2%	12.5%	12.3%	26.1%
2008–2012 Households Actual Proportion	61.9%	9.7%	17.6%	32.9%
2008–2012 Households Free Market	70.7%	15.5%	6.6%	23.5%
2008–2012 Households Difference	-8.8%	-5.7%	11.0%	9.4%
2010 Census Tract 5216				
Householders (2000 Census)	49.6%	32.2%	1.8%	33.3%
2008–2012 Households Actual Proportion	56.9%	23.6%	4.1%	56.2%
2008–2012 Households Free Market	64.7%	20.2%	5.4%	31.4%
2008–2012 Households Difference	-7.8%	3.4%	-1.3%	24.8%
2010 Census Tract 5218				
Householders (2000 Census)	53.5%	11.4%	20.9%	26.6%
2008–2012 Households Actual Proportion	55.0%	10.2%	23.2%	38.7%
2008–2012 Households Free Market	66.8%	18.5%	6.1%	28.0%
2008–2012 Households Difference	-11.8%	-8.3%	17.1%	10.7%
2010 Census Tract 5401 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	72.0%	5.8%	9.3%	23.0%
2008–2012 Households Actual Proportion	66.7%	5.7%	18.5%	23.6%
2008–2012 Households Free Market	74.3%	12.6%	7.2%	19.1%
2008–2012 Households Difference	-7.6%	-7.0%	11.4%	4.5%

Carverdale is a small residential area that was originally marketed to African Americans as home sites just outside the city. It is now surrounded by large industrial parks and warehouse complexes. Its proximity to the Northwest Freeway and Beltway 8 has made this area a popular one for industrial and distribution complexes. The residential area is characterized by modest homes on side streets and small retail establishments on the major thoroughfares. Houston Community College Northwest Campus is located nearby, south of Tanner Road. Population increased from 1,928 in 2000 to 4,827 in 2012 while annual median household income skyrocketed from \$12,089 to \$55,370.



The east half of Carverdale, tract 5216, is being consolidated into the Latino enclave to its east and north. A significantly higher than expected concentration of Asians continues in the west half — the actual proportion (23.2 percent) is more than triple what would be expected (6.1 percent). The proportion of Hispanics is growing even more rapidly but is within parameters.

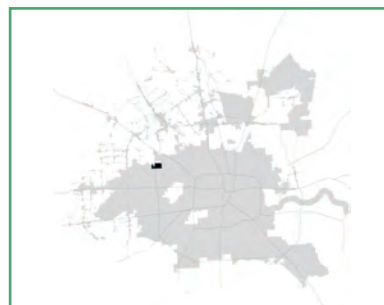
Recommended Actions: The City of Houston should further exam-

ine Carverdale to identify the reasons for the concentration of Asian households in tracts 5218 and 5401 as well as the growing concentration of Latino households in tract 5216.

Table 15: Westbranch

Super Neighborhood 8: Westbranch				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	63.8%	8.3%	14.5%	24.6%
2008–2012 Households Actual Proportion	62.8%	7.2%	20.1%	28.6%
2008–2012 Households Free Market	71.8%	14.6%	6.8%	22.1%
2008–2012 Households Difference	-9.0%	-7.4%	13.3%	6.6%
2010 Census Tract 5218				
Householders (2000 Census)	53.5%	11.4%	20.9%	26.6%
2008–2012 Households Actual Proportion	55.0%	10.2%	23.2%	38.7%
2008–2012 Households Free Market	66.8%	18.5%	6.1%	28.0%
2008–2012 Households Difference	-11.8%	-8.3%	17.1%	10.7%
2010 Census Tract 5401 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	72.0%	5.8%	9.3%	23.0%
2008–2012 Households Actual Proportion	66.7%	5.7%	18.5%	23.6%
2008–2012 Households Free Market	74.3%	12.6%	7.2%	19.1%
2008–2012 Households Difference	-7.6%	-7.0%	11.4%	4.5%

Westbranch is located north of Clay Road at the West Belt. One portion, Westway, consists of town homes, and the other, Westbranch, is made up of single-family homes. The western portion of the community, which adjoins the West Belt, is being redeveloped with commercial and office projects. The City of Houston annexed the neighborhood in 1994. Population fell by more than half, from 4,321 in 2000 to 2,028 in 2012. Annual median household income grew from \$52,375 to \$63,090 in 2012.



West Branch has a significantly higher than expected concentration of Asian households, especially in tract 5218 which it shares with Carverdale immediately to the north and east.

The proportion of Hispanics is growing much more rapidly in tract 5218 but is within parameters.

Recommended Actions: As with Cloverdale, the City of Houston should identify why the actual proportions of Asian households are greater than would be expected and determine whether the concentrations are intensifying.

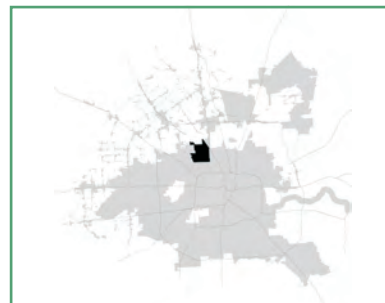
Table 16: Acres Homes

Super Neighborhood 6: Acres Homes				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	12.8%	79.7%	1.2%	10.5%
2008–2012 Households Actual Proportion	18.9%	71.9%	0.7%	22.1%
2008–2012 Households Free Market	63.0%	21.9%	5.3%	31.5%
2008–2012 Households Difference	-44.1%	50.0%	-4.7%	-9.3%
2010 Census Tract 5308				
Householders (2000 Census)	10.3%	86.9%	0.2%	3.4%
2008–2012 Households Actual Proportion	14.0%	72.7%	0.0%	17.8%
2008–2012 Households Free Market	64.5%	20.5%	5.6%	30.4%
2008–2012 Households Difference	-50.5%	52.2%	-5.6%	-12.6%
2010 Census Tract 5318				
Householders (2000 Census)	2.9%	94.3%	0.1%	4.4%
2008–2012 Households Actual Proportion	25.9%	68.2%	0.0%	22.9%
2008–2012 Households Free Market	61.9%	22.4%	5.1%	33.5%
2008–2012 Households Difference	-36.0%	45.8%	-5.1%	-10.6%
2010 Census Tract 5319				
Householders (2000 Census)	4.5%	87.8%	0.1%	11.0%
2008–2012 Households Actual Proportion	7.6%	84.4%	0.4%	15.1%
2008–2012 Households Free Market	62.5%	22.4%	5.3%	31.3%
2008–2012 Households Difference	-54.9%	62.0%	-4.8%	-16.2%
2010 Census Tract 5330				
Householders (2000 Census)	0.4%	98.2%	0.0%	1.8%
2008–2012 Households Actual Proportion	20.8%	67.8%	0.0%	30.6%
2008–2012 Households Free Market	61.6%	22.5%	4.7%	35.7%
2008–2012 Households Difference	-40.9%	45.3%	-4.7%	-5.1%
2010 Census Tract 5331				
Householders (2000 Census)	24.9%	67.8%	2.0%	9.0%
2008–2012 Households Actual Proportion	22.4%	69.4%	0.7%	19.8%
2008–2012 Households Free Market	64.0%	21.0%	5.5%	30.6%
2008–2012 Households Difference	-41.6%	48.4%	-4.7%	-10.9%

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Super Neighborhood 6: Acres Homes (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5332				
Householders (2000 Census)	13.8%	79.2%	1.6%	8.2%
2008–2012 Households Actual Proportion	20.5%	73.8%	1.9%	10.4%
2008–2012 Households Free Market	64.3%	20.9%	5.6%	29.4%
2008–2012 Households Difference	-43.9%	52.9%	-3.7%	-19.0%
2010 Census Tract 5333				
Householders (2000 Census)	3.2%	93.3%	0.4%	5.0%
2008–2012 Households Actual Proportion	6.5%	91.9%	0.0%	8.5%
2008–2012 Households Free Market	59.8%	24.8%	5.1%	32.6%
2008–2012 Households Difference	-53.3%	67.1%	-5.1%	-24.1%
2010 Census Tract 5334				
Householders (2000 Census)	20.3%	62.9%	2.5%	25.8%
2008–2012 Households Actual Proportion	31.7%	51.9%	1.4%	43.0%
2008–2012 Households Free Market	64.2%	20.8%	5.5%	31.0%
2008–2012 Households Difference	-32.5%	31.2%	-4.0%	12.1%

Acres Homes, a wooded area northwest of the city, was originally subdivided into large lots and marketed to African Americans. Still primarily African American, the community now includes a combination of large areas of pine forests with only a scattering of homes: small tract homes built in standard suburban subdivisions, and large comfortable homes on well-maintained wooded lots. There is little commercial or industrial development. The eastern part of the community is located in the Houston Independent School District, the western part is in the Aldine Independent School District. Water and sewer service was introduced into the original subdivisions during the 1970s as the area was annexed by the City of Houston. The population rose from 23,512 to 27,831 in 2012 while annual median household income increased from \$24,518 to \$49,315 in 2012.



Situated north of Central Northwest and west of Greater Inwood, Acres Homes is part of a concentration of African American households that continues west to Fairbanks/Northwest Crossing and north through Greater Greensport and to census tracts not assigned to any super neighborhood.

The actual proportions of Black households exceeds the proportions expected in a free housing market absent discrimination by 31.2 to 67.1 percentage points. The actual proportions of white households are from 32.5 to 54.9 percent lower than what would be expected. There is nothing natural about these intense levels of concentration.

It is promising, however, that the percentage of Black households declined sig-

nificantly since 2000 in half of the eight census tracts that comprise the Acres Home subdivision while the percentages of Caucasian increased in four tracts.

While the percentages of Latino households increased in five tracts since 2000, the increases in 5308 (3.4 to 17.3 percent), 5318 (4.4 to 22.9 percent), 5330 (1.8 to 30.6 percent), and 5334 (25.8 to 43 percent) suggest fairly rapid change and instability.

The City of Houston should carefully study Acres Homes to identify the causes of the rapid increase in the Latino population and decline in the African American population, with a particular eye on possible steering and other illegal discriminatory real estate practices.

Among the slew of census tracts north of Acres Homes that are not assigned to any super neighborhood are 5336, 5512, 5530.01, 5530.02, 5534.02, 5534.02, and 5549.01 with actual racial and Hispanic compositions close to what would be expected in a free housing market. Just north of Acres Homes is a cluster of census tracts where the actual proportions of Latino households significantly exceed the proportion expected in a free housing market absent discrimination — 5338.01, 5337.01, 5340.01, 5339.01, 5340.02, 5340.03, and 5506.03. Generally speaking, the proportions of Hispanic households in these tracts have increased substantially since 2000, suggesting that these intensifying concentrations may be the product of current housing discrimination.

North of these tracts are census tracts consolidated into the African American enclave — 5339.02, 5507, 5508, 5505, 5504.02, 5503.01, 5504.01, 5533, and 5503.02. The actual proportions of Black households significantly exceeds the proportions expected in a free housing market while the actual proportions of whites are notably lower than expected. In some tracts, the proportions have changed substantially from 2000 while in others they have remained pretty much the same.

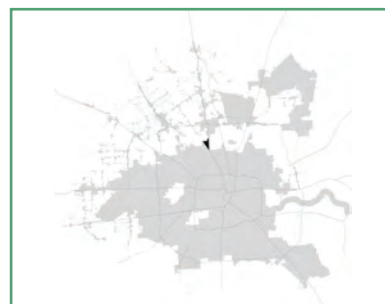
North of them are tracts 5531 and 5532 which are within parameters, but which have seen significant racial change since 2000 with the percentage of Black households growing from 9.7 to 25.2 and from 12.2 to 30.8 percent respectively, while the proportions of Caucasian households have declined to levels that would be expected in a free housing market.

Recommended Actions: It would behoove the City of Houston to examine the unassigned census tracts with racial and/or Latino compositions that depart significantly what the compositions expected in a free market for possible illegal housing discrimination.

Table 17: Hidden Valley

Super Neighborhood 7: Hidden Valley				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	56.8%	18.1%	5.2%	32.6%
2008–2012 Households Actual Proportion	59.4%	23.1%	2.0%	54.0%
2008–2012 Households Free Market	65.2%	19.5%	5.5%	31.3%
2008–2012 Households Difference	-5.8%	3.6%	-3.6%	22.8%
2010 Census Tract 5335				
Householders (2000 Census)	56.8%	18.1%	5.2%	32.6%
2008–2012 Households Actual Proportion	59.4%	23.1%	2.0%	54.0%
2008–2012 Households Free Market	65.2%	19.5%	5.5%	31.3%
2008–2012 Households Difference	-5.8%	3.6%	-3.6%	22.8%

Hidden Valley is a neighborhood in north Houston, a triangle formed by the North Freeway, Veterans Memorial Highway, and West Mount Houston Road. This area is located between heavily wooded areas to the north and south. It is characterized by tract homes separated from the freeway edge by a row of large auto dealerships. The population grew slightly from 3,891 in 2000 to 4,600 in 2012 while annual median household income stagnated at \$46,625 in 2012 compared to \$44,649 in 2000.



Located between the Acres Homes and Northside/Northline super neighborhoods, Hidden Valley is consolidated into the growing Latino enclave to the east. The proportion of Hispanic households skyrocketed from 32.6 to 54 percent since 2000, to a level that is more than 22 percentage points greater than would be expected in a free housing market.

Recommended Actions: The city should determine whether steering or other illegal discriminatory real estate practices are contributing to this intensifying concentration of Latino households.

Table 18: Greater Inwood

Super Neighborhood 5: Greater Inwood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	46.1%	36.2%	4.9%	22.8%
2008–2012 Households Actual Proportion	53.3%	24.1%	6.2%	60.4%
2008–2012 Households Free Market	65.8%	19.4%	5.9%	29.1%
2008–2012 Households Difference	-12.5%	4.7%	0.3%	31.3%
2010 Census Tract 5320.01 (Was Tract 5320 in 2000 Census)				
Householders (2000 Census)	25.8%	62.7%	1.2%	16.1%
2008–2012 Households Actual Proportion	23.8%	67.5%	2.7%	20.4%
2008–2012 Households Free Market	60.0%	24.7%	4.9%	33.4%
2008–2012 Households Difference	-36.2%	42.9%	-2.2%	-13.0%
2010 Census Tract 5321 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	48.8%	31.5%	3.0%	29.7%
2008–2012 Households Actual Proportion	41.4%	35.9%	3.7%	37.8%
2008–2012 Households Free Market	62.7%	22.0%	5.2%	32.2%
2008–2012 Households Difference	-21.3%	13.8%	-1.5%	5.6%
2010 Census Tract 5322				
Householders (2000 Census)	31.7%	53.6%	1.1%	20.6%
2008–2012 Households Actual Proportion	40.4%	46.7%	0.7%	32.0%
2008–2012 Households Free Market	62.9%	21.8%	5.3%	32.0%
2008–2012 Households Difference	-22.5%	24.9%	-4.5%	0.0%
2010 Census Tract 5324				
Householders (2000 Census)	79.3%	5.1%	2.3%	24.1%
2008–2012 Households Actual Proportion	68.5%	13.9%	5.0%	41.2%
2008–2012 Households Free Market	66.5%	18.7%	5.9%	28.8%
2008–2012 Households Difference	2.0%	-4.8%	-0.9%	12.4%

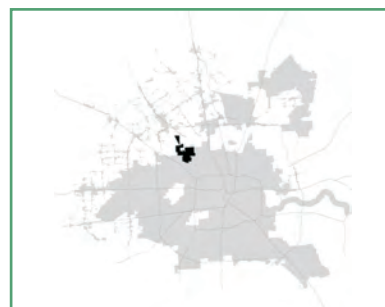
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Super Neighborhood 5: Greater Inwood (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5325.01 (Was Tract 5325 in 2000 Census. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	64.1%	9.9%	7.6%	36.7%
2008–2012 Households Actual Proportion	54.3%	12.2%	9.4%	51.3%
2008–2012 Households Free Market	66.8%	18.3%	5.8%	29.5%
2008–2012 Households Difference	-12.5%	-6.2%	3.6%	21.8%
2010 Census Tract 5325.02 (Was Tract 5325 in 2000 Census)				
Householders (2000 Census)	64.1%	9.9%	7.6%	36.7%
2008–2012 Households Actual Proportion	69.1%	5.2%	0.6%	66.1%
2008–2012 Households Free Market	64.6%	20.2%	5.5%	31.6%
2008–2012 Households Difference	4.4%	-15.0%	-4.9%	34.5%
2010 Census Tract 5326				
Householders (2000 Census)	26.7%	50.3%	12.0%	15.6%
2008–2012 Households Actual Proportion	31.4%	46.6%	11.9%	27.7%
2008–2012 Households Free Market	64.1%	20.8%	5.5%	31.0%
2008–2012 Households Difference	-32.7%	25.7%	6.4%	-3.3%
2010 Census Tract 5327				
Householders (2000 Census)	58.4%	33.1%	2.8%	9.9%
2008–2012 Households Actual Proportion	43.0%	43.4%	1.9%	27.3%
2008–2012 Households Free Market	65.1%	20.1%	5.7%	29.5%
2008–2012 Households Difference	-22.1%	23.3%	-3.9%	-2.2%
2010 Census Tract 5328				
Householders (2000 Census)	59.8%	28.8%	4.2%	14.8%
2008–2012 Households Actual Proportion	54.5%	27.8%	2.9%	36.8%
2008–2012 Households Free Market	66.4%	18.7%	5.9%	28.7%
2008–2012 Households Difference	-11.9%	9.1%	-3.0%	8.1%

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Super Neighborhood 5: Greater Inwood (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5330 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	0.4%	98.2%	0.0%	1.8%
2008–2012 Households Actual Proportion	20.8%	67.8%	0.0%	30.6%
2008–2012 Households Free Market	61.6%	22.5%	4.7%	35.7%
2008–2012 Households Difference	-40.9%	45.3%	-4.7%	-5.1%
2010 Census Tract 5331				
Householders (2000 Census)	24.9%	67.8%	2.0%	9.0%
2008–2012 Households Actual Proportion	22.4%	69.4%	0.7%	19.8%
2008–2012 Households Free Market	64.0%	21.0%	5.5%	30.6%
2008–2012 Households Difference	-41.6%	48.4%	-4.7%	-10.9%
2010 Census Tract 5332				
Householders (2000 Census)	13.8%	79.2%	1.6%	8.2%
2008–2012 Households Actual Proportion	20.5%	73.8%	1.9%	10.4%
2008–2012 Households Free Market	64.3%	20.9%	5.6%	29.4%
2008–2012 Households Difference	-43.9%	52.9%	-3.7%	-19.0%
2010 Census Tract 5340.02 (Was Tract 5341 in 2000 Census)				
Householders (2000 Census)	57.4%	14.2%	11.0%	30.2%
2008–2012 Households Actual Proportion	53.3%	24.1%	6.2%	60.4%
2008–2012 Households Free Market	65.8%	19.4%	5.9%	29.1%
2008–2012 Households Difference	-12.5%	4.7%	0.3%	31.3%

Greater Inwood has its origins in the development of Inwood Forest, a golf course centered community, in the late 1960s. Other subdivisions include Woodland Trails, Candlelight Forest, Chateau Forest and Antoine Forest. Most of the area is heavily wooded, although the northern portions resemble the prairies found to the northwest. Almost all of Greater Inwood is part of the Aldine Independent School District. Large apartment complexes are found along Antoine, West Little York and Gulf Bank. New home construction resumed in the Oaks of Inwood luxury home area and Inwood Forest Village patio homes in the 1990s, after a slump from the mid–1980s economic crash. Two industrial parks are accessed via the Burlington and Northern rail line which bisects the area. Population shrunk by one–fourth, down to 32,099 in 2012 while annual median household income stagnated: \$37,399 in 2000, \$38,078 in 2012.



The actual compositions and expected compositions are the same for two census tracts in the Greater Inwood super neighborhood — 5324 and 5328. In seven of Greater Inwood's 13 census tracts, the actual proportion of Black households ranges from 23.3 to 52.9 percentage points greater than what would be expected in a free housing market not distorted by discrimination. The actual proportions of Caucasians household range from 43.9 to 21.3 percentage points less than

would be expected. Except for tract 5330 which saw the percentage of African American households decline from 98.2 to 67.8 percent while the percentage of white households increased from 0.4 to 20.8 percent, the compositions of the census tracts were pretty stable since 2000. It is highly likely that nearly all of the increase in Caucasian households is due to a large influx of Hispanic households which grew from 1.8 to 30.6 percent of the tract, roughly what would be expected in a free market.

Recommended Actions: The city should identify the factors that reduced segregation in tract 5330 since 2000. Testing for possible illegal housing discrimination is warranted throughout Greater Inwood.

Table 19: Willowbrook

Super Neighborhood 1: Willowbrook				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	80.4%	7.0%	5.0%	13.6%
2008–2012 Households Actual Proportion	64.7%	15.0%	12.9%	26.8%
2008–2012 Households Free Market	66.8%	18.5%	5.9%	28.5%
2008–2012 Households Difference	-2.1%	-3.5%	7.0%	-1.8%
2010 Census Tract 5514.00 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	77.7%	9.0%	5.2%	15.3%
2008–2012 Households Actual Proportion	58.9%	17.6%	12.8%	26.1%
2008–2012 Households Free Market	67.5%	18.0%	6.1%	27.1%
2008–2012 Households Difference	-8.6%	-0.4%	6.7%	-1.0%
2010 Census Tract 5515.00				
Householders (2000 Census)	62.7%	9.5%	4.8%	42.9%
2008–2012 Households Actual Proportion	52.2%	19.3%	21.0%	34.1%
2008–2012 Households Free Market	67.1%	18.1%	5.9%	28.9%
2008–2012 Households Difference	-14.9%	1.2%	15.1%	5.2%
2010 Census Tract 5526.01 (Was Tract 5526 in 2000)				
Householders (2000 Census)	83.2%	8.8%	4.2%	7.9%
2008–2012 Households Actual Proportion	55.9%	25.3%	9.7%	28.8%
2008–2012 Households Free Market	64.4%	20.3%	5.4%	32.0%
2008–2012 Households Difference	-8.5%	5.0%	4.3%	-3.2%
2010 Census Tract 5527.00				
Householders (2000 Census)	86.2%	3.2%	5.7%	6.5%
2008–2012 Households Actual Proportion	80.6%	5.5%	9.0%	21.0%
2008–2012 Households Free Market	67.4%	18.1%	6.0%	27.3%
2008–2012 Households Difference	13.2%	-12.6%	3.0%	-6.3%

Willowbrook is in northwest Harris County. It generally surrounds Willowbrook Mall and is primarily commercial, with about 63.9% undeveloped land. The area includes apartment complexes, office buildings, a major Houston Lighting and Power electric generating station, and several retail shopping centers in addition to the regional mall. The city annexed the area in 1993. Between 2000 and 2010, the neighborhood's population grew from 2,741 to 6,877 and median household income rose from \$32,366 to \$39,449.



Surrounded by land not in any super neighborhood, Willowbrook is located along State Highway 249, several census tracts northwest of the Greater Inwood super neighborhood.

A concentration of Asian households is developing in census tract 5515 where the proportion of Asian households actually living there is nearly four times what would be expected in a free housing market not distorted by discrimination. Since 2000, the proportion of Asian households skyrocketed from less than five percent to 21 percent.

The proportion of Caucasian households living in the tract is nearly 15 percentage points less than what would be expected. .

Immediately north of tract 5515 Willowbrook, tract 5527 reflects a trend throughout the city where the proportion of residents who are African American declines while the proportion who are Latino grows, although the differences between actual and expected proportions are not yet of concern.

Tracts 5514 and 5526.01 maintained their racial and Hispanic diversity during the 2000s.

Recommended Actions: The huge increase in the proportion of Asian households in tract 5515 warrants further investigation to determine whether racial steering is occurring and, if so, steps need to be taken to end this practice.

The city has not assigned the census tracts in the table below to any super neighborhood. Each was reported on earlier in this section in the discussion of the super neighborhood that is closest to it.

Table 20: Northwest Quadrant: Census Tracts Not in a Super Neighborhood

Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5225 (Tract consists of parts of 2000 tracts 5208 and 5209)				
Householders (2000 Census)	95.8%	0.2%	2.3%	2.8%
2008–2012 Households Actual Proportion	95.1%	0.0%	4.5%	3.8%
2008–2012 Households Free Market	75.8%	11.5%	7.4%	16.9%
2008–2012 Households Difference	19.2%	-11.5%	-2.9%	-13.2%
2010 Census Tract 5329				
Householders (2000 Census)	11.5%	79.2%	1.9%	11.5%
2008–2012 Households Actual Proportion	27.8%	55.2%	7.4%	29.0%
2008–2012 Households Free Market	65.9%	19.2%	5.8%	29.6%
2008–2012 Households Difference	-38.1%	36.0%	1.6%	-0.6%
2010 Census Tract 5336				
Householders (2000 Census)	38.5%	38.8%	4.3%	30.3%
2008–2012 Households Actual Proportion	52.3%	33.4%	5.5%	45.3%
2008–2012 Households Free Market	62.9%	21.7%	5.3%	32.5%
2008–2012 Households Difference	-10.5%	11.6%	0.3%	12.9%
2010 Census Tract 5338.01 (Was Tract 5338 in 2000)				
Householders (2000 Census)	52.6%	18.7%	9.8%	37.7%
2008–2012 Households Actual Proportion	53.0%	23.2%	13.1%	58.1%
2008–2012 Households Free Market	65.5%	19.5%	5.6%	30.3%
2008–2012 Households Difference	-12.5%	3.7%	7.5%	27.8%
2010 Census Tract 5339.01 (Was Tract 5339 in 2000)				
Householders (2000 Census)	41.6%	33.2%	11.7%	28.9%
2008–2012 Households Actual Proportion	37.3%	34.3%	8.4%	45.5%
2008–2012 Households Free Market	65.4%	19.7%	5.7%	29.6%
2008–2012 Households Difference	-28.1%	14.6%	2.6%	15.9%
2010 Census Tract 5339.02 (Was Tract 5339 in 2000)				
Householders (2000 Census)	41.6%	33.2%	11.7%	28.9%
2008–2012 Households Actual Proportion	24.5%	49.5%	4.6%	35.6%
2008–2012 Households Free Market	60.8%	23.8%	5.2%	32.0%
2008–2012 Households Difference	-36.3%	25.7%	-0.6%	3.6%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5340.01 (Was Tract 5340 in 2000)				
Householders (2000 Census)	48.4%	23.7%	6.8%	33.2%
2008–2012 Households Actual Proportion	56.5%	5.0%	6.8%	66.7%
2008–2012 Households Free Market	62.5%	21.6%	4.7%	36.0%
2008–2012 Households Difference	-6.0%	-16.6%	2.0%	30.7%
2010 Census Tract 5340.03				
Householders (2000 Census)	44.8%	28.8%	9.4%	30.9%
2008–2012 Households Actual Proportion	40.0%	25.5%	11.1%	47.5%
2008–2012 Households Free Market	68.0%	17.5%	6.3%	26.3%
2008–2012 Households Difference	-28.0%	8.0%	4.8%	21.1%
2010 Census Tract 5342.03 (Was Tract 5342 in 2000)				
Householders (2000 Census)	79.9%	5.0%	7.5%	15.0%
2008–2012 Households Actual Proportion	48.0%	15.9%	12.7%	45.2%
2008–2012 Households Free Market	67.4%	17.8%	5.9%	28.6%
2008–2012 Households Difference	-19.4%	-1.9%	6.8%	16.5%
2010 Census Tract 5405.01 (Was Tract 5405 in 2000)				
Householders (2000 Census)	77.1%	9.7%	3.4%	17.0%
2008–2012 Households Actual Proportion	70.5%	13.9%	9.1%	55.9%
2008–2012 Households Free Market	64.6%	20.1%	5.3%	32.3%
2008–2012 Households Difference	5.9%	-6.2%	3.8%	23.6%
2010 Census Tract 5406.02 (Was Tract 5406 in 2000)				
Householders (2000 Census)	72.1%	11.7%	6.8%	14.6%
2008–2012 Households Actual Proportion	62.1%	18.8%	5.5%	37.6%
2008–2012 Households Free Market	67.1%	18.2%	6.0%	28.1%
2008–2012 Households Difference	-5.0%	0.6%	-0.4%	9.5%
2010 Census Tract 5408				
Householders (2000 Census)	63.4%	8.2%	6.7%	39.3%
2008–2012 Households Actual Proportion	56.7%	16.1%	4.4%	41.5%
2008–2012 Households Free Market	65.2%	19.9%	5.6%	30.3%
2008–2012 Households Difference	-8.4%	-3.7%	-1.2%	11.2%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5409.01 (Was Tract 5409 in 2000)				
Householders (2000 Census)	80.0%	8.1%	6.5%	9.2%
2008–2012 Households Actual Proportion	72.3%	14.7%	6.4%	4.1%
2008–2012 Households Free Market	74.4%	12.5%	7.3%	19.1%
2008–2012 Households Difference	-2.1%	2.2%	-0.9%	-15.0%
2010 Census Tract 5409.02 (Was Tract 5409 in 2000)				
Householders (2000 Census)	80.0%	8.1%	6.5%	9.2%
2008–2012 Households Actual Proportion	67.5%	21.5%	7.5%	12.9%
2008–2012 Households Free Market	69.0%	16.6%	6.2%	26.5%
2008–2012 Households Difference	-1.5%	4.8%	1.3%	-13.6%
2010 Census Tract 5410.01 (Was Tract 5410 in 2000)				
Householders (2000 Census)	75.6%	10.7%	7.5%	9.7%
2008–2012 Households Actual Proportion	60.5%	22.1%	11.9%	20.2%
2008–2012 Households Free Market	68.0%	17.4%	6.1%	27.3%
2008–2012 Households Difference	-7.5%	4.7%	5.9%	-7.2%
2010 Census Tract 5410.02 (Was Tract 5410 in 2000)				
Householders (2000 Census)	75.6%	10.7%	7.5%	9.7%
2008–2012 Households Actual Proportion	59.0%	18.5%	14.8%	15.7%
2008–2012 Households Free Market	70.7%	15.4%	6.7%	23.1%
2008–2012 Households Difference	-11.7%	3.1%	8.0%	-7.4%
2010 Census Tract 5412.03 (Was Tract 5412 in 2000)				
Householders (2000 Census)	83.0%	5.4%	5.8%	10.4%
2008–2012 Households Actual Proportion	84.4%	7.7%	4.0%	5.1%
2008–2012 Households Free Market	73.7%	13.1%	7.1%	19.8%
2008–2012 Households Difference	10.7%	-5.4%	-3.0%	-14.7%
2010 Census Tract 5413				
Householders (2000 Census)	66.1%	13.0%	4.9%	29.3%
2008–2012 Households Actual Proportion	63.3%	22.7%	5.4%	46.2%
2008–2012 Households Free Market	66.4%	18.7%	5.8%	29.5%
2008–2012 Households Difference	-3.1%	4.0%	-0.3%	16.6%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5414				
Householders (2000 Census)	66.6%	12.6%	6.0%	23.7%
2008–2012 Households Actual Proportion	59.0%	23.6%	13.7%	28.2%
2008–2012 Households Free Market	68.0%	17.5%	6.1%	27.3%
2008–2012 Households Difference	-9.0%	6.1%	7.5%	0.9%
2010 Census Tract 5416.01 (Was Tract 5416 in 2000)				
Householders (2000 Census)	77.5%	5.5%	3.7%	21.6%
2008–2012 Households Actual Proportion	81.3%	5.9%	8.5%	10.9%
2008–2012 Households Free Market	72.8%	13.9%	7.1%	20.3%
2008–2012 Households Difference	8.6%	-8.0%	1.4%	-9.4%
2010 Census Tract 5416.02 (Was Tract 5416 in 2000)				
Householders (2000 Census)	77.5%	5.5%	3.7%	21.6%
2008–2012 Households Actual Proportion	73.0%	6.4%	7.9%	45.3%
2008–2012 Households Free Market	66.8%	18.4%	5.8%	28.8%
2008–2012 Households Difference	6.2%	-12.1%	2.1%	16.5%
2010 Census Tract 5420				
Householders (2000 Census)	76.8%	8.3%	4.0%	18.1%
2008–2012 Households Actual Proportion	70.5%	17.6%	5.7%	33.5%
2008–2012 Households Free Market	68.3%	17.2%	6.2%	27.1%
2008–2012 Households Difference	2.2%	0.3%	-0.5%	6.4%
2010 Census Tract 5422				
Householders (2000 Census)	71.2%	10.4%	3.5%	24.1%
2008–2012 Households Actual Proportion	57.1%	25.5%	3.8%	42.2%
2008–2012 Households Free Market	67.3%	17.9%	6.0%	28.4%
2008–2012 Households Difference	-10.3%	7.5%	-2.2%	13.8%
2010 Census Tract 5423.01 (Was Tract 5423 in 2000)				
Householders (2000 Census)	77.2%	9.3%	4.0%	17.5%
2008–2012 Households Actual Proportion	73.6%	12.8%	4.8%	42.4%
2008–2012 Households Free Market	68.7%	16.9%	6.4%	26.0%
2008–2012 Households Difference	4.8%	-4.1%	-1.6%	16.4%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5508				
Householders (2000 Census)	17.7%	61.0%	9.3%	17.1%
2008–2012 Households Actual Proportion	22.0%	65.6%	7.4%	26.1%
2008–2012 Households Free Market	64.5%	20.3%	5.5%	31.3%
2008–2012 Households Difference	-42.5%	45.3%	2.0%	-5.2%
2010 Census Tract 5509				
Householders (2000 Census)	39.6%	26.8%	14.7%	28.6%
2008–2012 Households Actual Proportion	47.5%	26.3%	16.5%	42.6%
2008–2012 Households Free Market	66.5%	18.7%	6.0%	28.5%
2008–2012 Households Difference	-19.0%	7.6%	10.5%	14.1%
2010 Census Tract 5510				
Householders (2000 Census)	40.9%	22.5%	13.6%	46.0%
2008–2012 Households Actual Proportion	49.7%	31.7%	8.4%	53.0%
2008–2012 Households Free Market	65.6%	19.0%	5.5%	31.7%
2008–2012 Households Difference	-15.9%	12.7%	2.8%	21.2%
2010 Census Tract 5511				
Householders (2000 Census)	49.2%	25.5%	13.9%	18.4%
2008–2012 Households Actual Proportion	42.2%	33.3%	16.2%	34.8%
2008–2012 Households Free Market	64.5%	20.5%	5.5%	30.4%
2008–2012 Households Difference	-22.3%	12.8%	10.7%	4.4%
2010 Census Tract 5512				
Householders (2000 Census)	79.6%	8.1%	5.8%	14.5%
2008–2012 Households Actual Proportion	65.1%	18.0%	9.4%	19.0%
2008–2012 Households Free Market	67.3%	18.1%	6.0%	27.5%
2008–2012 Households Difference	-2.1%	-0.1%	3.3%	-8.5%
2010 Census Tract 5516				
Householders (2000 Census)	66.7%	13.0%	6.8%	22.5%
2008–2012 Households Actual Proportion	66.1%	19.7%	7.4%	33.6%
2008–2012 Households Free Market	66.0%	18.9%	5.7%	30.5%
2008–2012 Households Difference	0.0%	0.8%	1.7%	3.0%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5423.02 (Was Tract 5423 in 2000)				
Householders (2000 Census)	77.2%	9.3%	4.0%	17.5%
2008–2012 Households Actual Proportion	65.9%	14.7%	3.0%	43.5%
2008–2012 Households Free Market	66.9%	18.4%	6.0%	28.5%
2008–2012 Households Difference	-0.9%	-3.7%	-3.0%	15.1%
2010 Census Tract 5424				
Householders (2000 Census)	72.9%	6.3%	3.6%	28.5%
2008–2012 Households Actual Proportion	61.2%	18.3%	5.7%	42.0%
2008–2012 Households Free Market	65.8%	19.2%	5.6%	30.3%
2008–2012 Households Difference	-4.6%	-0.9%	0.0%	11.7%
2010 Census Tract 5425				
Householders (2000 Census)	93.4%	2.1%	2.3%	4.8%
2008–2012 Households Actual Proportion	94.4%	1.7%	0.0%	10.8%
2008–2012 Households Free Market	70.0%	16.1%	6.7%	23.5%
2008–2012 Households Difference	24.4%	-14.4%	-6.7%	-12.7%
2010 Census Tract 5426				
Householders (2000 Census)	81.5%	5.2%	1.9%	26.7%
2008–2012 Households Actual Proportion	73.8%	9.0%	6.6%	29.5%
2008–2012 Households Free Market	70.4%	15.6%	6.7%	24.0%
2008–2012 Households Difference	3.4%	-6.6%	-0.1%	5.5%
2010 Census Tract 5429				
Householders (2000 Census)	84.0%	5.9%	1.5%	16.8%
2008–2012 Households Actual Proportion	74.5%	10.2%	2.2%	28.0%
2008–2012 Households Free Market	69.1%	16.6%	6.3%	25.9%
2008–2012 Households Difference	5.4%	-6.4%	-4.1%	2.1%
2010 Census Tract 5430.01 (Was Tract 5430 in 2000)				
Householders (2000 Census)	72.8%	9.5%	4.3%	23.2%
2008–2012 Households Actual Proportion	58.2%	20.8%	12.1%	17.0%
2008–2012 Households Free Market	71.6%	14.7%	6.8%	22.4%
2008–2012 Households Difference	-13.4%	6.1%	5.3%	-5.5%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5430.02 (Was Tract 5430 in 2000)				
Householders (2000 Census)	72.8%	9.5%	4.3%	23.2%
2008–2012 Households Actual Proportion	66.1%	15.4%	9.1%	18.8%
2008–2012 Households Free Market	72.4%	14.1%	7.1%	20.6%
2008–2012 Households Difference	-6.3%	1.3%	2.0%	-1.8%
2010 Census Tract 5431				
Householders (2000 Census)	73.5%	11.8%	0.2%	23.6%
2008–2012 Households Actual Proportion	80.6%	4.8%	0.4%	36.2%
2008–2012 Households Free Market	67.5%	17.9%	6.2%	27.1%
2008–2012 Households Difference	13.0%	-13.1%	-5.8%	9.1%
2010 Census Tract 5503.02 (Was Tract 5503 in 2000)				
Householders (2000 Census)	66.3%	22.2%	3.2%	12.9%
2008–2012 Households Actual Proportion	34.6%	54.0%	4.8%	18.4%
2008–2012 Households Free Market	64.4%	20.5%	5.5%	31.2%
2008–2012 Households Difference	-29.8%	33.5%	-0.7%	-12.8%
2010 Census Tract 5504.01 (Was Tract 5504 in 2000)				
Householders (2000 Census)	42.7%	41.3%	4.6%	20.3%
2008–2012 Households Actual Proportion	45.6%	41.9%	4.0%	39.1%
2008–2012 Households Free Market	63.4%	21.3%	5.2%	32.6%
2008–2012 Households Difference	-17.8%	20.6%	-1.2%	6.4%
2010 Census Tract 5506.03 (Was Tract 5506 in 2000)				
Householders (2000 Census)	28.4%	45.3%	10.9%	32.0%
2008–2012 Households Actual Proportion	54.4%	30.5%	5.1%	64.1%
2008–2012 Households Free Market	65.2%	19.8%	5.4%	31.2%
2008–2012 Households Difference	-10.8%	10.7%	-0.3%	32.9%
2010 Census Tract 5507				
Householders (2000 Census)	28.4%	45.3%	10.9%	32.0%
2008–2012 Households Actual Proportion	30.2%	34.3%	17.0%	26.0%
2008–2012 Households Free Market	66.1%	19.1%	5.8%	29.2%
2008–2012 Households Difference	-28.0%	21.9%	6.3%	9.9%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5518				
Householders (2000 Census)	92.7%	1.0%	4.2%	4.4%
2008–2012 Households Actual Proportion	89.9%	3.8%	4.8%	7.5%
2008–2012 Households Free Market	72.7%	13.8%	7.0%	20.9%
2008–2012 Households Difference	17.2%	-10.0%	-2.3%	-13.4%
2010 Census Tract 5520.01 (Was Tract 5520 in 2000)				
Householders (2000 Census)				
2008–2012 Households Actual Proportion	81.7%	6.5%	7.0%	10.9%
2008–2012 Households Free Market	66.6%	18.8%	5.9%	28.3%
2008–2012 Households Difference	0.7%	-1.0%	2.0%	-13.9%
2010 Census Tract 5520.02 (Was Tract 5520 in 2000)				
Householders (2000 Census)	81.7%	6.5%	7.0%	10.9%
2008–2012 Households Actual Proportion	59.9%	20.4%	12.2%	10.1%
2008–2012 Households Free Market	69.1%	16.6%	6.4%	25.7%
2008–2012 Households Difference	-9.3%	3.8%	5.8%	-15.7%
2010 Census Tract 5521.01 (Was 5521 in 2000)				
Householders (2000 Census)	80.2%	7.6%	6.4%	9.9%
2008–2012 Households Actual Proportion	58.8%	25.6%	10.5%	20.8%
2008–2012 Households Free Market	66.9%	18.7%	6.2%	26.6%
2008–2012 Households Difference	-8.1%	6.9%	4.3%	-5.8%
2010 Census Tract 5521.03 (Was 5521 in 2000)				
Householders (2000 Census)	80.2%	7.6%	6.4%	9.9%
2008–2012 Households Actual Proportion	83.8%	7.1%	2.0%	25.2%
2008–2012 Households Free Market	68.4%	17.1%	6.2%	26.9%
2008–2012 Households Difference	15.4%	-10.0%	-4.3%	-1.7%
2010 Census Tract 5522				
Householders (2000 Census)	86.3%	6.0%	1.5%	13.3%
2008–2012 Households Actual Proportion	70.9%	17.5%	4.2%	16.6%
2008–2012 Households Free Market	66.3%	19.0%	5.9%	28.3%
2008–2012 Households Difference	4.6%	-1.4%	-1.7%	-11.7%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5523.01 (Was Tract 5523 in 2000)				
Householders (2000 Census)	90.9%	2.8%	2.4%	6.6%
2008–2012 Households Actual Proportion	90.8%	2.3%	0.7%	12.8%
2008–2012 Households Free Market	69.2%	16.6%	6.3%	25.5%
2008–2012 Households Difference	21.6%	-14.3%	-5.6%	-12.7%
2010 Census Tract 5524				
Householders (2000 Census)	83.8%	6.7%	3.6%	12.8%
2008–2012 Households Actual Proportion	69.7%	13.4%	10.0%	23.5%
2008–2012 Households Free Market	66.9%	18.3%	5.9%	28.5%
2008–2012 Households Difference	2.8%	-4.9%	4.1%	-5.0%
2010 Census Tract 5525				
Householders (2000 Census)	81.4%	6.9%	4.9%	14.9%
2008–2012 Households Actual Proportion	72.1%	9.7%	13.0%	24.2%
2008–2012 Households Free Market	67.9%	17.7%	6.2%	26.9%
2008–2012 Households Difference	4.2%	-7.9%	6.8%	-2.7%
2010 Census Tract 5526.02 (Was Tract 5526 In 2000)				
Householders (2000 Census)	83.2%	8.8%	4.2%	7.9%
2008–2012 Households Actual Proportion	82.5%	8.5%	9.0%	19.3%
2008–2012 Households Free Market	70.0%	15.9%	6.6%	24.6%
2008–2012 Households Difference	12.6%	-7.4%	2.4%	-5.3%
2010 Census Tract 5528				
Householders (2000 Census)	91.8%	2.8%	3.5%	4.0%
2008–2012 Households Actual Proportion	86.7%	5.4%	4.7%	10.3%
2008–2012 Households Free Market	70.6%	15.5%	6.5%	23.6%
2008–2012 Households Difference	16.1%	-10.1%	-1.8%	-13.3%
2010 Census Tract 5529				
Householders (2000 Census)	88.8%	4.3%	3.1%	6.0%
2008–2012 Households Actual Proportion	74.6%	17.9%	3.7%	8.8%
2008–2012 Households Free Market	68.0%	17.7%	6.1%	26.5%
2008–2012 Households Difference	6.6%	0.3%	-2.4%	-17.7%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5530.01 (Was Tract 5530 in 2000)				
Householders (2000 Census)	75.4%	12.2%	5.6%	10.8%
2008–2012 Households Actual Proportion	79.0%	12.2%	6.4%	18.8%
2008–2012 Households Free Market	70.4%	15.6%	6.4%	24.6%
2008–2012 Households Difference	8.6%	-3.4%	0.0%	-5.8%
2010 Census Tract 5530.02 (Was Tract 5530 in 2000)				
Householders (2000 Census)	75.4%	12.2%	5.6%	10.8%
2008–2012 Households Actual Proportion	72.7%	18.1%	7.5%	22.1%
2008–2012 Households Free Market	70.0%	16.1%	6.5%	23.8%
2008–2012 Households Difference	2.7%	2.0%	1.0%	-1.8%
2010 Census Tract 5531				
Householders (2000 Census)	80.5%	9.7%	3.8%	12.2%
2008–2012 Households Actual Proportion	68.5%	25.2%	3.9%	16.9%
2008–2012 Households Free Market	68.2%	17.3%	6.0%	27.5%
2008–2012 Households Difference	0.3%	7.9%	-2.2%	-10.6%
2010 Census Tract 5532				
Householders (2000 Census)	77.5%	12.2%	3.0%	16.6%
2008–2012 Households Actual Proportion	63.1%	30.8%	2.1%	30.5%
2008–2012 Households Free Market	64.4%	20.4%	5.4%	31.3%
2008–2012 Households Difference	-1.3%	10.4%	-3.3%	-0.8%
2010 Census Tract 5533				
Householders (2000 Census)	69.3%	16.6%	5.5%	14.3%
2008–2012 Households Actual Proportion	41.7%	53.1%	2.3%	21.2%
2008–2012 Households Free Market	62.5%	22.1%	5.2%	32.7%
2008–2012 Households Difference	-20.8%	31.0%	-3.0%	-11.5%
2010 Census Tract 5534.01 (Was Tract 5534)				
Householders (2000 Census)	90.2%	3.7%	2.9%	6.7%
2008–2012 Households Actual Proportion	86.0%	10.5%	0.0%	14.2%
2008–2012 Households Free Market	71.8%	14.5%	6.9%	22.3%
2008–2012 Households Difference	14.2%	-4.1%	-6.9%	-8.1%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5534.02 (Was Tract 5534)				
Householders (2000 Census)	90.2%	3.7%	2.9%	6.7%
2008–2012 Households Actual Proportion	81.3%	10.7%	3.9%	12.7%
2008–2012 Households Free Market	71.8%	14.5%	6.8%	22.4%
2008–2012 Households Difference	9.5%	-3.8%	-2.9%	-9.8%
2010 Census Tract 5534.03 (Was Tract 5534)				
Householders (2000 Census)	90.2%	3.7%	2.9%	6.7%
2008–2012 Households Actual Proportion	79.2%	10.6%	8.6%	17.7%
2008–2012 Households Free Market	71.0%	15.2%	6.6%	23.3%
2008–2012 Households Difference	8.2%	-4.7%	1.9%	-5.6%
2010 Census Tract 5542				
Householders (2000 Census)	78.3%	8.1%	4.8%	12.7%
2008–2012 Households Actual Proportion	72.6%	7.7%	8.6%	18.7%
2008–2012 Households Free Market	70.2%	15.7%	6.6%	24.3%
2008–2012 Households Difference	2.4%	-8.0%	2.0%	-5.6%
2010 Census Tract 5543.01 (Was Tract 5543 in 2000)				
Householders (2000 Census)	92.5%	2.7%	2.2%	5.6%
2008–2012 Households Actual Proportion	94.6%	4.5%	0.0%	7.5%
2008–2012 Households Free Market	73.3%	13.3%	7.1%	20.5%
2008–2012 Households Difference	21.3%	-8.8%	-7.1%	-12.9%
2010 Census Tract 5544.01 (Was Tract 5544 in 2000)				
Householders (2000 Census)	92.3%	2.6%	2.1%	5.1%
2008–2012 Households Actual Proportion	87.8%	2.9%	6.5%	9.5%
2008–2012 Households Free Market	75.0%	12.0%	7.4%	18.2%
2008–2012 Households Difference	12.8%	-9.2%	-0.8%	-8.7%
2010 Census Tract 5544.02 (Was Tract 5544 in 2000)				
Householders (2000 Census)	92.3%	2.6%	2.1%	5.1%
2008–2012 Households Actual Proportion	80.4%	7.5%	8.5%	11.2%
2008–2012 Households Free Market	73.2%	13.5%	7.1%	20.3%
2008–2012 Households Difference	7.2%	-6.0%	1.4%	-9.1%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5544.03 (Was Tract 5544 in 2000)				
Householders (2000 Census)	92.3%	2.6%	2.1%	5.1%
2008–2012 Households Actual Proportion	77.8%	10.5%	3.6%	26.5%
2008–2012 Households Free Market	70.4%	15.6%	6.7%	24.0%
2008–2012 Households Difference	7.4%	-5.0%	-3.1%	2.5%
2010 Census Tract 5545.02 (Was Tract 5545 in 2000)				
Householders (2000 Census)	90.9%	2.6%	2.5%	7.0%
2008–2012 Households Actual Proportion	94.6%	0.6%	2.6%	5.9%
2008–2012 Households Free Market	73.9%	12.9%	7.2%	19.3%
2008–2012 Households Difference	20.7%	-12.2%	-4.6%	-13.4%
2010 Census Tract 5546				
Householders (2000 Census)	93.2%	2.3%	2.3%	3.4%
2008–2012 Households Actual Proportion	91.2%	2.4%	3.3%	9.8%
2008–2012 Households Free Market	74.6%	12.4%	7.4%	18.2%
2008–2012 Households Difference	16.6%	-10.0%	-4.2%	-8.4%
2010 Census Tract 5547				
Householders (2000 Census)	88.3%	2.4%	4.8%	7.2%
2008–2012 Households Actual Proportion	81.3%	6.5%	8.5%	14.7%
2008–2012 Households Free Market	71.9%	14.4%	6.8%	22.4%
2008–2012 Households Difference	9.4%	-7.9%	1.7%	-7.7%
2010 Census Tract 5548.01 (Was Tract 5548 in 2000)				
Householders (2000 Census)	86.0%	5.2%	1.3%	11.5%
2008–2012 Households Actual Proportion	74.1%	13.5%	6.3%	20.6%
2008–2012 Households Free Market	68.8%	16.9%	6.3%	26.0%
2008–2012 Households Difference	5.4%	-3.5%	0.0%	-5.5%
2010 Census Tract 5548.02 (Was Tract 5548 in 2000)				
Householders (2000 Census)	86.0%	5.2%	1.3%	11.5%
2008–2012 Households Actual Proportion	88.8%	2.7%	5.1%	11.4%
2008–2012 Households Free Market	72.2%	14.3%	6.9%	21.3%
2008–2012 Households Difference	16.5%	-11.6%	-1.8%	-9.9%

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Northwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5549.01 (Was Tract 5549 in 2000)				
Householders (2000 Census)	86.0%	5.2%	1.3%	11.5%
2008–2012 Households Actual Proportion	92.2%	2.0%	1.6%	6.9%
2008–2012 Households Free Market	69.6%	16.2%	6.5%	25.3%
2008–2012 Households Difference	-2.8%	-4.8%	2.2%	-4.4%
2010 Census Tract 5555.02 (Was Tract 5555 in 2000)				
Householders (2000 Census)	90.0%	2.1%	1.0%	10.9%
2008–2012 Households Actual Proportion	81.2%	7.9%	5.6%	17.1%
2008–2012 Households Free Market	71.0%	15.1%	6.8%	23.0%
2008–2012 Households Difference	10.2%	-7.2%	-1.2%	-6.0%
2010 Census Tract 5556				
Householders (2000 Census)	94.2%	1.4%	0.2%	7.0%
2008–2012 Households Actual Proportion	92.8%	1.1%	0.0%	14.9%
2008–2012 Households Free Market	70.7%	15.4%	6.7%	23.4%
2008–2012 Households Difference	22.1%	-14.3%	-6.7%	-8.5%
2010 Census Tract 5557.01 (Was Tract 5557 in 2000)				
Householders (2000 Census)	91.8%	2.5%	2.8%	5.8%
2008–2012 Households Actual Proportion	80.3%	8.4%	2.6%	18.2%
2008–2012 Households Free Market	72.8%	13.7%	7.1%	21.1%
2008–2012 Households Difference	7.5%	-5.3%	-4.5%	-2.8%
2010 Census Tract 5557.02 (Was Tract 5557 in 2000)				
Householders (2000 Census)	91.8%	2.5%	2.8%	5.8%
2008–2012 Households Actual Proportion	91.1%	5.0%	3.4%	8.1%
2008–2012 Households Free Market	74.5%	12.4%	7.4%	18.6%
2008–2012 Households Difference	16.6%	-7.4%	-4.0%	-10.5%
2010 Census Tract 5560 (Tract consists of parts of 2000 tracts 5558 and 5559)				
Householders (2000 Census)	75.3%	15.2%	0.7%	14.8%
2008–2012 Households Actual Proportion	78.6%	10.9%	0.0%	26.8%
2008–2012 Households Free Market	66.8%	18.5%	5.8%	28.9%
2008–2012 Households Difference	11.9%	-7.6%	-5.8%	-2.0%

Northeast Quadrant

Super Neighborhoods in the Northeast Quadrant

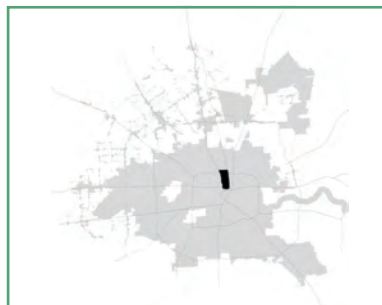
2 Greater Greenspoint	50 Settegast
42 IAH/Airport Area	51 Near Northside
43 Kingwood Area	52 Kashmere Gardens
44 Lake Houston	53 Eldorado/Oates Prairie
45 Northside Northline	54 Hunterwood
46 Eastex/Jensen Area	55 Greater Fifth Ward
47 East Little York/Homestead	57 Pleasantville
48 Trinity/Houston Gardens	58 Northshore
49 East Houston	

Census tracts not assigned to a super neighborhood are shown with data following the super neighborhoods.

Table 21: Near Northside

Super Neighborhood 51: Near Northside				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	50.4%	16.4%	0.4%	71.0%
2008–2012 Households Actual Proportion	72.3%	14.1%	0.1%	75.3%
2008–2012 Households Free Market	62.4%	22.3%	5.3%	32.0%
2008–2012 Households Difference	9.9%	-8.2%	-5.2%	43.3%
2010 Census Tract 2104				
Householders (2000 Census)	46.2%	17.3%	0.2%	73.5%
2008–2012 Households Actual Proportion	71.5%	17.7%	0.0%	75.8%
2008–2012 Households Free Market	60.9%	23.8%	5.3%	31.9%
2008–2012 Households Difference	10.6%	-6.1%	-5.3%	43.9%
2010 Census Tract 2105				
Householders (2000 Census)	49.0%	13.7%	0.1%	77.9%
2008–2012 Households Actual Proportion	65.0%	15.5%	0.0%	76.6%
2008–2012 Households Free Market	62.1%	22.3%	5.1%	33.6%
2008–2012 Households Difference	2.9%	-6.9%	-5.1%	43.0%
2010 Census Tract 2106				
Householders (2000 Census)	65.2%	2.0%	0.9%	67.0%
2008–2012 Households Actual Proportion	85.4%	3.2%	0.0%	73.0%
2008–2012 Households Free Market	65.6%	19.5%	5.7%	29.8%
2008–2012 Households Difference	19.8%	-16.3%	-5.7%	43.2%
2010 Census Tract 2107				
Householders (2000 Census)	25.6%	38.8%	0.4%	57.8%
2008–2012 Households Actual Proportion	52.5%	37.9%	0.0%	54.9%
2008–2012 Households Free Market	61.8%	22.7%	5.1%	33.0%
2008–2012 Households Difference	-9.3%	15.2%	-5.1%	21.8%
2010 Census Tract 2108 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	17.7%	61.3%	0.1%	36.7%
2008–2012 Households Actual Proportion	44.0%	44.2%	0.0%	54.3%
2008–2012 Households Free Market	61.4%	23.5%	5.1%	31.8%
2008–2012 Households Difference	-17.4%	20.7%	-5.1%	22.5%
2010 Census Tract 2123 (Tract consists of parts of 2000 tracts 2102 and 2103)				
Householders (2000 Census)	62.7%	7.5%	0.5%	87.8%
2008–2012 Households Actual Proportion	79.8%	6.6%	0.5%	88.0%
2008–2012 Households Free Market	59.9%	24.8%	5.1%	32.6%
2008–2012 Households Difference	19.8%	-18.2%	-4.5%	55.4%
2010 Census Tract 2202				
Householders (2000 Census)	59.6%	0.8%	0.0%	79.9%
2008–2012 Households Actual Proportion	82.0%	0.0%	0.0%	89.7%
2008–2012 Households Free Market	64.2%	20.4%	5.2%	32.9%
2008–2012 Households Difference	17.8%	-20.4%	-5.2%	56.9%

Near Northside is immediately adjacent to Downtown. The southern two thirds of the area consists of wood frame homes surrounding commercial properties along North Main and Fulton. The northern third includes Lindale Park, with its large lots and more substantial homes. Moody Park is an important gathering place in the center of the community, as is the Davis High School–Marshall Middle School–Carnegie Library complex in the southern part of the community. Extension of the Hardy Toll Road runs along the entire eastern edge of the area. The population fell by nearly 16 percent from 29,923 to 25,257 as the annual median household income grew slightly from \$26,537 to \$30,258 in 2012, still well below the city's medians.



From at least 2000 through 2012, the Near Northside has been part of the expanding extreme and increasingly segregated concentration of Hispanics north and northeast of Downtown Houston. The proportion of households in each census tract that are Hispanic ranges from 54 to 89 percent. These proportions are 21 to 57 percentage points greater than would be expected in a free market that housing discrimination has *not* distorted.

The actual proportions of African American households are significantly less than would be expected in a free market in three tracts and noticeably greater in two tracts. The actual proportions of Caucasians are much greater in three tracts and less in one tract than would be expected in a free market untouched by housing discrimination.

As is the case in nearly every super neighborhood in this quadrant, the actual proportions of Asian households are barely measurable in any census tract. In the Near Northside, every tract would be about five percent Asian instead of actual proportions of zero to 0.5 percent.

Recommended Actions: Real estate testing is warranted in the Near Northside and in other super neighborhoods with similar demographics.

Testing is also warranted based on the differences between actual and expected proportions of Hispanics of any race, African Americans, or Caucasians in every census tract in the Near Northside.

The City of Houston should work to expand the housing choices of Latino residents of the Near Northside to include areas that are not within the city's Hispanic enclaves and expand the choices of non-Hispanic Caucasians, African Americans, and Asians to include the Near Northside and similar areas.

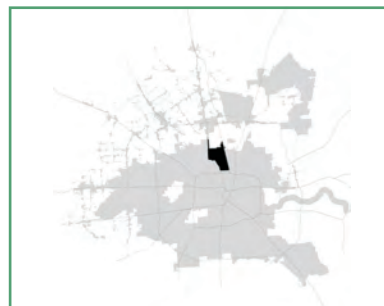
Table 22: Northside/Northline

Super Neighborhood 45: Northside/Northline				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	64.4%	8.2%	0.9%	59.3%
2008–2012 Households Actual Proportion	78.5%	10.7%	1.0%	74.2%
2008–2012 Households Free Market	62.6%	22.0%	5.2%	32.5%
2008–2012 Households Difference	15.9%	-11.3%	-4.2%	41.7%
2010 Census Tract 2203				
Householders (2000 Census)	58.3%	1.7%	0.2%	76.8%
2008–2012 Households Actual Proportion	86.9%	0.5%	0.0%	86.8%
2008–2012 Households Free Market	62.9%	21.8%	5.3%	31.9%
2008–2012 Households Difference	24.1%	-21.2%	-5.3%	54.9%
2010 Census Tract 2204				
Householders (2000 Census)	63.7%	2.7%	0.3%	74.7%
2008–2012 Households Actual Proportion	87.2%	0.9%	0.0%	91.5%
2008–2012 Households Free Market	63.1%	21.5%	5.2%	32.9%
2008–2012 Households Difference	24.1%	-20.7%	-5.2%	58.6%
2010 Census Tract 2205				
Householders (2000 Census)	64.7%	11.9%	1.0%	54.5%
2008–2012 Households Actual Proportion	76.5%	17.0%	0.2%	63.3%
2008–2012 Households Free Market	60.0%	24.7%	5.0%	32.7%
2008–2012 Households Difference	16.5%	-7.7%	-4.8%	30.5%
2010 Census Tract 2206				
Householders (2000 Census)	48.2%	20.5%	1.0%	58.6%
2008–2012 Households Actual Proportion	77.1%	14.3%	0.0%	69.7%
2008–2012 Households Free Market	63.1%	21.5%	5.3%	32.2%
2008–2012 Households Difference	14.0%	-7.1%	-5.3%	37.5%
2010 Census Tract 2212				
Householders (2000 Census)	71.4%	2.6%	0.1%	56.9%
2008–2012 Households Actual Proportion	84.0%	1.5%	0.0%	77.1%
2008–2012 Households Free Market	63.5%	20.9%	5.2%	33.5%
2008–2012 Households Difference	20.5%	-19.4%	-5.2%	43.6%

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Super Neighborhood 45: Northside/Northline (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2213				
Householders (2000 Census)	66.7%	2.1%	0.7%	64.9%
2008–2012 Households Actual Proportion	82.4%	1.2%	3.9%	84.7%
2008–2012 Households Free Market	64.4%	20.4%	5.4%	31.8%
2008–2012 Households Difference	18.1%	-19.2%	-1.4%	52.9%
2010 Census Tract 2214				
Householders (2000 Census)	68.7%	4.6%	0.6%	66.8%
2008–2012 Households Actual Proportion	93.2%	0.6%	1.1%	82.1%
2008–2012 Households Free Market	62.8%	21.8%	5.2%	32.6%
2008–2012 Households Difference	30.4%	-21.2%	-4.1%	49.5%
2010 Census Tract 2215				
Householders (2000 Census)	61.5%	13.2%	0.7%	61.8%
2008–2012 Households Actual Proportion	76.4%	16.8%	1.2%	71.9%
2008–2012 Households Free Market	61.4%	23.1%	5.1%	33.3%
2008–2012 Households Difference	15.0%	-6.3%	-3.9%	38.6%
2010 Census Tract 2216				
Householders (2000 Census)	76.1%	3.5%	1.0%	44.7%
2008–2012 Households Actual Proportion	87.2%	2.0%	2.1%	73.0%
2008–2012 Households Free Market	64.2%	20.5%	5.4%	31.7%
2008–2012 Households Difference	23.0%	-18.5%	-3.3%	41.2%
2010 Census Tract 2217				
Householders (2000 Census)	71.9%	1.9%	2.7%	57.5%
2008–2012 Households Actual Proportion	86.6%	2.6%	1.6%	80.5%
2008–2012 Households Free Market	63.0%	21.5%	5.2%	32.8%
2008–2012 Households Difference	23.6%	-18.9%	-3.6%	47.7%
2010 Census Tract 5307				
Householders (2000 Census)	40.8%	33.2%	1.0%	45.8%
2008–2012 Households Actual Proportion	60.3%	34.4%	0.0%	53.2%
2008–2012 Households Free Market	61.5%	23.3%	5.2%	32.0%
2008–2012 Households Difference	-1.2%	11.1%	-5.2%	21.2%

The Northside/Northline super neighborhood is in the north central part of the city. The area is largely single-family residential with large apartment complexes located near the I-45 (North Freeway) on the western edge of the community. The two major roadways, I-45 and the Hardy Toll road, provide access to the area. The North Freeway initially spurred development of numerous retail centers, light industrial and distribution facilities in close proximity to the freeway. The population grew from 54,676 to 59,451 in 2012 while the annual median household income increased slightly from \$27,773 to \$31,501 in 2012.



Immediately north of the Near Northside, Northside/Northline continues the pattern to its east of extreme actual concentrations of Latino households constituting 30 to 66 percentage points more than would be expected in a free housing market undistorted by discrimination. The actual proportions of African American households in seven of the 11 tracts is notably less than would be expected in the absence of housing discrimination while the actual proportions of white households is significantly greater in nine out of 11 census tracts.

Since 2000, this super neighborhood has become increasingly Hispanic and white while the proportion of African Americans has declined in most of the census tracts.

Recommended Actions: Testing is warranted based on the differences between actual and expected proportions of Hispanics of any race, African Americans, or Caucasians in every census tract in the Northside/Northline.

The City of Houston should work to expand the housing choices of Latino residents of the Northside/Northline to include areas that are not within the city's Hispanic enclaves and of non-Hispanic Caucasians, African Americans, and Asians to include Northside/Northline.

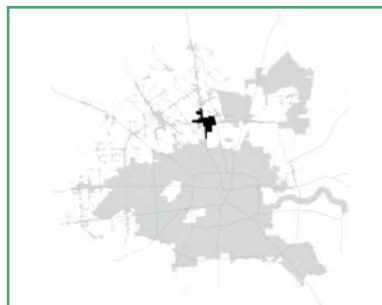
Table 23: Greater Greenspoint

Super Neighborhood 2: Greater Greenspoint				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	39.5%	32.4%	2.3%	44.4%
2008–2012 Households Actual Proportion	45.9%	44.4%	2.1%	45.6%
2008–2012 Households Free Market	62.3%	22.2%	5.1%	33.2%
2008–2012 Households Difference	-14.3%	22.2%	-3.1%	12.4%
2010 Census Tract 2224.01 (Was Tract 2224 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	65.6%	7.0%	2.8%	47.5%
2008–2012 Households Actual Proportion	94.0%	0.0%	0.0%	82.4%
2008–2012 Households Free Market	61.8%	22.7%	5.0%	33.6%
2008–2012 Households Difference	32.1%	-22.7%	-5.0%	48.8%
2010 Census Tract 2225.01 (Was Tract 2225 in 2000)				
Householders (2000 Census)	46.8%	16.9%	1.0%	57.1%
2008–2012 Households Actual Proportion	86.4%	10.2%	0.0%	84.0%
2008–2012 Households Free Market	62.3%	22.2%	5.0%	33.9%
2008–2012 Households Difference	24.1%	-12.0%	-5.0%	50.0%
2010 Census Tract 2225.02 (Tract consists of parts of 2000 tracts 2224 and 2225. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	53.8%	13.3%	1.7%	53.5%
2008–2012 Households Actual Proportion	86.0%	2.6%	1.3%	72.1%
2008–2012 Households Free Market	65.6%	19.5%	5.6%	30.0%
2008–2012 Households Difference	20.4%	-16.9%	-4.3%	42.1%
2010 Census Tract 2225.03 (Was Tract 2225 in 2000)				
Householders (2000 Census)	46.8%	16.9%	1.0%	57.1%
2008–2012 Households Actual Proportion	85.2%	10.2%	0.0%	82.8%
2008–2012 Households Free Market	63.0%	21.7%	5.2%	32.7%
2008–2012 Households Difference	22.3%	-11.5%	-5.2%	50.1%
2010 Census Tract 2226				
Householders (2000 Census)	29.8%	33.0%	1.1%	57.2%
2008–2012 Households Actual Proportion	71.1%	23.0%	0.0%	73.8%
2008–2012 Households Free Market	59.6%	24.9%	4.9%	33.7%
2008–2012 Households Difference	11.5%	-2.0%	-4.9%	40.1%
2010 Census Tract 2401				
Householders (2000 Census)	40.4%	34.9%	3.5%	32.2%
2008–2012 Households Actual Proportion	47.6%	40.3%	3.3%	47.3%
2008–2012 Households Free Market	61.3%	23.0%	4.9%	34.8%
2008–2012 Households Difference	-13.7%	17.2%	-1.6%	12.5%
2010 Census Tract 2405.01 (Was Tract 2405 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	22.1%	56.4%	1.3%	31.3%
2008–2012 Households Actual Proportion	41.8%	55.0%	0.7%	43.3%
2008–2012 Households Free Market	61.9%	22.5%	4.9%	34.6%
2008–2012 Households Difference	-20.0%	32.5%	-4.2%	8.7%

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Super Neighborhood 2: Greater Greenspoint (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2405.02 (Was Tract 2405 in 2000)				
Householders (2000 Census)	22.1%	56.4%	1.3%	31.3%
2008–2012 Households Actual Proportion	40.0%	53.6%	1.2%	40.3%
2008–2012 Households Free Market	61.2%	23.2%	5.0%	33.9%
2008–2012 Households Difference	-21.2%	30.4%	-3.7%	6.4%
2010 Census Tract 2406 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	35.5%	36.5%	2.6%	37.5%
2008–2012 Households Actual Proportion	40.5%	53.6%	0.8%	41.8%
2008–2012 Households Free Market	60.3%	23.8%	4.7%	35.7%
2008–2012 Households Difference	-19.8%	29.7%	-3.9%	6.1%
2010 Census Tract 5337.01 (Was Tract 5337 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	35.5%	25.7%	4.6%	55.2%
2008–2012 Households Actual Proportion	72.3%	15.7%	4.5%	76.2%
2008–2012 Households Free Market	62.7%	22.0%	5.1%	32.7%
2008–2012 Households Difference	9.6%	-6.3%	-0.6%	43.5%
2010 Census Tract 5501				
Householders (2000 Census)	28.2%	51.8%	4.0%	29.7%
2008–2012 Households Actual Proportion	31.7%	54.6%	1.3%	36.1%
2008–2012 Households Free Market	60.9%	23.3%	4.8%	35.2%
2008–2012 Households Difference	-29.2%	31.3%	-3.5%	0.8%
2010 Census Tract 5502				
Householders (2000 Census)	20.1%	70.1%	0.7%	16.2%
2008–2012 Households Actual Proportion	34.7%	57.8%	0.0%	35.2%
2008–2012 Households Free Market	60.2%	24.1%	4.9%	34.4%
2008–2012 Households Difference	-25.5%	33.8%	-4.9%	0.8%
2010 Census Tract 5503.01 (Was Tract 5503 in 2000, Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	66.3%	22.2%	3.2%	12.9%
2008–2012 Households Actual Proportion	32.9%	63.4%	2.9%	22.2%
2008–2012 Households Free Market	62.0%	22.3%	5.0%	34.3%
2008–2012 Households Difference	-29.1%	41.2%	-2.1%	-12.1%
2010 Census Tract 5504.02 (Was Tract 5504 in 2000, Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	43.8%	46.7%	3.4%	13.5%
2008–2012 Households Actual Proportion	20.3%	70.8%	3.8%	21.0%
2008–2012 Households Free Market	65.8%	19.4%	5.7%	29.7%
2008–2012 Households Difference	-45.5%	51.4%	-1.9%	-8.7%
2010 Census Tract 5505 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	27.1%	50.7%	10.2%	18.3%
2008–2012 Households Actual Proportion	47.5%	36.5%	9.5%	39.5%
2008–2012 Households Free Market	64.1%	20.8%	5.5%	31.0%
2008–2012 Households Difference	-16.6%	15.7%	4.1%	8.5%

Greater Greenspoint takes its name from the shopping mall at its center. The original subdivisions here were developed for Houstonians seeking moderately priced homes in the Aldine Independent School District close to the North Freeway. The opening of Intercontinental Airport in 1969 transformed the intersection of 1–45 and the Beltway into a commercial crossroads. The subsequent rapid development of office space around the mall provided the jobs to support massive construction of apartment complexes, which now dominate much of the landscape. The real estate bust of the last decade produced significant deterioration in those complexes, and led to the creation of a management district. Crime has been significantly reduced and renovation of thousands of the apartments is underway. Between 2000 and 2012, the population grew slightly from 40,671 to 42,569 and the annual median household income declined from \$27,240 to \$26,823.



North of Northside/Northline, the census tracts in the south two-thirds of Greater Greenspoint east of U.S. 45 are part of the growing extreme concentrations of Hispanic households characteristic of most of Houston's northeast quadrant. The proportions of Hispanic and white households grew dramatically this century in tracts 2224.01, 2225.01, 2225.02, 2225.03, and 2226. The actual proportion of Hispanic households ranged from 40 to 50 percentage points higher than would be expected in a housing market not distorted by discrimination. In all five tracts, the actual proportion of whites was 22 to 32 percentage points higher than would be expected. The tract immediately west of these across U.S. 45, 5337.0, experienced similar growth in the Hispanic concentration with the actual proportion being more than 43 percentage points higher than would be expected.

The remaining tracts at the north end and west ends of Greater Greenspoint had higher actual proportions of African American households and lower proportions of Caucasian households than would be expected in a free market devoid of housing discrimination. The actual proportions of Hispanics were within the range of what would be expected.

The two tracts immediately north of Greater Greenspoint that are not assigned to any super neighborhood — 2407.02 and 2407.03 both had fewer whites living in them than would be expected absent housing discrimination. In 2407.02 the actual proportion of Latino households more than doubled this century and was 20 percentage points greater than what would be expected while the proportion of whites fell by almost a third and was 21.8 percentage points less than would be expected. Immediately north, the actual proportion of African Americans more than doubled in tract 2407.01 and was more than 29 percentage points greater than would be expected while the actual proportion of white households declined by 26 percentage points and was nearly 30 percentage points lower than would be expected absent housing discrimination.

Recommended Actions: Testing is warranted based on the differences between actual and expected proportions of Hispanics of any

race, African Americans, or Caucasians in every census tract in Greater Greenspoint.

The City of Houston should work to expand the housing choices of Latino and African American residents of Greater Greenspoint to include all of Greater Greenspoint as well as areas that are not within the city's Hispanic or Black enclaves and of non-Hispanic Caucasians and Asians to include Greater Greenspoint.

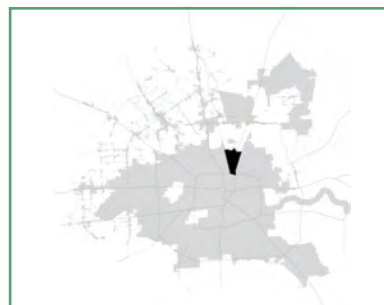
Table 24: Eastex/Jensen Area

Super Neighborhood 46: Eastex/Jensen Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	46.9%	27.5%	0.4%	55.7%
2008–2012 Households Actual Proportion	53.5%	26.8%	0.1%	65.3%
2008–2012 Households Free Market	62.3%	22.4%	5.2%	32.4%
2008–2012 Households Difference	-8.8%	4.4%	-5.1%	32.9%
2010 Census Tract 2201				
Householders (2000 Census)	12.1%	67.6%	0.1%	29.6%
2008–2012 Households Actual Proportion	32.0%	56.5%	0.0%	43.5%
2008–2012 Households Free Market	61.7%	23.2%	5.3%	31.6%
2008–2012 Households Difference	-29.7%	33.4%	-5.3%	11.9%
2010 Census Tract 2207				
Householders (2000 Census)	44.5%	31.7%	0.2%	57.2%
2008–2012 Households Actual Proportion	44.7%	36.9%	0.0%	60.6%
2008–2012 Households Free Market	61.5%	23.1%	5.1%	33.0%
2008–2012 Households Difference	-16.8%	13.8%	-5.1%	27.7%
2010 Census Tract 2208				
Householders (2000 Census)	20.8%	67.9%	0.7%	29.1%
2008–2012 Households Actual Proportion	34.5%	58.4%	0.0%	41.9%
2008–2012 Households Free Market	58.6%	26.1%	5.0%	32.3%
2008–2012 Households Difference	-24.1%	32.2%	-5.0%	9.6%
2010 Census Tract 2209				
Householders (2000 Census)	57.9%	14.6%	0.8%	73.3%
2008–2012 Households Actual Proportion	75.1%	13.5%	0.0%	79.0%
2008–2012 Households Free Market	61.6%	22.9%	5.2%	32.9%
2008–2012 Households Difference	13.5%	-9.3%	-5.2%	46.1%
2010 Census Tract 2210				
Householders (2000 Census)	49.9%	23.1%	0.4%	57.9%
2008–2012 Households Actual Proportion	52.2%	20.8%	0.0%	66.0%
2008–2012 Households Free Market	62.0%	22.5%	5.1%	33.4%
2008–2012 Households Difference	-9.8%	-1.7%	-5.1%	32.6%

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Super Neighborhood 46: Eastex/Jensen Area (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2211				
Householders (2000 Census)	68.8%	2.3%	1.3%	65.5%
2008–2012 Households Actual Proportion	66.3%	1.1%	0.0%	83.2%
2008–2012 Households Free Market	64.1%	20.6%	5.3%	32.2%
2008–2012 Households Difference	2.2%	-19.5%	-5.3%	51.0%
2010 Census Tract 2220				
Householders (2000 Census)	63.5%	7.2%	0.0%	58.9%
2008–2012 Households Actual Proportion	85.1%	1.4%	0.0%	81.2%
2008–2012 Households Free Market	64.2%	20.6%	5.2%	32.4%
2008–2012 Households Difference	20.9%	-19.2%	-5.2%	48.9%
2010 Census Tract 2305				
Householders (2000 Census)	44.2%	29.1%	0.3%	59.3%
2008–2012 Households Actual Proportion	43.6%	29.0%	0.0%	63.4%
2008–2012 Households Free Market	63.1%	21.7%	5.3%	32.0%
2008–2012 Households Difference	-19.4%	7.4%	-5.3%	31.5%
2010 Census Tract 2317 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	60.0%	4.8%	0.2%	67.5%
2008–2012 Households Actual Proportion	74.8%	5.3%	0.5%	80.3%
2008–2012 Households Free Market	64.1%	20.7%	5.3%	31.8%
2008–2012 Households Difference	10.7%	-15.4%	-4.8%	48.5%

Immediately east of the Northside/Northline super neighborhood, the Eastex/Jensen Area is a part of northeast Houston outside the North Loop on both sides of the important Eastex Freeway and Jensen Drive corridors. The many neighborhoods found here are made up of modest frame homes set in pine forests. Subdivisions include Huntington Place, Croyden Gardens and Epsom Downs, which was the site of a horse race track in the 1930s. Jensen was once the primary highway to east Texas but was replaced by the Eastex Freeway. The area is split between Houston, Aldine and North Forest school districts. The population declined from 28,196 to 26,236 in 2012 while the annual median household income moved up slightly from \$25,236 to \$29,319 in 2012, still well below the city's medians.



Most of the Eastex/Jensen Area is also within the intense Latino enclave north and northeast of Downtown Houston. The concentrations are not quite as severe as in the Near Northside. However, in seven of the nine census tracts, the difference between the actual proportions of Hispanic households and the proportions expected in a free market absent housing discrimination range from 31 to 51 percentage points. Two tracts — 2201 and 2208 — are part of the African

American enclave in Kashmere Gardens that also extends east of the Eastex Jensen Area. In three of the tracts — 2211, 2220, 2317 — the actual proportion of Blacks is significantly less than expected. Similarly the proportion of Caucasians is significantly less than expected in three tracts and greater in one.

All of the census tracts between the Eastex Jensen Area and the IAH/Airport Area super neighborhood for which household data were available had significantly higher actual proportions of Latino households than would be expected without discrimination. The proportions of Hispanic households range from 77 to 88 percent — all higher than in 2000 — while the actual proportions of African Americans was about 19 percent lower than expected.

Immediately north of these tracts sits tract 2229 where the actual proportion of Latino households is more than 43 percentage points greater than would be expected.

And as is the case with the Near Northside and other super neighborhoods, the number of Asian households barely registers.

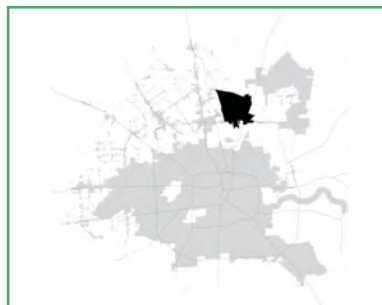
Recommended Actions: Testing is warranted based on the differences between actual and expected proportions of Hispanics of any race, African Americans, or Caucasians in every census tract in the Eastex/Jensen Area.

The City of Houston should work to expand the housing choices of Latino and African American residents of the Eastex/Jensen Area to include all of this super neighborhood as well as areas that are not within the city's Hispanic or Black enclaves and of non-Hispanic Caucasians and Asians to include the Eastex/Jensen Area.

Table 25: IAH/Airport Area

Super Neighborhood 42: IAH/Airport Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	59.1%	26.7%	1.2%	20.1%
2008–2012 Households Actual Proportion	49.4%	36.8%	3.0%	32.2%
2008–2012 Households Free Market	64.8%	20.3%	5.7%	29.2%
2008–2012 Households Difference	-15.4%	16.5%	-2.8%	3.0%
2010 Census Tract 2227				
Householders (2000 Census)	23.8%	67.9%	0.4%	13.8%
2008–2012 Households Actual Proportion	21.7%	72.7%	0.0%	20.4%
2008–2012 Households Free Market	58.2%	26.4%	5.2%	32.0%
2008–2012 Households Difference	-36.6%	46.3%	-5.2%	-11.6%
2010 Census Tract 2231				
Householders (2000 Census)	68.6%	11.8%	1.3%	37.8%
2008–2012 Households Actual Proportion	73.6%	11.9%	0.0%	73.0%
2008–2012 Households Free Market	63.4%	21.4%	5.2%	32.4%
2008–2012 Households Difference	10.3%	-9.5%	-5.2%	40.6%
2010 Census Tract 2322				
Householders (2000 Census)	71.6%	7.5%	0.5%	25.3%
2008–2012 Households Actual Proportion	69.2%	18.9%	4.1%	33.5%
2008–2012 Households Free Market	69.1%	16.7%	6.3%	25.2%
2008–2012 Households Difference	0.0%	2.2%	-2.2%	8.2%
2010 Census Tract 2415 (Was Tract 2402 in 2000)				
Householders (2000 Census)	82.1%	3.3%	1.6%	24.0%
2008–2012 Households Actual Proportion	46.8%	41.4%	1.8%	29.2%
2008–2012 Households Free Market	61.9%	22.7%	5.1%	33.0%
2008–2012 Households Difference	-15.1%	18.7%	-3.3%	-3.8%
2010 Census Tract 2501				
Householders (2000 Census)	72.1%	15.3%	2.2%	15.6%
2008–2012 Households Actual Proportion	45.0%	30.0%	5.2%	42.1%
2008–2012 Households Free Market	67.2%	18.2%	6.1%	27.9%
2008–2012 Households Difference	-22.2%	11.8%	-0.9%	14.2%
2010 Census Tract 9801 (Was 2403 in 2000)				
Householders (2000 Census)	55.3%	33.2%	1.6%	16.7%
2008–2012 Households Actual Proportion	25.1%	46.7%	0.0%	53.3%
2008–2012 Households Free Market	60.8%	23.0%	4.3%	37.8%
2008–2012 Households Difference	-35.7%	23.7%	-4.3%	15.5%

The IAH/Airport Area consists of subdivisions, commercial developments and undeveloped land surrounding George Bush Intercontinental Airport. Planning and land acquisition for the airport began in the early 1960s when this area included heavily wooded land on the edge of development. Many of the small subdivisions here recently received city water and sewer service, reflecting their origins as rural home sites including Bordersville, the last section of which was recently annexed at its residents' request. The World Houston and Interwood developments on the airport's south side are major employment centers. Population roughly doubled from 5,590 to 11,266 in 2012 with a decline in annual median household income from \$32,844 down to \$32,563 in 2012.



In three of the five tracts, the actual proportion of African Americans was from 18 to 46 percentage points greater, and proportions of Caucasian households lower than would be anticipated in a free market without housing discrimination.

Signs of resegregation are visible in most of the IAH/Airport Area. Since 2000, tract 2501 has experienced resegregation from virtually all white (94.1 percent in 2000 to 45 percent, 22.2 percentage points below expectations) while the percentage of African American households skyrocketed from 2.9 to 30 percent, 11.8 percent greater than expected, and the actual proportion of Latino households soared from 5.9 to 42.1 percent, 14.2 percentage points greater than expected in a free housing market. The proportions of Latino households in tract 9801 rose from 16.7 to 53.3 percent since 2000, 15.5 percentage points more than expected.

The percentage of white households plummeted from 55.3 to 25.1 percent, 35.7 percentage points lower than expected while the actual proportion of Black households doubled, creating a 23.7 percentage point gap between actual and expected. Tract 2415 also showed a huge decline in the proportion of Caucasian households while the proportion of African American households increased more than 12 fold from 3.3 to 41.4 percent, 18.7 percentage points higher than expected in a free housing market absent discrimination.

In tract 2231 the actual percentage of Latino households roughly doubled from 37.8 to 73 percent, 40.6 percentage points higher than expected in a free housing market.

Recommended Actions: The City of Houston needs to identify the real estate industry practices and any public policies or practices that led to the rapid resegregation of much of the IAH/Airport area so the city can learn how to craft strategies to prevent recurrences of this failure to affirmatively further fair housing elsewhere in Houston.

Census Tracts Not Assigned to Any Super Neighborhood. The tracts north of the IAH/Airport Area super neighborhood not assigned to any super neighborhood and for which data were available — 2404, 2408.02, 2409.02 — showed no signs of racial or ethnic concentrations nor did tract 2506 to the IAH/Airport Area's east. In tract 2503.01, the actual proportion of white households

was 31 percentage points lower than expected while the actual proportion of African American households was about 28 percentage points higher than expected in a free market absent housing discrimination. Since 2000, the proportion of Caucasian households fell nearly in half, from 73 to 37 percent, while the proportion of Black households nearly tripled from 17 to 45 percent — changes characteristic of resegregation.

Recommended Actions: The City of Houston needs to identify the real estate industry practices and any public policies or practices that led to the rapid resegregation of census tract 2503.1 so the city can craft strategies to prevent recurrences of this failure to affirmatively further fair housing elsewhere in Houston.

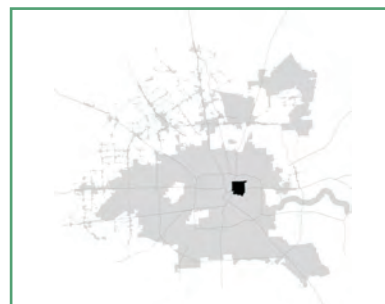
Table 26: Greater Fifth Ward

Super Neighborhood 55: Greater Fifth Ward				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	23.5%	62.0%	0.3%	35.7%
2008–2012 Households Actual Proportion	35.1%	56.0%	1.0%	39.4%
2008–2012 Households Free Market	60.2%	24.5%	5.1%	32.4%
2008–2012 Households Difference	-25.2%	31.5%	-4.1%	6.9%
2010 Census Tract 2108				
Householders (2000 Census)	17.7%	61.3%	0.1%	36.7%
2008–2012 Households Actual Proportion	44.0%	44.2%	0.0%	54.3%
2008–2012 Households Free Market	61.4%	23.5%	5.1%	31.8%
2008–2012 Households Difference	-17.4%	20.7%	-5.1%	22.5%
2010 Census Tract 2111				
Householders (2000 Census)	21.1%	65.4%	0.2%	33.9%
2008–2012 Households Actual Proportion	26.9%	60.4%	0.5%	37.5%
2008–2012 Households Free Market	59.0%	25.5%	4.8%	34.3%
2008–2012 Households Difference	-32.0%	34.9%	-4.2%	3.2%
2010 Census Tract 2112 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	11.4%	78.5%	0.2%	20.3%
2008–2012 Households Actual Proportion	13.2%	82.2%	0.0%	17.8%
2008–2012 Households Free Market	59.8%	24.8%	4.9%	33.5%
2008–2012 Households Difference	-46.6%	57.4%	-4.9%	-15.7%
2010 Census Tract 2113				
Householders (2000 Census)	6.3%	86.6%	0.2%	11.7%
2008–2012 Households Actual Proportion	16.1%	83.9%	0.0%	12.3%
2008–2012 Households Free Market	58.6%	26.2%	5.0%	32.4%
2008–2012 Households Difference	-42.4%	57.7%	-5.0%	-20.1%
2010 Census Tract 2114				
Householders (2000 Census)	12.3%	78.9%	0.4%	18.5%
2008–2012 Households Actual Proportion	24.9%	65.3%	6.9%	22.3%
2008–2012 Households Free Market	63.5%	22.0%	5.9%	27.5%
2008–2012 Households Difference	-38.5%	43.3%	1.1%	-5.2%

Continued on the next page

Super Neighborhood 55: Greater Fifth Ward (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2116 (Less than 25% of tract is in this super				
Householders (2000 Census)	54.2%	25.4%	0.4%	69.2%
2008–2012 Households Actual Proportion	63.7%	20.2%	0.0%	69.3%
2008–2012 Households Free Market	62.6%	22.0%	5.1%	32.8%
2008–2012 Households Difference	1.1%	-1.8%	-5.1%	36.5%
2010 Census Tract 2117 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	7.5%	84.1%	0.1%	14.6%
2008–2012 Households Actual Proportion	15.9%	79.6%	0.0%	18.6%
2008–2012 Households Free Market	59.6%	24.9%	5.0%	33.4%
2008–2012 Households Difference	-43.7%	54.8%	-5.0%	-14.8%
2010 Census Tract 2123 (Tract consists of parts of 2000 tracts 2102 and 2103)				
Householders (2000 Census)	62.7%	7.5%	0.5%	87.8%
2008–2012 Households Actual Proportion	79.8%	6.6%	0.5%	88.0%
2008–2012 Households Free Market	59.9%	24.8%	5.1%	32.6%
2008–2012 Households Difference	19.8%	-18.2%	-4.5%	55.4%

The Greater Fifth Ward has its origins on the north bank of Buffalo Bayou across from the original town site for Houston. Originally a multi-racial community, Fifth Ward quickly became one of the centers of Houston's African American community. Its commercial streets, especially Lyons and Jensen, provided retail outlets and entertainment for the residents of the small wood frame homes that predominated in the area. Small clusters of brick homes identified a small middle class population. Many original, substandard housing units have been demolished over the past two decades, but a recent revival of commercial activity and home construction is now filling these empty lots. The population fell nearly 10 percent, from 22,211 to 20,106 in 2012 while the annual median household income rose 42 percent from \$14,720 to \$20,870 in 2012, still less than half of the city's median household income.



The west end of the Greater Fifth Ward super neighborhood — tract 2108 — is a real mixed bag. While it is moving toward the racial composition that would be expected in a free market absent housing discrimination, the growth in the proportion of Hispanic households suggests that the tract *could* be resegregating to primarily Latino residents.

The actual proportion of African Americans is much greater in six of the eight census tracts than would be expected in a free housing market not distorted by discrimination, with the differences ranging from 20 to 58 percentage points. Concomitantly, the actual proportions of whites ranged from 17 to 46 percentage points less than would be expected. The actual proportions of Hispanic house-

holds were lower than expected in tracts 2112 and 2113.

Tract 2123 which is shared with the Near Northside and Downtown super neighborhoods has a much greater Latino population than would be expected (55.4 percentage points higher), greater white population than would be expected, and lower Black population than would be anticipated. The proportion of Hispanic households has remained around 88 percent this century.

Recommended Actions: The decision to live in the Greater Fifth Ward should be a matter of choice, not a location forced on residents due to housing discrimination elsewhere in Houston or residents feeling that other housing locations are not available to minority residents of the Greater Fifth Ward.

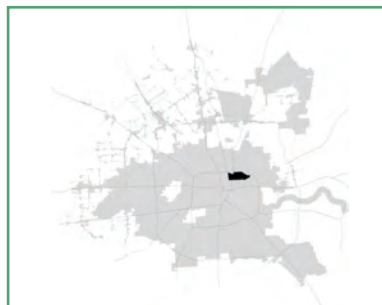
The City of Houston needs to expand housing choices so that African Americans and Latinos will expand their housing searches beyond just the city's Black and Hispanic concentrations, and so that whites and Asians will include integrated and predominantly minority areas in their housing searches.

Housing affordable to households with modest incomes should be maintained and preserved as affordable to households with modest incomes to prevent gentrification that could force such minority and lower-income households out of the Greater Fifth Ward.

Table 27: Kashmere Gardens

Super Neighborhood 52: Kashmere Gardens				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	7.8%	83.9%	0.2%	14.1%
2008–2012 Households Actual Proportion	14.1%	81.3%	0.2%	16.8%
2008–2012 Households Free Market	61.4%	23.3%	5.1%	32.7%
2008–2012 Households Difference	-47.3%	58.1%	-4.9%	-15.9%
2010 Census Tract 2108				
Householders (2000 Census)	17.7%	61.3%	0.1%	36.7%
2008–2012 Households Actual Proportion	44.0%	44.2%	0.0%	54.3%
2008–2012 Households Free Market	61.4%	23.5%	5.1%	31.8%
2008–2012 Households Difference	-17.4%	20.7%	-5.1%	22.5%
2010 Census Tract 2109				
Householders (2000 Census)	4.5%	88.7%	0.6%	8.4%
2008–2012 Households Actual Proportion	18.6%	77.5%	1.8%	16.3%
2008–2012 Households Free Market	63.3%	21.7%	5.3%	31.4%
2008–2012 Households Difference	-44.8%	55.7%	-3.5%	-15.1%
2010 Census Tract 2110				
Householders (2000 Census)	4.9%	87.8%	0.6%	10.6%
2008–2012 Households Actual Proportion	8.3%	86.6%	0.3%	13.6%
2008–2012 Households Free Market	61.5%	23.3%	4.9%	33.1%
2008–2012 Households Difference	-53.2%	63.3%	-4.6%	-19.5%
2010 Census Tract 2112				
Householders (2000 Census)	11.4%	78.5%	0.2%	20.3%
2008–2012 Households Actual Proportion	13.2%	82.2%	0.0%	17.8%
2008–2012 Households Free Market	59.8%	24.8%	4.9%	33.5%
2008–2012 Households Difference	-46.6%	57.4%	-4.9%	-15.7%
2010 Census Tract 2117				
Householders (2000 Census)	7.5%	84.1%	0.1%	14.6%
2008–2012 Households Actual Proportion	15.9%	79.6%	0.0%	18.6%
2008–2012 Households Free Market	59.6%	24.9%	5.0%	33.4%
2008–2012 Households Difference	-43.7%	54.8%	-5.0%	-14.8%
2010 Census Tract 2301				
Householders (2000 Census)	3.1%	93.6%	0.2%	4.5%
2008–2012 Households Actual Proportion	2.3%	96.5%	0.0%	2.3%
2008–2012 Households Free Market	61.6%	23.2%	5.3%	31.3%
2008–2012 Households Difference	-59.4%	73.4%	-5.3%	-29.1%
2010 Census Tract 2302 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	3.9%	93.4%	0.1%	3.7%
2008–2012 Households Actual Proportion	7.3%	89.8%	0.0%	7.8%
2008–2012 Households Free Market	62.6%	22.1%	5.1%	32.9%
2008–2012 Households Difference	-55.3%	67.7%	-5.1%	-25.2%

Kashmere Gardens, located north of the Fifth Ward along Loop 610 (N. Loop E.), is an area of modest single family homes, many on large lots. Some areas are wooded. The eastern edge is made up of warehouses and light industry. The western edge is adjacent to a major rail yard and rail corridor. The Harris County public hospital, named for Lyndon B. Johnson, is located on Loop 610 east of Lockwood Drive. The number of residents fell slightly from 11,286 to 10,842 while the annual median household income barely budged from \$20,360 to \$21,492 in 2012, even more below the city's median in 2012 than in 2000.



Kashmere Gardens has long been consolidated into the city's Black enclaves. The actual proportions of African American households *exceeds* the proportions expected in a free market absent housing discrimination by 20 to 73 percentage points. The actual proportions of Caucasian households are from 17 to nearly 60 percentage points *lower* than would be expected without discrimination in play. These concentrations likely reflect past and present housing discrimination.

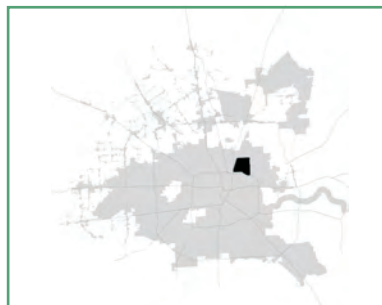
The actual proportion of Latino households was notably less than would be expected in a free market without discrimination in all but one census tract.

Recommended Actions: The City of Houston should work to expand the housing choices of Latino and African American residents of Kashmere Gardens to include areas that are not within the city's Hispanic or Black enclaves and expand the housing choices of Caucasians, Latinos, and Asians to include Kashmere Gardens.

Table 28: Trinity/Houston Gardens

Super Neighborhood 48: Trinity/Houston Gardens				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	5.8%	88.1%	0.1%	9.2%
2008–2012 Households Actual Proportion	13.6%	82.7%	0.0%	14.8%
2008–2012 Households Free Market	61.4%	23.3%	5.1%	32.7%
2008–2012 Households Difference	-47.8%	59.4%	-5.1%	-17.9%
2010 Census Tract 2301				
Householders (2000 Census)	3.1%	93.6%	0.2%	4.5%
2008–2012 Households Actual Proportion	2.3%	96.5%	0.0%	2.3%
2008–2012 Households Free Market	61.6%	23.2%	5.3%	31.3%
2008–2012 Households Difference	-59.4%	73.4%	-5.3%	-29.1%
2010 Census Tract 2302				
Householders (2000 Census)	3.9%	93.4%	0.1%	3.7%
2008–2012 Households Actual Proportion	7.3%	89.8%	0.0%	7.8%
2008–2012 Households Free Market	62.6%	22.1%	5.1%	32.9%
2008–2012 Households Difference	-55.3%	67.7%	-5.1%	-25.2%
2010 Census Tract 2303				
Householders (2000 Census)	3.2%	92.5%	0.2%	5.9%
2008–2012 Households Actual Proportion	16.7%	83.3%	0.0%	11.2%
2008–2012 Households Free Market	59.6%	25.0%	5.0%	33.0%
2008–2012 Households Difference	-42.9%	58.3%	-5.0%	-21.8%
2010 Census Tract 2304				
Householders (2000 Census)	11.4%	73.8%	0.0%	24.3%
2008–2012 Households Actual Proportion	26.6%	64.9%	0.0%	30.1%
2008–2012 Households Free Market	61.7%	22.8%	4.9%	33.9%
2008–2012 Households Difference	-35.1%	42.1%	-4.9%	-3.8%
2010 Census Tract 2306				
Householders (2000 Census)	9.7%	79.7%	0.1%	16.7%
2008–2012 Households Actual Proportion	16.1%	79.0%	0.0%	18.3%
2008–2012 Households Free Market	60.3%	24.4%	5.0%	32.9%
2008–2012 Households Difference	-44.2%	54.6%	-5.0%	-14.5%
2010 Census Tract 2308				
Householders (2000 Census)	5.4%	90.1%	0.1%	6.9%
2008–2012 Households Actual Proportion	15.4%	82.1%	0.0%	17.5%
2008–2012 Households Free Market	62.9%	21.7%	5.2%	32.8%
2008–2012 Households Difference	-47.5%	60.3%	-5.2%	-15.3%
2010 Census Tract 2309				
Householders (2000 Census)	3.6%	92.8%	0.1%	3.9%
2008–2012 Households Actual Proportion	12.0%	84.1%	0.0%	15.3%
2008–2012 Households Free Market	59.9%	25.0%	5.2%	31.4%
2008–2012 Households Difference	-47.8%	59.1%	-5.2%	-16.1%

Trinity/Houston Gardens takes its name from two communities: Trinity Gardens and Houston Gardens. Originally developed as communities just outside the city, each had oversized single-family home sites, allowing residents to have their own gardens. Now, home types vary widely, although most are single family and, generally, affordable. Density remains low. Railroad tracks trisect the neighborhood and are a dominant feature. Some of the inexpensive land has been converted to industrial uses, especially on the community's eastern edge. The number of residents barely budged, from 18,054 to 18,110 in 2012. The annual median household income — \$20,044 in 2000 and \$25,409 in 2012 — remained well below city medians.



Trinity/Houston Gardens is another low-income super neighborhood consolidated into the city's African American enclave. All census tracts exhibit the characteristics of racial segregation: the proportions of Black households range from 73 to nearly 94 percent with the proportions of Caucasians in single digits in all but one census tract.

The gaps between the actual proportions of African American households and the proportions expected in a free market without housing discrimination range from 42 to 73 percentage points while the gaps among white households range between 35 and 59 percentage points.

In five of the seven tracts, the gaps in the proportions of Hispanic households range from 15 to 29 percentage points.

There are some signs of a slight reduction in concentrations since 2000 with the actual percentages of African American households declining in all but one tract and the actual percentages of white and Latino households increasing in all but one census tract.

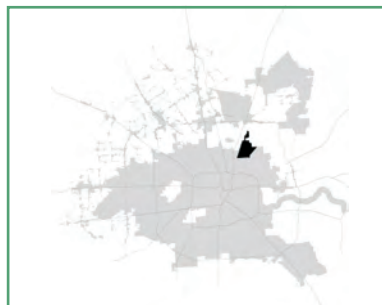
Recommended Actions: Testing is warranted to identify any real estate industry practices that continue to maintain segregation in Trinity/Houston Gardens.

The City of Houston needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and that whites, Hispanics, and Asians will consider housing throughout this super neighborhood.

Table 29: East Little York/Homestead

Super Neighborhood 47: East Little York/Homestead				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	18.1%	72.3%	0.6%	14.4%
2008–2012 Households Actual Proportion	19.3%	75.4%	0.0%	20.2%
2008–2012 Households Free Market	63.1%	21.6%	5.3%	32.2%
2008–2012 Households Difference	-43.8%	53.8%	-5.3%	-12.0%
2010 Census Tract 2307				
Householders (2000 Census)	8.1%	87.0%	0.1%	9.3%
2008–2012 Households Actual Proportion	8.7%	88.0%	0.0%	11.0%
2008–2012 Households Free Market	60.2%	24.8%	5.2%	31.5%
2008–2012 Households Difference	-51.5%	63.3%	-5.2%	-20.5%
2010 Census Tract 2314				
Householders (2000 Census)	0.2%	98.7%	0.1%	0.1%
2008–2012 Households Actual Proportion	1.5%	97.1%	0.0%	2.6%
2008–2012 Households Free Market	64.2%	20.4%	5.3%	32.9%
2008–2012 Households Difference	-62.8%	76.7%	-5.3%	-30.3%
2010 Census Tract 2315				
Householders (2000 Census)	1.2%	97.5%	0.0%	1.7%
2008–2012 Households Actual Proportion	5.3%	93.1%	0.0%	7.2%
2008–2012 Households Free Market	60.8%	23.9%	5.4%	31.5%
2008–2012 Households Difference	-55.5%	69.2%	-5.4%	-24.3%
2010 Census Tract 2316				
Householders (2000 Census)	6.2%	91.8%	0.0%	5.4%
2008–2012 Households Actual Proportion	5.2%	91.8%	0.0%	7.8%
2008–2012 Households Free Market	63.3%	21.2%	5.2%	32.7%
2008–2012 Households Difference	-58.1%	70.6%	-5.2%	-24.9%
2010 Census Tract 2318				
Householders (2000 Census)	27.4%	51.7%	0.0%	35.7%
2008–2012 Households Actual Proportion	45.0%	47.7%	0.0%	43.0%
2008–2012 Households Free Market	62.3%	22.3%	5.2%	32.7%
2008–2012 Households Difference	-17.3%	25.4%	-5.2%	10.3%
2010 Census Tract 2319				
Householders (2000 Census)	12.4%	79.8%	0.5%	11.0%
2008–2012 Households Actual Proportion	24.6%	73.3%	0.0%	20.0%
2008–2012 Households Free Market	64.2%	20.6%	5.3%	32.0%
2008–2012 Households Difference	-39.6%	52.7%	-5.3%	-12.1%
2010 Census Tract 2320 (Tract consists of parts of 2000 tract 2320 and 2502. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	39.6%	42.3%	1.5%	25.3%
2008–2012 Households Actual Proportion	35.5%	47.6%	0.0%	44.9%
2008–2012 Households Free Market	64.8%	19.9%	5.4%	31.9%
2008–2012 Households Difference	-29.3%	27.7%	-5.4%	13.0%

East Little York/Homestead is named after the two major thoroughfares that divide the community into quarters. The neighborhoods included in this North Forest Independent School District community include Fontaine Place, Scenic Woods, Northwood Manor, and the recently annexed Riverwoods Estates. These wooded subdivisions consist of modest single family homes built in the 1950s and 1960s. The newest subdivisions, like Riverwoods Estates have more recent construction and larger homes. There is very little in the way of commercial or industrial development, although a large landfill is located on the eastern edge of the community. The neighborhood lost over 11 percent of its population, going from 22,140 to 19,610 in 2012 while the annual median household income rose from \$28,495 to \$35,198, still well below city medians.



A part of the city's Black enclave, East Little York/Homestead exhibits the same demographic characteristics as Trinty/Houston Gardens immediately to its south. Tract 2319, at the northeast end of this super neighborhood, however, shows a reduction in its African American concentration since 2000, although the actual proportion of Black households is still nearly 53 percentage points greater than would be expected in the absence of present or historic housing discrimination.

Tracts 2307, 2314, 2315, and 2316 are extremely racially segregated with actual proportions of Black households that are 63.3, 76.7, 69.2, and 70.6 percentage points, respectively, greater than expected in a free market without discrimination.

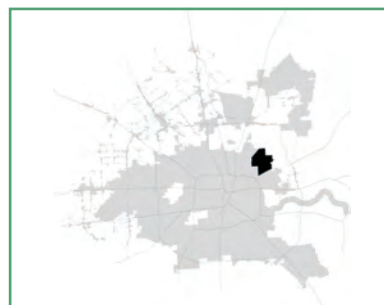
The proportions of Hispanic households has increased throughout this super neighborhood, but still remain significantly below what would be expected in four of the seven census tracts.

Recommended Actions: To affirmatively further fair housing in the East Little York/Homestead super neighborhood, the City of Houston needs to expand the housing choices of African Americans to look at housing outside the city's Black concentrations and those of whites, Hispanics, and Asians to consider housing in super neighborhoods like East Little York/Homestead. It will take many generations to effect significant change in an area this segregated.

Table 30: East Houston

Super Neighborhood 49: East Houston				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	14.9%	73.9%	0.2%	16.7%
2008–2012 Households Actual Proportion	20.3%	71.0%	0.2%	24.2%
2008–2012 Households Free Market	62.1%	22.5%	5.2%	32.7%
2008–2012 Households Difference	-41.8%	48.5%	-4.9%	-8.5%
2010 Census Tract 2310				
Householders (2000 Census)	12.1%	78.2%	0.1%	14.1%
2008–2012 Households Actual Proportion	22.6%	72.4%	0.0%	24.0%
2008–2012 Households Free Market	63.0%	21.5%	5.0%	33.9%
2008–2012 Households Difference	-40.4%	50.9%	-5.0%	-9.9%
2010 Census Tract 2311				
Householders (2000 Census)	33.6%	45.7%	0.4%	32.2%
2008–2012 Households Actual Proportion	43.7%	46.8%	0.0%	44.3%
2008–2012 Households Free Market	62.4%	22.2%	5.3%	32.5%
2008–2012 Households Difference	-18.7%	24.6%	-5.3%	11.8%
2010 Census Tract 2312				
Householders (2000 Census)	7.6%	82.9%	0.3%	12.9%
2008–2012 Households Actual Proportion	13.8%	76.6%	0.7%	21.9%
2008–2012 Households Free Market	61.2%	23.5%	5.2%	32.3%
2008–2012 Households Difference	-47.4%	53.1%	-4.5%	-10.5%
2010 Census Tract 2313				
Householders (2000 Census)	7.5%	87.8%	0.0%	7.6%
2008–2012 Households Actual Proportion	7.9%	82.1%	0.0%	11.2%
2008–2012 Households Free Market	62.4%	22.2%	5.2%	32.5%
2008–2012 Households Difference	-54.5%	59.9%	-5.2%	-21.3%

East Houston is a collection of neighborhoods in the northeastern part of the city. The name is taken from an old subdivision located just off what was then the highway to Beaumont; most of that old town site remains undeveloped. The community is made up largely of single family homes in standard suburban tract subdivisions. The area remains generally wooded, especially close to Halls Bayou, where a City of Houston golf course, Brock Park, is found. A major industrial park, Railwood, is located in the southeast corner of the community adjacent to a major land fill. There was a slight population increase from 19,744 to 20,537 in 2012 while the annual median household income of \$25,924 in 2000 and \$32,078 in 2012 remained well below the city's medians.



Like the two previous super neighborhoods, East Houston is part of the city's African American concentration. However, the intensity of the concentration of Black households has fallen a bit in three of the four census tracts while the percentages of Caucasians and Latinos have increased in all four tracts.

There still remain large differences between the actual proportions of African American and white households and the proportions expected in a free housing market without historic or present discrimination.

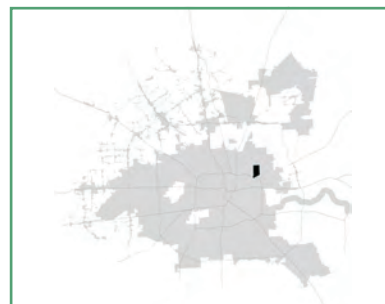
The concentrations are significantly less intense in tract 2311, although still reflective of possible housing discrimination.

Recommended Actions: The City of Houston needs to implement the recommendations of this study to prevent tract 2311 from becoming as segregated as the rest of East Houston, including promoting a wider range of housing choices for African American residents of East Houston outside the city's Black enclaves and for Caucasian, Asian, and Hispanic households to include East Houston in their housing choices.

Table 31: Settegast

Super Neighborhood 50: Settegast				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	3.6%	92.8%	0.1%	3.9%
2008–2012 Households Actual Proportion	12.0%	84.1%	0.0%	15.3%
2008–2012 Households Free Market	59.9%	25.0%	5.2%	31.4%
2008–2012 Households Difference	-47.8%	59.1%	-5.2%	-16.1%
2010 Census Tract 2309				
Householders (2000 Census)	3.6%	92.8%	0.1%	3.9%
2008–2012 Households Actual Proportion	12.0%	84.1%	0.0%	15.3%
2008–2012 Households Free Market	59.9%	25.0%	5.2%	31.4%
2008–2012 Households Difference	-47.8%	59.1%	-5.2%	-16.1%

Settegast was originally an inexpensive location for African American Houstonians seeking housing in northeast Houston. Currently, small wood frame homes are interspersed with many empty lots and very few commercial or industrial uses. It is bordered on the west by a very large railroad switching yard, and on the south by Loop 610 and the old Beaumont highway. The community had its own high school when the Northeast Houston Independent School District (now North Forest Independent School District) was segregated. In the northeast corner of the community is the large campus of the Old Lakewood Church. Population fell by nearly one-fourth, from 4,352 to 3,300 in 2012. The annual median household income rose slightly from \$16,906 to \$20,989 in 2012, more than \$20,000 below the city’s medians in both years.



Settegast has the same Black and Caucasian demographic characteristics as the super neighborhoods to its north and west but with an Hispanic population lower than would be expected in a free housing market.

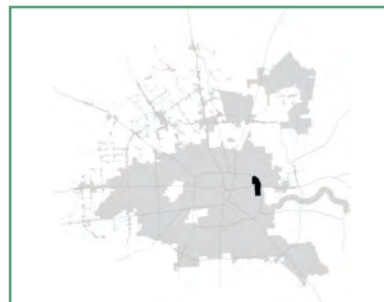
Since 2000, Settegast has become a bit more diverse with the percentages of African Americans declining slightly and the percentages of whites and Latinos growing.

Recommended Actions: By implementing the recommendations of this study to expand housing choice, the City of Houston can facilitate greater diversity in Settegast.

Table 32: Pleasantville Area

Super Neighborhood 57: Pleasantville Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	26.5%	55.5%	0.1%	40.0%
2008–2012 Households Actual Proportion	42.2%	50.7%	0.5%	45.5%
2008–2012 Households Free Market	61.6%	23.0%	5.1%	32.8%
2008–2012 Households Difference	-19.4%	27.7%	-4.6%	12.6%
2010 Census Tract 2124 (Tract consists of parts of 2000 tracts 2118 and 2120)				
Householders (2000 Census)	57.3%	9.7%	0.4%	82.4%
2008–2012 Households Actual Proportion	74.5%	12.8%	1.2%	79.0%
2008–2012 Households Free Market	62.5%	22.2%	5.2%	32.5%
2008–2012 Households Difference	12.0%	-9.4%	-4.0%	46.5%
2010 Census Tract 2125 (Tract consists of parts of 2000 tracts 2121 and 2122)				
Householders (2000 Census)	6.8%	84.8%	0.0%	12.8%
2008–2012 Households Actual Proportion	20.5%	76.1%	0.0%	23.0%
2008–2012 Households Free Market	61.0%	23.5%	5.1%	33.0%
2008–2012 Households Difference	-40.5%	52.6%	-5.1%	-10.1%

The Pleasantville Area includes many industrial areas, as well as two distinct residential areas. Groveland Terrace is a small residential area in the north and south of Interstate 10 (East Freeway) is the Pleasantville subdivision. Pleasantville was developed after World War II and is predominantly African American. The high homeownership rate and strong neighborhood identity has staved off deterioration even as the residential area has been surrounded by warehouses and industries. The number of residents in this sparsely populated neighborhood barely grew from 3,564 to 3,679 in 2012 while the annual median household income remained stagnant at \$28,218, barely up from \$27,138 in 2000.



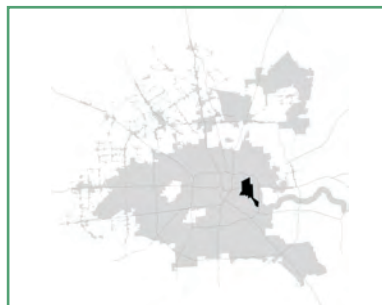
North of highway U.S. 10, census tract 2124 is part of the west end of a concentration of Hispanic households that is considerably more intense than would be expected absent housing discrimination. In census tract 2125, south of the highway, the gaps between the actual proportions of white and African American households and the proportions anticipated in a free housing market are huge. However, during this time, the tract has become more diverse except for the nearly complete absence of Asian households.

Recommended Actions: By implementing the recommendations of this study to expand housing choice, Houston can facilitate greater diversity in Pleasantville.

Table 33: Denver Harbor/Port Houston

Super Neighborhood 56: Denver Harbor/Port Houston				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	45.4%	26.4%	0.2%	67.5%
2008–2012 Households Actual Proportion	62.6%	23.5%	0.2%	72.3%
2008–2012 Households Free Market	62.1%	22.5%	5.2%	32.6%
2008–2012 Households Difference	0.4%	1.0%	-5.0%	39.7%
2010 Census Tract 2115				
Householders (2000 Census)	53.8%	8.2%	0.1%	83.4%
2008–2012 Households Actual Proportion	73.2%	8.6%	0.0%	90.4%
2008–2012 Households Free Market	63.1%	21.7%	5.3%	31.7%
2008–2012 Households Difference	10.1%	-13.1%	-5.3%	58.7%
2010 Census Tract 2116				
Householders (2000 Census)	54.2%	25.4%	0.4%	69.2%
2008–2012 Households Actual Proportion	63.7%	20.2%	0.0%	69.3%
2008–2012 Households Free Market	62.6%	22.0%	5.1%	32.8%
2008–2012 Households Difference	1.1%	-1.8%	-5.1%	36.5%
2010 Census Tract 2119				
Householders (2000 Census)	61.3%	0.5%	0.4%	93.1%
2008–2012 Households Actual Proportion	81.7%	0.0%	0.0%	95.4%
2008–2012 Households Free Market	61.4%	23.1%	5.1%	33.3%
2008–2012 Households Difference	20.3%	-23.1%	-5.1%	62.1%
2010 Census Tract 2124 (Tract consists of parts of 2000 tracts 2118 and 2120)				
Householders (2000 Census)	57.3%	9.7%	0.4%	82.4%
2008–2012 Households Actual Proportion	74.5%	12.8%	1.2%	79.0%
2008–2012 Households Free Market	62.5%	22.2%	5.2%	32.5%
2008–2012 Households Difference	12.0%	-9.4%	-4.0%	46.5%
2010 Census Tract 2125 (Tract consists of parts of 2000 tracts 2121 and 2122)				
Householders (2000 Census)	6.8%	84.8%	0.0%	12.8%
2008–2012 Households Actual Proportion	20.5%	76.1%	0.0%	23.0%
2008–2012 Households Free Market	61.0%	23.5%	5.1%	33.0%
2008–2012 Households Difference	-40.5%	52.6%	-5.1%	-10.1%

Denver Harbor/Port Houston consists of two distinct but similar neighborhoods located north of the Houston Ship Channel turning basin. The southern portion of the area along Clinton Drive is industrial. The smaller residential area, Port Houston, is laid out on both sides of McCarty Street. It has a mix of residential, commercial and industrial uses. Denver Harbor is primarily residential. Lyons Avenue is the major commercial corridor in Denver Harbor. Although Interstate Highway 10 splits Denver Harbor physically, its identity has remained strong. Both neighborhoods, originally blue collar Anglo neighborhoods, are now predominantly Hispanic. The population declined from 19,684 to 17,725 in 2012. Annual median household income barely grew from \$29,846 to \$31,734 in 2012, both well below the city's medians.



All but one census tract in Denver Harbor/Port Houston sits within an intense concentration of Latino households that extends eastward through the Pleasantville Area, El Dorado/Oates Prairie, Northshore super neighborhoods and beyond. In four of the five census tracts, the actual proportions of Hispanic households range from 36 to 62 percentage points greater than would be expected in the absence of housing discrimination. The proportion of African American households in tract 2119 barely registers, a tract that was 95 percent Latino by the end of the decade.

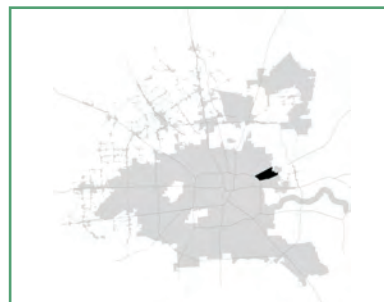
Tract 2125 which is shared with the Denver Harbor/Port Houston super neighborhood has a far larger African American population and much smaller Caucasian population than would be expected in a free housing market.

Recommended Actions: Testing should reveal any continuing illegal discriminatory real estate practices that contribute to the extreme concentrations of Latino households in Denver Harbor/Port Houston.

Table 34: El Dorado/Oates Prairie

Super Neighborhood 53: El Dorado/Oates Prairie				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	57.0%	9.3%	0.4%	62.1%
2008–2012 Households Actual Proportion	80.4%	4.4%	0.0%	75.6%
2008–2012 Households Free Market	65.1%	19.8%	5.5%	31.1%
2008–2012 Households Difference	15.3%	-15.4%	-5.5%	44.5%
2010 Census Tract 2325				
Householders (2000 Census)	57.0%	9.3%	0.4%	62.1%
2008–2012 Households Actual Proportion	80.4%	4.4%	0.0%	75.6%
2008–2012 Households Free Market	65.1%	19.8%	5.5%	31.1%
2008–2012 Households Difference	15.3%	-15.4%	-5.5%	44.5%

This super neighborhood includes El Dorado, Oates Prairie and OST (Old Spanish Trail) Acres. El Dorado/Oates Prairie is in northeast Houston outside of Loop 610 and consists of a collection of small subdivisions and scattered industrial facilities. Oates Prairie is a residential area begun when the area was rural and which developed further because of its proximity to jobs in Houston and the Channel industries. El Dorado is a typical tract home subdivision. OST Acres is a large-lot subdivision close to Loop 610. The excellent access the new freeway and existing thoroughfares provide makes this area desirable for further development of warehouse and industrial facilities on the remaining large tracts of undeveloped land. The population edged up from 2,759 to 3,686 in 2012 while the annual median household income increased from \$36,755 to \$41,198.



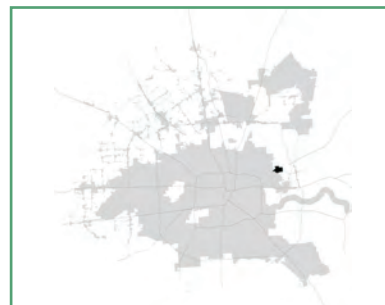
The actual proportion of Hispanics is more than 44 percentage points greater than what would be expected absent housing discrimination while the actual proportions of African Americans are lower and of whites higher than would be expected. The Latino concentration is less intense than in the super neighborhoods north and west of El Dorado/Oates Prairie.

Recommended Actions: Testing should reveal any illegal discriminatory real estate practices in El Dorato/Oates Prairie. Efforts are needed to expand the housing choices of Latinos beyond Hispanic enclaves like this to prevent El Dorato/Oates Prairie from becoming even less diverse than it is.

Table 35: Hunterwood

Super Neighborhood 54: Hunterwood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	40.6%	37.3%	3.3%	31.2%
2008–2012 Households Actual Proportion	60.6%	26.9%	2.1%	49.5%
2008–2012 Households Free Market	65.8%	19.2%	5.7%	30.4%
2008–2012 Households Difference	-5.2%	7.7%	-3.6%	19.1%
2010 Census Tract 2324.01 (Was Tract 2324 in 2000)				
Householders (2000 Census)	40.6%	37.3%	3.3%	31.2%
2008–2012 Households Actual Proportion	64.8%	21.4%	3.2%	44.7%
2008–2012 Households Free Market	66.9%	18.4%	5.9%	28.7%
2008–2012 Households Difference	-2.1%	3.0%	-2.7%	16.0%
2010 Census Tract 2324.03 (Was Tract 2324 in 2000) (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	40.6%	37.3%	3.3%	31.2%
2008–2012 Households Actual Proportion	53.3%	36.6%	0.0%	57.8%
2008–2012 Households Free Market	63.9%	20.7%	5.3%	33.3%
2008–2012 Households Difference	-10.6%	15.9%	-5.3%	24.5%

Hunterwood is a residential subdivision located east of Greens Bayou adjacent to a major Reliant power station. Development began in the mid-1970s, but in the 1980s property values fell along with the general real estate market. The high tax rate of the former Hunterwood Municipal Utility District prevented a revival of the market in Hunterwood during the 1990s. The population nudged up from 2,702 to 2,834 in 2012 with the annual median household income of \$32,636 in 2000 and \$42,479 in 2012 remaining below the city's medians.



While the actual proportions of Hispanics were 16 and 24 percent greater than would be expected in the absence of housing discrimination, the concentrations were less intense than in super neighborhoods toward the city's central core. The southeast corner of Hunterwood is in census tract 2324.03 where the actual proportion of African Americans was nearly 16 percentage points greater than would be expected while the percentages of white and Hispanic households increased rather significantly since 2000.

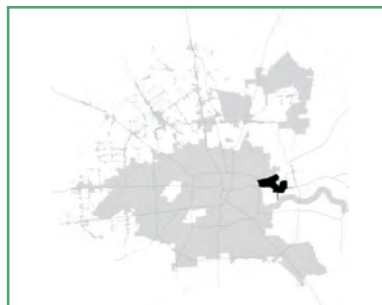
Nearby Census Tracts Not Assigned to Any Super Neighborhood. Close by census tracts not in super neighborhoods located east (2324.02) and south (2328, 2329, 2330.01) of census tract 2324.01 exhibit similar demographic characteristics.

Recommended Actions: Testing should reveal any illegal discriminatory real estate practices that may account for the large increase in the percentages of Caucasian households and large decreases in the percentages of African American households. The city needs to implement the recommendations of this study to foster diversity in Hunterwood and prevent further intensification of the existing concentrations of Latino households that would further reduce diversity in Hunterwood and nearby census tracts.

Table 36: Northshore

Super Neighborhood 58: Northshore				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	49.5%	25.1%	1.0%	47.9%
2008–2012 Households Actual Proportion	63.4%	16.0%	0.7%	64.4%
2008–2012 Households Free Market	64.1%	20.7%	5.4%	31.6%
2008–2012 Households Difference	-0.8%	-4.7%	-4.7%	32.7%
2010 Census Tract 2326				
Householders (2000 Census)	64.0%	11.3%	0.2%	47.9%
2008–2012 Households Actual Proportion	69.0%	8.0%	0.0%	65.9%
2008–2012 Households Free Market	67.9%	17.5%	6.0%	27.6%
2008–2012 Households Difference	1.0%	-9.6%	-6.0%	38.3%
2010 Census Tract 2327.01 (Was Tract 2327 in 2000)				
Householders (2000 Census)	36.8%	35.6%	1.3%	48.8%
2008–2012 Households Actual Proportion	50.3%	33.1%	0.9%	62.2%
2008–2012 Households Free Market	62.4%	22.3%	5.1%	32.8%
2008–2012 Households Difference	-12.1%	10.8%	-4.1%	29.4%
2010 Census Tract 2327.02 (Was Tract 2327 in 2000)				
Householders (2000 Census)	36.8%	35.6%	1.3%	48.8%
2008–2012 Households Actual Proportion	54.6%	23.6%	1.5%	63.4%
2008–2012 Households Free Market	63.0%	21.7%	5.1%	33.1%
2008–2012 Households Difference	-8.3%	1.9%	-3.6%	30.3%
2010 Census Tract 2332				
Householders (2000 Census)	81.6%	2.7%	0.4%	32.7%
2008–2012 Households Actual Proportion	74.9%	4.2%	0.6%	60.4%
2008–2012 Households Free Market	65.5%	19.4%	5.5%	31.0%
2008–2012 Households Difference	9.4%	-15.2%	-5.0%	29.3%
2010 Census Tract 2333				
Householders (2000 Census)	68.7%	4.7%	0.3%	63.5%
2008–2012 Households Actual Proportion	76.0%	0.0%	0.0%	73.3%
2008–2012 Households Free Market	63.8%	20.9%	5.4%	31.5%
2008–2012 Households Difference	12.2%	-20.9%	-5.4%	41.9%

Northshore is an area immediately north of the Houston Ship Channel, east of Loop 610. The community includes subdivisions such as Songwood, Holiday Forest, Wood Bayou, Cimarron, Home Owned Estates, Woodland Acres, Hidden Forest and Greens Bayou. Neighborhoods east of Greens Bayou and those south of Market Street are in Galena Park Independent School District. The balance of the area is in Houston Independent School District. This heavily wooded area includes a variety of home styles and prices. In the 1980s, the Brown Foundation donated a large tract of land that the Crosby Freeway (Highway 90) passes through. The number of residents barely changed from 27,350 in 2000 to 27,327 in 2012. The annual median household income shot up from \$33,899 to \$41,907 in 2012, still below the city's median.



South of the Hunterwood and El Dorado/Oates Prairie super neighborhoods, Northshore is consolidated into an extensive and intensifying Latino enclave that extends into census tracts to the east — 2331.01, 2331.02, 2331.03, 2522, 2524, 2526 — that are not in any super neighborhood. Like Northshore, all of these tracts have experienced substantial increases in the proportions of Hispanic households since 2000 while the proportions of African Americans have decreased or remained roughly the same. The Latino concentrations are more intense in Northshore and the tracts closest to it.

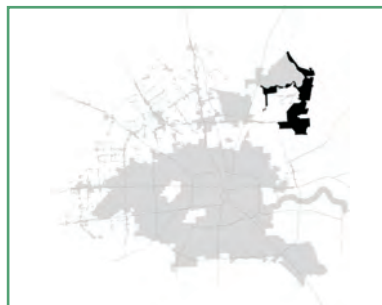
Actual proportions of the different groups were as expected in tract 2333.

Recommended Actions: Testing should help identify any illegal discriminatory real estate practices that are contributing to the growing concentration of Latino households in Northshore and nearby unassigned census tracts. Efforts are needed to expand the housing choices of Hispanic households to consider housing outside the growing Latino enclaves in Houston and for all other groups to include these enclaves among their housing choices.

Table 37: Lake Houston

Super Neighborhood 44: Lake Houston				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	88.7%	5.5%	1.9%	7.4%
2008–2012 Households Actual Proportion	82.8%	9.7%	1.8%	13.5%
2008–2012 Households Free Market	70.0%	16.0%	6.6%	24.2%
2008–2012 Households Difference	12.8%	-6.3%	-4.7%	-10.7%
2010 Census Tract 2507.01 (Was Tract 2507 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	84.9%	8.2%	2.3%	8.3%
2008–2012 Households Actual Proportion	78.9%	15.6%	2.8%	11.0%
2008–2012 Households Free Market	68.6%	17.2%	6.2%	26.0%
2008–2012 Households Difference	10.3%	-1.5%	-3.5%	-15.0%
2010 Census Tract 2516 (Tract consists of parts of 2000 tracts 2515 and 2516. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	95.0%	1.2%	2.0%	4.3%
2008–2012 Households Actual Proportion	95.4%	1.2%	0.0%	9.4%
2008–2012 Households Free Market	70.1%	15.8%	6.6%	24.1%
2008–2012 Households Difference	25.3%	-14.6%	-6.6%	-14.8%
2010 Census Tract 2517 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	94.6%	0.9%	0.4%	4.7%
2008–2012 Households Actual Proportion	93.8%	2.4%	0.0%	6.9%
2008–2012 Households Free Market	67.0%	18.3%	6.0%	28.2%
2008–2012 Households Difference	26.8%	-15.9%	-6.0%	-21.3%
2010 Census Tract 2519.01 (Was Tract 2519 in 2000)				
Householders (2000 Census)	97.4%	0.0%	0.0%	5.1%
2008–2012 Households Actual Proportion	86.8%	6.1%	1.6%	10.2%
2008–2012 Households Free Market	68.4%	17.2%	6.3%	26.4%
2008–2012 Households Difference	18.4%	-11.1%	-4.7%	-16.3%
2010 Census Tract 2520				
Householders (2000 Census)	83.4%	7.9%	2.3%	9.2%
2008–2012 Households Actual Proportion	69.4%	16.7%	3.9%	21.1%
2008–2012 Households Free Market	73.1%	13.6%	7.2%	19.8%
2008–2012 Households Difference	-3.7%	3.1%	-3.3%	1.3%
2010 Census Tract 2521 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	91.8%	1.7%	0.9%	7.7%
2008–2012 Households Actual Proportion	84.1%	10.2%	0.5%	19.8%
2008–2012 Households Free Market	69.2%	16.3%	6.2%	26.7%
2008–2012 Households Difference	14.9%	-6.1%	-5.7%	-6.9%

The Lake Houston super neighborhood is located adjacent to the east side of the City's primary water reservoir, Lake Houston. The majority of the population in this area resides in the Lakewood Heights, single-family subdivision. In 1965, the subdivisions immediately adjacent to the lake were annexed to the City and provided with City sewer services. Lake Houston includes a number of lakeside homes, which are part of the master-planned community of Atascosita. The area is within the Huffman Independent School District. Enjoying massive growth, Lake Houston's population skyrocketed from 4,164 to 16,046 in 2012. The annual median household income also soared, increasing from \$60,288 to \$101,512 in 2012.



This super neighborhood is separated from all but one super neighborhood by several census tracts not assigned to any super neighborhood. The census tracts in the Lake Houston super neighborhood are generally more in line with expectations than any of the other super neighborhoods in the city's northeast quadrant. However, the actual proportion of Latino households generally continues to be less than what would be expected in the absence of housing discrimination. With the exception of Asian households, this super neighborhood has become more diverse since 2000.

Recommended Actions: To affirmatively further fair housing in Lake Houston, the city needs to implement the recommendations proffered in this document to expand housing choices for Hispanic, African American, and Asian households to include Lake Houston in their housing choices.

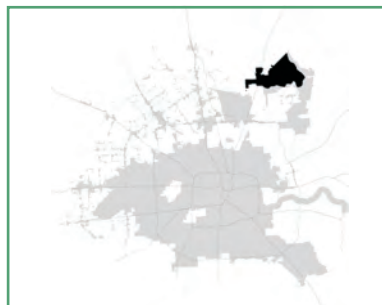
Table 38: Kingwood Area

Super Neighborhood 43: Kingwood Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	94.0%	1.7%	2.0%	5.4%
2008–2012 Households Actual Proportion	90.8%	3.1%	2.9%	8.7%
2008–2012 Households Free Market	72.1%	14.3%	6.9%	21.7%
2008–2012 Households Difference	18.7%	-11.2%	-4.0%	-13.0%
2010 Census Tract 2509				
Householders (2000 Census)	94.8%	1.3%	2.8%	2.4%
2008–2012 Households Actual Proportion	94.4%	2.1%	2.6%	2.7%
2008–2012 Households Free Market	75.4%	11.8%	7.3%	17.9%
2008–2012 Households Difference	19.0%	-9.7%	-4.8%	-15.3%
2010 Census Tract 2510				
Householders (2000 Census)	91.8%	2.3%	2.8%	5.7%
2008–2012 Households Actual Proportion	81.8%	3.2%	7.5%	7.0%
2008–2012 Households Free Market	71.1%	15.1%	6.4%	24.1%
2008–2012 Households Difference	10.7%	-11.8%	1.1%	-17.0%
2010 Census Tract 2511				
Householders (2000 Census)	94.8%	1.3%	1.6%	4.6%
2008–2012 Households Actual Proportion	93.1%	3.1%	1.8%	13.9%
2008–2012 Households Free Market	69.9%	16.0%	6.5%	24.9%
2008–2012 Households Difference	23.2%	-12.9%	-4.6%	-11.0%
2010 Census Tract 2512				
Householders (2000 Census)	93.8%	1.8%	1.7%	5.8%
2008–2012 Households Actual Proportion	89.2%	3.4%	4.7%	12.6%
2008–2012 Households Free Market	70.6%	15.5%	6.6%	23.8%
2008–2012 Households Difference	18.6%	-12.1%	-1.9%	-11.2%
2010 Census Tract 2513				
Householders (2000 Census)	94.8%	1.7%	1.4%	4.9%
2008–2012 Households Actual Proportion	92.7%	1.8%	2.2%	6.2%
2008–2012 Households Free Market	72.1%	14.4%	7.0%	21.2%
2008–2012 Households Difference	20.6%	-12.6%	-4.9%	-14.9%
2010 Census Tract 2514.01 (Was Tract 2514 in 2000)				
Householders (2000 Census)	92.9%	1.6%	2.1%	7.3%
2008–2012 Households Actual Proportion	95.7%	1.5%	1.8%	15.0%
2008–2012 Households Free Market	73.9%	12.9%	7.3%	19.0%
2008–2012 Households Difference	21.9%	-11.4%	-5.6%	-4.0%

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Super Neighborhood 43: Kingwood Area (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2514.02 (Was Tract 2514 in 2000)				
Householders (2000 Census)	92.9%	1.6%	2.1%	7.3%
2008–2012 Households Actual Proportion	91.8%	3.4%	0.0%	9.4%
2008–2012 Households Free Market	68.5%	17.1%	6.4%	26.1%
2008–2012 Households Difference	23.3%	-13.6%	-6.4%	-16.7%
2010 Census Tract 2515.01 (Was Tract 2515 in 2000)				
Householders (2000 Census)	94.7%	1.4%	2.3%	4.5%
2008–2012 Households Actual Proportion	86.1%	0.7%	8.1%	8.9%
2008–2012 Households Free Market	75.1%	12.0%	7.4%	18.0%
2008–2012 Households Difference	11.1%	-11.3%	0.6%	-9.0%
2010 Census Tract 2515.02 (Was Tract 2515 in 2000)				
Householders (2000 Census)	94.7%	1.4%	2.3%	4.5%
2008–2012 Households Actual Proportion	87.6%	6.5%	1.3%	8.7%
2008–2012 Households Free Market	73.2%	13.6%	7.1%	19.9%
2008–2012 Households Difference	14.5%	-7.1%	-5.8%	-11.2%
2010 Census Tract 2515.03 (Was Tract 2515 in 2000)				
Householders (2000 Census)	94.7%	1.4%	2.3%	4.5%
2008–2012 Households Actual Proportion	95.4%	0.0%	4.6%	5.2%
2008–2012 Households Free Market	71.4%	14.8%	6.8%	23.0%
2008–2012 Households Difference	24.1%	-14.8%	-2.3%	-17.7%
2010 Census Tract 6920.02 (Was Tract 6920 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	90.8%	4.5%	1.0%	7.5%
2008–2012 Households Actual Proportion	87.1%	7.1%	5.0%	9.2%
2008–2012 Households Free Market	74.3%	12.6%	7.3%	19.0%
2008–2012 Households Difference	12.8%	-5.5%	-2.3%	-9.8%
2010 Census Tract 6924 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	93.8%	1.1%	0.7%	7.6%
2008–2012 Households Actual Proportion	87.5%	3.5%	1.7%	13.1%
2008–2012 Households Free Market	65.1%	19.8%	5.5%	31.0%
2008–2012 Households Difference	22.4%	-16.3%	-3.8%	-17.9%

The Kingwood Area includes a number of small subdivisions which predate the master planned development for which it is known. The Kingwood master planned area includes a wide range of home types and prices in a heavily wooded setting. A commercial development at its entrance was annexed in 1995; the residential areas, along with the Forest Cove subdivision, were annexed in 1996. Most residents are located in the Humble Independent School District. The small portion of the area found in Montgomery County is in New Caney Independent School District. Home construction and commercial development continue, especially on the northeastern and southeastern edges of the community. The number of residents grew significantly from 52,899 to 60,728 in 2012 with the annual median household income (\$82,577 in 2000 and \$94,189 in 2012) continued to be more than twice the city's median.



Like the Lake Houston super neighborhood, the Kingwood Area is separated from other super neighborhoods by census tracts not assigned to any super neighborhood. Since at least 2000, very few Black households have lived in the Kingwood Area. With the exception of census tract 6924, the gaps between actual and expected proportions of African American households are generally just below the 15 percent-age point threshold. In seven of the 12 census tracts, the gaps between the actual and expected proportions of white households are greater than would be expected in a free housing market undistorted by housing discrimination.

The actual proportion of Latino households is significantly less than would be expected absent housing discrimination in five of the 12 census tracts. The gap is in double digits for all but two census tracts. However, the actual percentages of Hispanic households has increased incrementally throughout the Kingwood Area since 2000, suggesting positive movement here for Hispanics.

For reasons not yet known, relatively few of the city's wealthier Black, Latino, and Asian households live in the Kingwood Area.

The racial and Hispanic composition of census tract 6920.02 at the west end of the Kingwood Area are roughly what would be expected in a free market not distorted by housing discrimination.

Recommended Actions: The Kingwood Area offers a highly viable opportunity to affirmatively further fair housing. As a preventative measure, given the consistently lower-than-expected proportions of African American, Hispanic, and Asian households and that the actual low percentages of Black households have barely budged since 2000, this super neighborhood should be tested to see whether housing discrimination is taking place so, if present, it can be nipped in the bud.

The city needs to help wealthier African American, Hispanic, and Asian households become aware of housing opportunities in the Kingwood Area.

The city has not assigned the census tracts in the table below to any super neighborhood. Each was reported on earlier in this section along with the super neighborhood that is closest to it.

Table 39: Northeast Quadrant Census Tracts Not in a Super Neighborhood

Northeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2218				
Householders (2000 Census)	69.3%	1.0%	0.4%	67.6%
2008–2012 Households Actual Proportion	77.4%	2.9%	0.0%	87.9%
2008–2012 Households Free Market	62.5%	21.8%	4.9%	34.5%
2008–2012 Households Difference	14.9%	-18.9%	-4.9%	53.4%
2010 Census Tract 2219				
Householders (2000 Census)	65.9%	3.6%	0.3%	67.2%
2008–2012 Households Actual Proportion	77.0%	3.1%	0.0%	85.7%
2008–2012 Households Free Market	61.4%	23.1%	4.9%	34.4%
2008–2012 Households Difference	15.6%	-20.0%	-4.9%	51.3%
2010 Census Tract 2221				
Householders (2000 Census)	64.0%	3.0%	0.5%	70.4%
2008–2012 Households Actual Proportion	71.7%	0.7%	0.0%	74.6%
2008–2012 Households Free Market	64.3%	20.6%	5.4%	31.3%
2008–2012 Households Difference	7.4%	-19.8%	-5.4%	43.3%
2010 Census Tract 2223				
Householders (2000 Census)	62.8%	7.2%	2.5%	55.4%
2008–2012 Households Actual Proportion	71.3%	2.6%	0.6%	77.8%
2008–2012 Households Free Market	63.6%	21.0%	5.3%	32.6%
2008–2012 Households Difference	7.7%	-18.4%	-4.7%	45.2%
2010 Census Tract 2224.02 (Was Tract 2224 in 2000)				
Householders (2000 Census)	65.6%	7.0%	2.8%	47.5%
2008–2012 Households Actual Proportion	85.0%	8.4%	0.0%	79.3%
2008–2012 Households Free Market	63.8%	21.1%	5.3%	31.6%
2008–2012 Households Difference	21.3%	-12.7%	-5.3%	47.7%
2010 Census Tract 2229 (Tract consists of parts of 2000 tracts 2228 and 2229)				
Householders (2000 Census)	58.4%	0.5%	1.2%	50.5%
2008–2012 Households Actual Proportion	66.1%	10.3%	1.5%	74.7%
2008–2012 Households Free Market	65.0%	19.8%	5.5%	31.3%
2008–2012 Households Difference	1.0%	-9.6%	-3.9%	43.4%

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Northeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2323.01 (Was Tract 2323 in 2000)				
Householders (2000 Census)	49.5%	34.3%	0.5%	24.4%
2008–2012 Households Actual Proportion	53.8%	27.0%	0.7%	50.2%
2008–2012 Households Free Market	63.9%	20.8%	5.4%	32.0%
2008–2012 Households Difference	-10.1%	6.2%	-4.7%	18.2%
2010 Census Tract 2324.02 (Was Tract 2324 in 2000)				
Householders (2000 Census)	29.2%	47.0%	1.4%	40.7%
2008–2012 Households Actual Proportion	29.2%	47.4%	5.3%	40.4%
2008–2012 Households Free Market	63.8%	20.9%	5.4%	32.0%
2008–2012 Households Difference	-34.6%	26.5%	-0.1%	8.4%
2010 Census Tract 2328				
Householders (2000 Census)	38.2%	39.5%	3.9%	26.3%
2008–2012 Households Actual Proportion	32.9%	45.5%	0.8%	40.4%
2008–2012 Households Free Market	64.3%	20.5%	5.5%	31.5%
2008–2012 Households Difference	-31.3%	25.0%	-4.7%	8.8%
2010 Census Tract 2329				
Householders (2000 Census)	43.7%	39.8%	3.9%	19.3%
2008–2012 Households Actual Proportion	36.3%	46.3%	4.7%	21.1%
2008–2012 Households Free Market	65.8%	19.2%	5.7%	29.8%
2008–2012 Households Difference	-29.5%	27.1%	-1.0%	-8.7%
2010 Census Tract 2330.01 (Was Tract 2330 in 2000)				
Householders (2000 Census)	59.1%	30.8%	2.0%	16.2%
2008–2012 Households Actual Proportion	41.8%	36.8%	1.6%	30.8%
2008–2012 Households Free Market	64.8%	19.9%	5.3%	32.2%
2008–2012 Households Difference	-23.0%	16.9%	-3.7%	-1.4%
2010 Census Tract 2330.03 (Was Tract 2330 in 2000)				
Householders (2000 Census)	59.1%	30.8%	2.0%	16.2%
2008–2012 Households Actual Proportion	71.5%	18.2%	0.0%	24.3%
2008–2012 Households Free Market	67.7%	17.7%	6.0%	28.0%
2008–2012 Households Difference	3.8%	0.5%	-6.0%	-3.7%
2010 Census Tract 2331.01 (Was Tract 2331 in 2000)				
Householders (2000 Census)	74.0%	4.9%	0.8%	39.8%
2008–2012 Households Actual Proportion	78.2%	6.8%	1.2%	70.3%
2008–2012 Households Free Market	63.5%	21.1%	5.3%	32.8%
2008–2012 Households Difference	14.7%	-14.3%	-4.1%	37.6%

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Northeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2331.02 (Was Tract 2331 in 2000)				
Householders (2000 Census)	74.0%	4.9%	0.8%	39.8%
2008–2012 Households Actual Proportion	69.6%	0.4%	0.0%	79.9%
2008–2012 Households Free Market	62.5%	22.0%	5.2%	33.0%
2008–2012 Households Difference	7.1%	-21.7%	-5.2%	47.0%
2010 Census Tract 2331.03 (Was Tract 2331 in 2000)				
Householders (2000 Census)	74.0%	4.9%	0.8%	39.8%
2008–2012 Households Actual Proportion	75.7%	4.5%	0.0%	81.6%
2008–2012 Households Free Market	62.0%	22.5%	5.1%	33.6%
2008–2012 Households Difference	13.8%	-18.0%	-5.1%	48.0%
2010 Census Tract 2404				
Householders (2000 Census)	65.7%	20.0%	1.8%	21.5%
2008–2012 Households Actual Proportion	62.7%	24.4%	2.2%	39.8%
2008–2012 Households Free Market	65.7%	19.4%	5.7%	30.0%
2008–2012 Households Difference	-3.0%	5.0%	-3.4%	9.8%
2010 Census Tract 2407.01 (Was Tract 2407 in 2000)				
Householders (2000 Census)	63.7%	18.5%	6.6%	21.3%
2008–2012 Households Actual Proportion	37.8%	47.2%	3.6%	38.3%
2008–2012 Households Free Market	67.5%	17.8%	6.0%	28.2%
2008–2012 Households Difference	-29.6%	29.4%	-2.4%	10.2%
2010 Census Tract 2407.02 (Was Tract 2407 in 2000)				
Householders (2000 Census)	63.7%	18.5%	6.6%	21.3%
2008–2012 Households Actual Proportion	44.7%	33.1%	2.6%	50.4%
2008–2012 Households Free Market	66.4%	18.6%	5.7%	30.0%
2008–2012 Households Difference	-21.8%	14.5%	-3.1%	20.4%
2010 Census Tract 2408.01 (Was Tract 2408 in 2000)				
Householders (2000 Census)	72.4%	15.0%	2.4%	19.1%
2008–2012 Households Actual Proportion	56.9%	22.4%	3.2%	43.1%
2008–2012 Households Free Market	62.5%	21.9%	5.0%	34.1%
2008–2012 Households Difference	-5.7%	0.5%	-1.8%	9.1%
2010 Census Tract 2408.02 (Was Tract 2408 in 2000)				
Householders (2000 Census)	72.4%	15.0%	2.4%	19.1%
2008–2012 Households Actual Proportion	53.7%	33.6%	0.6%	27.4%
2008–2012 Households Free Market	65.5%	19.6%	5.5%	30.4%
2008–2012 Households Difference	-11.8%	14.0%	-4.9%	-3.0%

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Northeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2409.02 (Was Tract 2409 in 2000)				
Householders (2000 Census)	71.3%	17.8%	2.6%	15.0%
2008–2012 Households Actual Proportion	53.0%	33.4%	2.5%	29.7%
2008–2012 Households Free Market	66.9%	18.4%	6.1%	27.6%
2008–2012 Households Difference	-14.0%	14.9%	-3.6%	2.2%
2010 Census Tract 2413				
Householders (2000 Census)	87.2%	9.0%	1.3%	6.2%
2008–2012 Households Actual Proportion	70.4%	22.6%	5.4%	13.4%
2008–2012 Households Free Market	70.2%	15.8%	6.6%	24.2%
2008–2012 Households Difference	0.2%	6.7%	-1.1%	-10.8%
2010 Census Tract 2503.01 (Was Tract 2503 in 2000)				
Householders (2000 Census)	73.2%	17.0%	1.3%	13.8%
2008–2012 Households Actual Proportion	36.8%	45.2%	1.1%	27.9%
2008–2012 Households Free Market	68.1%	17.3%	6.1%	27.6%
2008–2012 Households Difference	-31.4%	27.9%	-5.0%	0.3%
2010 Census Tract 2504.01 (Was Tract 2504 in 2000)				
Householders (2000 Census)	95.8%	0.0%	4.2%	2.1%
2008–2012 Households Actual Proportion	77.2%	14.5%	3.4%	23.2%
2008–2012 Households Free Market	71.6%	14.6%	6.8%	22.7%
2008–2012 Households Difference	5.5%	-0.1%	-3.4%	0.6%
2010 Census Tract 2504.02 (Was Tract 2504 in 2000)				
Householders (2000 Census)	95.8%	0.0%	4.2%	2.1%
2008–2012 Households Actual Proportion	75.1%	18.3%	3.1%	8.7%
2008–2012 Households Free Market	71.1%	15.1%	6.8%	22.8%
2008–2012 Households Difference	4.0%	3.2%	-3.7%	-14.1%
2010 Census Tract 2505				
Householders (2000 Census)	80.6%	10.5%	3.1%	9.2%
2008–2012 Households Actual Proportion	67.4%	20.8%	4.0%	14.9%
2008–2012 Households Free Market	68.0%	17.4%	6.2%	27.2%
2008–2012 Households Difference	-0.6%	3.4%	-2.2%	-12.3%
2010 Census Tract 2506				
Householders (2000 Census)	72.7%	14.7%	2.1%	19.3%
2008–2012 Households Actual Proportion	59.8%	26.1%	3.4%	26.2%
2008–2012 Households Free Market	64.2%	20.5%	5.3%	32.3%
2008–2012 Households Difference	-4.3%	5.5%	-1.8%	-6.1%

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Northeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2507.02 (Was Tract 2507 in 2000)				
Householders (2000 Census)	84.9%	8.2%	2.3%	8.3%
2008–2012 Households Actual Proportion	87.2%	6.6%	1.1%	11.2%
2008–2012 Households Free Market	71.5%	14.8%	7.0%	21.7%
2008–2012 Households Difference	15.7%	-8.3%	-5.9%	-10.5%
2010 Census Tract 2508				
Householders (2000 Census)	93.4%	0.0%	4.7%	0.9%
2008–2012 Households Actual Proportion	91.4%	4.1%	3.0%	7.8%
2008–2012 Households Free Market	72.9%	13.8%	7.1%	20.2%
2008–2012 Households Difference	18.5%	-9.7%	-4.1%	-12.4%
2010 Census Tract 2519.02 (Tract consists of parts of 2000 tracts 2519 and 2520)				
Householders (2000 Census)	89.2%	6.2%	0.6%	5.0%
2008–2012 Households Actual Proportion	80.4%	13.9%	0.0%	14.9%
2008–2012 Households Free Market	70.7%	15.5%	7.0%	22.0%
2008–2012 Households Difference	9.7%	-1.6%	-7.0%	-7.1%
2010 Census Tract 2522				
Householders (2000 Census)	84.9%	2.5%	1.2%	20.5%
2008–2012 Households Actual Proportion	64.4%	20.4%	3.4%	47.2%
2008–2012 Households Free Market	65.9%	19.2%	5.8%	29.1%
2008–2012 Households Difference	-1.5%	1.1%	-2.4%	18.1%
2010 Census Tract 2524				
Householders (2000 Census)	82.5%	2.1%	0.6%	24.4%
2008–2012 Households Actual Proportion	83.6%	1.5%	0.0%	45.5%
2008–2012 Households Free Market	66.2%	18.9%	5.7%	29.7%
2008–2012 Households Difference	17.4%	-17.4%	-5.7%	15.7%
2010 Census Tract 2526				
Householders (2000 Census)	81.9%	0.6%	0.4%	25.7%
2008–2012 Households Actual Proportion	70.6%	1.1%	1.8%	50.5%
2008–2012 Households Free Market	63.1%	21.8%	5.4%	31.0%
2008–2012 Households Difference	7.6%	-20.7%	-3.6%	19.5%
2010 Census Tract 6923 (Montgomery County)				
Householders (2000 Census)	89.7%	1.6%	0.7%	13.4%
2008–2012 Households Actual Proportion	84.4%	7.3%	2.6%	18.7%
2008–2012 Households Free Market	67.5%	17.9%	6.1%	27.3%
2008–2012 Households Difference	16.9%	-10.6%	-3.5%	-8.5%

Southeast Quadrant

Super Neighborhoods in the Southeast Qudrant

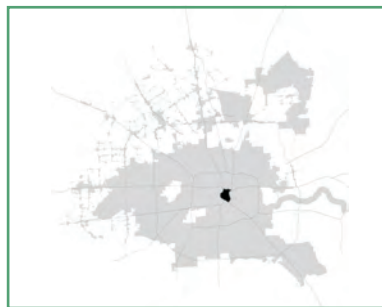
56 Denver Harbor/Port Houston	73 Golfcrest/Bellfort/Reveille
59 Clinton Park Tri-Community	74 Park Place
61 Downtown	75 Meadowbrook/Allendale
63 Second Ward	76 South Acres/Crestmont Park
64 Greater/Eastwood	77 Minnetex
65 Harrisburg/Manchester	78 Greater Hobby Area
67 Greater Third Ward	79 Edgebrook
68 OST-South Union	80 South Belt/Ellington
69 Gulfgate Riverview/Pine Valley	81 Clear Lake
70 Pecan Park	82 Magnolia Park
71 Sunnyside	83 MacGregor
72 South Park	88 Lawndale Wayside

Census tracts not assigned to a super neighborhood are shown with data following the super neighborhoods.

Table 40: Downtown

Super Neighborhood 61: Downtown				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	54.6%	18.5%	1.6%	50.9%
2008–2012 Households Actual Proportion	70.3%	18.0%	4.2%	41.1%
2008–2012 Households Free Market	64.6%	20.8%	5.8%	28.0%
2008–2012 Households Difference	5.7%	-2.8%	-1.6%	13.1%
2010 Census Tract 1000				
Householders (2000 Census)	79.1%	14.0%	2.1%	9.3%
2008–2012 Households Actual Proportion	78.6%	14.7%	4.6%	9.4%
2008–2012 Households Free Market	68.3%	17.8%	6.2%	24.8%
2008–2012 Households Difference	10.4%	-3.0%	-1.7%	-15.4%
2010 Census Tract 2101				
Householders (2000 Census)	85.7%	2.9%	1.4%	17.1%
2008–2012 Households Actual Proportion	39.0%	61.0%	0.0%	0.0%
2008–2012 Households Free Market	70.4%	15.4%	6.7%	24.4%
2008–2012 Households Difference	-31.4%	45.6%	-6.7%	-24.4%
2010 Census Tract 2123 (Tract consists of parts of 2000 tracts 2102 and 2103. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	57.3%	9.7%	0.4%	82.4%
2008–2012 Households Actual Proportion	79.8%	6.6%	0.5%	88.0%
2008–2012 Households Free Market	59.9%	24.8%	5.1%	32.6%
2008–2012 Households Difference	19.8%	-18.2%	-4.5%	55.4%
2010 Census Tract 3101 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	40.3%	17.2%	2.4%	72.2%
2008–2012 Households Actual Proportion	66.1%	20.0%	4.7%	40.0%
2008–2012 Households Free Market	63.8%	21.6%	5.8%	28.0%
2008–2012 Households Difference	2.3%	-1.5%	-1.1%	12.0%
2010 Census Tract 3102				
Householders (2000 Census)	14.3%	59.1%	0.5%	36.6%
2008–2012 Households Actual Proportion	47.3%	40.6%	10.1%	13.3%
2008–2012 Households Free Market	68.9%	17.0%	6.4%	25.3%
2008–2012 Households Difference	-21.6%	23.6%	3.8%	-12.1%

Downtown is Houston's birthplace. The construction of a ring of freeways in the 1960s and 1970s created the modern boundaries of downtown. The area extends into a transitional warehouse and light industrial area to the southeast, a part of which was included in the Third Ward before the Gulf Freeway was built in the 1950s. This area includes Houston's first Chinatown. Downtown was once the city's retail hub, but suburban development in the 1970s and 1980s reduced its importance, even as millions of square feet of new office space added tens of thousands of new workers. Loft conversions in older, often vacant office/commercial buildings are adding a new and welcome residential element to downtown. Population was stagnant with 12,407 residents in 2000 and 12,468 in 2012. Annual median household income rose from \$38,118 to \$43,601.



The actual racial and Latino household compositions of the two census tracts in the geographic center of the Downtown super neighborhood — 1000 and 3101 — are roughly what would be expected in a free housing market absent discrimination — except for a lower proportion than expected of Hispanic households in tract 1000. The actual proportion of African American households in tracts 2101 and 3102 are substantially larger than would be expected while the actual proportions of Caucasians are notably lower. Both tracts are next to tracts in adjacent super neighborhoods with the same situation.

The proportion of Hispanic households in the sparsely-populated tract 2101 plummeted from 17.1 percent in 2000 to next to nothing while it would be expected to be about 24 percent in a free market. Seventy households lived in tract 2101 in 2000 while just 41 households lived there in 2008–2010. Such a small number of households in tract 2101 makes testing impractical.

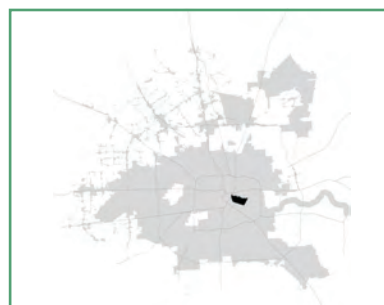
Tract 2123, which is shared with the Near Northside super neighborhood, is consolidated into a segregated Latino enclave that stretches far to the north.

Recommended Actions: Testing may identify any illegal discriminatory private and public sector real estate practices in the Downtown super neighborhood.

Table 41: Second Ward

Super Neighborhood 63: Second Ward				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	46.4%	6.2%	1.0%	85.7%
2008–2012 Households Actual Proportion	68.1%	10.9%	2.3%	67.6%
2008–2012 Households Free Market	62.6%	22.3%	5.4%	31.1%
2008–2012 Households Difference	5.5%	-11.5%	-3.1%	36.5%
2010 Census Tract 3101				
Householders (2000 Census)	40.3%	17.2%	2.4%	72.2%
2008–2012 Households Actual Proportion	66.1%	20.0%	4.7%	40.0%
2008–2012 Households Free Market	63.8%	21.6%	5.8%	28.0%
2008–2012 Households Difference	2.3%	-1.5%	-1.1%	12.0%
2010 Census Tract 3104				
Householders (2000 Census)	45.8%	1.5%	0.5%	91.4%
2008–2012 Households Actual Proportion	72.0%	4.6%	0.6%	89.6%
2008–2012 Households Free Market	60.9%	23.5%	4.9%	34.1%
2008–2012 Households Difference	11.1%	-18.9%	-4.3%	55.5%
2010 Census Tract 3105				
Householders (2000 Census)	51.3%	2.1%	0.3%	90.7%
2008–2012 Households Actual Proportion	67.0%	2.1%	0.0%	90.4%
2008–2012 Households Free Market	62.3%	22.3%	5.1%	32.9%
2008–2012 Households Difference	4.8%	-20.2%	-5.1%	57.4%

The Second Ward was one of the first Hispanic neighborhoods in Houston. It is the home of a number of important Hispanic institutions, including Our Lady of Guadalupe Catholic Church, Ripley House, and Talento Bilingue. The northern portion of the neighborhood is industrial. Most of the housing in the area was built before World War II. The largest block of post-war housing is the Clayton Homes public housing project on the community's western edge. In recent years, the area's proximity to downtown has made it possible for a number of restaurants, especially along Navigation, to attract a city-wide following. Population declined from 14,836 in 2000 to 12,266 in 2012 while annual median household income increased from \$23,473 to \$30,872 in 2012.



Census tract 3101, which is partially adjacent to tract 2101 in the Downtown super neighborhood, also experienced a precipitous decline in the proportion of Latino households since 2000. This change appears to have brought the actual proportion of Hispanic households much closer to the percentage expected in a free market. Overall, the tract has become more diverse since 2000 suggesting that fair housing is being affirmatively affirmed in tract 3101.

On the other hand, tracts 3104 and 3105 continue to maintain the historically extreme segregation that has long characterized the Second Ward with nearly nonexistent Asian or African American populations. These tracts are part of Houston's extensive Latino enclave.

While the Second Ward has been historically Hispanic, it appears that either some public or private sector practice(s) or action(s) enabled part of the Second Ward to become more diverse since 2000 or that any illegal discriminatory real estate practices have been curtailed — it's impossible to say without further research.

Like other historically Hispanic areas of Houston, the Second Ward has served as a residential destination for new Latino immigrants to Houston. This is a pattern among immigrants of all races and ethnicities throughout the nation. However, the sort of intense racial or ethnic concentration characteristic of these immigrant neighborhoods generally dissipates over time as subsequent generations achieve socioeconomic mobility and are assimilated into the American culture, enabling the descendants of these immigrants to find greater opportunities and move into the middle class.

Recommended Actions: The city should conduct thorough research to identify whether the Second Ward and other historically Hispanic areas are still functioning as a residential destination for new immigrants and determine where subsequent post-immigrant generations are living in Houston.

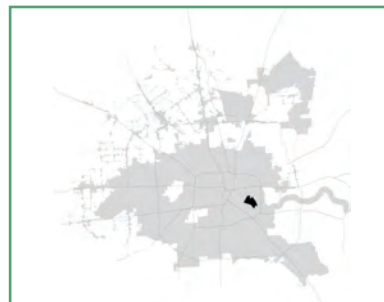
The city should implement an extensive effort to make residents of these historically segregated neighborhoods aware of the housing choices they have throughout the metropolitan area so they can have better access to higher opportunities.

The city should identify the factors that caused such a significant change in the Hispanic population in census tract 3101. Given the very different changes in the demographics in tract 3101 and the other two census tracts, the city should conduct further research to identify why tract 3101 became more diverse while segregation remains so entrenched in tracts 3104 and 3105.

Table 42: Magnolia Park

Super Neighborhood 82: Magnolia Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	51.1%	0.9%	0.2%	66.3%
2008–2012 Households Actual Proportion	68.0%	1.3%	0.0%	92.9%
2008–2012 Households Free Market	62.5%	22.1%	5.0%	33.3%
2008–2012 Households Difference	5.5%	-20.8%	-5.0%	59.6%
2010 Census Tract 3109				
Householders (2000 Census)	46.2%	0.7%	0.3%	93.9%
2008–2012 Households Actual Proportion	70.9%	1.5%	0.0%	90.6%
2008–2012 Households Free Market	61.4%	23.2%	5.1%	33.0%
2008–2012 Households Difference	9.5%	-21.7%	-5.1%	57.6%
2010 Census Tract 3110				
Householders (2000 Census)	53.6%	1.2%	0.0%	93.6%
2008–2012 Households Actual Proportion	73.0%	1.3%	0.0%	91.7%
2008–2012 Households Free Market	63.0%	21.7%	5.0%	33.4%
2008–2012 Households Difference	10.0%	-20.4%	-5.0%	58.3%
2010 Census Tract 3111				
Householders (2000 Census)	52.7%	0.8%	0.2%	96.0%
2008–2012 Households Actual Proportion	59.2%	1.1%	0.0%	96.6%
2008–2012 Households Free Market	63.0%	21.6%	5.1%	33.4%
2008–2012 Households Difference	-3.8%	-20.5%	-5.1%	63.1%

Magnolia Park borders the Houston Ship Channel just south of the Turning Basin, the location of some of the first wharves built when Houston became a deep water port in 1913. The community thrived as a home for workers on the docks and in industries lining the channel. For a time it was even an incorporated municipality. As early as the 1930s, Magnolia Park was developing an identity as a center of Houston's Hispanic community. This continues, especially around recently revived commercial areas near Harrisburg and Wayside. Population declined from 21,302 in 2000 to 18,246 in 2012 while annual median household income more than doubled from \$14,875 to \$29,875.



It is difficult to be more segregated than Magnolia Park with the actual proportions of Latino households ranging from 90.6 to 96.6 percent which are from 57.6 to 63.1 percentage points greater than would be expected in a free housing market.

There is nearly a total absence of Black and Asian households throughout Magnolia Park.

Like most of the Second Ward, Magnolia Park appears to be the product of long-term historic housing discrimination. And like the Second Ward, the question remains whether such discrimination continues today.

Recommended Actions: It would behoove the city to conduct real estate testing and other research to identify continuing illegal real estate practices, if any, in Magnolia Park.

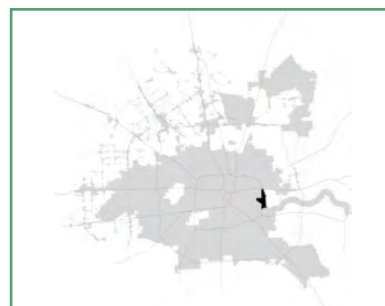
The city should conduct thorough research to identify whether Magnolia Park and other historically Hispanic areas are still functioning as a residential destination for new immigrants and determine where subsequent post-immigrant generations are living in Houston.

The city should implement an extensive effort to make residents of these historically segregated neighborhoods aware of the housing choices they have throughout the metropolitan area to give themselves better access to higher opportunities.

Table 43: Clinton Park Tri-Community

Super Neighborhood 59: Clinton Park Tri-Community				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	43.7%	39.4%	0.2%	38.4%
2008–2012 Households Actual Proportion	39.1%	51.9%	0.1%	34.9%
2008–2012 Households Free Market	62.3%	22.4%	5.2%	32.6%
2008–2012 Households Difference	-23.2%	29.5%	-5.1%	2.2%
2010 Census Tract 2125 (Tract consists of parts of 2000 tracts 2121 and 2122. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	6.8%	84.8%	0.0%	12.8%
2008–2012 Households Actual Proportion	20.5%	76.1%	0.0%	23.0%
2008–2012 Households Free Market	61.0%	23.5%	5.1%	33.0%
2008–2012 Households Difference	-40.5%	52.6%	-5.1%	-10.1%
2010 Census Tract 2334 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	73.1%	1.9%	0.0%	62.8%
2008–2012 Households Actual Proportion	58.4%	20.7%	0.0%	58.0%
2008–2012 Households Free Market	60.9%	23.7%	5.1%	32.9%
2008–2012 Households Difference	-2.5%	-2.9%	-5.1%	25.1%
2010 Census Tract 2336				
Householders (2000 Census)	1.9%	95.5%	0.1%	3.5%
2008–2012 Households Actual Proportion	6.3%	92.6%	0.6%	6.8%
2008–2012 Households Free Market	61.2%	23.5%	5.0%	33.0%
2008–2012 Households Difference	-54.9%	69.1%	-4.4%	-26.2%
2010 Census Tract 2337.01 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	66.2%	10.8%	0.4%	54.6%
2008–2012 Households Actual Proportion	61.8%	27.2%	0.0%	46.4%
2008–2012 Households Free Market	64.8%	20.0%	5.4%	31.8%
2008–2012 Households Difference	-3.0%	7.2%	-5.4%	14.6%

Clinton Park Tri-Community is a small community south and east of the Denver Port Houston/Port Harbor super neighborhood (analyzed in the Northeast Quadrant section of this document). It is located just north of Clinton Drive, adjacent to the City of Galena Park. It is split between Houston Independent School District (Clinton Park) and Galena Park Independent School District (Fidelity), and includes a part of the Port of Houston. From its inception, this area has been almost exclusively an African American community. Development began in the area spurred by the proximity to jobs in the Port and nearby Ship Channel industries. Large holding ponds containing materials dredged from the Houston Ship Chan-



nel are located adjacent to the residential areas. The population remained nearly unchanged at 2,437 in 2000 and 2,276 in 2012. The annual median household income stagnated at \$24,856 in 2012 falling further behind the city's median of \$44,648. In 2000, the annual median household income was \$23,267, not as far below the city's \$36,616 median.

Located on the east edge of Houston, the composition of the two census tracts that comprise the vast majority of Clinton Park Tri-Community still reflect the super neighborhood's history as a nearly totally segregated Black area. The actual proportion of African American households in tract 2336 stands at 92.6 percent, 69.1 percentage points higher than what would be expected in a free housing market not distorted by discrimination. The actual proportion of Caucasian households is just 6.3 percent, nearly 55 percentage points lower than would be expected in the absence of housing discrimination. The actual 6.8 percent proportion of Latino households is more than 26 percentage points lower than expected while the Asian population is nearly nonexistent. It is very likely that these concentrations are vestiges of historic discrimination.

Part of tracts 2334 and 2337.01 are also in Clinton Park Tri-Community. Tract 2334 located north of tract 2336 became significantly more diverse since 2000 with the percentage of African American households soaring ten fold from 1.9 to 20.7 percent, what would be expected in a free housing market. This rapid change *could* be the early stages of resegregation to a predominantly African American concentration. The proportion of Caucasian households fell from 73.1 to 58.4 percent, also what would be expected in a free housing market while the proportion of Latino households remains about 25 percentage point higher than would be expected. Without further research, it's not known whether these changes reflect the early stages of resegregation or movement toward stable integration.

Recommended Actions: The city should conduct real estate testing in tract 2334 and nearby tracts as soon as possible to determine whether the demographic changes since 2000 are the early stages of resegregation or movement toward stable integration. If testing reveals steering of Black households to tract 2334, the city needs to take immediate steps to curb this illegal discriminatory practice and achieve demand for housing here from white and Asian households.

The city needs to implement tools to expand housing choices for African American households in tracts 2125 and 2336 and to expand the choices of Caucasian and Hispanic households of any race to include these tracts.

Nearby Census Tracts Not in Any Super Neighborhood. East of Clinton Park Tri-Community are a series of census tracts with actual African American populations smaller than would be expected in a free housing market that are part of the city's burgeoning Latino enclave — tracts 2335, 2337.05, 2525, and 3241. At the extreme east end of Houston, the actual proportions of Hispanic households in tracts 2545 and 2546 are 42.4 and 26.9 percentage points greater

than what would be expected in a free market not distorted by housing discrimination while the actual proportions of white and African American households are about what would be expected. The proportions of Latino households have grown substantially since 2000.

The actual proportion of Black households in tract 2533 continues to be barely measurable and nearly 15 percentage points less than what would be expected in the absence of housing discrimination while the proportion of white households is more than 16 percentage points higher than would be expected.

The actual proportion of white households in tract 3436, just south of tract 2533 and west of tracts 2545 and 2546, is about 21 percentage points higher than the expected 66 percent proportion in the absence of housing discrimination. The actual proportion of African American households is just 5.4 percent, 13.8 percentage points lower than expected in a free housing market.

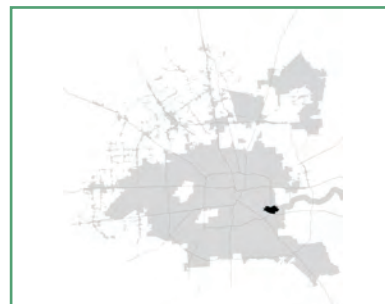
The presence of Asian households is barely detectable in any of these census tracts.

Recommended Actions: Real estate testing is needed to determine the extent, if any, that steering accounts for the growth in the Hispanic population and reduction or stagnation of the proportions of African American households in these unassigned census tracts, as well as the near total absence of Asian households and other demographic anomalies noted above.

Table 44: Harrisburg/Manchester

Super Neighborhood 65: Harrisburg/Manchester				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	47.8%	8.3%	0.3%	77.0%
2008–2012 Households Actual Proportion	53.0%	5.5%	0.0%	88.6%
2008–2012 Households Free Market	62.7%	22.1%	5.4%	31.6%
2008–2012 Households Difference	-9.7%	-16.6%	-5.4%	57.0%
2010 Census Tract 3114				
Householders (2000 Census)	39.7%	19.8%	0.4%	73.2%
2008–2012 Households Actual Proportion	57.2%	9.8%	0.0%	84.4%
2008–2012 Households Free Market	62.2%	22.5%	5.3%	32.0%
2008–2012 Households Difference	-5.0%	-12.7%	-5.3%	52.4%
2010 Census Tract 3242 (Tract consists of parts of 2000 tracts 3203 and 3204)				
Householders (2000 Census)	53.0%	1.0%	0.2%	79.4%
2008–2012 Households Actual Proportion	47.6%	0.0%	0.0%	94.0%
2008–2012 Households Free Market	63.4%	21.5%	5.4%	31.2%
2008–2012 Households Difference	-15.8%	-21.5%	-5.4%	62.8%

Harrisburg/Manchester was a community located at the confluence of Brays Bayou and Buffalo Bayou before the Texas Revolution. Santa Anna's army burned the community on its way to defeat at San Jacinto. Manchester lies to the east of Harrisburg, near the confluence of Sims Bayou and the Ship Channel. Its modest homes are surrounded by Channel industries. Harrisburg residential areas have largely disappeared, and its commercial district has not experienced the revival that the rise of the area's Hispanic community has brought to other East End shopping districts. Between 2000 and 2010, the neighborhood's population grew slightly from 3,768 to 3,869 and median household income rose from \$26,989 to \$30,048.



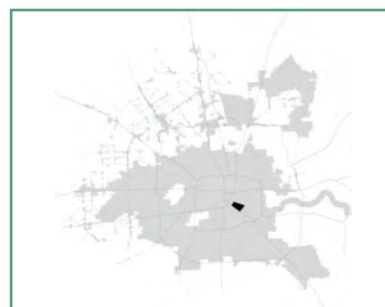
Since 2000, Hispanic households have become more segregated and isolated as the proportion of African Americans in the west-most tract 3114 declined by more than half. The proportions of Hispanic households far exceed the proportions expected in the absence of housing discrimination while the proportion of African Americans in tract 3242 is nearly zero even though, in a free market the tract would be about one-fifth Black. Housing choice appears to be contracting in Harrisburg/Manchester and that discriminatory real estate practices continue.

Recommended Actions: Real estate testing and the use of tools to expand housing choice are warranted in Harrisburg/Manchester.

Table 45: Greater Eastwood

Super Neighborhood 64: Greater Eastwood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	49.6%	10.0%	2.7%	71.6%
2008–2012 Households Actual Proportion	65.2%	13.8%	3.5%	55.3%
2008–2012 Households Free Market	64.6%	20.5%	5.7%	29.4%
2008–2012 Households Difference	0.6%	-6.7%	-2.2%	25.9%
2010 Census Tract 3101 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	40.3%	17.2%	2.4%	72.2%
2008–2012 Households Actual Proportion	66.1%	20.0%	4.7%	40.0%
2008–2012 Households Free Market	63.8%	21.6%	5.8%	28.0%
2008–2012 Households Difference	2.3%	-1.5%	-1.1%	12.0%
2010 Census Tract 3102				
Householders (2000 Census)	14.3%	59.1%	0.5%	36.6%
2008–2012 Households Actual Proportion	47.3%	40.6%	10.1%	13.3%
2008–2012 Households Free Market	68.9%	17.0%	6.4%	25.3%
2008–2012 Households Difference	-21.6%	23.6%	3.8%	-12.1%
2010 Census Tract 3103				
Householders (2000 Census)	55.0%	3.6%	5.0%	68.2%
2008–2012 Households Actual Proportion	72.5%	4.7%	1.6%	62.6%
2008–2012 Households Free Market	65.5%	19.6%	5.7%	29.8%
2008–2012 Households Difference	7.0%	-14.9%	-4.1%	32.8%
2010 Census Tract 3106				
Householders (2000 Census)	56.7%	2.3%	1.1%	81.5%
2008–2012 Households Actual Proportion	64.2%	5.0%	1.3%	81.9%
2008–2012 Households Free Market	63.0%	21.7%	5.3%	32.1%
2008–2012 Households Difference	1.2%	-16.7%	-3.9%	49.8%

Eastwood/Lawndale is a collection of middle class, single-family home subdivisions developed before World War II and located southeast of Downtown. The construction of the Gulf Freeway in the 1950s created a commercial edge on its south. The area was once exclusively Anglo, but through the growth of Houston's Hispanic middle class in recent decades, its population is now largely Hispanic. Renovation of its stock of well-built bungalows and duplexes was cut short by the real estate collapse of the 1980s. However, a revival of interest in renovation in the area is occurring. The population has declined from 13,639 in 2000 to 12,327 in 2012 while annual median household income rose from \$29,537 to \$44,674.



Located just south of the Second Ward, the eastern two-thirds of Greater

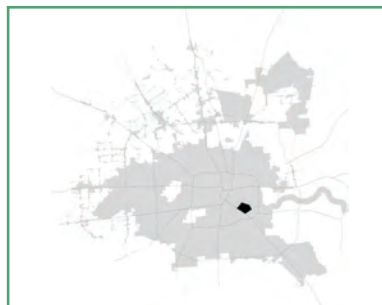
Eastwood — census tracts 3103 and 3106 — are part of the city's large Hispanic enclave where the actual proportions of Latinos significantly exceed the expected proportions. Tract 3102 has been part of an African American concentration that extends to the south end of the city. However, since 2000, the actual proportion of Black households in tract 3101 shrunk by a third, from 59.1 to 40.6 percentage points, still 23.6 percentage points higher than would be expected in a free housing market. *This represents considerable progress toward establishing a more integrated census tract like tract 3101 immediately to its north.*

Recommended Actions: The city needs to build on the progress toward affirmatively furthering fair housing in census tract 3102 by taking steps to promote stable racial and Hispanic diversity throughout Greater Eastwood.

Table 46: Lawndale/Wayside

Super Neighborhood 88: Lawndale/Wayside				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	52.7%	1.4%	0.4%	86.8%
2008–2012 Households Actual Proportion	66.3%	1.5%	0.5%	88.9%
2008–2012 Households Free Market	63.0%	21.7%	5.2%	32.5%
2008–2012 Households Difference	3.3%	-20.2%	-4.7%	56.4%
2010 Census Tract 3107				
Householders (2000 Census)	54.6%	2.2%	0.8%	70.5%
2008–2012 Households Actual Proportion	68.3%	1.3%	0.0%	80.5%
2008–2012 Households Free Market	64.7%	20.3%	5.5%	30.5%
2008–2012 Households Difference	3.6%	-19.0%	-5.5%	50.0%
2010 Census Tract 3108				
Householders (2000 Census)	51.4%	2.8%	0.2%	85.0%
2008–2012 Households Actual Proportion	71.9%	1.6%	0.0%	86.1%
2008–2012 Households Free Market	63.4%	21.3%	5.1%	32.8%
2008–2012 Households Difference	8.5%	-19.7%	-5.1%	53.3%
2010 Census Tract 3109 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	46.2%	0.7%	0.3%	93.9%
2008–2012 Households Actual Proportion	70.9%	1.5%	0.0%	90.6%
2008–2012 Households Free Market	61.4%	23.2%	5.1%	33.0%
2008–2012 Households Difference	9.5%	-21.7%	-5.1%	57.6%
2010 Census Tract 3111 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	52.7%	0.8%	0.2%	96.0%
2008–2012 Households Actual Proportion	59.2%	1.1%	0.0%	96.6%
2008–2012 Households Free Market	63.0%	21.6%	5.1%	33.4%
2008–2012 Households Difference	-3.8%	-20.5%	-5.1%	63.1%
2010 Census Tract 3112				
Householders (2000 Census)	60.6%	1.4%	0.4%	81.4%
2008–2012 Households Actual Proportion	64.8%	2.1%	2.1%	87.7%
2008–2012 Households Free Market	63.0%	21.7%	5.2%	32.8%
2008–2012 Households Difference	1.9%	-19.5%	-3.1%	54.9%

Lawndale/Wayside is a collection of neighborhoods which still reflect the area's origins as a prestigious east side neighborhood. At that time, the municipal Wortham Golf Center was the City's first country club, what is now the Houston Country Club (established in 1908). The adjacent heavily-wooded Country Club and Idylwood neighborhoods have remained attractive. The areas of Forest Hill and Mason Park are shady, middle class havens with curving streets and large lots. The presence of wooded preserves such as the large Forest Park Cemetery, Villa De Matel convent, Mason Park and Wortham Golf Center have helped to maintain the area's beauty. The entire neighborhood is within the Greater East End Management District. The population declined by 614 to 13,518 in 2012 while the annual median household income fell from \$42,011 to \$34,210.



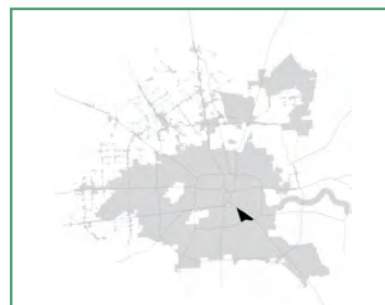
The composition of Lawndale/Wayside is comparable to the east end of its neighbor Greater Eastwood and to Magnolia Park immediately to the north. This super neighborhood is consolidated into the city's growing eastside Hispanic concentration. Its actual proportions of Latino households range from 80.5 to 96 percent, which are 50 to 63.1 percentage points higher than the proportions expected in a free housing market absent discrimination. Concomitantly, the proportions of Black and Asian residents are barely measurable and significantly below the proportions expected in a free housing market.

Recommended Actions: To affirmatively further fair housing here, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic residents of Lawndale/Wayside to areas outside the city's Latino enclaves and to expand housing choices of African Americans and Asians to include Lawndale/Wayside.

Table 47: Gulfgate Riverview/Pine Valley

Super Neighborhood 69: Gulfgate Riverview/Pine Valley				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	63.3%	3.0%	1.1%	79.6%
2008–2012 Households Actual Proportion	61.3%	8.8%	2.2%	78.8%
2008–2012 Households Free Market	63.2%	21.4%	5.3%	32.2%
2008–2012 Households Difference	-1.9%	-12.6%	-3.2%	46.6%
2010 Census Tract 3117				
Householders (2000 Census)	61.3%	4.7%	0.9%	76.9%
2008–2012 Households Actual Proportion	61.2%	18.9%	3.0%	71.2%
2008–2012 Households Free Market	63.2%	21.5%	5.3%	32.6%
2008–2012 Households Difference	-1.9%	-2.6%	-2.3%	38.6%
2010 Census Tract 3118				
Householders (2000 Census)	65.9%	1.9%	0.8%	83.0%
2008–2012 Households Actual Proportion	63.6%	0.0%	0.6%	83.9%
2008–2012 Households Free Market	62.9%	21.8%	5.4%	31.9%
2008–2012 Households Difference	0.7%	-21.8%	-4.7%	52.0%
2010 Census Tract 3119				
Householders (2000 Census)	62.7%	1.6%	2.0%	78.9%
2008–2012 Households Actual Proportion	57.0%	0.0%	2.9%	88.4%
2008–2012 Households Free Market	63.8%	20.8%	5.4%	32.0%
2008–2012 Households Difference	-6.9%	-20.8%	-2.4%	56.4%

Gulfgate Riverview/Pine Valley is a collection of neighborhoods inside Loop 610 south of the Gulf Freeway. It is crisscrossed by older highways, such as Telephone Road and the city's first bypass, the Old Spanish Trail/Wayside combination. These highways, along with a major rail line and Brays Bayou, divide the area into a number of discrete neighborhoods. The largest of these (Pine Valley, Freeway, and Riverview) consist of single family homes surrounded by light industrial buildings and warehouses. Gulfgate, one of Houston's first malls, located on the eastern edge of the area, has been completely redeveloped as part of a tax increment reinvestment zone to revitalize what had been a failing retail district. The population increased by 205 to 13,100 in 2012 while median household income rose from \$29,430 to \$38,589.



Gulfgate Riverview/Pine Valley shares the segregative characteristics of the super neighborhoods to its north, east, and south. The actual proportions of Latino households range from 71.2 to 88.4 percent, 38.6 to 56.4 percentage points higher than would be expected in a free housing market devoid of discrimination.

While the percentage of African American households in tract 3117 soared from 4.7 percent in 2000 to 18.9 percent, roughly what would be expected in a free housing market, the proportions of African American households in tracts 3118 and 3119 were so low that they did not register. In a free housing market, the proportion of Black households in both tracts would have exceeded 20 percent.

Recommended Actions: To affirmatively further fair housing here, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic residents of Gulfgate Riverview/Pine Valley to areas outside the city's Latino enclaves and to expand housing choices of African Americans and Asians to include Gulfgate Riverview/Pine Valley.

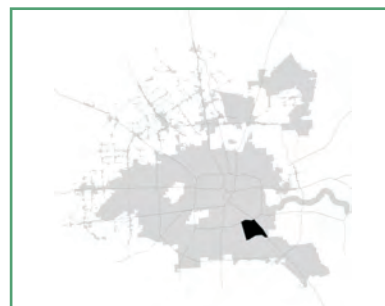
Table 48: Golfcrest/Bellfort/Reveille

Super Neighborhood 73: Golfcrest/Bellfort/Reveille				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	36.6%	32.1%	3.3%	44.6%
2008–2012 Households Actual Proportion	53.8%	26.9%	2.5%	59.0%
2008–2012 Households Free Market	63.5%	21.3%	5.3%	32.0%
2008–2012 Households Difference	-9.7%	5.6%	-2.8%	27.0%
2010 Census Tract 3325				
Householders (2000 Census)	23.6%	64.8%	0.2%	19.3%
2008–2012 Households Actual Proportion	29.8%	62.7%	0.9%	23.3%
2008–2012 Households Free Market	64.5%	20.4%	5.5%	31.1%
2008–2012 Households Difference	-34.7%	42.3%	-4.5%	-7.8%
2010 Census Tract 3326				
Householders (2000 Census)	31.5%	44.7%	0.8%	38.6%
2008–2012 Households Actual Proportion	34.1%	48.3%	0.0%	43.3%
2008–2012 Households Free Market	62.9%	21.7%	5.3%	32.1%
2008–2012 Households Difference	-28.8%	26.6%	-5.3%	11.1%
2010 Census Tract 3327				
Householders (2000 Census)	58.0%	5.8%	0.9%	71.8%
2008–2012 Households Actual Proportion	65.2%	2.1%	0.0%	86.6%
2008–2012 Households Free Market	63.2%	21.4%	5.3%	32.1%
2008–2012 Households Difference	2.0%	-19.4%	-5.3%	54.4%
2010 Census Tract 3328				
Householders (2000 Census)	35.6%	16.8%	0.6%	70.1%
2008–2012 Households Actual Proportion	62.6%	13.4%	0.0%	76.6%
2008–2012 Households Free Market	62.7%	21.9%	5.3%	32.5%
2008–2012 Households Difference	0.0%	-8.5%	-5.3%	44.1%
2010 Census Tract 3329				
Householders (2000 Census)	44.9%	4.8%	1.3%	73.4%
2008–2012 Households Actual Proportion	74.0%	4.2%	0.4%	85.1%
2008–2012 Households Free Market	64.3%	20.4%	5.2%	33.1%
2008–2012 Households Difference	9.7%	-16.2%	-4.8%	52.0%

Continued on the next page

Super Neighborhood 73: Golfcrest/Bellefort/Reveille (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3330				
Householders (2000 Census)	55.9%	5.1%	2.0%	58.3%
2008–2012 Households Actual Proportion	72.2%	0.6%	2.5%	76.4%
2008–2012 Households Free Market	66.5%	18.6%	5.8%	29.3%
2008–2012 Households Difference	5.6%	-18.1%	-3.3%	47.1%
2010 Census Tract 3331				
Householders (2000 Census)	30.3%	25.4%	35.2%	17.6%
2008–2012 Households Actual Proportion	44.8%	29.8%	18.5%	46.3%
2008–2012 Households Free Market	62.4%	22.4%	5.2%	31.9%
2008–2012 Households Difference	-17.6%	7.4%	13.3%	14.5%
2010 Census Tract 3332.01 (Was Tract 3332 in 2000)				
Householders (2000 Census)	30.8%	41.5%	1.9%	40.3%
2008–2012 Households Actual Proportion	53.4%	26.3%	3.7%	62.9%
2008–2012 Households Free Market	61.8%	22.7%	5.1%	33.4%
2008–2012 Households Difference	-8.4%	3.6%	-1.4%	29.5%
2010 Census Tract 3332.02 (Was Tract 3332 in 2000)				
Householders (2000 Census)	30.8%	41.5%	1.9%	40.3%
2008–2012 Households Actual Proportion	45.3%	42.5%	2.4%	46.7%
2008–2012 Households Free Market	62.1%	22.4%	5.0%	33.6%
2008–2012 Households Difference	-16.8%	20.0%	-2.5%	13.1%
2010 Census Tract 3335				
Householders (2000 Census)	33.1%	36.0%	2.6%	45.2%
2008–2012 Households Actual Proportion	54.6%	24.1%	1.4%	66.6%
2008–2012 Households Free Market	63.6%	21.1%	5.3%	32.4%
2008–2012 Households Difference	-9.0%	3.0%	-3.8%	34.2%
2010 Census Tract 3336				
Householders (2000 Census)	71.3%	8.5%	1.0%	31.4%
2008–2012 Households Actual Proportion	83.0%	8.6%	0.0%	46.7%
2008–2012 Households Free Market	68.4%	17.4%	6.3%	25.9%
2008–2012 Households Difference	14.7%	-8.8%	-6.3%	20.7%

Golfcrest/Bellefort/Reveille is a section of southeast Houston located outside Loop 610 between Mykawa and the Gulf Freeway. Subdivisions within this community include Overbrook, Bayou Oaks, Santa Rosa, Greenway, Lum Terrace, Golfcrest, Kings Court, Tropicana Village and Oakland Plaza. Many small industrial facilities are located near Long Drive in the western part of the community. The original Golfcrest Country Club site was redeveloped with a stadium for Houston Independent School District, public housing and a City park. Most of the homes in the area date from the suburban development after World War II.



Many of the more expensive homes were built on heavily wooded sites adjacent to Sims Bayou. The population nearly doubled from 26,054 to 50,896 in 2010 while annual median household income rose from \$30,893 to \$37,077 in 2012.

The Hispanic concentrations in tracts 3332.01, 3335, and 3336 divide the African American concentrations in tracts 3325, 3326, and 3332.02. The concentrations of Black households are not nearly as intense as the concentrations of Latino households. With the exceptions of tracts 3332.01 and 3335, the concentrations of African American households have not changed much since 2000. In tracts, 3332.01 and 3335, the actual proportions of Black households declined and are about what would be expected in a free housing market.

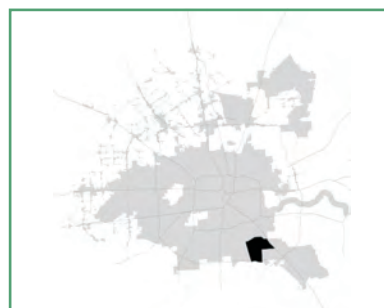
The proportions of Latino households grew substantially since 2000 and now exceed the proportions expected in a free housing market by 29.5 and 34.2 percentage points. Overall, the Golfcrest/Bellfort/Reveille is becoming increasingly Latino and may be in the process of segregating into an overwhelmingly Hispanic super neighborhood with relatively few Black or Asian residents.

Recommended Actions: The City of Houston needs to conduct real estate testing here and in neighboring areas to determine whether Latinos are being steered to Gulfgate Riverview/Pine Valley while Blacks, Asians, and non-Hispanic Caucasians are being steered away. If steering is found, the city needs to take aggressive measures to curb the practice and promote demand from all racial groups in this super neighborhood.

Table 49: Greater Hobby Area

Super Neighborhood 78: Greater Hobby Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	54.2%	18.9%	4.0%	39.3%
2008–2012 Households Actual Proportion	61.2%	19.1%	8.5%	47.2%
2008–2012 Households Free Market	66.8%	18.5%	5.9%	28.3%
2008–2012 Households Difference	-5.6%	0.5%	2.5%	18.9%
2010 Census Tract 3333				
Householders (2000 Census)	45.0%	22.3%	4.8%	46.1%
2008–2012 Households Actual Proportion	63.1%	23.9%	0.0%	64.8%
2008–2012 Households Free Market	63.5%	21.2%	5.3%	32.0%
2008–2012 Households Difference	-0.4%	2.6%	-5.3%	32.8%
2010 Census Tract 3337 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	58.6%	10.7%	3.9%	43.6%
2008–2012 Households Actual Proportion	66.7%	13.5%	8.8%	68.4%
2008–2012 Households Free Market	65.4%	19.6%	5.7%	29.9%
2008–2012 Households Difference	1.3%	-6.1%	3.1%	38.5%
2010 Census Tract 3338				
Householders (2000 Census)	45.2%	25.5%	2.2%	47.5%
2008–2012 Households Actual Proportion	64.9%	14.9%	0.0%	65.1%
2008–2012 Households Free Market	65.0%	20.0%	5.6%	30.4%
2008–2012 Households Difference	-0.1%	-5.2%	-5.6%	34.8%
2010 Census Tract 3501 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	83.6%	5.8%	6.3%	9.7%
2008–2012 Households Actual Proportion	56.9%	19.7%	18.3%	22.0%
2008–2012 Households Free Market	70.1%	15.9%	6.6%	24.5%
2008–2012 Households Difference	-13.2%	3.8%	11.7%	-2.5%
Census Tract 9800 was excluded because it had only 14 households in 2008–2012.				

The Greater Hobby Area takes its name from Hobby Airport, located at the center of this part of southeast Houston. A rail line at the western edge of the community provides access for a number of large industrial facilities. Sims Bayou, along the northern boundary, attracted development of single-family homes in the Garden Villas subdivision before World War II and in the Glenbrook Valley subdivision during the 1950s. Gulf Freeway Oaks is a similar subdivision of homes located close to I-45, an eastern boundary of the area. East Haven and Skyscraper Shadows, located to the east and south of the airport, respectively, still have many empty lots and a variety of housing styles. Gulf Meadows is located close to Clear Creek, the southern edge of the community. Population fell by 42 per-



cent, from 41,198 in 2000 to 23,891 in 2012. Annual median household income rose from \$32,601 to \$42,330.

With the exception of the small portion of census tract 3501 in the Greater Hobby Area at the south end of this super neighborhood, the proportions of Latino households increased by about half since 2000. The actual proportions of Hispanic households range from 32.8 to 38.5 percentage points more than would be expected in a free housing market. The proportions of all other groups are roughly what would be expected.

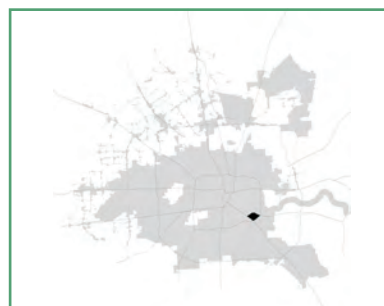
A concentration of Asian households has been developing since 2000 in that small portion of tract 3501 that is in the Greater Hobby Area. The proportion of Asian households almost tripled to 18.6 percent since 2000, about 11.7 percent higher than would be expected in a free market.

Recommended Actions: The City of Houston should conduct real estate testing to see if Asian households are being steered to tract 3501 and whether Latino households are being steered to the other tracts in the Greater Hobby Area. If steering is found, the city needs to take steps to curtail the practice.

Table 50: Pecan Park

Super Neighborhood 70: Pecan Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	56.0%	4.1%	1.8%	84.5%
2008–2012 Households Actual Proportion	56.9%	3.0%	3.2%	88.1%
2008–2012 Households Free Market	62.9%	21.8%	5.2%	32.9%
2008–2012 Households Difference	-6.0%	-18.8%	-2.0%	55.3%
2010 Census Tract 3113				
Householders (2000 Census)	62.9%	1.1%	0.3%	80.6%
2008–2012 Households Actual Proportion	72.9%	2.4%	1.4%	86.7%
2008–2012 Households Free Market	63.7%	20.9%	5.3%	32.8%
2008–2012 Households Difference	9.2%	-18.5%	-3.9%	53.9%
2010 Census Tract 3115				
Householders (2000 Census)	57.6%	2.7%	1.2%	85.2%
2008–2012 Households Actual Proportion	50.2%	1.2%	5.3%	87.8%
2008–2012 Households Free Market	62.9%	21.8%	5.3%	31.8%
2008–2012 Households Difference	-12.7%	-20.6%	0.0%	56.0%
2010 Census Tract 3116				
Householders (2000 Census)	47.7%	8.4%	4.0%	87.0%
2008–2012 Households Actual Proportion	49.3%	7.0%	1.6%	90.5%
2008–2012 Households Free Market	61.7%	22.7%	4.8%	34.8%
2008–2012 Households Difference	-12.4%	-15.7%	-3.2%	55.6%

Pecan Park is a pre-World War II single-family residential community located just south of Harrisburg. Its close proximity to the Port of Houston made it a popular location for workers in the Channel industries. The community is bounded by the Gulf Freeway on the southwest, Loop 610 on the southeast, and Griggs Road on the northwest. Commercial development has eroded the edges of the neighborhood along the freeways. In the southern part of the area, a large apartment complex originally built for adults only is now the home of hundreds of families with school-age children. The influx of young families in general prompted the construction of two new schools for this community. Between 2000 and 2010, the neighborhood's population fell from 19,230 to 16,876 and median household income rose from \$27,214 to \$35,104.



Like adjacent Manchester/Harrisburg, Pecan Park is part of an intensely segregated concentration of Hispanic households. The actual proportions of Hispanic households throughout Pecan Park are far greater than would be expected in the absence of historic and likely current housing discrimination. Similarly, the actual pro-

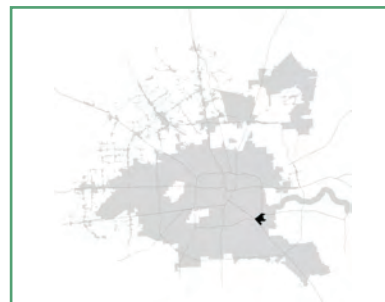
portions of Black households are a mere fraction of what would be expected in a free housing market.

Recommended Actions: This extreme concentration of Hispanic households suggests that real estate testing and the use of tools to expand housing choice are warranted in Pecan Park.

Table 51: Park Place

Super Neighborhood 74: Park Place				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	40.6%	4.4%	11.6%	64.5%
2008–2012 Households Actual Proportion	57.1%	5.0%	10.5%	73.5%
2008–2012 Households Free Market	63.1%	21.7%	5.3%	31.9%
2008–2012 Households Difference	-6.1%	-16.7%	5.2%	41.6%
2010 Census Tract 3201				
Householders (2000 Census)	36.5%	7.3%	2.0%	74.9%
2008–2012 Households Actual Proportion	66.7%	5.0%	0.7%	88.3%
2008–2012 Households Free Market	62.0%	22.6%	5.2%	32.5%
2008–2012 Households Difference	4.7%	-17.6%	-4.5%	55.8%
2010 Census Tract 3202				
Householders (2000 Census)	42.3%	3.2%	15.7%	60.1%
2008–2012 Households Actual Proportion	53.2%	4.9%	14.4%	67.6%
2008–2012 Households Free Market	63.6%	21.3%	5.3%	31.7%
2008–2012 Households Difference	-10.3%	-16.4%	9.1%	35.9%

Park Place was an independent municipality before 1927 when it voluntarily consolidated with the City of Houston. At that time, Broadway and Park Place Boulevards were lined with large homes. Most of these were replaced with apartments and small businesses after deed restrictions in the area lapsed. (Some areas in the wooded setting adjacent to Sims Bayou are still deed restricted.) Many side streets in the community are lined with large pecan trees, some of which date from the 1920s. Industrial development occupies the northeastern corner of the community, which is close to the Houston Ship Channel. In recent years, several aging apartment complexes have been converted to condominiums. The population declined by 701 to 9,201 in 2012 while annual median household income rose from \$28,956 to \$34,260.



Park Place is consolidated into the same Hispanic concentration as Pecan Park and the other super neighborhoods that surround Park Place. The percentage of Latino households has increased since 2000 and is now 55.8 and 35.9 percentage points greater in each census tract than would be expected in a free housing market absent discrimination. The proportions of African American households are nearly identical to what they were in 2000 and are 17.6 and 16.4 percentage points below what would be expected in a free housing market.

While the proportion of Asians continues to be barely measurable in tract 3201, it continues to exceed expectations by about 9 percentage points in census tract 3202.

Recommended Actions: To affirmatively further fair housing in this super neighborhood, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic residents of Park Place to areas outside the city's Latino enclaves and to expand housing choices of African Americans to include Park Place.

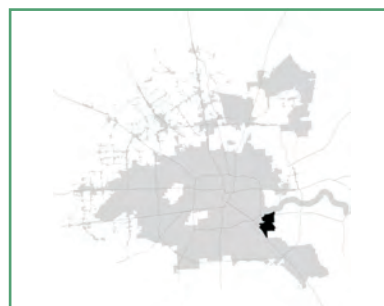
Table 52: Meadowbrook/Allendale

Super Neighborhood 75: Meadowbrook/Allendale				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	64.3%	1.7%	2.1%	61.4%
2008–2012 Households Actual Proportion	66.9%	3.5%	4.3%	71.8%
2008–2012 Households Free Market	64.2%	20.6%	5.5%	31.1%
2008–2012 Households Difference	2.7%	-17.1%	-1.1%	40.7%
2010 Census Tract 3202				
Householders (2000 Census)	42.3%	3.2%	15.7%	60.1%
2008–2012 Households Actual Proportion	53.2%	4.9%	14.4%	67.6%
2008–2012 Households Free Market	63.6%	21.3%	5.3%	31.7%
2008–2012 Households Difference	-10.3%	-16.4%	9.1%	35.9%
2010 Census Tract 3205 (Tract consists of parts of 2000 tracts 3205 and 3219)				
Householders (2000 Census)	67.7%	0.7%	0.1%	58.1%
2008–2012 Households Actual Proportion	72.7%	0.8%	0.4%	82.9%
2008–2012 Households Free Market	65.3%	19.6%	5.5%	31.0%
2008–2012 Households Difference	7.4%	-18.8%	-5.1%	51.9%
2010 Census Tract 3206.01 (Was Tract 3206 in 2000)				
Householders (2000 Census)	53.1%	2.1%	1.2%	75.3%
2008–2012 Households Actual Proportion	73.7%	0.0%	1.5%	76.7%
2008–2012 Households Free Market	63.0%	21.8%	5.2%	32.1%
2008–2012 Households Difference	10.7%	-21.8%	-3.7%	44.6%
2010 Census Tract 3206.02 (Was Tract 3206 in 2000)				
Householders (2000 Census)	53.1%	2.1%	1.2%	75.3%
2008–2012 Households Actual Proportion	60.6%	8.5%	1.7%	79.8%
2008–2012 Households Free Market	62.0%	22.6%	5.1%	32.9%
2008–2012 Households Difference	-1.4%	-14.1%	-3.4%	46.8%
2010 Census Tract 3207 (Tract consists of parts of 2000 tracts 3207, 3208, and 3214)				
Householders (2000 Census)	67.1%	2.9%	1.1%	63.3%
2008–2012 Households Actual Proportion	60.7%	10.0%	9.2%	60.0%
2008–2012 Households Free Market	64.6%	20.4%	5.5%	30.8%
2008–2012 Households Difference	-3.9%	-10.4%	3.7%	29.3%

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Super Neighborhood 75: Meadowbrook/Allendale (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3216				
Householders (2000 Census)	80.8%	1.1%	0.8%	39.7%
2008–2012 Households Actual Proportion	79.9%	0.0%	0.0%	66.7%
2008–2012 Households Free Market	65.8%	19.2%	5.8%	29.5%
2008–2012 Households Difference	14.1%	-19.2%	-5.8%	37.2%
2010 Census Tract 3217 (Tract consists of parts of 2000 tracts 3214 and 3217)				
Householders (2000 Census)	75.3%	0.8%	0.7%	54.7%
2008–2012 Households Actual Proportion	78.1%	1.7%	0.6%	59.9%
2008–2012 Households Free Market	65.9%	19.3%	5.8%	29.0%
2008–2012 Households Difference	12.1%	-17.6%	-5.2%	30.9%
2010 Census Tract 3218 (Tract consists of parts of 2000 tracts 3218 and 3219)				
Householders (2000 Census)	68.5%	0.7%	0.3%	57.9%
2008–2012 Households Actual Proportion	72.8%	2.0%	1.5%	77.9%
2008–2012 Households Free Market	63.7%	21.0%	5.3%	32.3%
2008–2012 Households Difference	9.1%	-19.0%	-3.8%	45.7%
2010 Census Tract 3242 (Tract consists of parts of 2000 tracts 3203, 3204, 3223)				
Householders (2000 Census)	53.0%	1.0%	0.2%	79.4%
2008–2012 Households Actual Proportion	47.6%	0.0%	0.0%	94.0%
2008–2012 Households Free Market	63.4%	21.5%	5.4%	31.2%
2008–2012 Households Difference	-15.8%	-21.5%	-5.4%	62.8%

Meadowbrook/Allendale is located on Houston's southeast edge bounded by the cities of Pasadena and South Houston, Loop 610, the Gulf Freeway, and the Ship Channel. The northern part of the community is home to several major chemical plants. The southern corner, which was once an oil field, is now an industrial area. Several wooded neighborhoods with single-family homes are nestled in between. The oldest areas, Meadowbrook and Allendale, were built before World War II. After the war, Forest Oaks and Oak Meadows were built for Houston's growing population of middle-income citizens. The newest addition to the area, Meadowcreek Village, contains the largest homes in the Community. The population increased from 22,929 in 2000 to 24,431 in 2012 while annual median household income rose from \$34,823 to \$40,823.



Meadowbrook/Allendale is part of the large Latino enclave that includes its neighbor to the west Park Place. The concentrations of Hispanics here range from 59.9 to 94 percent, from 29.3 to 62.8 percentage points higher than expected in a free housing market devoid of discrimination. The proportion of Latino households in tracts 3205, 3216, 3218, and 3242 rose substantially to segregative levels since 2000. There are virtually no African American households in two-

thirds of the census tracts in Meadowbrook and, in seven of 13 tracts, notably fewer Black households than would be expected in a free housing market.

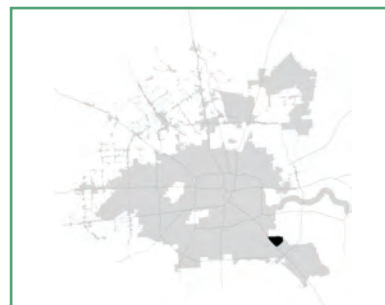
The actual proportions of Asian households are less than expected in 11 of 13 census tracts.

Recommended Actions: To affirmatively further fair housing in this super neighborhood, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for Meadowbrook's Hispanic residents to areas outside the city's Latino enclaves and to expand housing choices of African Americans and Asians to include Meadowbrook.

Table 53: Edgebrook

Super Neighborhood 79: Edgebrook				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	64.7%	7.9%	2.4%	53.1%
2008–2012 Households Actual Proportion	67.3%	12.6%	1.7%	62.4%
2008–2012 Households Free Market	64.3%	20.5%	5.4%	31.9%
2008–2012 Households Difference	3.0%	-7.8%	-3.7%	30.5%
2010 Census Tract 3209 (Tract consists of parts of 2000 tracts 3208 and 3209)				
Householders (2000 Census)	61.9%	8.2%	3.0%	58.3%
2008–2012 Households Actual Proportion	67.1%	16.6%	1.2%	61.2%
2008–2012 Households Free Market	64.0%	20.8%	5.5%	31.5%
2008–2012 Households Difference	3.1%	-4.1%	-4.3%	29.7%
2010 Census Tract 3210				
Householders (2000 Census)	62.3%	9.9%	3.3%	41.4%
2008–2012 Households Actual Proportion	66.2%	10.9%	2.1%	61.8%
2008–2012 Households Free Market	65.6%	19.2%	5.5%	31.6%
2008–2012 Households Difference	0.6%	-8.3%	-3.4%	30.2%
2010 Census Tract 3213 (Tract consists of parts of 2000 tracts 3213 and 3214)				
Householders (2000 Census)	68.6%	6.5%	1.5%	54.9%
2008–2012 Households Actual Proportion	68.9%	9.9%	1.7%	64.5%
2008–2012 Households Free Market	62.8%	21.8%	5.1%	32.9%
2008–2012 Households Difference	6.1%	-11.9%	-3.4%	31.6%

The Edgebrook Area is a group of single-family home subdivisions on both sides of Edgebrook Boulevard in southeast Houston. The City of South Houston forms the northern boundary; South Shaver sets the eastern and southern boundaries, and the western boundary is the Gulf Freeway. The area began to develop after the opening of the Gulf Freeway in 1948. Its oldest subdivision is Freeway Manor, followed by Gulfway Terrace, Sun Valley, and Arlington Heights, all developed in the 1950s. Large apartment complexes are found along the freeway, Edgebrook and State Highway 3, which bisects the community. The population has held pretty steady: 19,770 in 2000 and 20,318 in 2012 as did annual median household income which rose from \$36,888 to \$40,969.



Edgebrook is also part of the Houston's sprawling Latino concentration with the proportion of Hispanic households increasing in all three census tracts since 2000. The actual proportion of Latino households is around 30 percentage points higher than expected in all three census tracts. Since 2000 the proportion of Black households doubled in tract 3209 and is roughly what would be expected in

a free housing market. The proportions of Asian households continue to be miniscule and less than expected.

Recommended Actions: To affirmatively further fair housing in Edgebrook, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic residents of Edgebrook to areas outside the city's Latino enclaves and to expand housing choices of Asians to include Edgebrook.

Table 54: South Belt/Ellington

Super Neighborhood 80: South Belt/Ellington				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	71.4%	10.2%	6.7%	21.0%
2008–2012 Households Actual Proportion	63.6%	16.8%	10.4%	39.4%
2008–2012 Households Free Market	67.2%	18.2%	6.0%	28.2%
2008–2012 Households Difference	-3.6%	-1.3%	4.4%	11.2%
2010 Census Tract 3211				
Householders (2000 Census)	69.2%	12.4%	2.9%	24.8%
2008–2012 Households Actual Proportion	60.3%	16.5%	5.5%	58.2%
2008–2012 Households Free Market	65.9%	19.2%	5.8%	29.4%
2008–2012 Households Difference	-5.7%	-2.7%	-0.3%	28.7%
2010 Census Tract 3212				
Householders (2000 Census)	73.4%	2.7%	1.2%	48.8%
2008–2012 Households Actual Proportion	68.7%	8.6%	1.1%	75.8%
2008–2012 Households Free Market	61.4%	23.1%	4.9%	34.1%
2008–2012 Households Difference	7.3%	-14.5%	-3.8%	41.7%
2010 Census Tract 3240 (Tract consists of parts of 2000 tracts 3236 and 3240)				
Householders (2000 Census)	86.6%	1.3%	2.6%	19.5%
2008–2012 Households Actual Proportion	88.2%	1.3%	6.8%	32.7%
2008–2012 Households Free Market	68.3%	17.2%	6.1%	27.2%
2008–2012 Households Difference	19.9%	-15.9%	0.7%	5.5%
2010 Census Tract 3339.01 (Was Tract 3339 in 2000)				
Householders (2000 Census)	62.4%	14.1%	6.2%	27.7%
2008–2012 Households Actual Proportion	52.9%	19.9%	15.7%	52.5%
2008–2012 Households Free Market	68.4%	17.0%	6.2%	26.9%
2008–2012 Households Difference	-15.5%	2.9%	9.5%	25.6%
2010 Census Tract 3339.02 (Was Tract 3339 in 2000)				
Householders (2000 Census)	62.4%	14.1%	6.2%	27.7%
2008–2012 Households Actual Proportion	62.3%	24.0%	3.6%	47.3%
2008–2012 Households Free Market	65.7%	19.3%	5.6%	30.6%
2008–2012 Households Difference	-3.4%	4.7%	-2.0%	16.7%

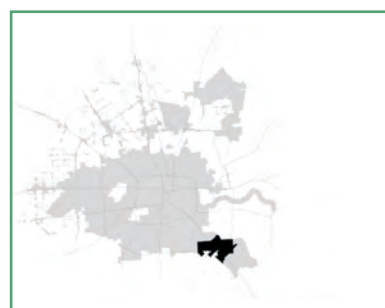
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Super Neighborhood 80: South Belt/Ellington (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3340.01 (Was Tract 3340 in 2000)				
Householders (2000 Census)	65.2%	15.6%	5.9%	23.0%
2008–2012 Households Actual Proportion	60.1%	35.8%	1.8%	50.9%
2008–2012 Households Free Market	64.7%	20.1%	5.6%	31.1%
2008–2012 Households Difference	-4.6%	15.7%	-3.8%	19.8%
2010 Census Tract 3340.02 (Was Tract 3340 in 2000)				
Householders (2000 Census)	65.2%	15.6%	5.9%	23.0%
2008–2012 Households Actual Proportion	70.8%	13.2%	11.6%	29.1%
2008–2012 Households Free Market	66.1%	18.9%	5.8%	29.8%
2008–2012 Households Difference	4.7%	-5.7%	5.7%	-0.7%
2010 Census Tract 3340.03 (Was Tract 3340 in 2000)				
Householders (2000 Census)	65.2%	15.6%	5.9%	23.0%
2008–2012 Households Actual Proportion	65.2%	14.9%	14.1%	35.7%
2008–2012 Households Free Market	66.5%	18.6%	5.9%	29.0%
2008–2012 Households Difference	-1.3%	-3.7%	8.3%	6.7%
2010 Census Tract 3401				
Householders (2000 Census)	74.5%	11.1%	5.1%	15.5%
2008–2012 Households Actual Proportion	63.0%	18.9%	5.9%	29.6%
2008–2012 Households Free Market	64.6%	20.2%	5.4%	31.8%
2008–2012 Households Difference	-1.6%	-1.3%	0.4%	-2.2%
2010 Census Tract 3402.01 (Tract consists of parts of 2000 tracts 3402 and 3420)				
Householders (2000 Census)	83.9%	1.8%	10.6%	8.0%
2008–2012 Households Actual Proportion	67.6%	1.8%	28.7%	10.6%
2008–2012 Households Free Market	73.7%	13.1%	7.3%	19.5%
2008–2012 Households Difference	-6.1%	-11.3%	21.5%	-8.9%
2010 Census Tract 3501 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	83.6%	5.8%	6.3%	9.7%
2008–2012 Households Actual Proportion	56.9%	19.7%	18.3%	22.0%
2008–2012 Households Free Market	70.1%	15.9%	6.6%	24.5%
2008–2012 Households Difference	-13.2%	3.8%	11.7%	-2.5%

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Super Neighborhood 80: South Belt/Ellington (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3502				
Householders (2000 Census)	71.3%	10.1%	7.1%	22.3%
2008–2012 Households Actual Proportion	67.3%	15.0%	7.7%	40.6%
2008–2012 Households Free Market	68.9%	16.7%	6.2%	26.6%
2008–2012 Households Difference	-1.6%	-1.8%	1.5%	13.9%
2010 Census Tract 3503 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	73.2%	12.7%	7.8%	14.5%
2008–2012 Households Actual Proportion	70.1%	11.4%	10.4%	28.7%
2008–2012 Households Free Market	69.0%	16.8%	6.4%	25.2%
2008–2012 Households Difference	1.1%	-5.4%	3.9%	3.5%
2010 Census Tract 3504				
Householders (2000 Census)	62.5%	12.7%	10.4%	24.6%
2008–2012 Households Actual Proportion	59.9%	17.4%	10.6%	40.8%
2008–2012 Households Free Market	66.0%	19.2%	5.9%	29.0%
2008–2012 Households Difference	-6.0%	-1.8%	4.7%	11.8%
2010 Census Tract 3505				
Householders (2000 Census)	56.3%	14.6%	12.1%	32.6%
2008–2012 Households Actual Proportion	58.8%	20.2%	12.4%	43.9%
2008–2012 Households Free Market	65.5%	19.6%	5.6%	30.1%
2008–2012 Households Difference	-6.7%	0.6%	6.9%	13.8%

South Belt/Ellington is a part of southeast Houston, located at the intersection of the Sam Houston Parkway (Beltway 8) and the Gulf Freeway (I-45 S). Ellington Field, a general aviation airport that was once a military training field, is at the eastern edge of the community. Almeda Mall is the center of a large retail and commercial district that spreads across both sides of the Gulf Freeway. Some of the older subdivisions in the community include Beverly Hills, Gulf Palms, and the Genoa townsite. Later developments include Kirkwood, Sagemont, and Scarsdale. The City of Houston annexed Sycamore Valley, another subdivision in the area, in 1994. The completion of Beltway 8 has stimulated residential and commercial development throughout the community. New home construction is continuing in the western subdivision of Bridgegate. Population skyrocketed by 57 percent to 55,217 in 2012 while annual median household income rose from \$46,229 to \$54,198.



The city's Latino concentration extends into five of the eight census tracts north of Beltway 8 — 3211, 3212, 3339.01, 3339.02, and 3340.01. With the exception of tract 3212 where the proportion of Latino households grew from 48.8 percent in 2000 to 75.8 percentage points (41.7 percent more than expected in a free

market), the concentrations of Hispanic households is not nearly as intense as in the super neighborhoods to the north and west.

Tract 3340.01 is one of the few census tracts in Houston where the actual proportions of both African Americans and Latinos is greater than the proportions expected in a free market without discrimination. The proportions of both groups increased by more than 20 percentage points since 2000, suggesting that steering may be occurring.

The proportion of Asian households nearly tripled since 2000 in census tract 3402.01 from 10.6 to 28.7 percent, 21.5 percentage points more than would be expected in a free housing market. Neighboring tracts 3340.02 and 3340.03 saw smaller growth spurts in their Asian composition since 2000 as did tract 3339.01.

The actual composition of eight of the 15 census tracts that comprise Southbelt/Ellington are the same as would be expected in a free market absent housing discrimination. Six of these are outside Beltway 8.

Recommended Actions: To affirmatively further fair housing in Southbelt/Ellington, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic residents of Southbelt/Ellington to areas outside the city's Latino enclaves.

The city should look more closely at the national origins of the Asian households in census tracts 3339.01, 3340.02, and 3340.03 to see which Asian groups are concentrating here (Chinese, Indian, Japanese, Pakistani, Korean, etc.) and conduct real estate testing to see if steering is at play.

Table 55: Clear Lake

Super Neighborhood 81: Clear Lake				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	81.4%	5.0%	8.3%	9.1%
2008–2012 Households Actual Proportion	74.4%	7.8%	10.8%	17.6%
2008–2012 Households Free Market	69.0%	16.8%	6.3%	25.5%
2008–2012 Households Difference	5.5%	-9.0%	4.5%	-7.9%
2010 Census Tract 3401 (Less Than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	74.5%	11.1%	5.1%	15.5%
2008–2012 Households Actual Proportion	63.0%	18.9%	5.9%	29.6%
2008–2012 Households Free Market	64.6%	20.2%	5.4%	31.8%
2008–2012 Households Difference	-1.6%	-1.3%	0.4%	-2.2%
2010 Census Tract 3402.01 (Tract consists of parts of 2000 tracts 3402 and 3420)				
Householders (2000 Census)	83.9%	1.8%	10.6%	8.0%
2008–2012 Households Actual Proportion	67.6%	1.8%	28.7%	10.6%
2008–2012 Households Free Market	73.7%	13.1%	7.3%	19.5%
2008–2012 Households Difference	-6.1%	-11.3%	21.5%	-8.9%
2010 Census Tract 3402.02 (Tract consists of parts of 2000 tracts 3402 and 3420)				
Householders (2000 Census)	83.9%	1.8%	10.6%	8.0%
2008–2012 Households Actual Proportion	69.5%	3.6%	22.4%	12.1%
2008–2012 Households Free Market	75.9%	11.3%	7.6%	16.9%
2008–2012 Households Difference	-6.5%	-7.7%	14.9%	-4.9%
2010 Census Tract 3403.01 (Was Tract 3403 in 2000)				
Householders (2000 Census)	86.0%	2.4%	9.5%	4.4%
2008–2012 Households Actual Proportion	71.4%	6.7%	21.5%	4.5%
2008–2012 Households Free Market	79.8%	8.5%	8.0%	12.0%
2008–2012 Households Difference	-8.4%	-1.7%	13.4%	-7.5%
2010 Census Tract 3403.02 (Was Tract 3403 in 2000)				
Householders (2000 Census)	86.0%	2.4%	9.5%	4.4%
2008–2012 Households Actual Proportion	83.1%	3.5%	10.8%	9.4%
2008–2012 Households Free Market	73.6%	13.2%	7.3%	19.5%
2008–2012 Households Difference	9.6%	-9.7%	3.5%	-10.1%

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Super Neighborhood 81: Clear Lake (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3404				
Householders (2000 Census)	86.7%	1.7%	9.0%	3.2%
2008–2012 Households Actual Proportion	87.5%	0.0%	12.5%	3.3%
2008–2012 Households Free Market	75.9%	11.4%	7.6%	16.6%
2008–2012 Households Difference	11.5%	-11.4%	5.0%	-13.3%
2010 Census Tract 3405				
Householders (2000 Census)	82.1%	4.9%	5.2%	12.0%
2008–2012 Households Actual Proportion	70.3%	7.2%	11.7%	21.4%
2008–2012 Households Free Market	66.3%	18.9%	5.8%	28.8%
2008–2012 Households Difference	4.0%	-11.7%	5.9%	-7.4%
2010 Census Tract 3406				
Householders (2000 Census)	92.6%	2.6%	3.0%	4.1%
2008–2012 Households Actual Proportion	95.1%	2.9%	0.8%	11.1%
2008–2012 Households Free Market	70.4%	15.6%	6.6%	24.0%
2008–2012 Households Difference	24.7%	-12.7%	-5.8%	-12.8%
2010 Census Tract 3407				
Householders (2000 Census)	77.9%	4.4%	10.8%	8.3%
2008–2012 Households Actual Proportion	72.6%	4.7%	9.1%	19.4%
2008–2012 Households Free Market	68.5%	17.0%	6.3%	26.4%
2008–2012 Households Difference	4.0%	-12.3%	2.8%	-7.0%
2010 Census Tract 3408				
Householders (2000 Census)	78.6%	4.1%	14.0%	6.7%
2008–2012 Households Actual Proportion	73.2%	4.5%	18.3%	6.6%
2008–2012 Households Free Market	72.5%	14.1%	7.2%	20.3%
2008–2012 Households Difference	0.7%	-9.5%	11.1%	-13.7%
2010 Census Tract 3409				
Householders (2000 Census)	72.0%	12.7%	5.3%	13.2%
2008–2012 Households Actual Proportion	76.5%	11.8%	4.9%	28.4%
2008–2012 Households Free Market	63.3%	21.4%	5.2%	32.2%
2008–2012 Households Difference	13.2%	-9.6%	-0.4%	-3.8%

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Super Neighborhood 81: Clear Lake (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3410				
Householders (2000 Census)	80.3%	7.6%	4.8%	11.8%
2008–2012 Households Actual Proportion	76.6%	11.3%	6.0%	20.8%
2008–2012 Households Free Market	65.3%	19.8%	5.7%	29.8%
2008–2012 Households Difference	11.4%	-8.5%	0.3%	-9.0%
2010 Census Tract 3413.01 (Was Tract 3413 in 2000)				
Householders (2000 Census)	78.0%	6.5%	8.3%	10.6%
2008–2012 Households Actual Proportion	76.4%	6.1%	8.1%	14.8%
2008–2012 Households Free Market	65.3%	19.9%	5.7%	29.5%
2008–2012 Households Difference	11.1%	-13.8%	2.3%	-14.7%
2010 Census Tract 3413.02 (Was Tract 3413 in 2000)				
Householders (2000 Census)	78.0%	6.5%	8.3%	10.6%
2008–2012 Households Actual Proportion	72.4%	16.3%	8.0%	22.7%
2008–2012 Households Free Market	65.0%	19.8%	5.6%	30.9%
2008–2012 Households Difference	7.4%	-3.5%	2.4%	-8.1%
2010 Census Tract 3506.01 (Was Tract 3506 in 2000)				
Householders (2000 Census)	77.7%	8.8%	8.0%	11.2%
2008–2012 Households Actual Proportion	72.3%	10.7%	14.0%	10.9%
2008–2012 Households Free Market	69.9%	16.2%	6.6%	23.9%
2008–2012 Households Difference	2.5%	-5.5%	7.3%	-13.0%
2010 Census Tract 3508.02 (Was Tract 3508 in 2000)				
Householders (2000 Census)	83.1%	7.2%	2.9%	12.2%
2008–2012 Households Actual Proportion	73.0%	6.2%	9.6%	28.6%
2008–2012 Households Free Market	70.1%	15.8%	6.4%	24.9%
2008–2012 Households Difference	2.9%	-9.7%	3.1%	3.7%

Clear Lake lies in the southeast corner of the City of Houston. Before NASA's Manned Spacecraft Center was built in the early 1960s, it was largely coastal prairie devoted to ranching. Today, the area includes the master planned community of Clear Lake City, the adjacent communities of Pipers Meadow and Sterling Knoll, and the Baybrook Mall retail center. Clear Lake City is home to numerous aeronautics contractors attracted by NASA. New home construction continues in the northern part of Clear Lake City; however, the northern and western edges of the area are undeveloped because of traffic patterns at Ellington Field and a nearby oil field. Population grew from 57,117 to 60,159 while annual median household income rose from \$68,815 to \$81,540.



The actual compositions of 14 of the 16 Clear Lake census tracts are what

would be expected in a free market absent housing discrimination. However the actual proportions of African American households in ten of the 16 census tracts are nine or more percentage points lower than would be expected in a free housing market.

The actual proportion of Caucasian households in tract 3406 is nearly 25 percentage points higher than expected while the proportions of Black and Hispanic households are each nearly 13 percentage points lower than would be expected.

Recommended Actions: While we have established a relatively high 15 percentage point differential between actual and expected figures for this study instead of the usual ten percentage points, these gaps in this newer super neighborhood are of concern and it would behoove the City of Houston to conduct testing to see if higher income minority households are being steered away from Clear Lake.

The actual proportion of Asian households in tract 3402.01 nearly tripled from 10.6 to 28.7 percent; since 2000, nearly 22 percentage points higher than would be expected in the absence of housing discrimination. Two adjacent tracts, 3402.02 and 3403.01 also experienced large increases in their Asian populations, from 10.6 to 22.4 and 9.5 to 21.5 percent respectively. The actual proportions of Asian households exceeds the expected proportions in those tracts by more than seven percentage points. Four additional adjacent tracts — 3403.02, 3404, 3405, and 3408 — had slightly greater actual proportions of Asian households than would be expected. This is of possible concern only because the Asian composition is generally expected to be about five percentage points nearly everywhere in Houston and small differences may be more significant than with more populous races and Hispanics who constitute a much larger percentage of the city's population.

Recommended Actions: While these are well within the 15 point differential used in this study, the proximity of these tracts suggest that a concentration of Asian households could be in its formative stages. The city would be prudent to conduct testing to see if steering is taking place. In addition, the city should look more closely at the national origins of the Asian populations in census tracts 3339.01, 3340.02, and 3340.03 to see whether a single Asian groups is concentrating here (Chinese, Indian, Japanese, Pakatani, Korean, etc.) or if the national origins of the Asian households here is more diverse.

Nearby Census Tracts Not Assigned to Any Super Neighborhood. Census tract 3402.03 also has a somewhat higher than expected Asian population much like tract 3404 as it became more diverse since 2000. The actual composition of tract 3411 falls within expectations for a free housing market as it became more diverse since 2000.

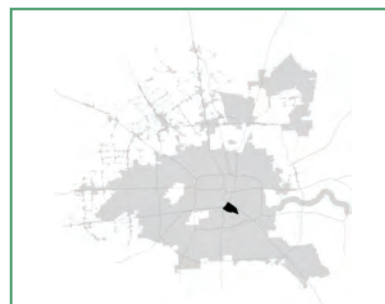
Table 56: Greater Third Ward

Super Neighborhood 67: Greater Third Ward				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	15.2%	76.8%	3.0%	6.9%
2008–2012 Households Actual Proportion	31.8%	58.9%	5.3%	9.4%
2008–2012 Households Free Market	64.0%	21.5%	5.7%	28.2%
2008–2012 Households Difference	-32.1%	37.5%	-0.4%	-18.8%
2010 Census Tract 3120				
Householders (2000 Census)	29.0%	51.2%	15.6%	4.2%
2008–2012 Households Actual Proportion	35.1%	54.1%	8.3%	6.4%
2008–2012 Households Free Market	62.7%	22.7%	5.7%	28.3%
2008–2012 Households Difference	-27.6%	31.4%	2.6%	-21.9%
2010 Census Tract 3121 (No households in tract 3121)				
Householders (2000 Census)	There is only college housing ("group quarters") in this tract. No households.			
2008–2012 Households Actual Proportion				
2008–2012 Households Free Market				
2008–2012 Households Difference				
2010 Census Tract 3122				
Householders (2000 Census)	4.9%	90.4%	0.2%	7.8%
2008–2012 Households Actual Proportion	6.7%	89.9%	1.4%	8.2%
2008–2012 Households Free Market	57.8%	26.9%	4.9%	32.7%
2008–2012 Households Difference	-51.1%	63.1%	-3.5%	-24.5%
2010 Census Tract 3123				
Householders (2000 Census)	5.0%	88.8%	2.5%	6.8%
2008–2012 Households Actual Proportion	14.4%	79.0%	0.0%	14.3%
2008–2012 Households Free Market	60.6%	24.3%	5.3%	31.1%
2008–2012 Households Difference	-46.2%	54.7%	-5.3%	-16.7%
2010 Census Tract 3124				
Householders (2000 Census)	2.6%	93.6%	0.1%	4.7%
2008–2012 Households Actual Proportion	11.8%	79.8%	1.3%	18.1%
2008–2012 Households Free Market	60.9%	24.0%	5.2%	31.8%
2008–2012 Households Difference	-49.0%	55.8%	-3.9%	-13.7%

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Super Neighborhood 67: Greater Third Ward (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3126 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	38.8%	50.2%	2.4%	12.5%
2008–2012 Households Actual Proportion	63.9%	19.8%	11.3%	10.5%
2008–2012 Households Free Market	70.2%	16.0%	6.5%	23.3%
2008–2012 Households Difference	-6.3%	3.8%	4.7%	-12.8%
2010 Census Tract 3127				
Householders (2000 Census)	2.0%	94.6%	0.2%	2.5%
2008–2012 Households Actual Proportion	4.5%	93.5%	0.0%	0.9%
2008–2012 Households Free Market	62.9%	22.2%	5.4%	30.9%
2008–2012 Households Difference	-58.4%	71.4%	-5.4%	-29.9%
2010 Census Tract 3128				
Householders (2000 Census)	2.3%	93.1%	0.9%	4.5%
2008–2012 Households Actual Proportion	9.4%	90.1%	0.0%	5.9%
2008–2012 Households Free Market	57.7%	27.3%	5.2%	30.5%
2008–2012 Households Difference	-48.3%	62.8%	-5.2%	-24.5%

The Greater Third Ward is home to some of the most important institutions in Houston's African American community, including Texas Southern University, Riverside Hospital, and dozens of prominent churches. Originally a small community of shotgun style houses and modest frame homes, over time the area called "Third Ward" expanded to the south into neighborhoods such as Washington Terrace. By the mid 1950s, the growing African American middle class found more substantial brick homes and duplexes in areas formerly restricted to whites. Neighborhood household income has not kept pace with the rest of the city; however, recently there has been some revival along Scott. During the 2000s, the population fell by 1,423 to 14,040 while the annual median household income more than doubled from \$14,493 to \$38,936.



Aside from the small portion of the Greater Third Ward that is in tract 3126 (most of which is in the Museum Park super neighborhood), the Greater Third Ward continues to exhibit the vestiges of historic segregation although there are signs of greater diversity developing. The actual proportions of Black households remain much greater than would be expected in a free housing market not distorted by discrimination, ranging from 31.4 to 71.4 percentage points higher than would be expected. The actual proportions of Caucasian and Latino households continue to be substantially lower than expected with a range of 27.6 to 58.4 percentage points lower among white households and 16.7 to 29.9 percentage points lower among Hispanic households of any race. As is the case in most of Houston, Asian households are missing in action except in tract 3120 where the proportion of Asian households fell almost in half since 2000 and is now what

would be expected and in tract 3126 where the proportion increased almost five fold since 2000 and is roughly what would be expected.

The proportions of Hispanic households have barely budged since 2000 except in tracts 3124 where it increased about four fold from 4.7 to 18.1 percent, still 13.7 percent lower than would be expected in a free housing market.

The proportions of Black households remained pretty much the same except in tract 3124 where it declined from 93.6 to 79.8 percent, still 55.8 percentage points greater than expected in a free housing market and in tract 3126 which is analyzed with the rest of the tracts in the Museum Park super neighborhood in the city's southwest quadrant.

While the actual proportions of white households have barely changed in most of the Greater Third Ward census tracts since 2000, tracts 3123, 3124, and 3128 have seen a measurable increase as has tract 3125 which is analyzed with the rest of the tracts in the Museum Park super neighborhood in the city's southwest quadrant.

It is possible that a more diverse set of households may be moving into the Greater Third Ward due to its proximity to the predominantly Caucasian Museum Park, Midtown, and Medical Center super neighborhoods. The huge increase in median household income from \$14,493 in 2000 to \$38,936 also suggests that gentrification is likely occurring in the Greater Third Ward.

Recommended Actions: The Greater Third Ward appears to offer the City of Houston the opportunity to reduce economic stratification and racial segregation.

The data suggest that the Greater Third Ward *may* be in the early stages of integrating racially, ethnically, and economically. To affirmatively further fair housing in the Greater Third Ward, Houston faces the challenge of fostering development of a stable, racially and economically integrated neighborhood. The city needs to implement the recommendations elsewhere in this report to preserve a significant proportion of the existing housing that is affordable to households with modest incomes in the face of gentrification while fostering this growing economic, racial, and Latino diversification.

When looking at continued progress toward these goals, it is vital to remember that successful integration of a neighborhood results from incremental change and doesn't happen overnight.

Table 57: MacGregor

Super Neighborhood 83: MacGregor				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	21.6%	67.6%	6.2%	6.0%
2008–2012 Households Actual Proportion	33.3%	53.3%	9.2%	7.6%
2008–2012 Households Free Market	66.1%	19.4%	6.0%	27.3%
2008–2012 Households Difference	-32.8%	33.9%	3.2%	-19.8%
2010 Census Tract 3120				
Householders (2000 Census)	29.0%	51.2%	15.6%	4.2%
2008–2012 Households Actual Proportion	35.1%	54.1%	8.3%	6.4%
2008–2012 Households Free Market	62.7%	22.7%	5.7%	28.3%
2008–2012 Households Difference	-27.6%	31.4%	2.6%	-21.9%
2010 Census Tract 3126 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	38.8%	50.2%	2.4%	12.5%
2008–2012 Households Actual Proportion	63.9%	19.8%	11.3%	10.5%
2008–2012 Households Free Market	70.2%	16.0%	6.5%	23.3%
2008–2012 Households Difference	-6.3%	3.8%	4.7%	-12.8%
2010 Census Tract 3129				
Householders (2000 Census)	1.9%	95.9%	0.8%	0.8%
2008–2012 Households Actual Proportion	5.8%	88.8%	3.0%	0.0%
2008–2012 Households Free Market	62.7%	22.6%	5.6%	29.3%
2008–2012 Households Difference	-56.9%	66.2%	-2.6%	-29.3%
2010 Census Tract 3130				
Householders (2000 Census)	4.0%	92.0%	0.5%	3.7%
2008–2012 Households Actual Proportion	9.6%	88.2%	0.9%	4.3%
2008–2012 Households Free Market	63.4%	21.4%	5.4%	31.3%
2008–2012 Households Difference	-53.8%	66.8%	-4.5%	-27.0%
2010 Census Tract 3131 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	64.7%	10.2%	20.7%	8.7%
2008–2012 Households Actual Proportion	66.3%	16.0%	15.5%	12.7%
2008–2012 Households Free Market	69.9%	16.3%	6.5%	23.6%
2008–2012 Households Difference	-3.6%	-0.3%	9.0%	-10.9%

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Super Neighborhood 83: MacGregor (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3132				
Householders (2000 Census)	7.1%	84.8%	3.8%	5.0%
2008–2012 Households Actual Proportion	9.7%	86.3%	1.7%	3.6%
2008–2012 Households Free Market	66.4%	19.0%	5.9%	27.9%
2008–2012 Households Difference	-56.7%	67.3%	-4.2%	-24.3%
2010 Census Tract 3133 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	4.4%	92.8%	0.0%	5.2%
2008–2012 Households Actual Proportion	4.4%	87.5%	0.0%	11.0%
2008–2012 Households Free Market	64.0%	21.0%	5.5%	30.5%
2008–2012 Households Difference	-59.6%	66.5%	-5.5%	-19.5%
2010 Census Tract 3139 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	40.0%	36.6%	16.8%	7.2%
2008–2012 Households Actual Proportion	33.7%	38.1%	20.4%	9.6%
2008–2012 Households Free Market	64.8%	20.4%	5.8%	29.1%
2008–2012 Households Difference	-31.1%	17.7%	14.7%	-19.6%

MacGregor is a collection of neighborhoods on both sides of Brays Bayou east of the Texas Medical Center. The area became home to many of Houston's African American professionals during the 1950s and 1960s. At that time some large homes were demolished or converted to commercial uses. As a result some parts of the community include stately homes interspersed with small motels and deteriorated apartments. Some subdivisions, notably Timbercrest, University Oaks and Riverside Terrace along South MacGregor, retain their gracious residential characteristics and contain numerous examples of outstanding architecture. Population grew to 14,083 in 2012 from 13,997 in 2000 while annual median household income rose from \$39,615 to \$48,999.



MacGregor is at the northern tip of an expansive concentration of predominantly African American super neighborhoods stretching to the city's southern boundaries. With the exception of the small portion of census tract 3131, most of which is in the Medical Center super neighborhood, and the small portion of tract 3139, most of which is in the Astrodome Area super neighborhood (both of which are analyzed in the southwest quadrant portion of this report), MacGregor has long been part of this south central Black enclave.

In tract 3126, the decline in the actual proportion of African American households from 50.2 in 2000 to 19.8 percent and increase in the actual proportion of

white households from 38.8 to 63.9 percent has changed the composition of tract 3126 to what would be expected in a free market lacking housing discrimination.¹⁶

The actual proportions of African American households in the tracts that comprise the core of the MacGregor super neighborhood range from 54.1 to 88.8 percent Black, from 31.4 to 66.8 percentage points higher than expected in a free market in housing. The actual proportions of white households range from 27.6 to 59.6 percent lower than would be expected in the absence of discrimination.

The actual proportions of Latino households remains well below what would be expected in a free market, from 19.5 to 29.3 percentage points.

The Asian population in the tracts completely within MacGregor is barely measurable except in tract 3120 where the actual proportion is about what would be expected in a free market. The proportion of Asian households nearly fell in half since 2000.

Recommended Actions: To affirmatively further fair housing in this super neighborhood, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the African American residents of MacGregor to areas outside the city's Black enclaves and to expand housing choices for Caucasians, Hispanics, and Asians to include MacGregor.

16. See the discussion of this tract in the analysis of the Greater Third Ward, immediately before MacGregor.

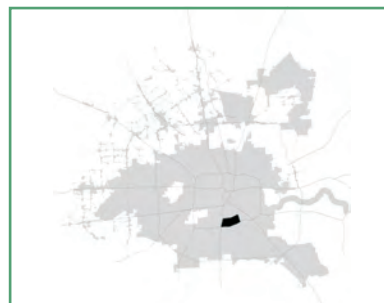
Table 58: Greater OST/South Union

Super Neighborhood 68: Greater OST/South Union				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	5.3%	88.9%	1.0%	7.3%
2008–2012 Households Actual Proportion	8.0%	86.3%	0.6%	10.3%
2008–2012 Households Free Market	62.2%	22.6%	5.3%	31.7%
2008–2012 Households Difference	-54.3%	63.7%	-4.6%	-21.4%
2010 Census Tract 3132 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	7.1%	84.8%	3.8%	5.0%
2008–2012 Households Actual Proportion	9.7%	86.3%	1.7%	3.6%
2008–2012 Households Free Market	66.4%	19.0%	5.9%	27.9%
2008–2012 Households Difference	-56.7%	67.3%	-4.2%	-24.3%
2010 Census Tract 3133				
Householders (2000 Census)	4.4%	92.8%	0.0%	5.2%
2008–2012 Households Actual Proportion	4.4%	87.5%	0.0%	11.0%
2008–2012 Households Free Market	64.0%	21.0%	5.5%	30.5%
2008–2012 Households Difference	-59.6%	66.5%	-5.5%	-19.5%
2010 Census Tract 3134				
Householders (2000 Census)	6.6%	88.8%	0.0%	9.3%
2008–2012 Households Actual Proportion	11.3%	87.0%	0.0%	12.1%
2008–2012 Households Free Market	61.4%	23.1%	5.1%	33.0%
2008–2012 Households Difference	-50.1%	63.9%	-5.1%	-20.9%
2010 Census Tract 3135				
Householders (2000 Census)	6.6%	88.8%	0.0%	9.3%
2008–2012 Households Actual Proportion	9.1%	81.2%	0.0%	18.1%
2008–2012 Households Free Market	61.1%	23.7%	5.1%	32.3%
2008–2012 Households Difference	-52.0%	57.5%	-5.1%	-14.2%
2010 Census Tract 3136				
Householders (2000 Census)	6.4%	84.2%	0.2%	13.4%
2008–2012 Households Actual Proportion	8.3%	80.7%	0.0%	17.8%
2008–2012 Households Free Market	60.8%	23.7%	5.1%	32.9%
2008–2012 Households Difference	-52.5%	56.9%	-5.1%	-15.1%

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Super Neighborhood 68: Greater OST/South Union (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3137				
Householders (2000 Census)	3.5%	93.8%	0.0%	4.5%
2008–2012 Households Actual Proportion	6.2%	92.5%	0.0%	2.8%
2008–2012 Households Free Market	62.7%	22.0%	5.2%	32.3%
2008–2012 Households Difference	-56.6%	70.5%	-5.2%	-29.5%
2010 Census Tract 3138				
Householders (2000 Census)	2.6%	92.2%	1.7%	4.3%
2008–2012 Households Actual Proportion	6.6%	89.4%	1.6%	8.4%
2008–2012 Households Free Market	59.8%	24.9%	5.0%	33.1%
2008–2012 Households Difference	-53.2%	64.5%	-3.4%	-24.7%

Greater OST/South Union is a collection of neighborhoods in south central Houston inside Loop 610. Most of the homes in this community were built just after World War II. Many of these small homes have been converted to commercial use, especially along Martin Luther King Boulevard. Other areas, such as LaSalette Place, remain deed restricted and well maintained. One small portion of Riverside Terrace is included in the community immediately south of MacGregor Park. Commercial development has revived along Old Spanish Trail, and the Shrine of the Black Madonna church has purchased and redeveloped a number of deteriorated properties near its sanctuary. In addition, new home construction is occurring in various locations throughout the area. The population fell slightly from 19,523 to 19,444 during the decade while annual median household income rose from \$20,586 to \$27,785.



The actual proportion of African American households in every census tract in Greater OST/South Union is 56.9 to 67.3 percentage points greater than the proportion expected in a free housing market absent discrimination. The actual proportions remain largely changed from 2000, now ranging from 80.7 percent to 92.5 percent. The actual proportions of whites range from 50.1 to 59.6 percentage points less than would be expected. The actual proportions of Hispanic households range from 15.1 to 29.5 percentage points less than would be expected. Asian households barely register throughout this super neighborhood.

Recommended Actions: The city needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians will consider housing in this super neighborhood. Real estate testing would reveal whether the continuing segregation in Greater OST/South Union is due to historic segregation or current illegal discriminatory real estate practices.

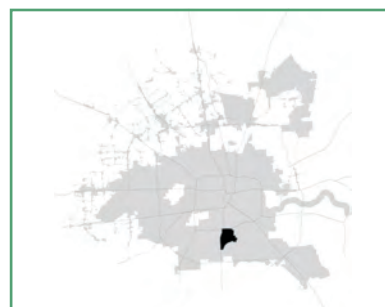
Table 59: Sunnyside

Super Neighborhood 71: Sunnyside				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	2.0%	94.6%	0.9%	3.3%
2008–2012 Households Actual Proportion	4.0%	92.3%	0.4%	5.8%
2008–2012 Households Free Market	60.8%	23.9%	5.1%	32.7%
2008–2012 Households Difference	-56.8%	68.4%	-4.7%	-26.9%
2010 Census Tract 3311				
Householders (2000 Census)	3.6%	92.9%	0.2%	5.5%
2008–2012 Households Actual Proportion	52.7%	91.3%	0.2%	96.0%
2008–2012 Households Free Market	61.2%	23.2%	5.1%	33.4%
2008–2012 Households Difference	-55.7%	68.1%	-5.1%	-27.2%
2010 Census Tract 3312				
Householders (2000 Census)	1.2%	96.8%	0.1%	2.0%
2008–2012 Households Actual Proportion	3.3%	90.6%	0.0%	5.6%
2008–2012 Households Free Market	59.2%	25.3%	5.0%	32.8%
2008–2012 Households Difference	-56.0%	65.3%	-5.0%	-27.2%
2010 Census Tract 3313				
Householders (2000 Census)	0.6%	97.8%	0.2%	1.4%
2008–2012 Households Actual Proportion	0.9%	96.2%	0.0%	2.7%
2008–2012 Households Free Market	62.4%	22.1%	5.1%	33.4%
2008–2012 Households Difference	-61.6%	74.0%	-5.1%	-30.6%
2010 Census Tract 3314				
Householders (2000 Census)	1.0%	93.8%	3.4%	1.4%
2008–2012 Households Actual Proportion	0.7%	96.1%	1.0%	4.9%
2008–2012 Households Free Market	57.4%	27.3%	4.7%	33.5%
2008–2012 Households Difference	-56.7%	68.8%	-3.8%	-28.6%

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Super Neighborhood 71: Sunnyside (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3318				
Householders (2000 Census)	1.5%	96.7%	0.1%	2.0%
2008–2012 Households Actual Proportion	7.1%	90.3%	0.0%	7.7%
2008–2012 Households Free Market	61.0%	23.7%	5.1%	32.7%
2008–2012 Households Difference	-53.8%	66.6%	-5.1%	-25.0%
2010 Census Tract 3319				
Householders (2000 Census)	1.5%	96.7%	0.1%	2.0%
2008–2012 Households Actual Proportion	1.4%	96.5%	0.0%	2.4%
2008–2012 Households Free Market	62.3%	22.5%	5.2%	31.9%
2008–2012 Households Difference	-61.7%	74.6%	-4.2%	-30.6%
2010 Census Tract 3320				
Householders (2000 Census)	3.6%	89.8%	2.0%	6.9%
2008–2012 Households Actual Proportion	7.9%	87.0%	1.0%	10.7%
2008–2012 Households Free Market	60.7%	24.1%	5.2%	31.8%
2008–2012 Households Difference	-52.8%	62.9%	-4.2%	-21.1%

Sunnyside is the oldest African American community in south central Houston. It was originally developed to provide homes outside the city, but close enough for residents to commute. It includes a number of tract home subdivisions on typical suburban streets, as well as the original frame homes interspersed with small churches of the original neighborhood. New developments revived parts of the community, especially along Cullen. The population rose by 1,351 to 19,980 in 2012 while median household income remained low at \$24,056, up \$3,673 from 2000.



Had the historic housing discrimination that produced Sunnyside never existed, the actual proportion of African American households would be far less than today's 87 to 96.5 percent. The actual proportions exceed what would be expected in a free housing market by 65.3 to 74.6 percentage points. The actual proportions of white, Hispanic, and Asian households would likely be far greater than their current minuscule percentages.

Sunnyside's intense levels of segregation are among the vestiges of historic housing discrimination. The data since the turn of this century suggest that housing discrimination is probably continuing pretty much unabated.

Recommended Actions: The city needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians consider housing in

this super neighborhood. Real estate testing can reveal whether the continuing segregation in Sunnyside is due to historic segregation or to twenty-first century illegal discriminatory real estate practices.

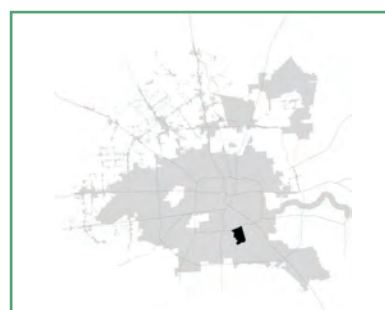
Table 60: South Park

Super Neighborhood 72: South Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	4.5%	89.2%	0.6%	8.7%
2008–2012 Households Actual Proportion	10.7%	85.0%	0.3%	13.9%
2008–2012 Households Free Market	62.0%	22.7%	5.1%	32.6%
2008–2012 Households Difference	-51.3%	62.3%	-4.8%	-18.7%
2010 Census Tract 3318 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	1.5%	96.7%	0.1%	2.0%
2008–2012 Households Actual Proportion	7.1%	90.3%	0.0%	7.7%
2008–2012 Households Free Market	61.0%	23.7%	5.1%	32.7%
2008–2012 Households Difference	-53.8%	66.6%	-5.1%	-25.0%
2010 Census Tract 3319				
Householders (2000 Census)	1.4%	96.5%	0.0%	2.4%
2008–2012 Households Actual Proportion	0.6%	97.1%	1.0%	1.3%
2008–2012 Households Free Market	62.3%	22.5%	5.2%	31.9%
2008–2012 Households Difference	-61.7%	74.6%	-4.2%	-30.6%
2010 Census Tract 3320				
Householders (2000 Census)	3.6%	89.8%	2.0%	6.9%
2008–2012 Households Actual Proportion	7.9%	87.0%	1.0%	10.7%
2008–2012 Households Free Market	60.7%	24.1%	5.2%	31.8%
2008–2012 Households Difference	-52.8%	62.9%	-4.2%	-21.1%
2010 Census Tract 3321				
Householders (2000 Census)	8.6%	77.5%	0.2%	19.5%
2008–2012 Households Actual Proportion	19.6%	71.0%	0.0%	29.0%
2008–2012 Households Free Market	61.7%	22.7%	5.1%	33.4%
2008–2012 Households Difference	-42.1%	48.3%	-5.1%	-4.5%

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Super Neighborhood 72: South Park (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3322				
Householders (2000 Census)	9.4%	78.9%	0.7%	17.5%
2008–2012 Households Actual Proportion	21.0%	72.7%	0.0%	26.7%
2008–2012 Households Free Market	62.8%	21.8%	5.1%	33.1%
2008–2012 Households Difference	-41.7%	50.9%	-5.1%	-6.4%
2010 Census Tract 3323				
Householders (2000 Census)	4.5%	89.5%	0.1%	10.4%
2008–2012 Households Actual Proportion	16.6%	78.4%	0.0%	21.9%
2008–2012 Households Free Market	62.5%	22.1%	5.0%	33.6%
2008–2012 Households Difference	-45.9%	56.3%	-5.0%	-11.7%
2010 Census Tract 3324				
Householders (2000 Census)	2.4%	94.7%	0.1%	4.0%
2008–2012 Households Actual Proportion	4.9%	94.3%	0.0%	5.2%
2008–2012 Households Free Market	63.1%	21.6%	5.2%	32.4%
2008–2012 Households Difference	-58.2%	72.7%	-5.2%	-27.1%

South Park (no relation to the television series) is a series of tract-home subdivisions developed along South Park Boulevard during the 1950s. The oldest subdivision consists of small frame homes on streets named for World War II battles that the original home buyers, many of whom were returning veterans, knew from personal experience. Over the years, property values and household incomes have not kept pace with the city's growth in these indicators. Throughout the area, many small and well maintained homes remain, however, they are often adjacent to deteriorating properties or vacant lots. Many homes adjacent to the main thoroughfare, now called Martin Luther King Boulevard, have been converted to various commercial uses. The population declined from 22,282 in 2000 to 21,198 in 2012. The median annual household income was \$27,060 in 2000, almost \$2,000 less than citywide. By 2012, it was \$36,616, more than \$8,000 less than citywide.



Immediately east of Sunnyside, South Park also reflects the vestiges of historic racial segregation. The actual proportions of Black households exceed expected proportions by 48.3 to 74.6 percentage points while the actual proportions of white households range from 41.7 to 61.7 percentage points lower than expected in a free housing market.

In four tracts, the actual proportion of Hispanic households range from 21.1 to 30.6 percentage points less than would be expected.

Four of the seven census tracts, however, are showing some signs of diversity incrementally occurring — 3318, 3321, 3322, and 3323.

Asian households can barely be measured anywhere in South Park.

Recommended Actions: The data suggest that the city has an opportunity to foster further diversification of South Park's population by expanding housing choices for all groups to consider housing in areas outside those where their race or ethnicity predominates.

Table 61: South Acres/Crestmont Park

Super Neighborhood 76: South Acres/Crestmont Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	3.4%	94.3%	0.2%	2.8%
2008–2012 Households Actual Proportion	6.9%	89.7%	0.2%	8.3%
2008–2012 Households Free Market	63.3%	21.4%	5.3%	31.9%
2008–2012 Households Difference	-56.5%	68.3%	-5.1%	-23.6%
2010 Census Tract 3315				
Householders (2000 Census)	4.3%	93.2%	0.4%	3.2%
2008–2012 Households Actual Proportion	8.7%	89.2%	0.5%	6.3%
2008–2012 Households Free Market	64.1%	20.6%	5.3%	32.3%
2008–2012 Households Difference	-55.4%	68.6%	-4.8%	-25.9%
2010 Census Tract 3316.01 (Was Tract 3316 in 2000)				
Householders (2000 Census)	3.2%	94.7%	0.2%	2.5%
2008–2012 Households Actual Proportion	4.3%	94.3%	0.0%	5.7%
2008–2012 Households Free Market	65.1%	19.8%	5.5%	30.9%
2008–2012 Households Difference	-60.8%	74.5%	-5.5%	-25.2%
2010 Census Tract 3316.02 (Was Tract 3316 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	3.2%	94.7%	0.2%	2.5%
2008–2012 Households Actual Proportion	2.7%	82.6%	0.0%	17.4%
2008–2012 Households Free Market	60.0%	24.7%	5.1%	32.5%
2008–2012 Households Difference	-57.3%	58.0%	-5.1%	-15.1%
2010 Census Tract 3317				
Householders (2000 Census)	3.2%	94.1%	0.1%	3.4%
2008–2012 Households Actual Proportion	9.9%	87.7%	0.0%	11.1%
2008–2012 Households Free Market	60.9%	23.7%	5.2%	32.6%
2008–2012 Households Difference	-51.0%	64.0%	-5.2%	-21.5%

South Acres/Crestmont Park is a suburban area of south central Houston across Sims Bayou from Sunnyside. Most of the housing in the community is post-war single family in typical suburban street patterns, although there are some large apartment complexes on the eastern edge. The community is bordered by undeveloped land to the south, east and west, and was relatively inaccessible until the opening of the South Freeway in the early 1980s and the recent opening of the South Belt. Population declined by 1,919 to 16,035 in 2012 while annual median household income grew from \$30,168 to \$38,423.



South Acres/Crestmont exhibits the same intense racial segregation as its im-

mediate neighbors to its north, South Park and Sunnyside. The actual proportions of African American households range from 58 to 74.5 percentage points higher than would be expected in a free housing market devoid of housing discrimination. Only tract 3116.02 shows any hints of diversity developing.

The actual proportions of Caucasian households range from 51 to 60.8 percentage points less than would be expected while the actual proportions of Latino households are 15.1 to 25.9 percentage points lower than expected in the absence of housing discrimination.

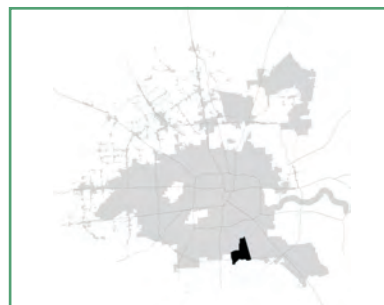
The number of Asian households is so low here that they barely register.

Recommended Actions: The city needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians consider housing in this super neighborhood. Real estate testing would reveal whether the continuing segregation in South Acres/Crestmont Park is due to historic segregation or to twenty-first century illegal discriminatory real estate practices.

Table 62: Minnetex

Super Neighborhood 77: Minnetex				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	8.2%	86.9%	0.4%	6.0%
2008–2012 Households Actual Proportion	19.1%	70.1%	3.1%	18.9%
2008–2012 Households Free Market	64.4%	20.6%	5.6%	30.1%
2008–2012 Households Difference	-45.2%	49.5%	-2.5%	-11.2%
2010 Census Tract 3308				
Householders (2000 Census)	32.1%	50.4%	1.3%	21.2%
2008–2012 Households Actual Proportion	28.3%	58.2%	5.6%	23.0%
2008–2012 Households Free Market	67.3%	18.0%	6.0%	28.1%
2008–2012 Households Difference	-39.0%	40.1%	-0.5%	-5.1%
2010 Census Tract 3316.02 (Was Tract 3316 in 2000)				
Householders (2000 Census)	3.2%	94.7%	0.2%	2.5%
2008–2012 Households Actual Proportion	2.7%	82.6%	0.0%	17.4%
2008–2012 Households Free Market	60.0%	24.7%	5.1%	32.5%
2008–2012 Households Difference	-57.3%	58.0%	-5.1%	-15.1%
2010 Census Tract 3317				
Householders (2000 Census)	3.2%	94.1%	0.1%	3.4%
2008–2012 Households Actual Proportion	9.9%	87.7%	0.0%	11.1%
2008–2012 Households Free Market	60.9%	23.7%	5.2%	32.6%
2008–2012 Households Difference	-51.0%	64.0%	-5.2%	-21.5%

Minnetex is an isolated, semi-rural area in south central Houston which experienced very little development. The scattered homes, small large-lot subdivisions and occasional industrial facility are surrounded by acres of raw land which now has quick access to the rest of the metropolitan area. For now, barriers to new growth are the lack of water and sewer lines, and possibly noise due to the community being in an approach path for Hobby Airport. The population nearly tripled from 2,245 to 6,354 in this sparsely-populated neighborhood. Median household income rose from \$28,190 to \$31,718.



Minnetex is the south end of the largely and intensely segregated Black enclave that stretches from south of Downtown. The actual proportions of African American households range from 40.1 to 64 percentage points higher than would be expected in a free housing market while the actual proportions of white households range from 39 to 57.3 percentage points lower than expected.

The actual proportion of Hispanic households is as expected in tract 3308 while it is 15.1 and 21.5 percentage points lower than expected in tracts 3316.02

and 3317 respectively.

Asians barely exist in Minnetex.

Recommended Actions: The city needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians consider housing in this super neighborhood. Real estate testing is needed to determine whether illegal discriminatory real estate practices are at play in the Minnetex super neighborhood.

The City of Houston has not assigned the census tracts in the table below to any super neighborhood. Each was reported on earlier in this section in analysis of the super neighborhood that is closest to it.

Table 63: Southeast Quadrant Census Tracts Not in a Super Neighborhood

Southeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 2335				
Householders (2000 Census)	73.6%	0.6%	0.1%	62.9%
2008–2012 Households Actual Proportion	70.6%	0.8%	0.0%	83.2%
2008–2012 Households Free Market	62.7%	21.9%	5.1%	33.3%
2008–2012 Households Difference	7.9%	-21.1%	-5.1%	49.9%
2010 Census Tract 2337.03 (Was Tract 2337 in 2000)				
Householders (2000 Census)	66.2%	10.8%	0.4%	54.6%
2008–2012 Households Actual Proportion	84.8%	1.3%	0.0%	65.2%
2008–2012 Households Free Market	65.1%	19.6%	5.5%	31.4%
2008–2012 Households Difference	19.6%	-18.4%	-5.5%	33.8%
2010 Census Tract 2525				
Householders (2000 Census)	84.0%	1.4%	0.4%	29.0%
2008–2012 Households Actual Proportion	76.0%	2.8%	0.0%	51.8%
2008–2012 Households Free Market	62.6%	22.0%	5.2%	32.5%
2008–2012 Households Difference	13.4%	-19.2%	-5.2%	19.3%
2010 Census Tract 2533				
Householders (2000 Census)	94.1%	1.7%	0.4%	9.1%
2008–2012 Households Actual Proportion	85.6%	2.1%	2.7%	21.8%
2008–2012 Households Free Market	68.9%	16.9%	6.4%	25.3%
2008–2012 Households Difference	16.7%	-14.8%	-3.7%	-3.5%
2010 Census Tract 2545				
Householders (2000 Census)	48.3%	26.1%	0.0%	62.8%
2008–2012 Households Actual Proportion	54.4%	14.4%	0.0%	73.8%
2008–2012 Households Free Market	63.4%	21.4%	5.4%	31.4%
2008–2012 Households Difference	-9.0%	-7.1%	-5.4%	42.4%
2010 Census Tract 2546 (Tract consists of parts of 2000 tracts 2546 and 2547)				
Householders (2000 Census)	66.7%	12.8%	1.2%	38.6%
2008–2012 Households Actual Proportion	59.2%	17.9%	0.0%	59.2%
2008–2012 Households Free Market	63.7%	21.1%	5.2%	32.3%
2008–2012 Households Difference	-4.5%	-3.3%	-5.2%	26.9%

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Southeast Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3241 (Tract consists of parts of 2000 tracts 3224 and 3225)				
Householders (2000 Census)	53.0%	1.0%	0.2%	79.4%
2008–2012 Households Actual Proportion	68.0%	2.6%	1.6%	83.4%
2008–2012 Households Free Market	62.8%	21.8%	5.3%	32.2%
2008–2012 Households Difference	5.2%	-19.2%	-3.7%	51.2%
2010 Census Tract 3402.03 (Was Tract 3402 in 2000)				
Householders (2000 Census)	79.3%	2.7%	15.5%	5.5%
2008–2012 Households Actual Proportion	83.5%	3.1%	12.5%	8.0%
2008–2012 Households Free Market	74.8%	12.2%	7.2%	18.9%
2008–2012 Households Difference	8.7%	-9.1%	5.2%	-10.9%
2010 Census Tract 3411				
Householders (2000 Census)	72.4%	8.4%	2.9%	21.3%
2008–2012 Households Actual Proportion	74.2%	10.7%	1.3%	37.1%
2008–2012 Households Free Market	65.5%	19.5%	5.6%	30.4%
2008–2012 Households Difference	8.7%	-8.8%	-4.3%	6.7%
2010 Census Tract 3436 (Was Tract 3426 in 2000)				
Householders (2000 Census)	90.9%	2.9%	0.0%	7.4%
2008–2012 Households Actual Proportion	86.8%	5.4%	0.0%	30.8%
2008–2012 Households Free Market	66.1%	19.2%	5.7%	29.2%
2008–2012 Households Difference	20.7%	-13.8%	-5.7%	1.7%

Southwest Quadrant

Super Neighborhoods in the Southwest Quadrant

16 Memorial	31 Meyerland
17 Eldridge/WestOaks	32 Braeswood Place
18 Briarforest	33 Medical Center
19 Westchase	34 Astrodome Area
20 Mid West	35 South Main
21 Greater Uptown	36 Brays Oak
22 Washington Ave/Memorial Park	37 Westbury
23 Afton Oaks/River Oaks	38 Willow Meadows/Willow Bend
24 Neartown/Montrose	39 Fondren Gardens
25 Alief	40 Central Southwest
26 Sharpstown	41 Fort Bend Houston
27 Gulfton	60 Fourth Ward
28 University Place	62 Midtown
29 Westwood	66 Museum Park
30 Braeburn	87 Greenway/Upper Kirby

Census tracts not assigned to a super neighborhood are shown with data following the super neighborhoods.

Table 64: Washington Avenue Coalition/Memorial Park

Super Neighborhood 22: Washington Avenue Coalition/Memorial Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	68.5%	8.4%	2.0%	36.8%
2008–2012 Households Actual Proportion	82.1%	4.4%	7.6%	20.1%
2008–2012 Households Free Market	70.9%	15.4%	6.7%	22.7%
2008–2012 Households Difference	11.2%	-11.0%	0.9%	-2.6%
2010 Census Tract 5101				
Householders (2000 Census)	35.9%	18.8%	1.6%	69.4%
2008–2012 Households Actual Proportion	74.2%	14.9%	0.6%	35.8%
2008–2012 Households Free Market	66.0%	19.2%	5.8%	28.9%
2008–2012 Households Difference	8.1%	-4.3%	-5.2%	6.9%
2010 Census Tract 5102				
Householders (2000 Census)	69.5%	7.8%	2.0%	37.3%
2008–2012 Households Actual Proportion	81.7%	5.0%	9.8%	19.2%
2008–2012 Households Free Market	69.3%	16.7%	6.4%	24.7%
2008–2012 Households Difference	12.4%	-11.6%	3.4%	-5.5%
2010 Census Tract 5105 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	57.1%	20.1%	0.8%	34.4%
2008–2012 Households Actual Proportion	81.0%	7.5%	0.9%	21.9%
2008–2012 Households Free Market	70.4%	15.8%	6.5%	24.0%
2008–2012 Households Difference	10.6%	-8.3%	-5.6%	-2.1%
2010 Census Tract 5106				
Householders (2000 Census)	49.7%	15.1%	0.6%	63.6%
2008–2012 Households Actual Proportion	70.3%	7.0%	18.2%	17.3%
2008–2012 Households Free Market	73.3%	13.4%	7.0%	20.3%
2008–2012 Households Difference	-3.0%	-6.4%	11.1%	-3.1%
2010 Census Tract 5107				
Householders (2000 Census)	81.0%	4.2%	5.2%	23.9%
2008–2012 Households Actual Proportion	87.1%	2.1%	6.7%	14.4%
2008–2012 Households Free Market	71.2%	15.2%	6.8%	22.1%
2008–2012 Households Difference	16.0%	-13.2%	-0.1%	-7.7%

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Super Neighborhood 22: Washington Avenue Coalition/Memorial Park (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 5108				
Householders (2000 Census)	85.0%	4.1%	2.7%	12.2%
2008–2012 Households Actual Proportion	87.7%	1.3%	6.3%	10.4%
2008–2012 Households Free Market	72.8%	14.0%	6.9%	20.3%
2008–2012 Households Difference	14.9%	-12.7%	-0.7%	-9.9%
2010 Census Tract 5109				
Householders (2000 Census)	64.9%	1.0%	0.7%	58.0%
2008–2012 Households Actual Proportion	82.9%	2.7%	5.6%	34.9%
2008–2012 Households Free Market	70.0%	16.2%	6.8%	22.8%
2008–2012 Households Difference	12.9%	-13.5%	-1.2%	12.1%

Memorial Park/Washington Avenue is a corridor stretching from the northern edge of downtown on the east to Loop 610 on the west. It includes many of Houston's most historic sites such as Memorial Park, one of the city's primary environmental assets located on the former grounds of Camp Logan, a World War I Army training camp. Residential areas, in the west, adjacent to the park, are rapidly redeveloping with high end single-family homes. The eastern end of the area includes First and Sixth Wards, political geographic units, which date from the 19th Century. Sixth Ward contains the city's best Victorian era buildings. Interstate 10 creates a barrier on the northern boundary. Both the population and annual median household income soared between 2000 and 2012: 18,552 residents increased to 24,717 in 2012 and annual median household income more than doubled from \$43,892 to \$93,071.



The actual composition of the Washington Avenue Coalition/Memorial Park super neighborhood is what would be expected in a free housing market absent discrimination with the sole exception of census tract 5107 where the actual proportion of Caucasian households rose from 81 to 87.1 percent, 16 percentage point higher than expected in a free market. Since 2000, the actual proportions of Latino and Black households declined and are below what would be expected. Overall there has been a very significant decline in the proportions of Hispanic households to levels that would be expected in a free market.

In all but one census tract, the actual proportions of African American households are a mere fraction of what would be expected in a free market absent discrimination.

Recommended Actions: The City of Houston should inquire further to identify why the percentages of Latino households declined so much since 2000 and why the proportions of African American house-

holds remain so much lower than expected. Testing may be warranted. The city needs to identify any public or private sector practices or policies that reduced the proportions of Hispanic households and implement public and private sector policies to stabilize the current proportions of Hispanic households which are at the levels expected in a free housing market absent discrimination.

Table 65: Fourth Ward

Super Neighborhood 60: Fourth Ward				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	36.7%	43.7%	4.0%	31.2%
2008–2012 Households Actual Proportion	83.4%	9.8%	2.8%	16.3%
2008–2012 Households Free Market	68.3%	17.4%	6.2%	26.2%
2008–2012 Households Difference	15.1%	-7.6%	-3.3%	-9.9%
2010 Census Tract 4101				
Householders (2000 Census)	36.7%	43.7%	4.0%	31.2%
2008–2012 Households Actual Proportion	52.8%	32.3%	7.8%	13.8%
2008–2012 Households Free Market	66.3%	19.3%	6.1%	26.7%
2008–2012 Households Difference	-13.5%	13.0%	1.7%	-12.9%
2010 Census Tract 4105 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	86.2%	2.5%	2.4%	17.3%
2008–2012 Households Actual Proportion	96.1%	0.4%	0.8%	17.3%
2008–2012 Households Free Market	69.2%	16.6%	6.2%	25.9%
2008–2012 Households Difference	26.9%	-16.2%	-5.4%	-8.6%

The Fourth Ward has long been a community in transition. The heart of this community was Freedman’s Town, a settlement of freed slaves on the western edge of the city. Fourth Ward was a major commercial and cultural center for Houston’s widely scattered African American community. The construction of Interstate 45 delineates the eastern edge of the community. In turn, that portion was redeveloped primarily as retail. Since then, absentee property owners have anticipated redevelopment of the remaining area. The Allen Parkway Village public housing project was built in the 1940s, and its recent redevelopment has spurred growth of the remaining area. A major portion of the Fourth Ward has been included within a tax increment reinvestment zone, the 4th Ward TIRZ. The number of residents more than doubled from 1,740 to 3,641 in 2012 while the annual median household income skyrocketed from \$33,405 to \$59,671.



The huge increase in median household income suggests that some “gentrification” has likely occurred since 2000. Tract 4101, which comprises nearly all of the Fourth Ward, has seen pretty substantial decline in the percentages of African American and Hispanic households since 2000. While the actual composition of tract 4101 is now at levels expected in a free housing market, the percentages of African American and Latino households plummeted since 2000. These declines reduced the actual proportion of Hispanic households to nearly 13 percentage points less than expected. The 11.4 percentage point decline in the actual

proportion of African American households since 2000 brought the proportion of Black households closer to the proportion expected in a free housing market. Tract 4101 appears to be moving in the direction reflective of affirmatively furthering fair housing choice.

The discrepancies between the actual and expected composition of the sliver of tract 4105 are examined in the analysis of the Neartown/Montrose super neighborhood.

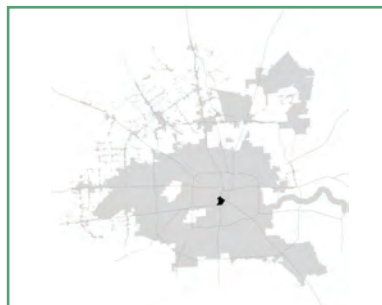
The direction the Fourth Ward is taking is exacerbating economic stratification in Houston.

Recommended Actions: As the Fourth Ward appears to undergo gentrification, much of its Latino and Black populations are being displaced. This change has brought the actual proportions of African American, white, and Asian households closer to what would be expected in a free market absent housing discrimination. But the actual proportion of Hispanic households have declined to a level significantly below what would be expected. Testing may help identify illegal discriminatory real estate industry practices, if any, that are contributing to these changes and enable the city to craft a strategy to affirmatively further fair housing by achieving a stable, racially and ethnically integrated Fourth Ward.

Table 66: Midtown

Super Neighborhood 62: Midtown				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	78.7%	8.1%	3.3%	15.8%
2008–2012 Households Actual Proportion	77.1%	12.4%	6.4%	13.8%
2008–2012 Households Free Market	68.3%	17.5%	6.3%	25.6%
2008–2012 Households Difference	8.8%	-5.1%	0.1%	-11.8%
2010 Census Tract 3125				
Householders (2000 Census)	47.1%	27.9%	2.7%	35.0%
2008–2012 Households Actual Proportion	63.6%	20.1%	13.7%	17.0%
2008–2012 Households Free Market	69.9%	16.3%	6.5%	23.5%
2008–2012 Households Difference	-6.2%	3.8%	7.2%	-6.5%
2010 Census Tract 4101 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	36.7%	43.7%	4.0%	31.2%
2008–2012 Households Actual Proportion	52.8%	32.3%	7.8%	13.8%
2008–2012 Households Free Market	66.3%	19.3%	6.1%	26.7%
2008–2012 Households Difference	-13.5%	13.0%	1.7%	-12.9%
2010 Census Tract 4105 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	86.2%	2.5%	2.4%	17.3%
2008–2012 Households Actual Proportion	96.1%	0.4%	0.8%	17.3%
2008–2012 Households Free Market	69.2%	16.6%	6.2%	25.9%
2008–2012 Households Difference	26.9%	-16.2%	-5.4%	-8.6%
2010 Census Tract 4106 (Tract consists of parts of 2000 tracts 4106 and 4107)				
Householders (2000 Census)	82.6%	5.3%	3.7%	12.5%
2008–2012 Households Actual Proportion	90.0%	3.0%	4.2%	10.1%
2008–2012 Households Free Market	70.5%	15.6%	6.6%	23.5%
2008–2012 Households Difference	19.5%	-12.6%	-2.5%	-13.4%
2010 Census Tract 4107.02 (Was Tract 4107 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	82.8%	5.0%	3.4%	12.9%
2008–2012 Households Actual Proportion	74.4%	10.3%	9.0%	9.6%
2008–2012 Households Free Market	64.3%	20.9%	5.7%	28.8%
2008–2012 Households Difference	10.1%	-10.6%	3.3%	-19.2%

Midtown was a fashionable residential district before World War I. However, encroaching commercial development and heavy traffic sent high-income homeowners in search of quieter neighborhoods. The area became a mix of old homes, small apartment buildings and low-rise commercial buildings. For many years, the only stability in the community was a number of surviving churches and the Houston Community College campus in the old San Jacinto High School building. A Vietnamese business district has arisen along Milam, Webster, Fannin and San Jacinto. Spurred by the Midtown TIRZ, luxury apartment and townhome construction has begun in the western edge of the community and in areas close to Baldwin Park. Population rose from 5,311 in 2000 to 8,390 in 2012 while annual median household income soared from \$40,383 to \$70,829 in 2012.



Immediately southwest of Downtown Houston, Midtown's composition is generally what would be expected in a free housing market. Midtown appears to also be experiencing gentrification that may account for the precipitous decline in the percentages of Latino households in tracts 3125 and 4101 which Midtown shares with the Fourth Ward. Gentrification may also account in part for the increase in the actual proportion of whites since 2000 to a level that is 19.5 percentage points greater than expected.

In several tracts, the actual proportions of African American households are just a fraction of what would be expected in a free housing market.

The slivers of tracts 4105 and 4107.02 are examined in the analysis of the Neartown/Montrose super neighborhood where most of these two tracts are located.

Recommended Actions: As Midtown appears to undergo gentrification, much of its Latino and Black populations are being displaced. This change has brought the actual proportions of African American, white, and Asian households closer to what would be expected in a free market absent housing discrimination — in some census tracts. But the actual proportion of Hispanic households have declined to a level significantly below what would be expected. Testing may help identify illegal discriminatory real estate industry practices, if any, that are contributing to these changes and enable the city to craft a strategy to affirmatively further fair housing by achieving a stable, racially and ethnically integrated Midtown.

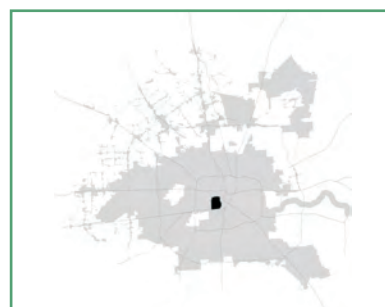
Table 67: Neartown/Montrose

Super Neighborhood 24: Neartown/Montrose				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	85.5%	3.3%	3.1%	14.7%
2008–2012 Households Actual Proportion	85.9%	3.9%	4.3%	16.5%
2008–2012 Households Free Market	68.6%	17.3%	6.3%	25.4%
2008–2012 Households Difference	17.3%	-13.4%	-1.9%	-8.9%
2010 Census Tract 4102				
Householders (2000 Census)	83.4%	3.0%	3.5%	18.8%
2008–2012 Households Actual Proportion	88.5%	3.1%	3.1%	15.4%
2008–2012 Households Free Market	70.4%	15.8%	6.6%	23.5%
2008–2012 Households Difference	18.1%	-12.7%	-3.5%	-8.1%
2010 Census Tract 4103				
Householders (2000 Census)	86.2%	3.9%	4.9%	9.9%
2008–2012 Households Actual Proportion	82.4%	7.0%	7.5%	15.2%
2008–2012 Households Free Market	70.8%	15.6%	6.7%	22.3%
2008–2012 Households Difference	11.6%	-8.6%	0.9%	-7.1%
2010 Census Tract 4104.01 (Was Tract 4104 in 2000)				
Householders (2000 Census)	88.8%	1.5%	2.7%	14.0%
2008–2012 Households Actual Proportion	89.2%	1.9%	4.5%	14.2%
2008–2012 Households Free Market	70.6%	15.6%	6.6%	23.4%
2008–2012 Households Difference	18.6%	-13.8%	-2.0%	-9.2%
2010 Census Tract 4104.02 (Was Tract 4104 in 2000)				
Householders (2000 Census)	88.8%	1.5%	2.7%	14.0%
2008–2012 Households Actual Proportion	78.2%	1.2%	6.8%	24.8%
2008–2012 Households Free Market	69.4%	16.5%	6.4%	25.0%
2008–2012 Households Difference	8.7%	-15.3%	0.5%	-0.2%
2010 Census Tract 4105				
Householders (2000 Census)	86.2%	2.5%	2.4%	17.3%
2008–2012 Households Actual Proportion	96.1%	0.4%	0.8%	17.3%
2008–2012 Households Free Market	69.2%	16.6%	6.2%	25.9%
2008–2012 Households Difference	26.9%	-16.2%	-5.4%	-8.6%

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Super Neighborhood 24: Neartown/Montrose (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4107.01 (Was Tract 4107 in 2000)				
Householders (2000 Census)	82.8%	5.0%	3.4%	12.9%
2008–2012 Households Actual Proportion	81.7%	7.0%	2.3%	16.2%
2008–2012 Households Free Market	67.4%	18.2%	6.2%	26.1%
2008–2012 Households Difference	14.3%	-11.3%	-3.9%	-9.9%
2010 Census Tract 4107.02 (Was Tract 4107 in 2000)				
Householders (2000 Census)	82.8%	5.0%	3.4%	12.9%
2008–2012 Households Actual Proportion	74.4%	10.3%	9.0%	9.6%
2008–2012 Households Free Market	64.3%	20.9%	5.7%	28.8%
2008–2012 Households Difference	10.1%	-10.6%	3.3%	-19.2%
2010 Census Tract 4108				
Householders (2000 Census)	83.6%	3.0%	2.5%	18.2%
2008–2012 Households Actual Proportion	83.2%	6.4%	6.4%	15.7%
2008–2012 Households Free Market	66.2%	19.2%	5.8%	28.2%
2008–2012 Households Difference	17.0%	-12.8%	0.6%	-12.5%
2010 Census Tract 4109				
Householders (2000 Census)	86.7%	4.0%	2.5%	17.7%
2008–2012 Households Actual Proportion	90.6%	0.0%	2.6%	22.6%
2008–2012 Households Free Market	67.6%	18.1%	6.0%	26.5%
2008–2012 Households Difference	23.0%	-18.1%	-3.4%	-3.9%

Neartown/Montrose is an eclectic neighborhood where cottage housing exists side by side with burgeoning townhome developments, large luxury apartment complexes and older duplexes. Many of Houston's historic mansions are found in the Avondale and Courtland Place areas. Restaurants, bars and unique retail shops can be found throughout this area. The population changed little with 28,015 residents in 2000 and 28,813 in 2012. The annual median household income rose much higher than the change in city medians at \$44,242 in 2000 and \$64,918 in 2012.



The actual proportions of African American households in adjacent census tracts 4105 and 4404.02 are, respectively, 16.2 and 15.3 percentage points less than the levels expected in a free housing market absent discrimination. Tract 4105 saw a substantial increase in the actual proportion of Caucasian households from 86.2 to 96.1 percent while in tract 4104.02 the actual proportion of Latino households rose from 14 to 24.8 percent since 2000. So while the proportion of Hispanic households in tract 4104.02 is now at the level expected, the actual proportion of Black households remains well below that level. Tract 4102 exhibits characteristics similar to tract 4105, albeit less intense.

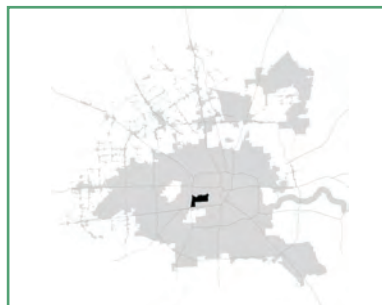
Tract 4109 exhibits characteristics similar to those in tract 4501 with both tracts having virtually no African American households living in them.

Recommended Actions: The City of Houston should conduct real estate testing to identify any practices that may account for the disparities between actual and expected racial and Hispanic composition in Neartown/Montrose and take steps to remedy the causes of these disparities.

Table 68: Afton Oaks/River Oaks

Super Neighborhood 23: Afton Oaks/River Oaks				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	91.9%	1.9%	2.6%	6.1%
2008–2012 Households Actual Proportion	85.5%	4.7%	5.4%	10.2%
2008–2012 Households Free Market	73.4%	13.4%	6.9%	20.3%
2008–2012 Households Difference	12.1%	-8.7%	-1.5%	-10.1%
2010 Census Tract 4111				
Householders (2000 Census)	93.4%	1.3%	2.5%	5.8%
2008–2012 Households Actual Proportion	90.5%	0.0%	6.6%	12.9%
2008–2012 Households Free Market	74.7%	12.4%	7.1%	18.7%
2008–2012 Households Difference	15.8%	-12.4%	-0.5%	-5.9%
2010 Census Tract 4112				
Householders (2000 Census)	94.6%	0.5%	2.5%	2.7%
2008–2012 Households Actual Proportion	99.1%	0.9%	0.0%	2.3%
2008–2012 Households Free Market	78.2%	9.9%	7.6%	14.1%
2008–2012 Households Difference	20.9%	-9.0%	-7.6%	-11.7%
2010 Census Tract 4113				
Householders (2000 Census)	86.7%	3.4%	4.2%	10.0%
2008–2012 Households Actual Proportion	72.1%	10.1%	8.6%	16.2%
2008–2012 Households Free Market	69.3%	16.5%	6.3%	25.5%
2008–2012 Households Difference	2.8%	-6.4%	2.3%	-9.3%
2010 Census Tract 4114				
Householders (2000 Census)	98.4%	0.1%	0.6%	2.2%
2008–2012 Households Actual Proportion	94.0%	4.3%	1.2%	1.1%
2008–2012 Households Free Market	76.4%	11.1%	7.4%	16.6%
2008–2012 Households Difference	17.6%	-6.8%	-6.2%	-15.6%
2010 Census Tract 4116				
Householders (2000 Census)	93.5%	1.8%	1.3%	6.2%
2008–2012 Households Actual Proportion	90.8%	1.6%	5.1%	8.1%
2008–2012 Households Free Market	74.7%	12.4%	7.2%	18.6%
2008–2012 Households Difference	16.1%	-10.8%	-2.1%	-10.5%

The Afton Oaks/River Oaks area includes two of Houston's most prestigious upper-income neighborhoods. River Oaks began in the 1920s, and it quickly became Houston's most affluent development of residential area and remains so today. Afton Oaks was developed in the suburban boom after World War II. Many of Afton Oaks' original ranch-style homes are now being extensively renovated or are being replaced with much larger homes. Afton Oaks and River Oaks are conveniently located between Downtown and the Uptown/Galleria area. The area also includes Post Oak Park, a mixed use development in the northwest portion of the neighborhood. Post Oak Park was one of the first fashionable apartment districts developed along Mid Lane in the 1960s. Garden apartments have replaced luxury homes and townhouses as area land prices rise. The population declined precipitously between 2000 and 2012, falling from 41,820 to 14,465 in 2012. Annual median household income continued to be close to 300 percent of the city's medians, rising from \$97,170 in 2000 to \$122,353 in 2012.



Immediately east of Neartown/Montrose, Afton Oaks/River Oaks shares the same characteristics as Greenway/Upper Kirby to its south. In all but one census tract, the actual proportions of Caucasian households are greater than what would be expected in a free housing market while the proportions of African American households are generally a mere fraction of the percentages expected in a free housing market absent discrimination. In many of the census tracts the 15 percentage point gap used as a threshold to flag a census tract in this study is inapplicable because the expected proportion of Black households is less than 15 percent — which is the case for all but tract 4113. *So even though the actual proportion of African American households in every census tract here would be at least 9.9 percent, the actual proportions are mere fractions of what would be expected. The same phenomenon applies to Asian and Latino households in some of the census tracts.*

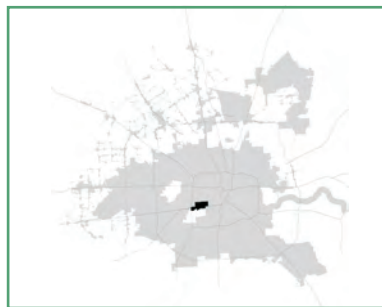
Recommended Actions: It is critical that the City of Houston take steps to expand housing choices for the higher income people of color who can afford to live here to include Afton Oaks/River Oaks among their housing choices. If the city is to affirmatively further fair housing choice, it needs to implement the recommendations of this study to overcome the apprehension, qualms, and discomfort many African Americans, Asians, and Latinos with higher incomes have regarding moving to an overwhelmingly non-Hispanic Caucasian area so that they will expand their housing choices to include areas like Afton Oaks/River Oaks.

Afton Oaks/River Oaks offers the city a golden opportunity to establish a stable racially and ethnically integrated super neighborhood that affirmatively furthers fair housing choice.

Table 69: Greenway/Upper Kirby

Super Neighborhood 87: Greenway/Upper Kirby				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	90.4%	2.2%	3.8%	7.1%
2008–2012 Households Actual Proportion	85.9%	3.8%	7.8%	13.6%
2008–2012 Households Free Market	69.5%	16.4%	6.4%	24.7%
2008–2012 Households Difference	16.4%	-12.6%	1.4%	-11.1%
2010 Census Tract 4110				
Householders (2000 Census)	93.0%	1.0%	2.2%	7.2%
2008–2012 Households Actual Proportion	86.9%	4.8%	7.8%	3.5%
2008–2012 Households Free Market	70.8%	15.4%	6.7%	22.8%
2008–2012 Households Difference	16.0%	-10.7%	1.1%	-19.3%
2010 Census Tract 4115.01 (Was Tract 4115 in 2000)				
Householders (2000 Census)	90.0%	2.3%	4.0%	7.0%
2008–2012 Households Actual Proportion	89.0%	1.4%	8.3%	22.5%
2008–2012 Households Free Market	70.6%	15.6%	6.7%	23.3%
2008–2012 Households Difference	18.4%	-14.2%	1.6%	-0.8%
2010 Census Tract 4115.02 (Was Tract 4115 in 2000)				
Householders (2000 Census)	90.0%	2.3%	4.0%	7.0%
2008–2012 Households Actual Proportion	87.8%	3.0%	5.2%	13.8%
2008–2012 Households Free Market	69.1%	16.7%	6.4%	25.3%
2008–2012 Households Difference	18.7%	-13.7%	-1.2%	-11.5%
2010 Census Tract 4117 (Tract consists of parts of 2000 tracts 4117 and 4210)				
Householders (2000 Census)	88.9%	2.8%	4.7%	7.4%
2008–2012 Households Actual Proportion	74.3%	8.4%	10.3%	13.1%
2008–2012 Households Free Market	66.4%	19.0%	6.0%	27.7%
2008–2012 Households Difference	7.9%	-10.6%	4.3%	-14.7%
2010 Census Tract 4118				
Householders (2000 Census)	90.8%	2.4%	3.6%	6.9%
2008–2012 Households Actual Proportion	87.5%	3.2%	8.2%	14.2%
2008–2012 Households Free Market	69.4%	16.4%	6.3%	25.4%
2008–2012 Households Difference	18.1%	-13.2%	2.0%	-11.2%

The Greenway/Upper Kirby Area is located inside Loop 610, south of Westheimer Road and bound on the east by Shepherd. The Southwest Freeway runs through the southernmost part of this area. Greenway Plaza, a major activity and employment center developed in the late 1970s, forms part of this neighborhood. Kirby Drive is one of the major commercial thoroughfares in this neighborhood. The area is a mixture of single and multi-family residential uses with office and commercial located along major thoroughfares and the Southwest Freeway feeder roads. Population increased from 16,166 in 2000 to 19,618 in 2012 while annual median household income soared from \$55,019 to \$78,192.



Greenway/Upper Kirby shares the same characteristics as Afton Oaks/River Oaks to its north. In all but one census tract, the actual proportions of Caucasian households are greater than what would be expected in a free housing market while the proportions of African American households are generally a mere fraction of the percentages expected in a free housing market absent discrimination. In many of the census tracts the 15 percentage point gap used as a threshold to flag a census tract in this study is inapplicable because the expected proportion of Black households is less than 15 percent — which is the case for every census tract in Afton Oak/River Oaks except for tract 4117. So even though the actual proportion of African American households in every census tract here would be at least 15.4 percent, the actual proportions are mere fractions of what would be expected.

With the exception of tract 4115.01, the actual proportions of Latino households are significantly less than expected, especially in tract 4110 where it is 19.3 percentage points lower.

Recommended Actions: It is vital that the City of Houston take steps to expand housing choices for the higher income people of color who can afford to live here to include Greenway/Upper Kirby among their housing choices. If the city is to affirmatively further fair housing choice, it needs to implement the recommendations of this study to overcome the apprehension, qualms, and discomfort many African Americans and Latinos with higher incomes have regarding moving to an overwhelmingly non-Hispanic Caucasian area so that they will expand their housing choices to include areas like Greenway/Upper Kirby.

Greenway/Upper Kirby offers the city a golden opportunity to establish a stable racially and ethnically integrated super neighborhood that affirmatively furthers fair housing choice.

Table 70: Greater Uptown

Super Neighborhood 21: Greater Uptown				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	85.4%	3.4%	4.1%	11.2%
2008–2012 Households Actual Proportion	81.4%	6.1%	7.6%	16.3%
2008–2012 Households Free Market	69.8%	16.2%	6.5%	24.3%
2008–2012 Households Difference	11.6%	-10.1%	1.1%	-7.9%
2010 Census Tract 4301				
Householders (2000 Census)	91.4%	1.9%	4.1%	6.1%
2008–2012 Households Actual Proportion	87.9%	4.7%	5.5%	11.1%
2008–2012 Households Free Market	70.3%	15.7%	6.4%	24.6%
2008–2012 Households Difference	17.6%	-11.0%	-0.9%	-13.5%
2010 Census Tract 4302				
Householders (2000 Census)	85.3%	2.4%	7.3%	8.3%
2008–2012 Households Actual Proportion	82.0%	0.0%	14.7%	15.7%
2008–2012 Households Free Market	68.5%	17.2%	6.2%	26.3%
2008–2012 Households Difference	13.5%	-17.2%	8.5%	-10.7%
2010 Census Tract 4313.01 (Was Tract 4313 in 2000)				
Householders (2000 Census)	86.2%	3.3%	4.7%	9.4%
2008–2012 Households Actual Proportion	64.4%	12.0%	13.0%	28.6%
2008–2012 Households Free Market	64.7%	20.1%	5.5%	31.1%
2008–2012 Households Difference	-0.3%	-8.1%	7.5%	-2.5%
2010 Census Tract 4313.02 (Was Tract 4313 in 2000)				
Householders (2000 Census)	86.2%	3.3%	4.7%	9.4%
2008–2012 Households Actual Proportion	94.2%	2.4%	3.1%	8.3%
2008–2012 Households Free Market	72.4%	14.3%	6.9%	20.9%
2008–2012 Households Difference	21.8%	-12.0%	-3.8%	-12.6%
2010 Census Tract 4314.01 (Was Tract 4314 in 2000)				
Householders (2000 Census)	89.4%	2.6%	3.1%	8.6%
2008–2012 Households Actual Proportion	80.7%	8.5%	6.3%	19.2%
2008–2012 Households Free Market	66.7%	18.7%	5.9%	28.4%
2008–2012 Households Difference	14.1%	-10.2%	0.4%	-9.2%

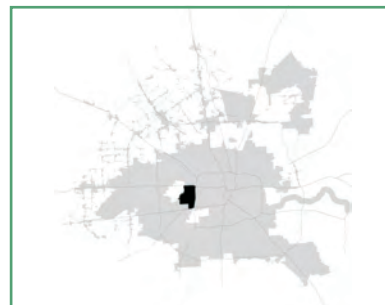
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Super Neighborhood 21: Greater Uptown (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4314.02 (Was Tract 4314 in 2000)				
Householders (2000 Census)	89.4%	2.6%	3.1%	8.6%
2008–2012 Households Actual Proportion	79.2%	9.1%	8.7%	15.2%
2008–2012 Households Free Market	69.2%	16.5%	6.4%	25.6%
2008–2012 Households Difference	10.1%	-7.5%	2.3%	-10.3%
2010 Census Tract 4315.01 (Was Tract 4315 in 2000)				
Householders (2000 Census)	92.5%	1.5%	2.7%	5.0%
2008–2012 Households Actual Proportion	90.2%	0.8%	4.9%	8.5%
2008–2012 Households Free Market	70.2%	16.1%	6.7%	22.6%
2008–2012 Households Difference	20.0%	-15.3%	-1.9%	-14.1%
2010 Census Tract 4315.02 (Was Tract 4315 in 2000)				
Householders (2000 Census)	92.5%	1.5%	2.7%	5.0%
2008–2012 Households Actual Proportion	89.0%	0.0%	3.8%	14.6%
2008–2012 Households Free Market	73.7%	13.2%	7.3%	19.3%
2008–2012 Households Difference	15.3%	-13.2%	-3.4%	-4.7%
2010 Census Tract 4316				
Householders (2000 Census)	96.2%	0.6%	1.5%	3.1%
2008–2012 Households Actual Proportion	95.2%	1.5%	0.8%	9.2%
2008–2012 Households Free Market	74.1%	13.0%	7.1%	18.6%
2008–2012 Households Difference	21.1%	-11.5%	-6.4%	-9.4%
2010 Census Tract 4317				
Householders (2000 Census)	95.3%	0.6%	1.8%	4.2%
2008–2012 Households Actual Proportion	94.1%	0.8%	2.7%	5.5%
2008–2012 Households Free Market	75.8%	11.5%	7.4%	16.9%
2008–2012 Households Difference	18.3%	-10.8%	-4.8%	-11.4%
2010 Census Tract 4318.01 (Was Tract 4318 in 2000)				
Householders (2000 Census)	87.8%	2.1%	4.0%	9.2%
2008–2012 Households Actual Proportion	69.6%	8.8%	19.3%	12.6%
2008–2012 Households Free Market	68.4%	17.4%	6.3%	25.3%
2008–2012 Households Difference	1.2%	-8.6%	13.0%	-12.7%

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Super Neighborhood 21: Greater Uptown (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4318.02 (Was Tract 4318 in 2000)				
Householders (2000 Census)	87.8%	2.1%	4.0%	9.2%
2008–2012 Households Actual Proportion	82.7%	6.3%	7.0%	21.9%
2008–2012 Households Free Market	69.9%	16.0%	6.5%	24.4%
2008–2012 Households Difference	12.8%	-9.7%	0.5%	-2.6%
2010 Census Tract 4319				
Householders (2000 Census)	84.8%	4.4%	4.4%	12.5%
2008–2012 Households Actual Proportion	71.7%	9.7%	12.3%	17.1%
2008–2012 Households Free Market	70.2%	15.9%	6.6%	23.7%
2008–2012 Households Difference	1.5%	-6.1%	5.7%	-6.7%
2010 Census Tract 4320.01 (Was Tract 4320 in 2000)				
Householders (2000 Census)	69.7%	8.0%	8.9%	17.3%
2008–2012 Households Actual Proportion	64.2%	13.8%	10.1%	25.0%
2008–2012 Households Free Market	67.2%	18.3%	6.0%	27.1%
2008–2012 Households Difference	-3.1%	-4.6%	4.1%	-2.1%
2010 Census Tract 4327.02 (Was Tract 4327 in 2000)				
Householders (2000 Census)	60.0%	9.4%	4.3%	41.0%
2008–2012 Households Actual Proportion	74.9%	10.6%	5.7%	39.9%
2008–2012 Households Free Market	64.5%	20.5%	5.5%	30.7%
2008–2012 Households Difference	10.4%	-9.9%	0.2%	9.2%

Greater Uptown is a large, mixed-use district located at the West Loop and traversed by Buffalo Bayou. It includes an office and retail complex centered on the Galleria which rivals the downtowns of many major cities. It also includes neighborhoods of expensive homes developed after World War II when this area was the city's western edge. The large subdivisions developed in the 1950s have now been almost entirely redeveloped. Apartments, condos, and expensive patio homes have replaced the modest, single-family homes on Augusta, Bering, Potomac and Nantucket. The population grew from 41,822 to 48,201 in 2012 while the annual median household income remained well above city medians, rising from \$73,283 to \$80,274 in 2012.



The actual proportions of Caucasian households are significantly larger than expected in a free housing market in the Greater Uptown census tracts just west of the Washington Avenue Coalition/Memorial Park super neighborhood (4301, 4315.01, 4315.02, 4316, and 4317) while the actual proportions of African American, Asian, and Hispanic households all lag behind expected percentages. The actual proportions are generally just a fraction of the expected proportions.

The actual proportions of all groups are roughly what would be expected in all

but two of the Greater Uptown census tracts west of the Afton Oak/River Oaks super neighborhood. However, in many of these census tracts the actual proportions of Black, Asian, or Latino households are a mere fraction of what would be expected.

Recommended Actions: The City of Houston needs to take steps to expand housing choices for the higher income people of color who can afford to live here to include Greater Uptown among their housing choices. If the city is to affirmatively further fair housing choice, it needs to implement the recommendations of this study to overcome the apprehension, qualms, and discomfort many African Americans, Asians, and Latinos with higher incomes have regarding moving to an overwhelmingly non-Hispanic Caucasian area so that they will expand their housing choices to include areas like Greater Uptown.

Greater Uptown offers Houston a golden opportunity to establish a stable racially and ethnically integrated super neighborhood that affirmatively furthers fair housing choice.

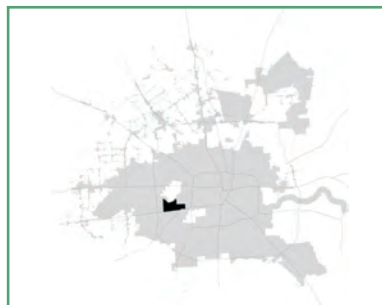
Table 71: Mid West

Super Neighborhood 20: Mid West				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	71.1%	9.5%	6.2%	20.6%
2008–2012 Households Actual Proportion	62.7%	17.4%	7.8%	29.9%
2008–2012 Households Free Market	65.4%	19.7%	5.7%	29.7%
2008–2012 Households Difference	-2.7%	-2.3%	2.1%	0.2%
2010 Census Tract 4311.01 (Was Tract 4311 in 2000)				
Householders (2000 Census)	86.4%	4.9%	4.6%	8.7%
2008–2012 Households Actual Proportion	78.4%	14.0%	7.0%	5.3%
2008–2012 Households Free Market	68.3%	17.4%	6.2%	25.9%
2008–2012 Households Difference	10.1%	-3.4%	0.7%	-20.7%
2010 Census Tract 4311.02 (Was Tract 4311 in 2000)				
Householders (2000 Census)	86.4%	4.9%	4.6%	8.7%
2008–2012 Households Actual Proportion	71.3%	11.3%	12.8%	15.3%
2008–2012 Households Free Market	66.2%	18.7%	5.7%	30.4%
2008–2012 Households Difference	5.1%	-7.4%	7.1%	-15.0%
2010 Census Tract 4312.01 (Was Tract 4312 in 2000)				
Householders (2000 Census)	77.7%	6.1%	6.8%	13.4%
2008–2012 Households Actual Proportion	65.0%	15.0%	10.9%	22.0%
2008–2012 Households Free Market	65.7%	19.6%	5.8%	28.9%
2008–2012 Households Difference	-0.6%	-4.6%	5.1%	-6.9%
2010 Census Tract 4312.02 (Was Tract 4312 in 2000)				
Householders (2000 Census)	77.7%	6.1%	6.8%	13.4%
2008–2012 Households Actual Proportion	69.0%	12.7%	15.9%	12.5%
2008–2012 Households Free Market	69.0%	16.7%	6.3%	26.2%
2008–2012 Households Difference	0.0%	-4.0%	9.6%	-13.7%
2010 Census Tract 4320.01 (Was Tract 4320 in 2000)				
Householders (2000 Census)	69.7%	8.0%	8.9%	17.3%
2008–2012 Households Actual Proportion	64.2%	13.8%	10.1%	25.0%
2008–2012 Households Free Market	67.2%	18.3%	6.0%	27.1%
2008–2012 Households Difference	-3.1%	-4.6%	4.1%	-2.1%
2010 Census Tract 4320.02 (Was Tract 4320 in 2000)				
Householders (2000 Census)	69.7%	8.0%	8.9%	17.3%
2008–2012 Households Actual Proportion	57.4%	32.0%	1.1%	36.0%
2008–2012 Households Free Market	61.2%	23.3%	4.9%	33.6%
2008–2012 Households Difference	-3.8%	8.6%	-3.8%	2.4%

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Super Neighborhood 20: Mid West (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4321				
Householders (2000 Census)	68.1%	10.2%	8.5%	19.9%
2008–2012 Households Actual Proportion	48.6%	18.5%	15.5%	28.6%
2008–2012 Households Free Market	65.2%	20.0%	5.6%	29.7%
2008–2012 Households Difference	-16.6%	-1.6%	9.9%	-1.1%
2010 Census Tract 4322				
Householders (2000 Census)	70.9%	15.5%	5.1%	18.7%
2008–2012 Households Actual Proportion	69.5%	20.7%	4.3%	24.4%
2008–2012 Households Free Market	65.8%	19.3%	5.7%	29.9%
2008–2012 Households Difference	3.7%	1.4%	-1.3%	-5.4%
2010 Census Tract 4325				
Householders (2000 Census)	50.5%	30.5%	5.1%	27.4%
2008–2012 Households Actual Proportion	53.1%	27.0%	2.9%	42.4%
2008–2012 Households Free Market	63.4%	21.3%	5.3%	32.0%
2008–2012 Households Difference	-10.3%	5.7%	-2.4%	10.4%
2010 Census Tract 4326				
Householders (2000 Census)	72.9%	13.0%	5.1%	16.5%
2008–2012 Households Actual Proportion	54.2%	25.2%	2.3%	16.6%
2008–2012 Households Free Market	68.8%	17.0%	6.2%	26.1%
2008–2012 Households Difference	-14.5%	8.2%	-3.9%	-9.4%
2010 Census Tract 4327.01 (Was Tract 4327 in 2000)				
Householders (2000 Census)	60.0%	9.4%	4.3%	41.0%
2008–2012 Households Actual Proportion	50.0%	7.4%	0.6%	83.8%
2008–2012 Households Free Market	61.6%	22.8%	4.9%	34.1%
2008–2012 Households Difference	-11.7%	-15.4%	-4.3%	49.7%
2010 Census Tract 4327.02 (Was Tract 4327 in 2000)				
Householders (2000 Census)	60.0%	9.4%	4.3%	41.0%
2008–2012 Households Actual Proportion	74.9%	10.6%	5.7%	39.9%
2008–2012 Households Free Market	64.5%	20.5%	5.5%	30.7%
2008–2012 Households Difference	10.4%	-9.9%	0.2%	9.2%

The Mid West super neighborhood is located directly south of Piney Point Village and is bordered on the south by the Southern Pacific Railroad track. The area contains a mix of single-family, condominiums, apartments, and office/commercial uses. Major commercial activity occurs along Westheimer, Richmond, and Fondren roads. The northwest corner of this neighborhood, known as Woodlake, consists of mixed commercial and high density residential uses. Tanglewilde and Briar Meadow (on both sides of Richmond Avenue) are the largest single-family subdivisions in the area. The population grew to 48,432 from 40,209 in 2000 while the annual median household income which was above the city's median in 2000 fell from \$41,172 to \$36,616, well below the city's median of \$44,648 in 2012.



The actual composition of nearly all of the census tracts in the Mid West super neighborhood, located just southwest of Greater Uptown, is what would be expected in a free housing market absent discrimination.

Census tract 4327.02 is part of a swath of tracts in the Gulfton and Sharpstown super neighborhoods where the actual proportions of Latino households significantly exceeds the percentage expected. The gap in tract 4327.02 is nearly 50 percentage points higher than the gaps in the other two super neighborhoods.

In the northwest corner of Mid West, the actual proportions of Hispanic households in tracts 4311.01 and 4311.02 are 20.7 and 15 percentage points lower than expected, respectively.

In tract 4321, the actual proportion of Asian households is nearly 10 percentage points higher than expected while the proportion of white households is nearly 17 percentage points lower.

Recommended Actions: Real estate testing may enable the City of Houston to identify the causes of the gaps between actual and expected proportions in some of the Mid West census tracts. But overall, the actual proportions in the Mid West super neighborhood are pretty much what would be expected in a free housing market.

The Mid West super neighborhood offers the city a golden opportunity to establish a stable racially and ethnically integrated super neighborhood that affirmatively furthers fair housing choice.

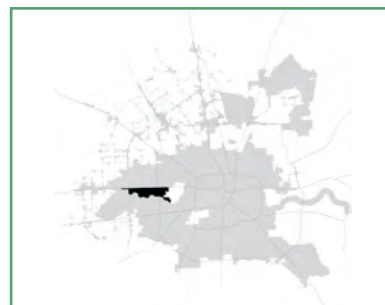
Table 72: Memorial

Super Neighborhood 16: Memorial				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	87.6%	2.1%	6.8%	6.6%
2008–2012 Households Actual Proportion	84.4%	4.8%	8.9%	11.2%
2008–2012 Households Free Market	72.1%	14.4%	6.8%	21.8%
2008–2012 Households Difference	12.3%	-9.6%	2.1%	-10.6%
2010 Census Tract 4307				
Householders (2000 Census)	89.5%	0.7%	6.2%	6.2%
2008–2012 Households Actual Proportion	81.4%	1.2%	14.9%	11.0%
2008–2012 Households Free Market	68.3%	17.5%	6.1%	26.4%
2008–2012 Households Difference	13.1%	-16.3%	8.8%	-15.4%
2010 Census Tract 4308				
Householders (2000 Census)	92.3%	0.1%	6.3%	3.1%
2008–2012 Households Actual Proportion	83.0%	0.0%	15.6%	4.9%
2008–2012 Households Free Market	75.3%	11.8%	7.3%	18.1%
2008–2012 Households Difference	7.7%	-11.8%	8.3%	-13.2%
2010 Census Tract 4309				
Householders (2000 Census)	89.7%	0.8%	7.0%	5.2%
2008–2012 Households Actual Proportion	85.1%	0.9%	12.1%	8.2%
2008–2012 Households Free Market	74.0%	12.9%	7.0%	19.8%
2008–2012 Households Difference	11.1%	-12.0%	5.1%	-11.5%
2010 Census Tract 4501				
Householders (2000 Census)	91.4%	0.3%	5.9%	4.9%
2008–2012 Households Actual Proportion	92.3%	0.3%	7.4%	4.7%
2008–2012 Households Free Market	70.6%	15.4%	6.5%	24.2%
2008–2012 Households Difference	21.7%	-15.1%	0.9%	-19.5%
2010 Census Tract 4502				
Householders (2000 Census)	91.3%	1.3%	5.8%	3.4%
2008–2012 Households Actual Proportion	87.7%	0.9%	9.1%	8.9%
2008–2012 Households Free Market	75.4%	11.8%	7.4%	17.5%
2008–2012 Households Difference	12.2%	-10.9%	1.7%	-8.6%

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Super Neighborhood 16: Memorial (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4503				
Householders (2000 Census)	76.1%	6.2%	9.9%	12.8%
2008–2012 Households Actual Proportion	75.8%	17.0%	6.0%	20.8%
2008–2012 Households Free Market	68.2%	17.4%	6.3%	26.6%
2008–2012 Households Difference	7.6%	-0.3%	-0.3%	-5.7%
2010 Census Tract 4504				
Householders (2000 Census)	84.2%	4.7%	5.7%	11.6%
2008–2012 Households Actual Proportion	82.1%	6.9%	7.1%	20.4%
2008–2012 Households Free Market	68.3%	17.3%	6.2%	26.6%
2008–2012 Households Difference	13.8%	-10.4%	1.0%	-6.2%
2010 Census Tract 4505				
Householders (2000 Census)	89.3%	1.2%	7.1%	3.6%
2008–2012 Households Actual Proportion	79.1%	10.5%	10.4%	7.3%
2008–2012 Households Free Market	75.3%	11.8%	7.3%	18.2%
2008–2012 Households Difference	3.8%	-1.3%	3.1%	-10.9%
2010 Census Tract 4506				
Householders (2000 Census)	84.7%	2.6%	8.5%	8.5%
2008–2012 Households Actual Proportion	86.7%	5.8%	4.3%	15.0%
2008–2012 Households Free Market	70.0%	16.1%	6.5%	24.0%
2008–2012 Households Difference	16.7%	-10.3%	-2.2%	-9.0%
2010 Census Tract 4507				
Householders (2000 Census)	94.7%	0.3%	3.7%	2.8%
2008–2012 Households Actual Proportion	94.1%	0.0%	4.3%	2.2%
2008–2012 Households Free Market	76.6%	11.0%	7.6%	15.9%
2008–2012 Households Difference	17.6%	-11.0%	-3.2%	-13.7%

Memorial is one of Houston's most prestigious neighborhoods. Situated between Buffalo Bayou and I-10, west of several incorporated villages, the community takes its name from the main thoroughfare, Memorial Drive. The first significant residential development in this area began in the 1950s. Above average income home buyers were attracted to this heavily wooded area and to Spring Branch Independent School District and Katy Independent School District schools. Subdivisions range from comfortable mass produced homes to million dollar estates. Development along I-10 on the northern portion of the area includes important office centers and massive retail districts at Town and Country and Memorial City. Population remained steady at 44,412 in 2012 after being 44,957 in 2000. However, annual median household income nearly doubled from \$53,582 to \$103,760 in 2012.



The Memorial super neighborhood is northwest of Mid West, immediately north of Briar Forest, and immediately south of Spring Branch West. To its east is land not in the City of Houston.

The actual compositions of six of the ten census tracts in Memorial are what would be expected in a free housing market absent discrimination except that the actual proportions of African American households is a small fraction of the percentage expected in three of these tracts (4308, 4309, 4502).

The actual percentages of Latino households are below the expected proportions in every census tract although the gap is greater than 15 points in only 4307 and 4501.

The actual percentages of Asian households are roughly what would be expected in all ten census tracts.

Recommended Actions: It is vital that the City of Houston take steps to expand housing choices for the higher income Latinos and African Americans who can afford to live here to include the Memorial super neighborhood among their housing choices. If the city is to affirmatively further fair housing choice, it needs to implement the recommendations of this study to overcome the apprehension, qualms, and discomfort many African Americans and Latinos with higher incomes have regarding moving to an overwhelmingly non-Hispanic Caucasian area so that they will expand their housing choices to include areas like Memorial.

The Memorial super neighborhood offers the city a golden opportunity to establish a stable racially and ethnically integrated super neighborhood that affirmatively furthers fair housing choice.

Table 73: Briar Forest

Super Neighborhood 18: Briar Forest				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	73.0%	12.2%	6.1%	15.0%
2008–2012 Households Actual Proportion	64.4%	20.5%	6.9%	17.8%
2008–2012 Households Free Market	68.5%	17.2%	6.2%	26.2%
2008–2012 Households Difference	-4.1%	3.3%	0.7%	-8.4%
2010 Census Tract 4310				
Householders (2000 Census)	92.7%	2.1%	3.0%	5.7%
2008–2012 Households Actual Proportion	92.8%	4.8%	2.1%	16.5%
2008–2012 Households Free Market	72.2%	14.3%	6.8%	21.9%
2008–2012 Households Difference	20.7%	-9.5%	-4.6%	-5.3%
2010 Census Tract 4508.01 (Was Tract 4508 in 2000)				
Householders (2000 Census)	70.7%	13.2%	6.5%	18.1%
2008–2012 Households Actual Proportion	62.4%	11.4%	6.5%	25.4%
2008–2012 Households Free Market	67.7%	17.8%	6.1%	27.2%
2008–2012 Households Difference	-5.3%	-6.4%	0.4%	-1.8%
2010 Census Tract 4508.02 (Was Tract 4508 in 2000)				
Householders (2000 Census)	70.7%	13.2%	6.5%	18.1%
2008–2012 Households Actual Proportion	56.2%	14.1%	5.9%	38.9%
2008–2012 Households Free Market	68.9%	16.7%	6.1%	26.9%
2008–2012 Households Difference	-12.7%	-2.6%	-0.3%	12.0%
2010 Census Tract 4509				
Householders (2000 Census)	82.3%	3.7%	8.6%	8.1%
2008–2012 Households Actual Proportion	72.1%	14.4%	10.4%	10.3%
2008–2012 Households Free Market	70.0%	16.0%	6.5%	24.3%
2008–2012 Households Difference	2.1%	-1.6%	3.9%	-14.0%
2010 Census Tract 4510.01 (Was Tract 4510 in 2000)				
Householders (2000 Census)	60.3%	19.6%	7.1%	20.4%
2008–2012 Households Actual Proportion	45.5%	43.6%	4.5%	18.5%
2008–2012 Households Free Market	64.0%	20.9%	5.3%	31.3%
2008–2012 Households Difference	-18.5%	22.7%	-0.9%	-12.8%

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Super Neighborhood 18: Briar Forest (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4510.02 (Was Tract 4510 in 2000)				
Householders (2000 Census)	60.3%	19.6%	7.1%	20.4%
2008–2012 Households Actual Proportion	38.1%	48.9%	5.3%	19.7%
2008–2012 Households Free Market	64.0%	20.8%	5.5%	31.1%
2008–2012 Households Difference	-25.9%	28.1%	-0.2%	-11.4%
2010 Census Tract 4511				
Householders (2000 Census)	84.0%	5.0%	6.2%	9.7%
2008–2012 Households Actual Proportion	65.6%	18.3%	8.9%	12.6%
2008–2012 Households Free Market	68.9%	16.8%	6.2%	26.0%
2008–2012 Households Difference	-3.3%	1.5%	2.7%	-13.4%
2010 Census Tract 4512				
Householders (2000 Census)	95.2%	1.1%	3.0%	4.2%
2008–2012 Households Actual Proportion	90.9%	1.0%	5.8%	5.1%
2008–2012 Households Free Market	72.9%	13.7%	7.0%	20.8%
2008–2012 Households Difference	18.0%	-12.8%	-1.2%	-15.7%
2010 Census Tract 4513				
Householders (2000 Census)	83.2%	7.4%	5.0%	8.3%
2008–2012 Households Actual Proportion	66.0%	15.2%	12.9%	9.8%
2008–2012 Households Free Market	69.4%	16.6%	6.5%	24.4%
2008–2012 Households Difference	-3.3%	-1.4%	6.4%	-14.5%

The Briarforest Area is bound by Buffalo Bayou and Gessner, Westheimer and Dairy Ashford roads. A significant feature of this neighborhood is a large wooded area east of Wilcrest Drive and adjacent to Buffalo Bayou on the north. The area is largely single-family residential with some multi-family, patio and town homes located along the area's major thoroughfares. Offices complexes are located along Sam Houston Parkway which passes through the easternmost sector of the area. Population shrunk from 42,100 in 2000 to 39,544 in 2012 while annual median household income remained comfortably higher than the city as a whole at \$59,211 and \$65,788 in 2012.



While the compositions of five of the nine census tracts in Briar Forest are what would be expected in a free housing market, the actual proportions of Latino households in four of those tracts range from 12 to 14.5 percentage points lower than expected.

Since 2000, the actual proportions of African American households in tracts 4510.01 and 4510.02 grew rapidly from 19.6 to 43.6 and from 19.6 to 48.9 percent respectively. The result is that the actual proportions of Black households now

exceed the expected proportions by 22.7 and 28.1 percentage points. Meanwhile, the actual proportions of white households fell precipitously to levels significantly lower than expected. These changes are characteristic of a neighborhood that may be undergoing resegregation from predominately Caucasian to predominantly African American. Along with most of the tracts in Westchase and some at the southeast corner of Eldridge/West Oaks, tracts 4510.01 and 4510.02 *may* be forming another Black enclave that runs counter to affirmatively furthering fair housing in Houston.

The actual proportion of Caucasian households in tract 4310 is nearly 21 percentage points higher than expected while the proportions of all other groups are slightly less than expected.

In tract 4512, the actual proportion of white households is 18 percentage points higher than expected while the actual proportion of Latino households is nearly 16 percentage points lower than expected. The actual proportion of African American households is almost 13 percentage points lower than expected.

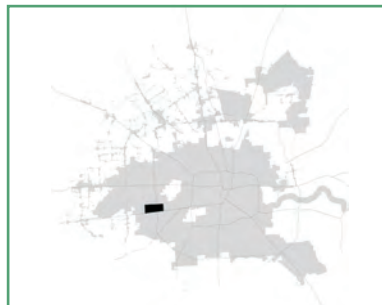
Recommended Actions: The city needs to identify the factors leading to these substantial and rapid demographic changes in tracts 4510.01 and 4501.02 and implement steps now that address these causes and curb the *apparent* resegregation in tracts 4510.01 and 4510.02. The city needs to expand Black demand for housing in areas where their actual proportions are less than expected in a free housing market and broaden white demand to include housing in integrated neighborhoods.

Given the demographic differences between Briar Forest census tracts, the City of Houston should conduct testing to identify if illegal discriminatory real estate practices are in play in Briar Forest and neighboring super neighborhoods.

Table 74: Westchase

Super Neighborhood 19: Westchase				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	56.7%	21.4%	11.7%	16.8%
2008–2012 Households Actual Proportion	40.7%	38.8%	8.8%	21.5%
2008–2012 Households Free Market	64.6%	20.4%	5.5%	30.6%
2008–2012 Households Difference	-23.8%	18.4%	3.3%	-9.1%
2010 Census Tract 4323				
Householders (2000 Census)	54.0%	20.1%	14.9%	18.5%
2008–2012 Households Actual Proportion	42.3%	37.9%	6.4%	30.1%
2008–2012 Households Free Market	63.9%	20.9%	5.4%	31.4%
2008–2012 Households Difference	-21.5%	17.0%	0.9%	-1.3%
2010 Census Tract 4324				
Householders (2000 Census)	47.9%	31.2%	9.8%	19.1%
2008–2012 Households Actual Proportion	38.2%	42.5%	8.0%	22.6%
2008–2012 Households Free Market	63.5%	21.1%	5.1%	33.0%
2008–2012 Households Difference	-25.2%	21.4%	2.9%	-10.4%
2010 Census Tract 4521				
Householders (2000 Census)	67.8%	14.8%	9.9%	12.6%
2008–2012 Households Actual Proportion	50.8%	25.3%	10.1%	19.9%
2008–2012 Households Free Market	66.8%	18.7%	6.0%	27.5%
2008–2012 Households Difference	-16.0%	6.7%	4.1%	-7.6%
2010 Census Tract 4522.01 (Was Tract 4522 in 2000)				
Householders (2000 Census)	57.0%	20.7%	11.9%	16.8%
2008–2012 Households Actual Proportion	34.2%	49.6%	10.6%	16.3%
2008–2012 Households Free Market	63.5%	21.3%	5.3%	31.9%
2008–2012 Households Difference	-29.3%	28.3%	5.3%	-15.6%
2010 Census Tract 4522.02 (Was Tract 4522 in 2000)				
Householders (2000 Census)	57.0%	20.7%	11.9%	16.8%
2008–2012 Households Actual Proportion	26.9%	50.8%	9.2%	14.7%
2008–2012 Households Free Market	64.1%	20.9%	5.4%	30.4%
2008–2012 Households Difference	-37.2%	29.9%	3.8%	-15.6%

Westchase is west of Gessner and south of Westheimer on Houston's west side. Its heavily landscaped boulevards are lined with condominium and apartment projects, office buildings, distribution centers, and retail centers. Developed with a central plan beginning in the 1970s, it has undergone an increase in the density of development as Houston boomed. The opening of the West Belt increased access and helped to end the real estate slump of the 1980s here. On the western edge of the area is the old Andrau Air Park. This privately-owned airport has closed and a gated country club community has been announced for this large tract. Population increased by nearly a fourth, from 21,017 in 2000 to 26,122 in 2012 while the annual median household income, \$40,741, fell below the city as a whole, \$44,648, in 2012. In 2000, the \$37,296 annual median household income was just above the \$36,616 median for the entire city.



Westchase has experienced rapid and substantial racial change since 2000 characteristic of a resegregating community. The proportions of African American households have increased by 10.5 to 30.1 percentage points since 2000. In four of the five census tracts, the actual proportion of Black households ranges from 17 to 29.9 percentage points greater than expected in a free market without discrimination. Meanwhile, the actual proportions of white households in every census tract have declined to between 16 and 37.2 percent lower than would be expected.

Census tract 4323 has seen a substantial increase in its percentage of Hispanic households since 2000, bringing its actual percentage to the same level as expected. The percentage of Latino households is less than expected in the other four tracts, with it being 15.6 percentage points lower than expected in both tracts 4522.01 and 4522.02.

The proportions of Asian households is about what would be expected in every Westchase census tract.

Recommended Actions: The city needs to identify the factors leading to these substantial and rapid demographic changes in Westchase and implement steps now that address these causes and curb the *apparent* early stages of resegregation in nearly all of Westchase. These steps including broadening Black demand for housing in areas where their actual proportions are less than expected in a free housing market and expanding white demand to include housing in integrated neighborhoods.

Table 75: Eldridge/West Oaks

Super Neighborhood 17: Eldridge/West Oaks				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	67.5%	12.1%	8.6%	12.2%
2008–2012 Households Actual Proportion	56.6%	21.7%	13.9%	18.6%
2008–2012 Households Free Market	68.6%	17.1%	6.3%	25.7%
2008–2012 Households Difference	-12.0%	4.6%	7.7%	-7.1%
2010 Census Tract 4514.01 (Was Tract 4514 in 2000)				
Householders (2000 Census)	76.0%	11.0%	6.4%	12.4%
2008–2012 Households Actual Proportion	69.4%	11.2%	13.2%	9.7%
2008–2012 Households Free Market	67.6%	18.0%	6.2%	26.4%
2008–2012 Households Difference	1.8%	-6.8%	7.0%	-16.7%
2010 Census Tract 4514.02 (Was Tract 4514 in 2000)				
Householders (2000 Census)	76.0%	11.0%	6.4%	12.4%
2008–2012 Households Actual Proportion	40.1%	45.1%	1.6%	17.1%
2008–2012 Households Free Market	63.9%	20.7%	5.3%	32.7%
2008–2012 Households Difference	-23.8%	24.4%	-3.7%	-15.5%
2010 Census Tract 4514.03 (Was Tract 4514 in 2000)				
Householders (2000 Census)	76.0%	11.0%	6.4%	12.4%
2008–2012 Households Actual Proportion	53.9%	22.7%	17.3%	18.4%
2008–2012 Households Free Market	66.1%	19.2%	5.9%	28.4%
2008–2012 Households Difference	-12.2%	3.5%	11.4%	-10.1%
2010 Census Tract 4515				
Householders (2000 Census)	81.7%	5.5%	7.4%	8.9%
2008–2012 Households Actual Proportion	61.5%	19.0%	15.7%	12.2%
2008–2012 Households Free Market	67.8%	17.7%	6.1%	27.3%
2008–2012 Households Difference	-6.3%	1.3%	9.5%	-15.1%
2010 Census Tract 4516.01 (Was Tract 4516 in 2000)				
Householders (2000 Census)	84.5%	3.9%	7.3%	6.4%
2008–2012 Households Actual Proportion	75.5%	4.7%	17.3%	7.8%
2008–2012 Households Free Market	73.3%	13.5%	7.0%	20.6%
2008–2012 Households Difference	2.3%	-8.8%	10.3%	-12.8%

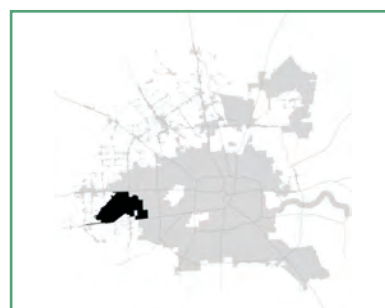
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Super Neighborhood 17: Eldridge/West Oaks (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4516.02 (Was Tract 4516 in 2000)				
Householders (2000 Census)	84.5%	3.9%	7.3%	6.4%
2008–2012 Households Actual Proportion	61.7%	13.2%	19.0%	13.9%
2008–2012 Households Free Market	71.2%	15.4%	6.9%	21.1%
2008–2012 Households Difference	-9.4%	-2.2%	12.0%	-7.2%
2010 Census Tract 4517				
Householders (2000 Census)	61.6%	21.8%	8.9%	14.2%
2008–2012 Households Actual Proportion	56.4%	30.4%	7.2%	27.7%
2008–2012 Households Free Market	67.4%	17.9%	5.8%	28.5%
2008–2012 Households Difference	-11.0%	12.5%	1.3%	-0.9%
2010 Census Tract 4518				
Householders (2000 Census)	57.6%	19.5%	12.4%	17.0%
2008–2012 Households Actual Proportion	37.7%	29.7%	11.5%	25.8%
2008–2012 Households Free Market	67.8%	17.6%	5.9%	28.3%
2008–2012 Households Difference	-30.1%	12.1%	5.6%	-2.5%
2010 Census Tract 4519.01 (Was Tract 4519 in 2000)				
Householders (2000 Census)	49.6%	26.7%	12.7%	17.5%
2008–2012 Households Actual Proportion	40.6%	37.0%	7.6%	30.1%
2008–2012 Households Free Market	64.5%	20.4%	5.5%	30.9%
2008–2012 Households Difference	-23.9%	16.6%	2.1%	-0.8%
2010 Census Tract 4519.02 (Was Tract 4519 in 2000)				
Householders (2000 Census)	49.6%	26.7%	12.7%	17.5%
2008–2012 Households Actual Proportion	43.4%	8.8%	47.8%	8.9%
2008–2012 Households Free Market	71.7%	14.8%	7.0%	20.8%
2008–2012 Households Difference	-28.3%	-6.1%	40.9%	-11.9%
2010 Census Tract 4520				
Householders (2000 Census)	57.7%	18.9%	11.8%	15.7%
2008–2012 Households Actual Proportion	42.2%	36.2%	12.5%	18.6%
2008–2012 Households Free Market	65.8%	19.5%	5.9%	28.4%
2008–2012 Households Difference	-23.7%	16.7%	6.6%	-9.7%

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Super Neighborhood 17: Eldridge/West Oaks (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4543.01 (Was Tract 4543 in 2000)				
Householders (2000 Census)	62.6%	16.5%	9.9%	22.1%
2008–2012 Households Actual Proportion	45.7%	31.7%	12.8%	34.6%
2008–2012 Households Free Market	64.2%	20.6%	5.6%	31.0%
2008–2012 Households Difference	-18.5%	11.1%	7.2%	3.6%
2010 Census Tract 4544				
Householders (2000 Census)	73.9%	10.9%	13.0%	6.5%
2008–2012 Households Actual Proportion	79.9%	0.0%	14.3%	31.2%
2008–2012 Households Free Market	68.2%	17.4%	6.2%	26.6%
2008–2012 Households Difference	11.6%	-17.4%	8.1%	4.5%
2010 Census Tract 4545.01 (Was Tract 4545 in 2000)				
Householders (2000 Census)	87.2%	2.0%	9.3%	4.4%
2008–2012 Households Actual Proportion	82.0%	1.4%	16.7%	7.3%
2008–2012 Households Free Market	76.1%	11.3%	7.5%	16.6%
2008–2012 Households Difference	5.8%	-9.9%	9.2%	-9.3%
2010 Census Tract 4545.02 (Was Tract 4545 in 2000)				
Householders (2000 Census)	87.2%	2.0%	9.3%	4.4%
2008–2012 Households Actual Proportion	79.9%	1.9%	16.0%	28.1%
2008–2012 Households Free Market	75.0%	12.1%	7.5%	17.6%
2008–2012 Households Difference	4.8%	-10.2%	8.5%	10.4%
2010 Census Tract 6730.02 (Was Tract 6730 in 2000)				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	72.2%	6.9%	14.5%	13.3%
2008–2012 Households Free Market	74.6%	12.4%	7.3%	18.5%
2008–2012 Households Difference	-2.4%	-5.5%	7.2%	-5.2%

Eldridge/West Oaks is located south of Interstate 10 in the western part of the City and includes West Oaks Mall, Barker Reservoir, and a developing area centered by Eldridge Parkway. Barker Reservoir covers over half of the area. The remaining half is a mix of multi-family and single-family residential uses and vacant land. A number of single-family gated communities built around man-made lakes have been developed in the area. The area is served by Houston Independent School District north of Westheimer Road and by Alief Independent School District on the south side. The beginning of the century saw huge growth from 40,013 residents in 2000 to 56,201 in 2012 while the annual median household income — \$50,857 in 2000 and \$64,369 in 2012 — remained above the city's medians.



At the southeast corner of Eldridge/West Oaks are five census tracts with significant differences in their actual composition and expected composition.

Since 2000, the actual proportion of Asian households in tract 4519.02 has nearly quadrupled from 12.7 to 47.8 percent while the expected proportion is just 7 percent. The actual proportions of households in all other groups have declined with the percentage of Black households plummeting from 26.7 percent in 2000 to just 8.8 percent which is close to its expected percentage. The percentage of Latino households fell in half to 8.9 percent while it would be expected to be about 21 percent. The actual proportion of Caucasians declined just 6.2 percentage points since 2000, 28.3 percentage points below what would be expected.

The extremely large increase in the percentage of Asian households coupled with the substantial declines in African American and Hispanic suggests that since 2000 the vast majority of households moving into tract 4519.02 have been Asian and that demand from all other groups has slumped to nearly nothing. This degree of change is characteristic of a diverse area beginning to segregate.

Tract 4519.02 is immediately north of the substantial concentration of Asian households in the north half of the Alief super neighborhood. It appears that instead of maintaining its diversity, tract 4519.02 being consolidated into this expanding Asian enclave that encompasses much of Alief, the west end of Sharpstown, and the census tracts west of Alief that are not assigned to any super neighborhood.

Immediately north of tract 4519.02 are tracts 4520 and 4514.02. Immediately west of 4519.02 is tract 4519.01. In all three tracts, the actual percentages of African American households exceeds the expected proportions by 16.7, 24.4, and 16.6 percentage points respectively. The actual percentages of white households are nearly 24 percentage points less than expected in all three tracts.

The actual percentages of Latino households in tracts 4514.01, 4514.02, and 4515 are less than expected by 16.7, 15.5, and 15.1 percentage points.

African American households practically disappeared from tract 4544 with the percentage dropping from 10.9 in 2000 to immeasurable, 17.4 percentage points lower than would be expected absent housing discrimination.

Recommended Actions: The City of Houston needs to conduct testing to determine if steering or other illegal discriminatory real estate practices are causing these significant changes within Eldridge/West Oaks. Of particular concern is the reduction in diversity resulting, in part, from the possible expansion of Asian concentrations in Alief and Sharpstown into Eldridge/West Oaks.

Nearby Census Tracts Not in Any Super Neighborhood. The actual composition of most of the census tracts (6730.03, 6731.02, 6730.01, 4547, 4548, 6734) west of Eldridge/West Oaks is what would be expected in a free housing market — just like the tracts abutting them on the west end of Eldridge/West Oaks (4545.01, 4545.02, 6730.2).

In a cluster of four tracts west of Eldridge/West Oaks (4551.01, 4551.02, 4552, 4546) the actual proportions of Caucasian households are greater than expected

by 23.2, 19.7, 21.1, and 16.1 percentage points respectively while the proportions of all other groups are a bit less than expected.

The actual proportion of African American households in tract 4553 at the farthest west end of Houston has seen some development since 2000. Its composition is mostly what would be expected in a free market except that the actual proportion of Latino households is 16.9 percentage points lower than expected.

South of Eldridge/West Oaks is the geographically huge census tract 6729 where the actual proportion of Caucasian households is 25.1 percentage points lower than expected. The proportions of African American, Asian, and Hispanic households grew since 2000 from 3.1 to 28.6, 6.9 to 19.8, and 6.6 to 20.3 percent, placing them all within the range expected in a free housing market although the proportions of Black and Asian households are close to the 15 percent threshold.

Also south of Eldridge/West Oaks is tract 4543.02 where the actual percentage of white households is 16.6 percentage points lower than expected and the actual proportions of Black, Asian, and Hispanic households are about what would be expected in a free housing market.

South of tract 4543.02 is tract 4542 where the actual percentage of white households is 15.5 percentage points lower than expected and the actual proportion of Hispanic households is 22.1 percentage points higher than expected thanks to a 23.4 percentage point increase since 2000.

South of tract 4542 is tract 6726.01 where the actual proportion of Caucasian households is 39.7 percentage points less than expected and the actual proportion of African American households is 16.8 percentage points more than expected. The increases since 2000 in the percentages of Hispanic and Black households and the decrease in the percentage of white households suggests that this tract may be losing its diversity.

Adjacent tracts to the east, 4540 and 4541 exhibit demographic changes similar to those of tract 4542, albeit not as extreme. Just south of these is tract 6725 where the percentage of Caucasian households fell from 54.1 to 31.7 percent, 35.6 percentage points lower than expected.

Recommended Actions: Testing is warranted to identify whether any illegal discriminatory real estate practices are contributing to the demographic changes in many of these census tracts not assigned to any super neighborhood.

Table 76: Museum Park

Super Neighborhood 66: Museum Park				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	38.8%	50.2%	2.4%	12.5%
2008–2012 Households Actual Proportion	63.9%	19.8%	11.3%	10.5%
2008–2012 Households Free Market	70.2%	16.0%	6.5%	23.3%
2008–2012 Households Difference	-6.3%	3.8%	4.7%	-12.8%
2010 Census Tract 3126				
Householders (2000 Census)	38.8%	50.2%	2.4%	12.5%
2008–2012 Households Actual Proportion	63.9%	19.8%	11.3%	10.5%
2008–2012 Households Free Market	70.2%	16.0%	6.5%	23.3%
2008–2012 Households Difference	-6.3%	3.8%	4.7%	-12.8%

Museum Park is the neighborhood north of Hermann Park that is home to the majority of the city's museums. It is nestled between downtown and the Medical Center. The construction of Highway 288 during the 1970s separated the neighborhood from the Riverside area. Museum Park is a district of large homes, small apartment buildings and scattered commercial buildings. While many of the pre-World War II buildings have been renovated and some new residential construction has occurred, substantial redevelopment in the area has not taken hold. The population declined by 341 to 3,319 in 2012 while the annual median household income rose by nearly half from \$47,745 to \$69,503 in 2012.



While the actual composition of Museum Park is pretty much the same as what would be expected in a free housing market, it should be noted that the percentage of Asian households increased almost four fold since 2000.

More significant, however is the large decline in the actual percentage of Black households from 50.2 to 19.8 percent, which is what would be expected in a free market and the increase in Caucasian households from 38.8 to 63.9 percent which is about what would be expected.

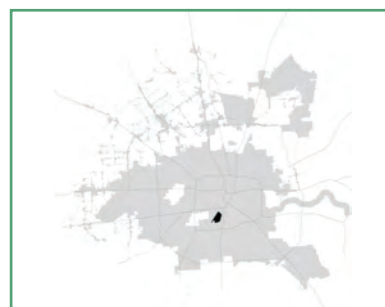
Given the large increase in median household income since 2000, it is very possible that Museum Park is gentrifying.

Recommended Actions: The City of Houston should take steps to maintain Museum Park's diversity by preserving housing affordable to households with modest incomes, which are disproportionately minority households.

Table 77: Medical Center

Super Neighborhood 33: Medical Center				
	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	65.4%	10.8%	18.1%	8.5%
2008–2012 Households Actual Proportion	67.7%	9.6%	17.2%	11.6%
2008–2012 Households Free Market	70.2%	16.0%	6.5%	23.6%
2008–2012 Households Difference	-2.5%	-6.4%	10.7%	-11.9%
2010 Census Tract 3131				
Householders (2000 Census)	64.7%	10.2%	20.7%	8.7%
2008–2012 Households Actual Proportion	66.3%	16.0%	15.5%	12.7%
2008–2012 Households Free Market	69.9%	16.3%	6.5%	23.6%
2008–2012 Households Difference	-3.6%	-0.3%	9.0%	-10.9%
2010 Census Tract 3140.01 (Was Tract 3140 in 2000)				
Householders (2000 Census)	47.7%	18.4%	26.8%	9.1%
2008–2012 Households Actual Proportion	51.2%	17.9%	18.6%	17.0%
2008–2012 Households Free Market	64.8%	20.3%	5.7%	29.6%
2008–2012 Households Difference	-13.6%	-2.5%	12.9%	-12.6%
2010 Census Tract 4122 (Tract consists of parts of tracts 4122 and 4132. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	83.8%	3.1%	8.6%	7.7%
2008–2012 Households Actual Proportion	79.4%	0.0%	17.5%	7.5%
2008–2012 Households Free Market	74.0%	12.9%	7.0%	19.6%
2008–2012 Households Difference	5.4%	-12.9%	10.5%	-12.2%

The Medical Center Area includes the original campus of the Texas Medical Center, Hermann Park, from which it was carved, and a fringe of private development. The Texas Medical Center itself has expanded its campus far beyond the original site north of Holcombe and east of Fannin, and has replaced the early restaurants and shopping centers on Main Street with high rise hotels, outpatient clinics and professional buildings. Hermann Park, home of the city's zoo, amphitheater, and museum of natural history is bordered on the north by several high rise condominiums, a private hospital and a medical museum. The population more than doubled from 2,358 to 5,431 in 2012 while the annual median household income soared from \$53,582 to \$87,937 in 2012.



While the composition of the Medical Center super neighborhood is what would be expected in a free market without discrimination, the proportion of Asian households is greater than would be expected. Since 2000 the proportions of Asian households declined a bit in two of the three census tracts while growing

in the third tract.

Unlike tracts 3131 and 3140.01, tract 4122 has an unmeasurable African American population when 12.9 percent of its households would be Black in a free housing market absent discrimination.

The large increase in median household income since 2000 suggests that the Medical Center super neighborhood *could* be experiencing gentrification.

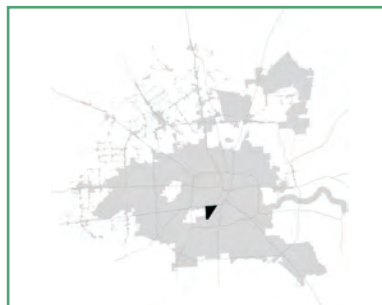
Recommended Actions: The City of Houston should conduct real estate testing to determine whether any illegal discriminatory real estate practices are occurring that may help account for the nearly complete absence of African American households in census tract 4122 and greater than expected concentrations of Asian households throughout the Medical Center super neighborhood.

Table 78: University Place

Super Neighborhood 28: University Place				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	87.3%	2.5%	6.4%	6.8%
2008–2012 Households Actual Proportion	82.9%	3.3%	10.7%	10.5%
2008–2012 Households Free Market	71.6%	14.8%	6.7%	22.1%
2008–2012 Households Difference	11.2%	-11.5%	4.0%	-11.6%
2010 Census Tract 4118 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	90.8%	2.4%	3.6%	6.9%
2008–2012 Households Actual Proportion	87.5%	3.2%	8.2%	14.2%
2008–2012 Households Free Market	69.4%	16.4%	6.3%	25.4%
2008–2012 Households Difference	18.1%	-13.2%	2.0%	-11.2%
2010 Census Tract 4119				
Householders (2000 Census)	88.6%	2.3%	5.0%	6.3%
2008–2012 Households Actual Proportion	90.3%	0.0%	5.5%	12.1%
2008–2012 Households Free Market	72.2%	14.4%	6.9%	21.0%
2008–2012 Households Difference	18.0%	-14.4%	-1.4%	-8.9%
2010 Census Tract 4120 (Tract consists of parts of 2000 tracts 4120 and 4123)				
Householders (2000 Census)	94.6%	0.5%	2.9%	3.9%
2008–2012 Households Actual Proportion	97.4%	0.0%	1.3%	1.9%
2008–2012 Households Free Market	77.1%	10.7%	7.6%	15.0%
2008–2012 Households Difference	20.4%	-10.7%	-6.3%	-13.1%
2010 Census Tract 4122 (Tracts consists of parts of 2000 tracts 4122 and 4132)				
Householders (2000 Census)	83.8%	3.1%	8.6%	7.7%
2008–2012 Households Actual Proportion	79.4%	0.0%	17.5%	7.5%
2008–2012 Households Free Market	74.0%	12.9%	7.0%	19.6%
2008–2012 Households Difference	5.4%	-12.9%	10.5%	-12.2%
2010 Census Tract 4132.02 (Was Tract 4132 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	80.2%	4.2%	10.4%	8.8%
2008–2012 Households Actual Proportion	63.5%	13.1%	17.4%	12.5%
2008–2012 Households Free Market	67.9%	17.8%	6.3%	26.0%
2008–2012 Households Difference	-4.4%	-4.7%	11.2%	-13.5%
Census Tract 4121 had only 9 households in 2008–2012 and is excluded from this table due to its unacceptably high margin of error.				

University Place is a group of neighborhoods surrounding Rice University. The better known neighborhoods, Southampton, Southgate, Old Braeswood and Boulevard Oaks, are deed restricted and expensive. Old Braeswood in the south and Boulevard Oaks in the north, include some of the city's finest homes, especially along the live oak esplanades of Sunset, North and South Boulevards. Proximity to the Texas Medical Center has led to intense redevelopment along

Holcombe and Main, and on the site of the old Shamrock Hilton hotel. The Village shopping district and the blocks adjacent to Montrose Boulevard have a mix of uses with considerable redevelopment underway. Population rose slightly from 14,050 to 15,827 in 2012 while the annual median household income soared from \$80,776 to \$99,346, both more than twice the median for the city.



While the actual percentages of African American households do not exceed the 15 percent threshold in any of University Place's census tracts, the actual proportions of Black households are mere fractions of what would be expected in a free housing market except in tract 4132.02. In tract 4118, the actual proportion of African American households is less than one-fifth of what would be expected. In tracts 4119, 4120, and 4122, the percentages of Black households are so minuscule, they cannot be approximated. In a free market, the proportions of African American households would be 14.4, 10.7, and 12.9 percent, respectively.

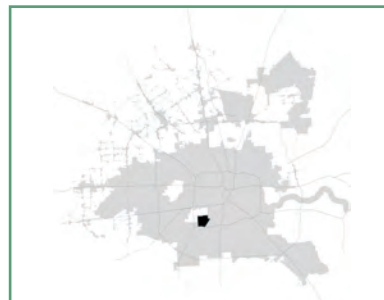
Concurrently, the actual proportions of Caucasian households in tracts 4118, 4119, and 4120 are 18.1, 18, and 20.4 percentage points higher, respectively, than would be expected in a free housing market

Recommended Actions: The City of Houston needs to conduct more in-depth research to determine why the actual proportions of Black households are so depressed in University Place. It needs to determine whether this situation is a reflection of the composition of Rice University faculty and staff, innocent anomalies, or the product of illegal discriminatory real estate practices and/or any practices or policies of the City of Houston.

Table 79: Braeswood

Super Neighborhood 32: Braeswood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	78.5%	6.9%	9.7%	8.8%
2008–2012 Households Actual Proportion	70.9%	11.4%	15.0%	9.9%
2008–2012 Households Free Market	69.4%	16.6%	6.5%	24.2%
2008–2012 Households Difference	1.5%	-5.2%	8.6%	-14.2%
2010 Census Tract 4129				
Householders (2000 Census)	77.0%	8.7%	9.7%	10.0%
2008–2012 Households Actual Proportion	66.7%	15.9%	15.8%	8.5%
2008–2012 Households Free Market	66.6%	19.0%	6.1%	27.0%
2008–2012 Households Difference	0.1%	-3.1%	9.7%	-18.5%
2010 Census Tract 4130 (Tract consists of parts of 2000 tracts 4125 and 4130)				
Householders (2000 Census)	82.1%	2.9%	9.6%	10.4%
2008–2012 Households Actual Proportion	88.3%	1.3%	8.3%	12.7%
2008–2012 Households Free Market	72.3%	14.5%	7.0%	19.9%
2008–2012 Households Difference	16.0%	-13.1%	1.3%	-7.2%
2010 Census Tract 4131				
Householders (2000 Census)	92.1%	1.4%	4.4%	3.7%
2008–2012 Households Actual Proportion	90.6%	1.0%	6.0%	9.4%
2008–2012 Households Free Market	75.6%	11.7%	7.3%	17.1%
2008–2012 Households Difference	15.0%	-10.8%	-1.3%	-7.7%
2010 Census Tract 4132.01 (Was Tract 4132 in 2000)				
Householders (2000 Census)	80.2%	4.2%	10.4%	8.8%
2008–2012 Households Actual Proportion	67.6%	7.2%	19.1%	9.9%
2008–2012 Households Free Market	66.1%	19.4%	6.0%	27.4%
2008–2012 Households Difference	1.6%	-12.3%	13.1%	-17.5%
2010 Census Tract 4132.02 (Was Tract 4132 in 2000)				
Householders (2000 Census)	80.2%	4.2%	10.4%	8.8%
2008–2012 Households Actual Proportion	63.5%	13.1%	17.4%	12.5%
2008–2012 Households Free Market	67.9%	17.8%	6.3%	26.0%
2008–2012 Households Difference	-4.4%	-4.7%	11.2%	-13.5%
2010 Census Tract 4133				
Householders (2000 Census)	68.2%	16.2%	10.3%	8.9%
2008–2012 Households Actual Proportion	64.6%	17.6%	13.2%	8.2%
2008–2012 Households Free Market	70.0%	16.0%	6.5%	24.3%
2008–2012 Households Difference	-5.4%	1.6%	6.8%	-16.1%

Braeswood Place is a group of comfortable subdivisions developed after World War II which have survived the pressure brought about by deteriorating apartment and commercial districts on its edges. In the process the community has re-invented itself through the creation of a community center on the site of a deteriorated collection of apartments along Stella Link. Construction of expensive new homes has resulted, originally north of Brays Bayou in Braes Heights, but now spreading to the west in Ayrshire, and the south in Braes Terrace and Knollwood Village. Other neighborhoods include Linkwood, Woodshire and Woodside. While the population grew slightly from 18,797 to 19,943 in 2012, the annual median household income soared from \$57,864 to \$76,953.



The actual proportions of Latino households are significantly lower than expected in a free housing market undistorted by discrimination in census tracts 4129, 4132.01, and 4133.

The actual proportions of white households is greater than expected in tracts 4130 and 4131 where the percentage of African American households is about one-tenth of what would be expected in a free housing market. The actual proportion of Black households is less than half of expected in tract 4132.01. The actual percentages of African American households are about what would be expected in tracts 4129, 4132.02, and 4133.

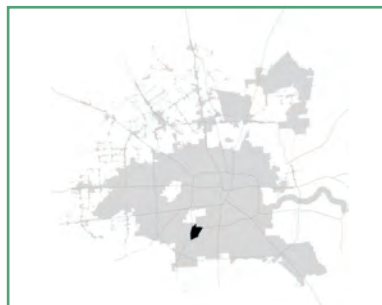
While they don't exceed the 15 percent threshold, the actual percentages of Asian households in tracts 4129, 4132.01, 4132.02, and 4133 are greater than what would be expected.

Recommended Actions: The City of Houston should conduct testing to identify the extent, if any, that illegal discriminatory real estate practices are at work in Braeswood.

Table 80: Willow Meadows/Willowbend Area

Super Neighborhood 38: Willow Meadows/Willowbend Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	70.9%	16.2%	6.1%	15.1%
2008–2012 Households Actual Proportion	62.0%	19.1%	10.1%	19.7%
2008–2012 Households Free Market	67.4%	18.2%	6.0%	27.0%
2008–2012 Households Difference	-5.4%	0.9%	4.0%	-7.3%
2010 Census Tract 4129				
Householders (2000 Census)	77.0%	8.7%	9.7%	10.0%
2008–2012 Households Actual Proportion	66.7%	15.9%	15.8%	8.5%
2008–2012 Households Free Market	66.6%	19.0%	6.1%	27.0%
2008–2012 Households Difference	0.1%	-3.1%	9.7%	-18.5%
2010 Census Tract 4201				
Householders (2000 Census)	23.4%	59.1%	3.1%	27.5%
2008–2012 Households Actual Proportion	24.4%	43.2%	9.0%	38.1%
2008–2012 Households Free Market	63.4%	21.6%	5.4%	31.2%
2008–2012 Households Difference	-38.9%	21.6%	3.6%	6.9%
2010 Census Tract 4202				
Householders (2000 Census)	68.7%	10.6%	9.5%	28.1%
2008–2012 Households Actual Proportion	60.9%	14.5%	9.6%	33.2%
2008–2012 Households Free Market	66.6%	18.7%	5.8%	29.2%
2008–2012 Households Difference	-5.6%	-4.2%	3.8%	4.0%
2010 Census Tract 4203				
Householders (2000 Census)	86.8%	6.8%	3.5%	5.2%
2008–2012 Households Actual Proportion	68.1%	18.2%	8.7%	9.4%
2008–2012 Households Free Market	71.2%	15.0%	6.7%	22.7%
2008–2012 Households Difference	-3.2%	3.1%	2.0%	-13.4%
2010 Census Tract 4204				
Householders (2000 Census)	87.0%	4.5%	4.2%	11.6%
2008–2012 Households Actual Proportion	85.4%	4.7%	5.0%	19.6%
2008–2012 Households Free Market	69.0%	16.8%	6.2%	26.0%
2008–2012 Households Difference	16.4%	-12.1%	-1.2%	-6.4%

The Willow Meadows/Willowbend Area is a community of single family homes built in the 1950s in southwest Houston adjacent to the South Loop and Willow Waterhole Bayou. The southern most subdivision is Post Oak Manor. Recent development of upscale retail centers on South Post Oak Road on the edge of the community illustrate its continued attraction to middle class home buyers. The southern edge of the community adjacent to South Main includes light industrial facilities which take advantage of the presence of a major rail line. The population grew a bit from 12,402 to 13,697 in 2012 along with slight growth in the annual median household income from \$46,996 to \$55,802 in 2012 — remaining around \$10,000 higher than the city's median.



South of Braeswood, the Willow Meadow/Willowbend Area has a composition that is mostly what would be expected in a free market. Within the super neighborhood, the actual percentage of African American households in tract 4201 is 21.6 percentages points higher than expected although the percentage of Black households declined from 59.1 to 43.2 percent. The actual percentage of white households remained unchanged since 2000 and 38.9 percentage points lower than expected while the actual percentages of Asian and Latino households increased since 2000. This tract is adjacent to the Black enclave to its east in South Main that extends southwest through Central Southwest, Fondren Gardens, and Fort Bend Houston. Overall, however, tract 4201 has become more diverse since 2000.

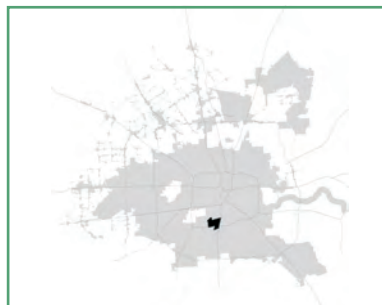
With just two exceptions, the actual composition of the rest of this super neighborhood is about what would be expected in a free housing market.

Recommended Action: Testing should be conducted to determine whether any illegal real estate practices are at play in the portions of this super neighborhood where actual percentages are not close to expected percentages.

Table 81: Astrodome Area

Super Neighborhood 34: Astrodome Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	41.2%	30.2%	20.4%	11.2%
2008–2012 Households Actual Proportion	33.8%	36.9%	22.0%	11.4%
2008–2012 Households Free Market	64.0%	21.1%	5.7%	29.4%
2008–2012 Households Difference	-30.2%	15.8%	16.2%	-18.0%
2010 Census Tract 3139				
Householders (2000 Census)	40.0%	36.6%	16.8%	7.2%
2008–2012 Households Actual Proportion	33.7%	38.1%	20.4%	9.6%
2008–2012 Households Free Market	64.8%	20.4%	5.8%	29.1%
2008–2012 Households Difference	-31.1%	17.7%	14.7%	-19.6%
2010 Census Tract 3140.01 (Was Tract 3140 in 2000)				
Householders (2000 Census)	47.7%	18.4%	26.8%	9.1%
2008–2012 Households Actual Proportion	51.2%	17.9%	18.6%	17.0%
2008–2012 Households Free Market	64.8%	20.3%	5.7%	29.6%
2008–2012 Households Difference	-13.6%	-2.5%	12.9%	-12.6%
2010 Census Tract 3140.02 (Was Tract 3140 in 2000)				
Householders (2000 Census)	47.7%	18.4%	26.8%	9.1%
2008–2012 Households Actual Proportion	36.5%	25.8%	31.8%	5.9%
2008–2012 Households Free Market	63.0%	21.8%	5.5%	31.0%
2008–2012 Households Difference	-26.5%	4.0%	26.3%	-25.1%
2010 Census Tract 3341* (Tract consists of parts of 2000 tracts 3301 and 3310. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	13.2%	72.4%	1.1%	20.3%
2008–2012 Households Actual Proportion	15.5%	67.7%	8.5%	14.0%
2008–2012 Households Free Market	64.0%	21.1%	5.8%	29.0%
2008–2012 Households Difference	-48.5%	46.6%	2.7%	-15.0%
2010 Census Tract 3144 (Tract consists of parts of 2000 tracts 3141 and 3142)				
Householders (2000 Census)	61.5%	11.5%	20.9%	9.0%
2008–2012 Households Actual Proportion	51.6%	10.5%	34.3%	15.5%
2008–2012 Households Free Market	64.5%	21.0%	6.0%	27.1%
2008–2012 Households Difference	-12.9%	-10.5%	28.2%	-11.6%
* 2010 Census Tract 3341: The 2000 census tract 3310 had two householders.				

The Astrodome Area includes the commercial and residential developments that have located in what was a virtually empty part of south Houston before the Astrodome opened in 1965. The area lies south of South Braeswood Boulevard, extending to Loop 610 further to the south. At that time boulevards cut through the treeless plain and large tracts of undeveloped land were laid out for major investments. Plaza Del Oro was the largest project, a mixed use development by Shell Oil Company which was scaled back to a few technical and medical office buildings and many apartments and condominiums. The majority of residential units in the area are multi-family or single-family attached homes. Staffordshire in the northern part of the area is single-family. The population rose from 13,832 to 15,435 in 2012 while the annual median household income inched up from \$39,720 to \$45,135 in 2012.



The actual percentages of African American households in the eastern third of the Astrodome Area — tracts 3139 and 3341 — are greater than expected in a free housing market devoid of discrimination. Since the vast majority of 3341 is in South Main and Central Southwest, the tract is not analyzed here.

In those two tracts, the actual percentages of white households are 31.1 and 48.5 percentage points less than expected. In tract 3140, it is 26.5 percentage points less than expected.

A growing concentration of Asian households lives in four of the five census tracts that comprise the Astrodome Area. The actual percentages of Asian households are 14.7, 12.9, 26.3, and 28.2 percentage points higher than expected in those four tracts.

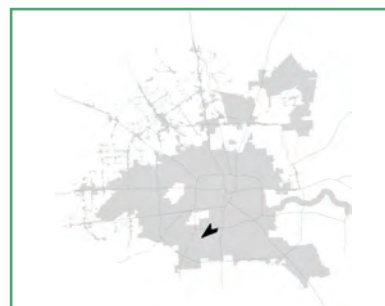
In contrast, the percentages of Hispanic households increased in three of five census tracts since 2000, but are 11.6 to 25.1 percentage points lower than expected in a free housing market.

Recommended Actions: Real estate testing should help reveal whether any illegal discriminatory real estate practices are at play in the Astrodome Area. The city should take steps to foster a reduction in concentrations in the Astrodome Area.

Table 82: South Main

Super Neighborhood 35: South Main				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	12.9%	74.4%	2.1%	15.2%
2008–2012 Households Actual Proportion	15.1%	72.1%	6.9%	12.1%
2008–2012 Households Free Market	63.0%	21.9%	5.6%	30.2%
2008–2012 Households Difference	-47.9%	50.2%	1.3%	-18.2%
2010 Census Tract 3341 (Tract consists of parts of 2000 tracts 3301 and 3310)*				
Householders (2000 Census)	13.2%	72.4%	1.1%	20.3%
2008–2012 Households Actual Proportion	15.5%	67.7%	8.5%	14.0%
2008–2012 Households Free Market	64.0%	21.1%	5.8%	29.0%
2008–2012 Households Difference	-48.5%	46.6%	2.7%	-15.0%
2010 Census Tract 3143				
Householders (2000 Census)	12.4%	77.5%	3.6%	7.5%
2008–2012 Households Actual Proportion	14.6%	79.0%	4.2%	9.0%
2008–2012 Households Free Market	61.5%	23.2%	5.2%	32.2%
2008–2012 Households Difference	-46.9%	55.8%	-0.9%	-23.2%
* 2010 Census Tract 3341: Census 2000 tract 3310 had 2 householders.				

South Main is an area along South Main Street on both sides of Loop 610. Astroworld, which has since been demolished, was located south of the Loop. South Main Street was a major highway leading into the city before the Southwest Freeway was built. Most of the residential development in the area consists of large multi-family complexes. The Main Street Coalition and the South Main Alliance (SMA) are working jointly to create a dramatic gateway to the corridor at Main Street and Loop 610 South. The number of residents grew from 4,849 to 6,189 in 2012 while the annual median household income grew by half from \$25,288 to \$38,136, bringing it closer to the city's 2012 median.



South Main is thoroughly consolidated into the city's southwest African American enclave to the east and south of this super neighborhood. The actual composition of both census tracts has barely changed since 2000.

The city needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians consider housing in this super neighborhood. Real estate testing would reveal whether the continuing segregation in South Main is due to historic segregation or to twenty-first century illegal discriminatory real estate practices.

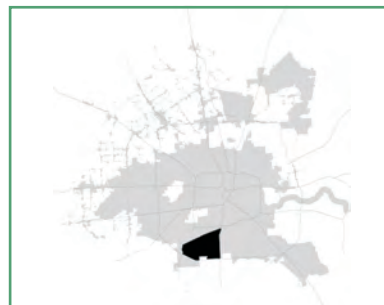
Table 83: Central Southwest

Super Neighborhood 40: Central Southwest				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	22.2%	60.6%	1.0%	28.1%
2008–2012 Households Actual Proportion	32.3%	51.8%	2.7%	38.2%
2008–2012 Households Free Market	64.8%	20.1%	5.6%	30.6%
2008–2012 Households Difference	-32.5%	31.7%	-2.9%	7.6%
2010 Census Tract 3301				
Householders (2000 Census)	13.2%	72.4%	1.1%	20.3%
2008–2012 Households Actual Proportion	28.6%	55.8%	0.4%	43.7%
2008–2012 Households Free Market	64.3%	20.3%	5.3%	32.8%
2008–2012 Households Difference	-35.7%	35.5%	-4.9%	10.9%
2010 Census Tract 3302				
Householders (2000 Census)	11.6%	80.8%	1.1%	11.7%
2008–2012 Households Actual Proportion	35.3%	50.2%	2.4%	43.2%
2008–2012 Households Free Market	63.3%	21.4%	5.3%	32.4%
2008–2012 Households Difference	-28.0%	28.8%	-2.9%	10.7%
2010 Census Tract 3303.01 (Was Tract 3303 in 2000)				
Householders (2000 Census)	27.3%	53.8%	0.9%	33.2%
2008–2012 Households Actual Proportion	35.8%	33.4%	3.2%	63.4%
2008–2012 Households Free Market	66.3%	18.8%	5.7%	29.7%
2008–2012 Households Difference	-30.5%	14.5%	-2.5%	33.8%
2010 Census Tract 3303.02 (Was Tract 3303 in 2000)				
Householders (2000 Census)	27.3%	53.8%	0.9%	33.2%
2008–2012 Households Actual Proportion	34.6%	45.6%	0.9%	46.1%
2008–2012 Households Free Market	64.9%	20.2%	5.8%	29.3%
2008–2012 Households Difference	-30.3%	25.4%	-4.9%	16.8%
2010 Census Tract 3303.03 (Was Tract 3303 in 2000)				
Householders (2000 Census)	27.3%	53.8%	0.9%	33.2%
2008–2012 Households Actual Proportion	31.2%	57.7%	0.0%	34.9%
2008–2012 Households Free Market	65.5%	19.3%	5.5%	31.3%
2008–2012 Households Difference	-34.2%	38.4%	-5.5%	3.6%

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Super Neighborhood 40: Central Southwest (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 3304				
Householders (2000 Census)	27.3%	53.0%	0.8%	34.1%
2008–2012 Households Actual Proportion	40.2%	48.9%	0.0%	42.7%
2008–2012 Households Free Market	63.8%	20.8%	5.4%	32.3%
2008–2012 Households Difference	-23.5%	28.1%	-5.4%	10.4%
2010 Census Tract 3305				
Householders (2000 Census)	21.1%	57.2%	0.4%	33.0%
2008–2012 Households Actual Proportion	52.1%	36.7%	0.0%	54.0%
2008–2012 Households Free Market	65.6%	19.4%	5.5%	30.5%
2008–2012 Households Difference	-13.5%	17.3%	-5.5%	23.5%
2010 Census Tract 3306				
Householders (2000 Census)	20.1%	68.3%	1.1%	21.1%
2008–2012 Households Actual Proportion	23.2%	66.5%	0.0%	26.3%
2008–2012 Households Free Market	64.3%	20.7%	5.6%	30.5%
2008–2012 Households Difference	-41.0%	45.8%	-5.6%	-4.2%
2010 Census Tract 3307				
Householders (2000 Census)	31.5%	40.4%	0.9%	46.8%
2008–2012 Households Actual Proportion	50.6%	28.9%	2.5%	57.2%
2008–2012 Households Free Market	64.6%	20.2%	5.5%	31.4%
2008–2012 Households Difference	-14.0%	8.8%	-3.0%	25.8%
2010 Census Tract 3309				
Householders (2000 Census)	43.0%	36.8%	1.1%	32.8%
2008–2012 Households Actual Proportion	34.6%	54.1%	3.3%	31.1%
2008–2012 Households Free Market	66.3%	18.8%	5.7%	29.8%
2008–2012 Households Difference	-31.7%	35.3%	-2.4%	1.3%
2010 Census Tract 3341 (Tract consists of parts of 2000 tracts 3301 and 3310)				
Householders (2000 Census)	13.2%	72.4%	1.1%	20.3%
2008–2012 Households Actual Proportion	15.5%	67.7%	8.5%	14.0%
2008–2012 Households Free Market	64.0%	21.1%	5.8%	29.0%
2008–2012 Households Difference	-48.5%	46.6%	2.7%	-15.0%

Central Southwest, located south of South Main and west of the South Freeway, contains a collection of subdivisions separated by undeveloped land. The northern part of the area includes an oil field, old landfills, and many heavy industries located close to Holmes Road. To the south, pleasant 1950s neighborhoods such as Cambridge Village, Brentwood, Windsor Village, Alameda Plaza and Pamela Heights are found. The neighborhood grew by 51 percent from 41,820 to 63,253 in 2012 with only a slight increase in annual median household income from \$39,720 to \$42,829.



Central Southwest is consolidated into the large concentration of African American households that stretches from Golfcrest/Bellefort/Reveille on the east and Greater Third Ward on the northeast to Alief on the west. While the actual proportions of Black households exceed what's expected in a free housing market absent discrimination in ten of the 11 census tracts by 14.5 to 46.6 percentage points, the actual percentage of African American households declined in nine of the ten tracts since 2000. In tract 3301, the percentage fell substantially since 2000 from 72.4 to 55.8 percent; tract 3302, from 80.8 to 50.2 percent, tract 3303.01, from 53.8 to 33.4 percent; tract 3305, from 57.2 to 36.7 percent; and tract 3307 from 40.4 to 28.9 percent.

The proportion of Hispanic households has increased since 2000 in every tract except 3309 and 3341. Most of the increases have been rather large: tract 3301, from 20.3 to 43.7 percent; tract 3302, from 11.7 to 43.2 percent; tract 3303.01, from 33.2 to 63.4 percent; tract 3303.02, from 33.2 to 46.1 percent; tract 3305, from 33 to 54 percent. In four tracts, the actual percentages of Latino households exceed the expected proportion by 33.8, 16.8, 23.5 and 25.8 percentage points while the actual percentage is 15 percentage points less than expected in tract 3341.

Asians barely exist in Central Southwest with the actual proportion being almost unmeasurable in six of the 11 census tracts.

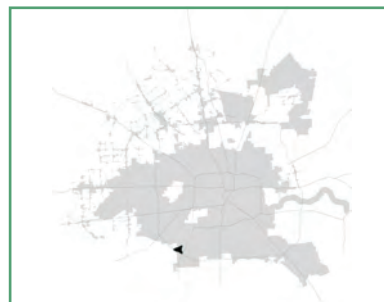
The very large changes in the proportions of African American and Hispanic households in much of Central Southwest are reflective of resegregation from predominantly African American to mostly Latino of any race.

Recommended Actions: The City of Houston needs to conduct testing to determine whether illegal steering is happening in Central Southwest. In addition, to affirmatively further fair housing in Central Southwest, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for African American and Hispanic households to areas beyond where they are now concentrated and for Caucasians and Asians to areas like Central Southwest.

Table 84: Fondren Gardens

Super Neighborhood 39: Fondren Gardens				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	27.3%	53.8%	0.9%	33.2%
2008–2012 Households Actual Proportion	31.2%	57.7%	0.0%	34.9%
2008–2012 Households Free Market	65.5%	19.3%	5.5%	31.3%
2008–2012 Households Difference	-34.2%	38.4%	-5.5%	3.6%
2010 Census Tract 3303.03 (Was Tract 3303 in 2000)				
Householders (2000 Census)	27.3%	53.8%	0.9%	33.2%
2008–2012 Households Actual Proportion	31.2%	57.7%	0.0%	34.9%
2008–2012 Households Free Market	65.5%	19.3%	5.5%	31.3%
2008–2012 Households Difference	-34.2%	38.4%	-5.5%	3.6%

Fondren Gardens is a corner of southwest Houston initially developed as an opportunity for Houstonians to work in the city and live in the country. Its large lots were sold to individuals who built modest homes over the decades. Once isolated on the edge of Harris County, accessible only by South Main and what was a narrow Fondren Road, it is now bordered by the South Belt and accessible by West Orem Boulevard as well. The number of residents increased slightly from 2,229 to 2,658. In 2012 the annual median household income increased significantly from \$26,197, which was about \$10,000 less than the city's median, to \$41,010 which was just \$4,600 below the city's 2012 median.



Fondren Gardens is at the southwest corner of one of the city's African American enclaves. The actual proportions of households is pretty much the same as in 2000 with a nearly complete absence of Asians. It is *not* as intensely concentrated as many of the other super neighborhoods in this enclave.

Recommended Actions: The City of Houston should conduct testing to identify any discriminatory real estate practices that may account for the near total absence of Asian households as well as the low proportion of white households and high proportion of African American households compared to what would be expected in a free housing market absent discrimination.

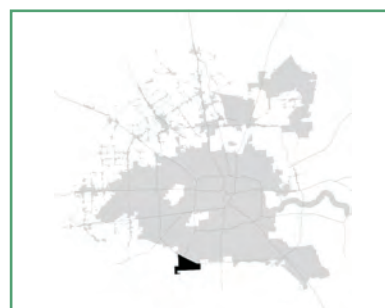
Table 85: Fort Bend/Houston

Super Neighborhood 41: Fort Bend/Houston				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	14.1%	73.3%	1.1%	18.5%
2008–2012 Households Actual Proportion	22.8%	64.7%	1.6%	26.7%
2008–2012 Households Free Market	65.8%	19.2%	5.7%	29.9%
2008–2012 Households Difference	-43.0%	45.6%	-4.1%	-3.1%
2010 Census Tract 3307 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	31.5%	40.4%	0.9%	46.8%
2008–2012 Households Actual Proportion	50.6%	28.9%	2.5%	57.2%
2008–2012 Households Free Market	64.6%	20.2%	5.5%	31.4%
2008–2012 Households Difference	-14.0%	8.8%	-3.0%	25.8%
2010 Census Tract 6701.01 (Was Tract 6701 in 2000)				
Householders (2000 Census)	19.1%	59.9%	0.9%	33.4%
2008–2012 Households Actual Proportion	45.7%	32.3%	0.0%	58.5%
2008–2012 Households Free Market	64.4%	20.5%	5.4%	31.2%
2008–2012 Households Difference	-18.7%	11.8%	-5.4%	27.3%
2010 Census Tract 6701.02 (Was Tract 6701 in 2000)				
Householders (2000 Census)	19.1%	59.9%	0.9%	33.4%
2008–2012 Households Actual Proportion	13.2%	76.8%	0.0%	18.8%
2008–2012 Households Free Market	64.7%	20.0%	5.5%	31.7%
2008–2012 Households Difference	-51.5%	56.8%	-5.5%	-12.9%
2010 Census Tract 6702				
Householders (2000 Census)	15.7%	70.8%	0.8%	20.6%
2008–2012 Households Actual Proportion	24.9%	66.1%	0.0%	28.3%
2008–2012 Households Free Market	65.6%	19.2%	5.6%	30.9%
2008–2012 Households Difference	-40.7%	46.9%	-5.6%	-2.6%
2010 Census Tract 6703				
Householders (2000 Census)	6.1%	86.8%	0.5%	8.0%
2008–2012 Households Actual Proportion	6.5%	86.3%	0.0%	11.2%
2008–2012 Households Free Market	65.7%	19.3%	5.7%	30.1%
2008–2012 Households Difference	-59.2%	66.9%	-5.7%	-18.9%

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Super Neighborhood 41: Fort Bend/Houston (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 6704				
Householders (2000 Census)	4.6%	91.4%	1.0%	3.4%
2008–2012 Households Actual Proportion	10.2%	83.5%	3.5%	8.7%
2008–2012 Households Free Market	66.5%	18.7%	5.9%	28.9%
2008–2012 Households Difference	-56.3%	64.8%	-2.4%	-20.2%
2010 Census Tract 6705 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	16.6%	73.6%	2.0%	10.7%
2008–2012 Households Actual Proportion	20.0%	66.7%	0.6%	19.8%
2008–2012 Households Free Market	67.7%	17.7%	6.0%	27.9%
2008–2012 Households Difference	-47.7%	48.9%	-5.4%	-8.1%
2010 Census Tract 6706.01 (Was Tract 6706 in 2000)				
Householders (2000 Census)	6.2%	88.2%	1.2%	6.6%
2008–2012 Households Actual Proportion	4.7%	86.0%	1.2%	10.3%
2008–2012 Households Free Market	67.2%	18.0%	6.0%	28.3%
2008–2012 Households Difference	-62.5%	68.0%	-4.8%	-18.0%
2010 Census Tract 6706.02 (Was Tract 6706 in 2000)				
Householders (2000 Census)	6.2%	88.2%	1.2%	6.6%
2008–2012 Households Actual Proportion	11.4%	76.3%	0.0%	20.1%
2008–2012 Households Free Market	63.4%	21.4%	5.4%	31.3%
2008–2012 Households Difference	-52.0%	54.9%	-5.4%	-11.2%
2010 Census Tract 6707				
Householders (2000 Census)	28.0%	61.2%	1.9%	11.9%
2008–2012 Households Actual Proportion	31.8%	54.1%	10.5%	18.5%
2008–2012 Households Free Market	67.4%	18.1%	6.2%	26.8%
2008–2012 Households Difference	-35.6%	36.0%	4.3%	-8.3%

Fort Bend/Houston is a collection of middle class subdivisions developed in the 1960s and 1970s in northeastern Fort Bend County. Beginning in the 1970s, the area has attracted middle class African American families. Most of the housing in the area is single-family. New home construction has recently resumed in the southeastern part of this Fort Bend Independent School District community. Population increased nearly 10 percent from 32,867 to 35,407 in 2012 while the annual median household income did the same, from \$43,535 to \$48,654 in 2012.



Fort Bend/Houston extends the African American enclave southwest of Central Southwest. In eight of the ten census tracts, the actual percentages of Black households greatly exceed the proportions expected in a free market devoid of discrimination by 56.8, 46.9, 66.9, 64.8, 48.9, 68, 54.9, and 36 percentage points.

In the other two tracts — 3307 and 6701.01 — the percentages of Black households declined from 40.4 to 28.9 and 59.9 to 32.3 percentage respectively since 2000.

In those same eight tracts, the percentages of white households are much lower than would be expected in a free housing market by 18.7, 51.5, 40.7, 59.2, 56.3, 47.7, 62.5, 52, and 35.6 percentage points.

While the proportion of Hispanic households grew since 2000 in all but one census tract (6701.02 where it fell from 33.4 to 18.8 percent), the actual proportion of Latino households exceeds what would be expected in tracts 3307 and 6701.01, but is lower than expected in tracts 6703, 6704, and 6706.01.

The proportion of Asian households cannot even be measured in four census tracts. In seven tracts the percentage of Asian households is a mere fraction of what would be expected. Only in tracts 3307, 6704, and 6707 is the percentage of Asian household about what would be expected in a free housing market.

Recommended Actions: The City of Houston needs to expand housing choices so that African Americans will look at housing outside the city's Black concentrations and whites, Hispanics, and Asians consider housing throughout Fort Bend/Houston, not just in the tracts where their actual proportions exceed what would be expected in a free housing market.

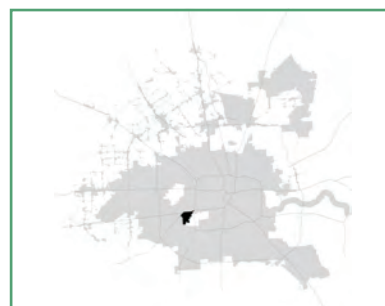
Table 86: Gulfton

Super Neighborhood 27: Gulfton				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	52.2%	12.0%	5.3%	57.7%
2008–2012 Households Actual Proportion	50.1%	13.4%	7.7%	67.3%
2008–2012 Households Free Market	61.8%	22.6%	5.0%	33.9%
2008–2012 Households Difference	-11.7%	-9.2%	2.8%	33.4%
2010 Census Tract 4211.01 (Tract consists of parts of 2000 tracts 4210 and 4211)				
Householders (2000 Census)	59.0%	14.7%	6.2%	38.3%
2008–2012 Households Actual Proportion	40.5%	20.0%	14.5%	46.8%
2008–2012 Households Free Market	63.1%	21.5%	5.1%	33.0%
2008–2012 Households Difference	-22.6%	-1.5%	9.4%	13.7%
2010 Census Tract 4211.02 (Was Tract 4211 in 2000)				
Householders (2000 Census)	49.4%	18.6%	6.8%	47.4%
2008–2012 Households Actual Proportion	42.9%	16.0%	9.6%	70.5%
2008–2012 Households Free Market	63.0%	21.3%	4.9%	35.0%
2008–2012 Households Difference	-20.1%	-5.3%	4.7%	35.6%
2010 Census Tract 4212.01 (Was Tract 4212 in 2000)				
Householders (2000 Census)	40.6%	16.8%	5.2%	64.1%
2008–2012 Households Actual Proportion	55.8%	15.3%	9.1%	63.7%
2008–2012 Households Free Market	61.0%	23.5%	5.1%	33.2%
2008–2012 Households Difference	-5.3%	-8.2%	4.0%	30.6%
2010 Census Tract 4212.02 (Was Tract 4212 in 2000)				
Householders (2000 Census)	40.6%	16.8%	5.2%	64.1%
2008–2012 Households Actual Proportion	45.4%	4.2%	6.1%	87.7%
2008–2012 Households Free Market	60.6%	23.6%	4.7%	35.4%
2008–2012 Households Difference	-15.2%	-19.4%	1.5%	52.3%
2010 Census Tract 4214.01 (Was Tract 4214 in 2000)				
Householders (2000 Census)	46.6%	10.4%	3.4%	77.6%
2008–2012 Households Actual Proportion	48.2%	12.4%	6.3%	77.8%
2008–2012 Households Free Market	61.9%	22.4%	4.8%	35.0%
2008–2012 Households Difference	-13.7%	-10.0%	1.5%	42.9%

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Super Neighborhood 27: Gulfton (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4214.02 (Was Tract 4214 in 2000)				
Householders (2000 Census)	46.6%	10.4%	3.4%	77.6%
2008–2012 Households Actual Proportion	58.5%	4.3%	0.0%	94.2%
2008–2012 Households Free Market	60.5%	23.5%	4.7%	36.3%
2008–2012 Households Difference	-2.0%	-19.2%	-4.7%	57.9%
2010 Census Tract 4214.03 (Was Tract 4214 in 2000)				
Householders (2000 Census)	46.6%	10.4%	3.4%	77.6%
2008–2012 Households Actual Proportion	58.4%	1.6%	3.2%	87.7%
2008–2012 Households Free Market	62.1%	22.5%	5.1%	33.4%
2008–2012 Households Difference	-3.7%	-20.9%	-1.9%	54.3%
2010 Census Tract 4215 (Tract consists of parts of 2000 tracts 4210 and 4215)				
Householders (2000 Census)	65.1%	9.3%	7.7%	34.4%
2008–2012 Households Actual Proportion	48.7%	26.8%	7.8%	41.4%
2008–2012 Households Free Market	62.0%	22.5%	5.1%	33.5%
2008–2012 Households Difference	-13.2%	4.3%	2.7%	7.9%
2010 Census Tract 4216 (Tract consists of parts of 2000 tracts 4209 and 4216)				
Householders (2000 Census)	71.8%	3.1%	6.6%	36.4%
2008–2012 Households Actual Proportion	51.9%	7.9%	10.4%	65.7%
2008–2012 Households Free Market	61.7%	23.0%	5.2%	32.2%
2008–2012 Households Difference	-9.7%	-15.1%	5.2%	33.4%

Gulfton is located just outside of Loop 610, in southwest Houston, south of US 59. Although it includes two small areas of single-family homes, its large apartment complexes dominate the area's landscape along with scattered commercial and light industrial uses. Most of Gulfton was originally developed as a rural subdivision called Westmoreland Farms. The large acreage parcels and widely-spaced grid pattern of roads made it possible for very large apartment complexes to be built in the area starting in the 1960s, many of which were restricted to adults. Gulfton is home to many recent immigrants from Mexico and Latin America. More than 8,000 fewer people lived here in 2012 (38,346) than in 2000. The annual median household income of \$25,069 in 2000 and \$31,427 in 2012 remained well below the city's medians



Gulfton sits just south of Mid West and east of Sharpstown. East of it are several census tracts that are not in the City of Houston.

The actual percentages of Hispanic households exceeds the proportions expected in a free housing market in every Gulfton census tract but two by 30.6 to 57.9 percentage points and by 13.7 points in tract 4211.01. Five tracts have seen large increases in their Hispanic composition since 2000 — 4211.02 (from 47.4 to

70.5 percent), 4212.02 (64.1 to 87.7 percent), 4214.02 (77.6 to 94.2 percent), and 4216 (36.4 to 65.7 percent).

The actual proportions of Black households are significantly less than expected in four tracts. The actual proportions of Caucasian households are substantially less in three tracts. There was a substantial drop in African American households from 16.8 to 4.2 percent in tracts 4212.02, further exacerbating the gap between actual and expected to 19.4 percentage points less than expected. Meanwhile the percentage of Black households in tract 4125 increased from 9.3 to 26.8 percent, bringing the actual percentage in line with the proportion expected in a free housing market.

The actual proportion of white households increased by about 12 or more percentage points in three tracts (4212.01, 4214.02, 4214.03) while it declined by nearly 20 percentage points in tract 4216.

The Asian composition in each census tract is roughly what would be expected in a free housing market, albeit a bit high in tracts 4211.01 and 4216.

Recommended Actions: All these demographic changes suggest that testing is warranted to see if any illegal discriminatory real estate practices account for the demographic changes in Gulfton.

Table 87: Sharpstown

Super Neighborhood 26: Sharpstown				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	42.9%	19.7%	18.4%	36.5%
2008–2012 Households Actual Proportion	54.7%	16.2%	15.3%	47.6%
2008–2012 Households Free Market	62.9%	21.7%	5.2%	32.6%
2008–2012 Households Difference	-8.2%	-5.5%	10.1%	15.0%
2010 Census Tract 4213				
Householders (2000 Census)	41.7%	18.1%	14.9%	38.2%
2008–2012 Households Actual Proportion	45.8%	22.9%	8.0%	48.7%
2008–2012 Households Free Market	61.0%	23.6%	5.1%	32.7%
2008–2012 Households Difference	-15.3%	-0.6%	2.9%	15.9%
2010 Census Tract 4227.01 (Was Tract 4227 in 2000)				
Householders (2000 Census)	68.9%	8.5%	5.0%	34.9%
2008–2012 Households Actual Proportion	78.6%	6.1%	0.0%	64.8%
2008–2012 Households Free Market	62.7%	21.9%	5.1%	33.0%
2008–2012 Households Difference	15.9%	-15.8%	-5.1%	31.8%
2010 Census Tract 4227.02 (Was Tract 4227 in 2000)				
Householders (2000 Census)	68.9%	8.5%	5.0%	34.9%
2008–2012 Households Actual Proportion	71.8%	2.7%	6.1%	44.1%
2008–2012 Households Free Market	65.8%	19.1%	5.4%	31.2%
2008–2012 Households Difference	6.0%	-16.4%	0.7%	13.0%
2010 Census Tract 4228				
Householders (2000 Census)	53.6%	16.4%	9.4%	31.8%
2008–2012 Households Actual Proportion	74.2%	6.8%	8.9%	41.7%
2008–2012 Households Free Market	64.7%	20.2%	5.5%	30.9%
2008–2012 Households Difference	9.5%	-13.4%	3.3%	10.8%
2010 Census Tract 4328.01 (Was Tract 4328 in 2000)				
Householders (2000 Census)	49.0%	23.6%	12.9%	34.8%
2008–2012 Households Actual Proportion	40.5%	25.9%	10.8%	45.4%
2008–2012 Households Free Market	62.6%	21.9%	5.1%	33.4%
2008–2012 Households Difference	-22.1%	4.0%	5.7%	12.0%

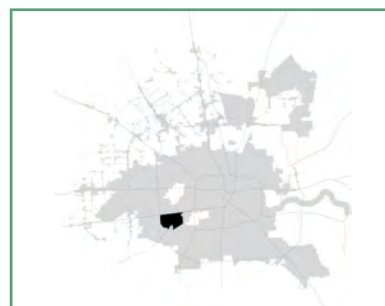
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Super Neighborhood 26: Sharpstown (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4328.02 (Was Tract 4328 in 2000)				
Householders (2000 Census)	49.0%	23.6%	12.9%	34.8%
2008–2012 Households Actual Proportion	53.0%	20.1%	9.1%	58.5%
2008–2012 Households Free Market	61.6%	22.8%	4.9%	34.3%
2008–2012 Households Difference	-8.6%	-2.7%	4.2%	24.2%
2010 Census Tract 4329.01 (Was Tract 4329 in 2000)				
Householders (2000 Census)	38.3%	18.2%	11.7%	48.8%
2008–2012 Households Actual Proportion	73.8%	6.3%	4.9%	69.8%
2008–2012 Households Free Market	65.3%	19.3%	5.3%	32.6%
2008–2012 Households Difference	8.5%	-13.0%	-0.4%	37.3%
2010 Census Tract 4329.02 (Was Tract 4329 in 2000)				
Householders (2000 Census)	38.3%	18.2%	11.7%	48.8%
2008–2012 Households Actual Proportion	59.4%	11.4%	15.3%	48.1%
2008–2012 Households Free Market	62.9%	21.7%	5.2%	32.8%
2008–2012 Households Difference	-3.5%	-10.3%	10.1%	15.3%
2010 Census Tract 4330.01 (Was Tract 4330 in 2000)				
Householders (2000 Census)	29.7%	20.5%	30.5%	40.0%
2008–2012 Households Actual Proportion	46.4%	11.7%	28.8%	57.0%
2008–2012 Households Free Market	60.7%	23.8%	5.0%	33.7%
2008–2012 Households Difference	-14.3%	-12.1%	23.8%	23.3%
2010 Census Tract 4330.02 (Was Tract 4330 in 2000)				
Householders (2000 Census)	29.7%	20.5%	30.5%	40.0%
2008–2012 Households Actual Proportion	54.6%	13.0%	22.4%	60.0%
2008–2012 Households Free Market	61.9%	22.4%	5.0%	34.5%
2008–2012 Households Difference	-7.3%	-9.3%	17.4%	25.5%
2010 Census Tract 4330.03 (Was Tract 4330 in 2000)				
Householders (2000 Census)	29.7%	20.5%	30.5%	40.0%
2008–2012 Households Actual Proportion	38.7%	7.6%	48.4%	35.7%
2008–2012 Households Free Market	59.6%	24.9%	4.8%	34.5%
2008–2012 Households Difference	-20.8%	-17.3%	43.6%	1.2%

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Super Neighborhood 26: Sharpstown (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4331				
Householders (2000 Census)	26.8%	53.7%	7.8%	29.2%
2008–2012 Households Actual Proportion	47.1%	46.2%	0.0%	51.0%
2008–2012 Households Free Market	60.4%	24.1%	5.0%	33.5%
2008–2012 Households Difference	-13.4%	22.2%	-5.0%	17.5%
2010 Census Tract 4332.01 (Was Tract 4332 in 2000)				
Householders (2000 Census)	46.1%	18.7%	22.5%	26.1%
2008–2012 Households Actual Proportion	40.0%	31.3%	20.3%	27.0%
2008–2012 Households Free Market	64.6%	20.3%	5.5%	30.8%
2008–2012 Households Difference	-24.6%	11.0%	14.8%	-3.8%
2010 Census Tract 4332.02 (Was Tract 4332 in 2000)				
Householders (2000 Census)	46.1%	18.7%	22.5%	26.1%
2008–2012 Households Actual Proportion	58.7%	8.4%	25.3%	39.2%
2008–2012 Households Free Market	65.9%	19.0%	5.5%	31.1%
2008–2012 Households Difference	-7.2%	-10.6%	19.8%	8.1%
2010 Census Tract 4333				
Householders (2000 Census)	71.6%	4.2%	15.3%	16.6%
2008–2012 Households Actual Proportion	65.1%	3.2%	19.6%	29.7%
2008–2012 Households Free Market	66.6%	18.6%	5.9%	28.7%
2008–2012 Households Difference	-1.5%	-15.5%	13.7%	0.9%
2010 Census Tract 4334				
Householders (2000 Census)	33.5%	35.0%	12.6%	30.9%
2008–2012 Households Actual Proportion	51.2%	30.9%	9.1%	47.0%
2008–2012 Households Free Market	63.4%	21.1%	5.1%	33.3%
2008–2012 Households Difference	-12.2%	9.8%	4.0%	13.6%

Sharpstown was Houston's largest development when it was undertaken in the mid-1950s. A prototype for the master planned communities of today, its pattern of middle class homes on curving streets and cul-de-sacs surrounding a shopping mall and country club was widely imitated. In recent years, Asian merchants have moved into empty shopping centers along Bellaire Boulevard and their groceries, restaurants and small shops now thrive. Demand in these areas is strong, resulting in the conversion of warehouses and apartments to meet the demand for retail space. The population shrunk from 77,085 to 68,939 in 2012 while the annual median household income barely budged from \$31,377 to \$32,271 in 2012.



The actual percentages of Latino households in most of Sharpstown's outer

east, north, and west census tracts exceed the proportions expected by 15.3 to 37.3 percentage points. The percentage of Hispanic households increased since 2000 in all but two Sharpstown census tracts (4329.02, 4330.03, 4333).

Tract 4331 is the only tract in Sharpstown where the actual percentage of African American households was higher than expected. The proportion of Black households declined slightly since 2000 while the proportion of Hispanic households rose from 29.2 to 51 percent. The Asian population nearly disappeared from this tract since 2000. The actual proportions of Black households was significantly lower than expected in tracts 4227.01, 4227.02, and 4330.03, all tracts with large Latino populations. The proportion of African American households in each of these three tracts declined since 2000.

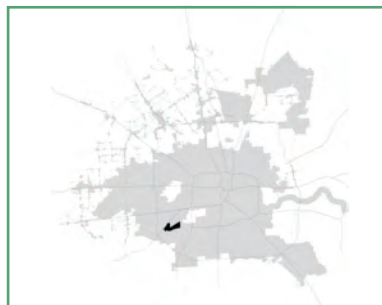
The actual proportions of Asian households exceed the expected percentages in tracts 4330.01 by 23.8 percentage points, 4330.02 by 17.4, tract 4330.03 by 43.6, and tract 4331 by 17.5. The percentages of Asian households increased substantially from 2000 in tract 4330.03, from 30.5 to 48.4 percent. Otherwise the actual percentage of Asian households actually decreased slightly since 2000 in most Sharpstown census tracts. The result is a growing concentration of Asian households in the northwest corner of this super neighborhood.

Recommended Actions: The city needs to expand housing choices so that Hispanics and Asians will look at housing outside Sharpstown's Hispanic and Asian concentrations and so that non-Hispanic whites include Sharpstown in their housing search.

Table 88: Braeburn

Super Neighborhood 30: Braeburn				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	46.8%	30.8%	3.9%	30.1%
2008–2012 Households Actual Proportion	57.7%	24.2%	4.4%	42.4%
2008–2012 Households Free Market	63.3%	21.4%	5.3%	32.2%
2008–2012 Households Difference	-5.6%	2.8%	-0.8%	10.2%
2010 Census Tract 4226				
Householders (2000 Census)	65.8%	15.7%	2.2%	28.4%
2008–2012 Households Actual Proportion	73.7%	15.1%	3.4%	28.2%
2008–2012 Households Free Market	65.3%	19.6%	5.5%	31.2%
2008–2012 Households Difference	8.4%	-4.4%	-2.1%	-3.0%
2010 Census Tract 4228 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	53.6%	16.4%	9.4%	31.8%
2008–2012 Households Actual Proportion	74.2%	6.8%	8.9%	41.7%
2008–2012 Households Free Market	64.7%	20.2%	5.5%	30.9%
2008–2012 Households Difference	9.5%	-13.4%	3.3%	10.8%
2010 Census Tract 4229				
Householders (2000 Census)	40.9%	40.0%	4.1%	25.3%
2008–2012 Households Actual Proportion	53.8%	29.4%	5.5%	47.4%
2008–2012 Households Free Market	61.9%	22.6%	5.1%	33.3%
2008–2012 Households Difference	-8.1%	6.8%	0.5%	14.1%
2010 Census Tract 4230				
Householders (2000 Census)	33.7%	42.8%	2.6%	28.8%
2008–2012 Households Actual Proportion	40.8%	37.0%	3.4%	45.2%
2008–2012 Households Free Market	63.3%	21.4%	5.2%	32.2%
2008–2012 Households Difference	-22.6%	15.5%	-1.8%	13.0%
2010 Census Tract 4231 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	30.2%	47.4%	1.4%	42.4%
2008–2012 Households Actual Proportion	39.5%	34.6%	0.0%	59.4%
2008–2012 Households Free Market	59.7%	24.8%	4.8%	34.3%
2008–2012 Households Difference	-20.2%	9.7%	-4.8%	25.2%

Braeburn is a part of southwest Houston along Brays Bayou west of Hillcroft. The first of these middle class subdivisions was developed after World War II at a time when Bissonnet provided the route into the city, rather than the Southwest Freeway. Development continued into the 1970s. The Braeburn Country Club is found in the center of the community. Many large tracts of land were developed as apartment complexes. Subdivisions found here include Robindell, Braeburn Glen, Braes Terrace, Larkwood, Braeburn Valley, and the acreage lot subdivision, Brae Acres. Half of the neighborhood's residents left this area between 2000 and 2012: 33,809 down to 16,817 in 2012. The annual median household income which had been at the city's median declined from \$36,030 to \$33,237, well below the city's 2012 median.



The actual composition of three of the five census tracts in Braeburn, which is situated just south of Sharpstown, is what would be expected in a free housing market absent discrimination, although in tract 4229 the proportion of Latino households soared from 25.3 percent in 2000 to 47.4 percent, 14.1 percentage points higher than expected in a free housing market. Meanwhile, the percentage of African American households declined from 40 to 29.4 percent, the level expected in a free housing market.

In tract 4230, which is on the north edge of the city's sweeping concentration of African American households running from Houston's southwest corner to the Golfcrest/Bellfort/Reveille super neighborhood, the actual percentage of Black households is 15.5 percentage points greater than expected in a free market while the actual percentage of white households is 22.6 percentage points less than expected. Since 2000 the changes in the percentages of white and African American households have been moving in a pro-integrative direction.

The sliver of tract 4231 in Braeburn is analyzed in the discussion of the Westwood super neighborhood.

Recommended Actions: Testing may reveal why the actual percentages of African American households declined and the actual proportions of Latinos rose so much in four of five census tracts since 2000.

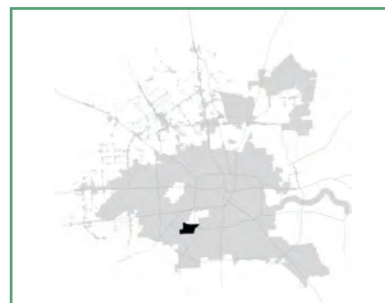
Table 89: Meyerland Area

Super Neighborhood 31: Meyerland Area				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	78.4%	9.0%	5.9%	11.3%
2008–2012 Households Actual Proportion	73.6%	10.6%	8.3%	18.0%
2008–2012 Households Free Market	68.4%	17.4%	6.3%	25.6%
2008–2012 Households Difference	5.1%	-6.7%	2.0%	-7.7%
2010 Census Tract 4129				
Householders (2000 Census)	77.0%	8.7%	9.7%	10.0%
2008–2012 Households Actual Proportion	66.7%	15.9%	15.8%	8.5%
2008–2012 Households Free Market	66.6%	19.0%	6.1%	27.0%
2008–2012 Households Difference	0.1%	-3.1%	9.7%	-18.5%
2010 Census Tract 4206 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	78.2%	8.7%	3.9%	16.6%
2008–2012 Households Actual Proportion	86.2%	3.6%	2.5%	13.3%
2008–2012 Households Free Market	69.3%	16.6%	6.4%	25.0%
2008–2012 Households Difference	16.9%	-13.0%	-4.0%	-11.6%
2010 Census Tract 4207				
Householders (2000 Census)	92.8%	1.7%	3.6%	3.3%
2008–2012 Households Actual Proportion	92.2%	0.0%	7.8%	2.5%
2008–2012 Households Free Market	75.8%	11.6%	7.5%	16.8%
2008–2012 Households Difference	16.4%	-11.6%	0.3%	-14.3%
2010 Census Tract 4208				
Householders (2000 Census)	91.7%	0.4%	6.3%	3.7%
2008–2012 Households Actual Proportion	85.2%	4.6%	9.7%	4.1%
2008–2012 Households Free Market	75.1%	12.0%	7.3%	18.3%
2008–2012 Households Difference	10.2%	-7.4%	2.4%	-14.2%
2010 Census Tract 4217 (Tract consists of parts of 2000 tracts 4209 and 4217)				
Householders (2000 Census)	83.1%	2.0%	6.2%	13.4%
2008–2012 Households Actual Proportion	73.4%	1.5%	11.7%	26.0%
2008–2012 Households Free Market	68.2%	17.5%	6.2%	26.0%
2008–2012 Households Difference	5.2%	-16.0%	5.5%	0.0%

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Super Neighborhood 31: Meyerland Area (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4218 (Tract consists of parts of 2000 tracts 4209 and 4218)				
Householders (2000 Census)	83.7%	4.3%	8.1%	6.8%
2008–2012 Households Actual Proportion	67.3%	17.9%	7.0%	22.9%
2008–2012 Households Free Market	64.9%	20.1%	5.6%	29.9%
2008–2012 Households Difference	2.4%	-2.2%	1.4%	-7.0%
2010 Census Tract 4219				
Householders (2000 Census)	94.8%	2.0%	2.5%	4.3%
2008–2012 Households Actual Proportion	93.8%	0.9%	4.6%	4.6%
2008–2012 Households Free Market	71.7%	14.7%	6.8%	22.2%
2008–2012 Households Difference	22.1%	-13.7%	-2.2%	-17.6%
2010 Census Tract 4225				
Householders (2000 Census)	45.1%	37.0%	2.1%	24.2%
2008–2012 Households Actual Proportion	57.1%	20.9%	3.5%	37.7%
2008–2012 Households Free Market	65.4%	19.8%	5.7%	29.4%
2008–2012 Households Difference	-8.3%	1.1%	-2.2%	8.3%

The Meyerland Area is found on both sides of Brays Bayou at the southwest corner of Loop 610. Its many neighborhoods include Meyerland, Marilyn Estates, Barkley Square and Maplewood. Many institutions of Houston' Jewish community are found here, including several synagogues and the Jewish Community Center. The northeast corner of the community includes the recently developed Meyerland Center retail development. The area was developed beginning in the 1950s. Both the population and annual median household income grew slightly between 2000 and 2014: 19,841 to 22,932 residents and \$65,413 to \$67,567, both above the city's median.



Meyerland rests between Braeburn on the west and Braeswood on the east. The actual percentage of African American households can barely be measured in tracts 4207, 4217, and 4219 where the actual percentages of Black households are 11.6, 16, and 13.7 percentage points less than expected in a free housing market absent discrimination.

The actual percentage of Caucasian households is greater than expected in tracts 4206 (by 16.9 percentage points), 4207 (16.4 points), and 4219 (22.1 points).

In five of the eight census tracts, the actual proportions of Latino households are 18.5, 11.6, 14.3, 14.2, and 17.6 percentage points less than expected

Throughout the Meyerland Area, the actual proportions of Asian households are what would be expected in a free housing market.

Recommended Actions: The City of Houston might want to conduct some real estate testing to see if any illegal discriminatory real estate practices may be at play in the Meyerland Area.

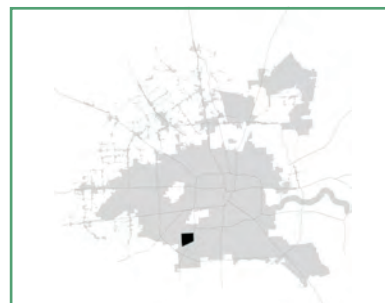
Table 90: Westbury

Super Neighborhood 37: Westbury				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	44.1%	40.3%	4.3%	20.1%
2008–2012 Households Actual Proportion	57.7%	24.4%	8.0%	22.0%
2008–2012 Households Free Market	66.4%	19.0%	5.9%	28.0%
2008–2012 Households Difference	-8.7%	5.4%	2.1%	-6.0%
2010 Census Tract 4205				
Householders (2000 Census)	33.4%	26.9%	14.8%	53.2%
2008–2012 Households Actual Proportion	42.4%	25.9%	13.7%	56.7%
2008–2012 Households Free Market	60.1%	24.3%	4.8%	34.7%
2008–2012 Households Difference	-17.7%	1.6%	9.0%	22.0%
2010 Census Tract 4206				
Householders (2000 Census)	78.2%	8.7%	3.9%	16.6%
2008–2012 Households Actual Proportion	86.2%	3.6%	2.5%	13.3%
2008–2012 Households Free Market	69.3%	16.6%	6.4%	25.0%
2008–2012 Households Difference	16.9%	-13.0%	-4.0%	-11.6%
2010 Census Tract 4207 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	92.8%	1.7%	3.6%	3.3%
2008–2012 Households Actual Proportion	92.2%	0.0%	7.8%	2.5%
2008–2012 Households Free Market	75.8%	11.6%	7.5%	16.8%
2008–2012 Households Difference	16.4%	-11.6%	0.3%	-14.3%
2010 Census Tract 4220 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	89.9%	4.1%	2.7%	8.0%
2008–2012 Households Actual Proportion	87.8%	1.7%	5.8%	14.9%
2008–2012 Households Free Market	72.8%	13.8%	7.1%	20.7%
2008–2012 Households Difference	15.0%	-12.1%	-1.3%	-5.7%
2010 Census Tract 4221				
Householders (2000 Census)	67.9%	14.0%	5.2%	21.0%
2008–2012 Households Actual Proportion	68.0%	4.2%	24.6%	0.0%
2008–2012 Households Free Market	67.2%	18.1%	5.9%	28.3%
2008–2012 Households Difference	0.7%	-13.9%	18.7%	-28.3%

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Super Neighborhood 37: Westbury (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4222				
Householders (2000 Census)	10.1%	80.9%	1.5%	10.1%
2008–2012 Households Actual Proportion	13.0%	75.4%	1.7%	16.1%
2008–2012 Households Free Market	61.2%	23.2%	5.0%	33.7%
2008–2012 Households Difference	-48.2%	52.2%	-3.4%	-17.6%
2010 Census Tract 4223.02 (Was Tract 4223 in 2000)				
Householders (2000 Census)	17.4%	71.9%	2.1%	13.1%
2008–2012 Households Actual Proportion	31.4%	58.0%	0.9%	18.4%
2008–2012 Households Free Market	65.8%	19.5%	5.8%	28.6%
2008–2012 Households Difference	-34.4%	38.4%	-4.9%	-10.2%
2010 Census Tract 4224.02 (Was Tract 4224 in 2000)				
Householders (2000 Census)	44.0%	35.9%	4.3%	28.8%
2008–2012 Households Actual Proportion	67.2%	7.7%	2.4%	54.3%
2008–2012 Households Free Market	64.3%	20.9%	5.6%	30.1%
2008–2012 Households Difference	2.9%	-13.2%	-3.2%	24.2%

Westbury would have been a fairly typical large suburban development when it was built in the 1950s and 1960s, except that it was built around a highly atypical shopping district, Westbury Square. The Square featured winding pedestrian streets built in 19th century style and lined with interesting shops, including a glass blower, a candle shop, and an old fashioned ice cream parlor. The surrounding homes were built in styles typical of middle class homes of that time. More expensive homes are located in the north in Park West; less expensive are found in Westbury South. The number of residents declined from 22,090 to 20,169 in 2012, but the annual median household income soared from \$39,792 to \$58,078 in 2012.



Westbury is immediately south of the Meyerland Area. At its east end, census tract 4205 is part of small Hispanic enclave extending south into the Central Southwest super neighborhood. The actual proportion of Latino households in tract 4205 is 22 percentage points higher than expected in a free housing market.

While the actual proportions of Black households are much greater than expected without discrimination only in tracts 4222 (52.2 percentage points) and tract 4223.02 (38.4 points), the composition of both tracts is moving incrementally in a pro-integrative direction. However, except for tract 4205 when the actual percentage matches the expected percentage, the proportions of African American households are 13, 11.6, 12.1, 13.9, and 13.2 percentage points less than would be expected absent discrimination. In tract 4224.02, the proportion of Black households plummeted since 2000 from 35.9 to 7.7 percent while the

proportion of Latino households rose from 28.8 to 54.3 percent, 24.2 percentage points more than expected. The percentages of Black households declined in every census tract in Westbury. In tracts 4207 and 4220, the proportions were barely measurable.

The actual percentage of Asian households is pretty much as expected except in tract 4221 where the percentage of Asian households grew from 5.2 percent in 2000 to 24.6 percent, 18.7 percentage points greater than would be expected in a free housing market. At the same time, the proportion of Latino households shrank from 21 percent to next to nothing, leaving the actual percentage 28.3 percentage points lower than expected in a free housing market.

Recommended Actions: It is very likely that testing will reveal any illegal discriminatory real estate practices that may account for the very different racial and Latino compositions among the Westbury census tracts.

Table 91: Brays Oaks

Super Neighborhood 36: Brays Oaks				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	32.9%	52.4%	4.7%	16.8%
2008–2012 Households Actual Proportion	38.0%	47.3%	5.3%	27.0%
2008–2012 Households Free Market	64.7%	20.3%	5.6%	30.5%
2008–2012 Households Difference	-26.6%	27.0%	-0.2%	-3.5%
2010 Census Tract 4222				
Householders (2000 Census)	10.1%	80.9%	1.5%	10.1%
2008–2012 Households Actual Proportion	13.0%	75.4%	1.7%	16.1%
2008–2012 Households Free Market	61.2%	23.2%	5.0%	33.7%
2008–2012 Households Difference	-48.2%	52.2%	-3.4%	-17.6%
2010 Census Tract 4223.01 (Was Tract 4223 in 2000)				
Householders (2000 Census)	17.4%	71.9%	2.1%	13.1%
2008–2012 Households Actual Proportion	25.9%	57.0%	9.4%	25.1%
2008–2012 Households Free Market	61.5%	22.9%	5.1%	33.8%
2008–2012 Households Difference	-35.6%	34.1%	4.4%	-8.8%
2010 Census Tract 4223.02 (Was Tract 4223 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	17.4%	71.9%	2.1%	13.1%
2008–2012 Households Actual Proportion	31.4%	58.0%	0.9%	18.4%
2008–2012 Households Free Market	65.8%	19.5%	5.8%	28.6%
2008–2012 Households Difference	-34.4%	38.4%	-4.9%	-10.2%
2010 Census Tract 4224.01 (Was Tract 4224 in 2000)				
Householders (2000 Census)	44.0%	35.9%	4.3%	28.8%
2008–2012 Households Actual Proportion	32.3%	51.5%	8.8%	24.7%
2008–2012 Households Free Market	61.5%	23.4%	5.3%	31.6%
2008–2012 Households Difference	-29.2%	28.1%	3.5%	-6.9%
2010 Census Tract 4224.02 (Was Tract 4224 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	44.0%	35.9%	4.3%	28.8%
2008–2012 Households Actual Proportion	67.2%	7.7%	2.4%	54.3%
2008–2012 Households Free Market	64.3%	20.9%	5.6%	30.1%
2008–2012 Households Difference	2.9%	-13.2%	-3.2%	24.2%

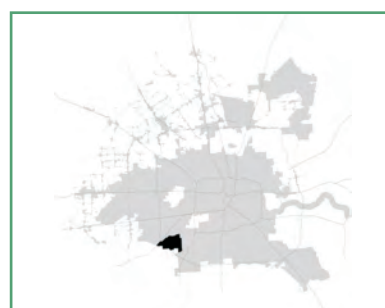
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Super Neighborhood 36: Brays Oaks (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4225				
Householders (2000 Census)	45.1%	37.0%	2.1%	24.2%
2008–2012 Households Actual Proportion	57.1%	20.9%	3.5%	37.7%
2008–2012 Households Free Market	65.4%	19.8%	5.7%	29.4%
2008–2012 Households Difference	-8.3%	1.1%	-2.2%	8.3%
2010 Census Tract 4232.01 (Was Tract 4232 in 2000)				
Householders (2000 Census)	32.8%	52.4%	3.9%	18.8%
2008–2012 Households Actual Proportion	59.4%	29.5%	5.7%	33.5%
2008–2012 Households Free Market	66.4%	18.9%	5.9%	28.5%
2008–2012 Households Difference	-7.0%	10.7%	-0.2%	4.9%
2010 Census Tract 4232.02 (Was Tract 4232 in 2000)				
Householders (2000 Census)	32.8%	52.4%	3.9%	18.8%
2008–2012 Households Actual Proportion	36.1%	51.8%	1.7%	41.2%
2008–2012 Households Free Market	62.8%	21.7%	5.0%	34.0%
2008–2012 Households Difference	-26.7%	30.1%	-3.2%	7.2%
2010 Census Tract 4233.01 (Was Tract 4233 in 2000)				
Householders (2000 Census)	45.2%	46.2%	3.4%	8.6%
2008–2012 Households Actual Proportion	51.7%	33.1%	4.2%	20.6%
2008–2012 Households Free Market	65.3%	19.6%	5.7%	30.0%
2008–2012 Households Difference	-13.6%	13.4%	-1.5%	-9.3%
2010 Census Tract 4233.02 (Was Tract 4233 in 2000)				
Householders (2000 Census)	45.2%	46.2%	3.4%	8.6%
2008–2012 Households Actual Proportion	32.3%	60.3%	4.0%	10.5%
2008–2012 Households Free Market	64.4%	20.6%	5.4%	31.2%
2008–2012 Households Difference	-32.0%	39.7%	-1.4%	-20.7%
2010 Census Tract 4234.01 (Was Tract 4234 in 2000)				
Householders (2000 Census)	18.2%	64.6%	10.8%	9.1%
2008–2012 Households Actual Proportion	18.0%	70.9%	3.1%	9.6%
2008–2012 Households Free Market	66.2%	18.9%	5.8%	29.1%
2008–2012 Households Difference	-48.2%	51.9%	-2.7%	-19.6%

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Super Neighborhood 36: Brays Oaks (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4234.02 (Was Tract 4234 in 2000)				
Householders (2000 Census)	18.2%	64.6%	10.8%	9.1%
2008–2012 Households Actual Proportion	18.2%	60.3%	16.1%	19.1%
2008–2012 Households Free Market	68.0%	17.5%	6.1%	27.1%
2008–2012 Households Difference	-49.9%	42.7%	9.9%	-7.9%
2010 Census Tract 4235				
Householders (2000 Census)	62.7%	22.3%	10.6%	6.1%
2008–2012 Households Actual Proportion	49.2%	41.3%	8.7%	12.2%
2008–2012 Households Free Market	69.3%	16.4%	6.4%	25.7%
2008–2012 Households Difference	-20.1%	24.9%	2.3%	-13.5%
2010 Census Tract 4236				
Householders (2000 Census)	30.7%	55.4%	6.4%	12.8%
2008–2012 Households Actual Proportion	30.6%	52.9%	7.8%	26.5%
2008–2012 Households Free Market	66.8%	18.3%	5.9%	29.0%
2008–2012 Households Difference	-36.3%	34.6%	1.9%	-2.5%
2010 Census Tract 4401				
Householders (2000 Census)	45.4%	27.8%	7.4%	35.3%
2008–2012 Households Actual Proportion	54.9%	35.7%	5.5%	35.5%
2008–2012 Households Free Market	66.9%	18.5%	5.9%	28.2%
2008–2012 Households Difference	-12.0%	17.2%	-0.4%	7.3%

Brays Oaks, sometimes also referred to as Greater Fondren Southwest, is found at the southwest corner of Beltway 8. The center of the area was undeveloped until the 1970s when construction began in Fondren Southwest. The area includes the neighborhoods of Braeburn Valley West and Glenshire. Many of the homes built in Fondren Southwest were large and expensive, frequently contemporary in style. Much land was reserved for apartment construction, and thousands were built along the major thoroughfares. When the local market collapsed in the 1980s, these complexes deteriorated rapidly. The community has successfully worked to eliminate the worst of these complexes. Recently several orthodox Jewish congregations have located in the area, adding to its diversity. The population grew by about 20 percent, from 49,436 to 59,266 in 2012 while the annual median household income barely shifted from \$36,122 to \$38,579.



Brays Oaks is located immediately west of Westbury. In 11 of the 15 census tracts, the actual percentages of African American households surpasses the proportions expected in a free housing market absent discrimination by 17.2 to 52.2 percentage points while the actual percentages of Caucasian households falls

short of the expected proportions by 20.1 to 49.9 percentage points. The concentrations of Black households have become less intense in about half of these tracts while the proportions of white households have risen. These tracts appear to be moving in a pro-integrative direction.

The percentages of Hispanic households rose since 2000 in every census tract except 4224.01. In tract 4224.02 where the percentage of Latino households soared from 28.8 to 54.3 percent, the actual percentage exceeds the expected by 24.2 percentage points while the proportion of Black households plummeted from 35.9 to 7.7 percent. In a free market, this tract would be 20.9 percent African American.

However, the actual proportions of Latino households in tracts 4222, 4233.02, and 4324.01 are 17.6, 20.7, and 19.6 percentage points less than expected in a free housing market.

There is a measurable presence of Asian households in all 11 Brays Oaks census tracts comparable to the levels expected in a free housing market.

Recommended Actions: Testing may help account the for gaps between actual and expected percentages in the different census tracts in Brays Oaks.

Table 92: Westwood

Super Neighborhood 29: Westwood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	29.4%	45.7%	6.0%	36.8%
2008–2012 Households Actual Proportion	44.6%	37.2%	4.7%	54.2%
2008–2012 Households Free Market	60.6%	23.8%	4.8%	34.6%
2008–2012 Households Difference	-16.0%	13.4%	-0.2%	19.5%
2010 Census Tract 4231				
Householders (2000 Census)	30.2%	47.4%	1.4%	42.4%
2008–2012 Households Actual Proportion	39.5%	34.6%	0.0%	59.4%
2008–2012 Households Free Market	59.7%	24.8%	4.8%	34.3%
2008–2012 Households Difference	-20.2%	9.7%	-4.8%	25.2%
2010 Census Tract 4331 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	26.8%	53.7%	7.8%	29.2%
2008–2012 Households Actual Proportion	47.1%	46.2%	0.0%	51.0%
2008–2012 Households Free Market	60.4%	24.1%	5.0%	33.5%
2008–2012 Households Difference	-13.4%	22.2%	-5.0%	17.5%
2010 Census Tract 4334				
Householders (2000 Census)	33.5%	35.0%	12.6%	30.9%
2008–2012 Households Actual Proportion	51.2%	30.9%	9.1%	47.0%
2008–2012 Households Free Market	63.4%	21.1%	5.1%	33.3%
2008–2012 Households Difference	-12.2%	9.8%	4.0%	13.6%
2010 Census Tract 4335.01 (Was Tract 4335 in 2000)				
Householders (2000 Census)	32.4%	39.8%	4.9%	45.7%
2008–2012 Households Actual Proportion	55.6%	23.5%	0.9%	73.0%
2008–2012 Households Free Market	60.4%	23.8%	4.7%	35.7%
2008–2012 Households Difference	-4.7%	-0.3%	-3.8%	37.3%
2010 Census Tract 4335.02 (Was Tract 4335 in 2000)				
Householders (2000 Census)	32.4%	39.8%	4.9%	45.7%
2008–2012 Households Actual Proportion	46.1%	33.5%	6.3%	63.0%
2008–2012 Households Free Market	59.3%	24.9%	4.8%	35.4%
2008–2012 Households Difference	-13.3%	8.6%	1.6%	27.6%
2010 Census Tract 4336				
Householders (2000 Census)	17.5%	68.0%	6.2%	12.4%
2008–2012 Households Actual Proportion	27.3%	57.9%	7.4%	30.4%
2008–2012 Households Free Market	60.1%	24.2%	4.8%	34.6%
2008–2012 Households Difference	-32.8%	33.7%	2.7%	-4.2%

Westwood is located just inside Beltway 8 at the Southwest Freeway. The area is primarily commercial and multi-family residential; only 2.6% is single-family. It is served by Alief Independent School District. The population grew a bit from 19,488 in 2000 to 21,186. The annual median household income actually declined from \$23,838 to \$23,229 in 2012, both well below the city's medians.



The actual proportions of Latino households exceed the expected proportions in five of the six census tracts by 17.5 to 37.3 percentage points. Westwood forms the southwest corner of a moderate Hispanic concentration that runs north of Westwood and east through the Sharpstown super neighborhood into Gulfton. While the concentration may be moderate, it has grown quickly and substantially since 2000, suggesting the *possibility* that Latinos are being steered to Westwood and others are being steered away from Westwood.

The actual proportions of African American households in tracts 4336 and 4231 are, respectively, 33.7 and 22.2 percentage points higher than would be expected in a free housing market absent discrimination. Tract 4336 is adjacent to tracts in Alief and Brays Oaks with similar characteristics. Tract 4231 is not adjacent to areas with similar characteristics.

In tract 4331, the proportion of Asian households fell from 7.8 percent to literally next to nothing. The percentage of Asian households was barely measurable in tracts 4131 and 4335.01.

The actual proportions of Caucasian households was significantly lower than would be expected in a free housing market in tracts 4231 and 4336 by 20.2 and 32.8 percentage points respectively.

Recommended Actions: The City of Houston needs to conduct real estate testing to determine whether illegal discriminatory practices are the causing the large and rapid in-migration of Latinos to nearly all of Westwood as well as the decline in the proportion of Asian residents and the differences between actual and expected proportions of African Americans and whites in several Westwood census tracts.

The city should take steps to expand housing choices to affirmatively further fair housing choice in Westwood.

Table 93: Alief

Super Neighborhood 25: Alief				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
Total for All Census Tracts Entirely or Partially in This Super Neighborhood				
Householders (2000 Census)	38.4%	30.2%	19.8%	21.4%
2008–2012 Households Actual Proportion	33.8%	28.1%	21.6%	34.2%
2008–2012 Households Free Market	64.1%	20.8%	5.5%	31.1%
2008–2012 Households Difference	-30.3%	7.3%	16.1%	3.0%
2010 Census Tract 4523				
Householders (2000 Census)	29.4%	18.1%	38.6%	22.7%
2008–2012 Households Actual Proportion	26.8%	18.3%	30.7%	40.7%
2008–2012 Households Free Market	65.3%	19.4%	5.5%	31.7%
2008–2012 Households Difference	-38.5%	-1.1%	25.2%	9.0%
2010 Census Tract 4524				
Householders (2000 Census)	38.0%	23.3%	25.1%	26.1%
2008–2012 Households Actual Proportion	30.7%	18.6%	26.7%	38.8%
2008–2012 Households Free Market	64.1%	20.7%	5.4%	31.3%
2008–2012 Households Difference	-33.4%	-2.1%	21.2%	7.4%
2010 Census Tract 4525				
Householders (2000 Census)	43.5%	28.6%	11.1%	31.4%
2008–2012 Households Actual Proportion	28.9%	24.3%	23.8%	39.4%
2008–2012 Households Free Market	62.5%	22.0%	5.2%	33.1%
2008–2012 Households Difference	-33.6%	2.3%	18.6%	6.4%
2010 Census Tract 4526				
Householders (2000 Census)	27.9%	34.5%	19.4%	25.3%
2008–2012 Households Actual Proportion	26.8%	32.2%	23.4%	36.7%
2008–2012 Households Free Market	63.6%	21.3%	5.4%	31.2%
2008–2012 Households Difference	-36.8%	10.9%	18.0%	5.6%
2010 Census Tract 4527 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	38.8%	26.9%	24.1%	18.8%
2008–2012 Households Actual Proportion	19.6%	38.0%	31.9%	21.2%
2008–2012 Households Free Market	65.2%	20.0%	5.7%	29.3%
2008–2012 Households Difference	-45.6%	18.0%	26.1%	-8.0%

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Super Neighborhood 25: Alief (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4528.01 (Was Tract 4528 in 2000)				
Householders (2000 Census)	35.1%	33.1%	17.0%	25.3%
2008–2012 Households Actual Proportion	26.4%	31.6%	23.8%	28.9%
2008–2012 Households Free Market	65.8%	19.2%	5.8%	29.5%
2008–2012 Households Difference	-39.5%	12.4%	18.0%	-0.6%
2010 Census Tract 4528.02 (Was Tract 2528 in 2000)				
Householders (2000 Census)	35.1%	33.1%	17.0%	25.3%
2008–2012 Households Actual Proportion	17.8%	29.3%	26.3%	38.0%
2008–2012 Households Free Market	62.7%	21.7%	5.1%	33.3%
2008–2012 Households Difference	-44.9%	7.6%	21.2%	4.7%
2010 Census Tract 4529				
Householders (2000 Census)	50.8%	17.4%	16.3%	31.9%
2008–2012 Households Actual Proportion	42.7%	19.0%	20.9%	33.6%
2008–2012 Households Free Market	63.8%	20.9%	5.3%	32.3%
2008–2012 Households Difference	-21.1%	-1.9%	15.6%	1.4%
2010 Census Tract 4530				
Householders (2000 Census)	46.8%	18.4%	15.5%	36.2%
2008–2012 Households Actual Proportion	33.8%	15.4%	20.1%	50.0%
2008–2012 Households Free Market	63.3%	21.4%	5.3%	32.2%
2008–2012 Households Difference	-29.4%	-6.0%	14.8%	17.8%
2010 Census Tract 4531				
Householders (2000 Census)	27.8%	38.8%	17.4%	27.7%
2008–2012 Households Actual Proportion	28.1%	32.1%	14.6%	38.2%
2008–2012 Households Free Market	61.1%	23.5%	5.0%	33.0%
2008–2012 Households Difference	-33.0%	8.7%	9.6%	5.2%
2010 Census Tract 4532				
Householders (2000 Census)	28.0%	51.2%	8.1%	22.1%
2008–2012 Households Actual Proportion	33.0%	31.1%	15.2%	39.5%
2008–2012 Households Free Market	61.6%	22.9%	5.0%	33.7%
2008–2012 Households Difference	-28.6%	8.2%	10.1%	5.8%

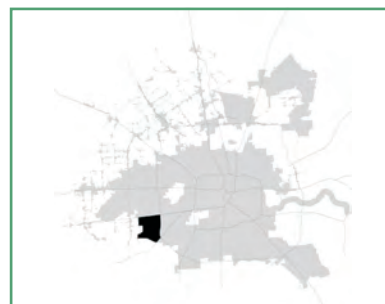
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Super Neighborhood 25: Alief (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4533				
Householders (2000 Census)	20.3%	50.3%	20.4%	11.7%
2008–2012 Households Actual Proportion	19.3%	53.8%	19.7%	19.4%
2008–2012 Households Free Market	60.1%	24.3%	4.9%	34.1%
2008–2012 Households Difference	-40.8%	29.6%	14.8%	-14.7%
2010 Census Tract 4534.01 (Was Tract 4534 in 2000)				
Householders (2000 Census)	36.5%	32.3%	19.5%	19.7%
2008–2012 Households Actual Proportion	60.3%	20.8%	13.2%	33.7%
2008–2012 Households Free Market	64.7%	20.2%	5.6%	30.7%
2008–2012 Households Difference	-4.4%	0.6%	7.6%	3.0%
2010 Census Tract 4534.02 (Was Tract 4534 in 2000)				
Householders (2000 Census)	36.5%	32.3%	19.5%	19.7%
2008–2012 Households Actual Proportion	40.6%	23.9%	21.6%	36.8%
2008–2012 Households Free Market	63.8%	20.9%	5.3%	32.2%
2008–2012 Households Difference	-23.2%	3.0%	16.3%	4.6%
2010 Census Tract 4534.03 (Was Tract 4534 in 2000)				
Householders (2000 Census)	36.5%	32.3%	19.5%	19.7%
2008–2012 Households Actual Proportion	15.6%	43.9%	24.3%	29.6%
2008–2012 Households Free Market	61.6%	23.1%	5.2%	32.2%
2008–2012 Households Difference	-46.0%	20.8%	19.2%	-2.7%
2010 Census Tract 4535.01 (Was Tract 4535 in 2000)				
Householders (2000 Census)	33.2%	26.7%	27.1%	16.9%
2008–2012 Households Actual Proportion	39.8%	33.6%	18.8%	37.8%
2008–2012 Households Free Market	63.7%	21.2%	5.5%	30.7%
2008–2012 Households Difference	-23.9%	12.4%	13.3%	7.1%
2010 Census Tract 4535.02 (Was Tract 4535 in 2000)				
Householders (2000 Census)	33.2%	26.7%	27.1%	16.9%
2008–2012 Households Actual Proportion	46.6%	36.8%	10.8%	27.5%
2008–2012 Households Free Market	66.0%	18.8%	5.5%	31.3%
2008–2012 Households Difference	-19.4%	18.0%	5.3%	-3.8%

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Super Neighborhood 25: Alief (Continued)				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4536.01 (Was Tract 4536 in 2000)				
Householders (2000 Census)	34.4%	31.2%	18.5%	26.9%
2008–2012 Households Actual Proportion	42.7%	36.7%	7.3%	31.8%
2008–2012 Households Free Market	65.8%	19.3%	5.7%	29.9%
2008–2012 Households Difference	-23.1%	17.4%	1.6%	1.9%
2010 Census Tract 4536.02 (Was Tract 4536 in 2000)				
Householders (2000 Census)	34.4%	31.2%	18.5%	26.9%
2008–2012 Households Actual Proportion	35.2%	36.3%	14.3%	34.7%
2008–2012 Households Free Market	62.5%	22.2%	5.1%	32.6%
2008–2012 Households Difference	-27.3%	14.1%	9.2%	2.2%
2010 Census Tract 4537				
Householders (2000 Census)	31.3%	45.4%	12.2%	17.5%
2008–2012 Households Actual Proportion	35.6%	39.1%	12.2%	35.0%
2008–2012 Households Free Market	63.8%	20.9%	5.4%	31.9%
2008–2012 Households Difference	-28.2%	18.2%	6.8%	3.1%
2010 Census Tract 4538				
Householders (2000 Census)	49.1%	25.0%	16.2%	16.5%
2008–2012 Households Actual Proportion	50.6%	28.7%	12.7%	36.7%
2008–2012 Households Free Market	66.2%	19.0%	5.8%	29.1%
2008–2012 Households Difference	-15.6%	9.7%	6.8%	7.6%
2010 Census Tract 6720.01 (Was Tract 6720 in 2000. Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	54.3%	14.7%	24.0%	11.9%
2008–2012 Households Actual Proportion	46.6%	11.8%	36.2%	18.4%
2008–2012 Households Free Market	67.9%	17.7%	6.2%	26.5%
2008–2012 Households Difference	-21.3%	-5.8%	30.0%	-8.2%
2010 Census Tract 6724 (Less than 25% of tract is in this super neighborhood)				
Householders (2000 Census)	54.1%	15.4%	18.4%	21.0%
2008–2012 Households Actual Proportion	43.9%	10.5%	22.2%	39.2%
2008–2012 Households Free Market	67.4%	18.0%	6.0%	27.8%
2008–2012 Households Difference	-23.5%	-7.4%	16.2%	11.4%

Alief is a large ethnically–diverse community on Houston’s far southwest side of Beltway 8. Most of the area is in Alief Independent School District, although a portion extends into Fort Bend County and is serviced by the Fort Bend Independent School District. Alief is a collection of medium–sized subdivisions with moderately priced homes and large affordably priced apartment and condominium complexes. The area’s diversity is reflected in the stores found in shopping centers lining the area’s major thoroughfares. The population increased almost by



half from 41,820 to 63,253 in 2012. The annual median household income which had been nearly \$2,500 above the city's median in 2000, had fallen to \$37,237 in 2012, below the city's 2012 median of \$44,648.

Since 2000, the proportions of Latino households grew in all 23 Alief census tracts, bringing the actual percentages to the levels expected in a free housing market in every tract except 4530. The percentage of Hispanic households grew from 36.2 percent in 2000 to 50 percent, raising the actual proportion to 17.8 percentage points higher than expected.

The actual proportions of African American households were at the levels expected in a free housing market except in six census tracts where they were greater than expected by 15.6 to 29.6 percentage points.

The actual percentage of Caucasian households is lower than the percentage expected in all 23 census tracts, ranging from 19.4 to 45.6 percentage points lower. Since 2000, the percentage of white households rose in ten tracts and fell in 13.

Throughout Alief, Asian households would constitute about five percent of the households in a free housing market. But the actual proportions of Asian households are greater than expected throughout Alief and from 15.6 to 26.1 percentage points greater in 12 of the 23 census tracts that comprise the Alief super neighborhood. As noted below, a number of adjacent census tracts not assigned to any super neighborhood have similar demographic characteristics.

Recommended Actions: To affirmatively further fair housing in Alief, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for the Hispanic and Asian residents of Alief to areas outside the city's Latino and Asian enclaves and to expand housing choices of Caucasians to include more diverse areas including Alief.

Nearby Census Tracts Not in Any Super Neighborhood. Immediately west of the concentrations of Asian households in Alief are five census tracts not assigned to any super neighborhood. Along with several similar tracts discussed earlier in the section on the Eldridge/West Oaks super neighborhood, these extend the concentrations of Asian households further west of Alief.

In three of these (4539, 6723.01, 6727.01) the actual proportions of Asian households are greater than the expected proportions by 22.2 to 28.6 percentage points. The actual proportions of Asian households are as expected in tracts 6719 and 6725. The expected proportion of Asian households in both tracts 6723.01 and 6727.01 is 6.3 percent. A huge increase in the proportion of Asian households since 2000 from 8.1 to 34.9 percent in tract 6723.01 accounts for the gap between actual and expected being 28.6 percentage points. In tract 6727.01 the percentage of Asian households grew from 18.4 to 28.5 percent resulting in the actual proportion being 22.2 percentage points greater than expected. The actual proportion of Asian households grew in tract 4539 from 23.5 to 32.1 percent, 26.5 percentage points higher than expected.

While the actual proportions of African American households were about

what was expected in a free market, the actual proportions of Caucasian households were 42.6, 14.2, 27.9, 35.6, and 41.7 percentage points lower than expected. In the four tracts where the gap was larger than 15 points, the proportions of white households fell since 2000 from 80.2 to 41.3 percent, 54.1 to 31.7 percent, and 54.1 to 27.2 percent.

The actual percentages of Hispanic households in these tracts near Alief are what are expected in the absence of discrimination.

Recommended Actions: To affirmatively further fair housing in these census tracts near the Alief super neighborhood, the City of Houston needs to implement the recommendations proffered in this document to expand housing choices for Asian residents to areas outside the city's Asian concentrations and to expand housing choices of Caucasians to include fairly integrated areas like these census tracts.

The city has not assigned the census tracts in the table below to any super neighborhood. Each was reported on earlier in this section along with the super neighborhood that is closest to it.

Table 94: Southwest Quadrant: Census Tracts Not in a Super Neighborhood

Southwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4539				
Householders (2000 Census)	37.1%	25.6%	23.5%	26.5%
2008–2012 Households Actual Proportion	22.3%	30.3%	32.1%	27.2%
2008–2012 Households Free Market	64.9%	20.0%	5.6%	30.1%
2008–2012 Households Difference	-42.6%	10.3%	26.5%	-2.9%
2010 Census Tract 4540				
Householders (2000 Census)	46.7%	23.8%	19.0%	17.3%
2008–2012 Households Actual Proportion	40.2%	36.4%	14.7%	29.9%
2008–2012 Households Free Market	68.9%	16.7%	6.3%	26.2%
2008–2012 Households Difference	-28.7%	19.7%	8.4%	3.8%
2010 Census Tract 4541				
Householders (2000 Census)	51.5%	22.6%	17.1%	14.6%
2008–2012 Households Actual Proportion	37.8%	38.2%	16.0%	18.2%
2008–2012 Households Free Market	67.6%	17.9%	6.1%	27.4%
2008–2012 Households Difference	-29.8%	20.3%	10.0%	-9.2%
2010 Census Tract 4542				
Householders (2000 Census)	56.8%	18.6%	9.2%	27.9%
2008–2012 Households Actual Proportion	51.3%	24.6%	6.0%	51.3%
2008–2012 Households Free Market	66.9%	18.2%	5.9%	29.3%
2008–2012 Households Difference	-15.5%	6.4%	0.1%	22.1%
2010 Census Tract 4543.02 (Was Tract 4543 in 2000)				
Householders (2000 Census)	67.9%	15.8%	9.9%	18.1%
2008–2012 Households Actual Proportion	50.2%	21.8%	15.0%	33.6%
2008–2012 Households Free Market	66.8%	18.3%	5.8%	29.5%
2008–2012 Households Difference	-16.6%	3.5%	9.2%	4.2%
2010 Census Tract 4546				
Householders (2000 Census)	92.2%	2.5%	3.6%	5.4%
2008–2012 Households Actual Proportion	83.3%	7.5%	5.7%	13.4%
2008–2012 Households Free Market	67.2%	18.4%	6.2%	26.3%
2008–2012 Households Difference	16.1%	-10.9%	-0.5%	-12.9%

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Southwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 4547				
Householders (2000 Census)	90.3%	2.3%	4.9%	6.0%
2008–2012 Households Actual Proportion	85.6%	5.4%	4.1%	13.9%
2008–2012 Households Free Market	73.0%	13.6%	7.0%	20.5%
2008–2012 Households Difference	12.5%	-8.2%	-2.9%	-6.6%
2010 Census Tract 4548 (Tract consists of parts of 2000 tracts 4548 and 4549)				
Householders (2000 Census)	83.2%	4.4%	7.2%	10.5%
2008–2012 Households Actual Proportion	82.2%	8.5%	3.9%	12.4%
2008–2012 Households Free Market	68.6%	17.1%	6.4%	25.6%
2008–2012 Households Difference	13.6%	-8.7%	-2.4%	-13.3%
2010 Census Tract 4551.01 (Was Tract 4551 in 2000)				
Householders (2000 Census)	88.2%	3.4%	3.7%	9.8%
2008–2012 Households Actual Proportion	91.1%	3.1%	0.7%	12.2%
2008–2012 Households Free Market	68.0%	17.5%	6.2%	27.0%
2008–2012 Households Difference	23.2%	-14.4%	-5.5%	-14.8%
2010 Census Tract 4551.02 (Was Tract 4551 in 2000)				
Householders (2000 Census)	88.2%	3.4%	3.7%	9.8%
2008–2012 Households Actual Proportion	91.3%	0.9%	1.7%	18.1%
2008–2012 Households Free Market	71.6%	14.7%	7.0%	22.0%
2008–2012 Households Difference	19.7%	-13.8%	-5.3%	-3.9%
2010 Census Tract 4552				
Householders (2000 Census)	90.8%	2.9%	1.7%	11.4%
2008–2012 Households Actual Proportion	90.4%	5.2%	1.6%	13.9%
2008–2012 Households Free Market	69.3%	16.5%	6.5%	24.8%
2008–2012 Households Difference	21.1%	-11.3%	-4.9%	-11.0%
2010 Census Tract 4553 (Fewer than 20 households in 2000)				
Householders (2000 Census)	—	—	—	—
2008–2012 Households Actual Proportion	73.1%	16.7%	9.5%	12.1%
2008–2012 Households Free Market	66.2%	19.0%	5.8%	29.0%
2008–2012 Households Difference	6.9%	-2.2%	3.7%	-16.9%

Continued on the next page

Southwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 6719 Fort Bend County				
Householders (2000 Census)	80.1%	5.3%	10.0%	9.7%
2008–2012 Households Actual Proportion	84.3%	4.7%	9.8%	13.8%
2008–2012 Households Free Market	70.1%	15.9%	6.6%	24.0%
2008–2012 Households Difference	14.2%	-11.2%	3.2%	-10.2%
2010 Census Tract 6723.01 (Was Tract 6723 in 2000) Fort Bend County				
Householders (2000 Census)	80.2%	4.7%	8.1%	13.0%
2008–2012 Households Actual Proportion	41.3%	15.6%	34.9%	20.7%
2008–2012 Households Free Market	69.2%	16.4%	6.3%	26.6%
2008–2012 Households Difference	-27.9%	-0.8%	28.6%	-5.9%
2010 Census Tract 6725 (Was Tract 6724 in 2000) Fort Bend County				
Householders (2000 Census)	54.1%	15.4%	18.4%	21.0%
2008–2012 Households Actual Proportion	31.7%	28.6%	17.6%	28.9%
2008–2012 Households Free Market	67.3%	18.0%	6.0%	28.0%
2008–2012 Households Difference	-35.6%	10.6%	11.6%	1.0%
2010 Census Tract 6726.01 (Was Tract 4542 in 2000) Fort Bend County				
Householders (2000 Census)	56.8%	18.6%	9.2%	27.9%
2008–2012 Households Actual Proportion	27.0%	35.2%	10.0%	41.7%
2008–2012 Households Free Market	66.7%	18.4%	5.9%	29.3%
2008–2012 Households Difference	-39.7%	16.8%	4.2%	12.4%
2010 Census Tract 6727.01 (Was Tract 6724 in 2000) Fort Bend County				
Householders (2000 Census)	54.1%	15.4%	18.4%	21.0%
2008–2012 Households Actual Proportion	27.2%	28.3%	28.5%	25.6%
2008–2012 Households Free Market	68.9%	16.7%	6.3%	26.4%
2008–2012 Households Difference	-41.7%	11.6%	22.2%	-0.8%

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Southwest Quadrant: Census Tracts Not in a Super Neighborhood				
Geographic Unit	White	Black	Asian	Hispanic of Any Race
2010 Census Tract 6729 (Was Tract 6730 in 2000) Fort Bend County				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	44.6%	28.6%	19.8%	20.3%
2008–2012 Households Free Market	69.7%	16.3%	6.5%	24.4%
2008–2012 Households Difference	-25.1%	12.3%	13.3%	-4.1%
2010 Census Tract 6730.01 (Was Tract 6730 in 2000) Fort Bend County				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	79.6%	8.9%	9.0%	8.9%
2008–2012 Households Free Market	74.9%	12.1%	7.3%	18.5%
2008–2012 Households Difference	4.7%	-3.2%	1.7%	-9.6%
2010 Census Tract 6730.03 (Was Tract 6730 in 2000) Fort Bend County				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	70.7%	4.2%	22.0%	17.0%
2008–2012 Households Free Market	75.1%	12.1%	7.4%	17.7%
2008–2012 Households Difference	-4.4%	-7.8%	14.6%	-0.6%
2010 Census Tract 6731.02 (Was Tract 6730 in 2000) Fort Bend County				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	78.0%	5.8%	10.5%	16.5%
2008–2012 Households Free Market	74.8%	12.2%	7.3%	18.4%
2008–2012 Households Difference	3.2%	-6.5%	3.2%	-1.9%
2010 Census Tract 6734 (Was Tract 6730 in 2000) Fort Bend County				
Householders (2000 Census)	87.0%	3.1%	6.9%	6.6%
2008–2012 Households Actual Proportion	79.7%	10.8%	7.8%	15.6%
2008–2012 Households Free Market	74.0%	12.9%	7.3%	19.0%
2008–2012 Households Difference	5.7%	-2.0%	0.5%	-3.4%

Part 2: Impediments and Recommendations

The recommendations to mitigate the impediments identified in this chapter seek to help Houston fulfill its legal obligation to affirmatively further fair housing. Every jurisdiction that accepts Community Development Block Grants and other funds from the U.S. Department of Housing and Urban Development (HUD) agrees to affirmatively further fair housing. As HUD has acknowledged,

The Department believes that the principles embodied in the concept of “fair housing” are fundamental to healthy communities, and that communities must be encouraged and supported to include *real, effective*, fair housing strategies in their overall planning and development process, not only because it is the law, but because it is the right thing to do.¹

Although the grantee’s AFFH [affirmatively further fair housing] obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the state or local level. ***The AFFH obligation extends to all housing and housing-related activities in the grantee’s jurisdictional area whether publicly or privately funded.***²

The recommendations in this chapter provide a framework upon which the City of Houston can build its efforts and incorporate them into its planning and implementation processes. They are not meant to constitute a complete menu of actions that can be taken. The city will likely find that there are additional actions and programs that might be appropriate that are not mentioned here.

Nor are these recommendations intended to solve all of Houston’s housing issues. The findings identified and recommendations offered are tightly focused on affirmatively furthering fair housing choice.

In the fullest sense of the term, “affirmatively furthering fair housing” means doing more than what so many other cities have done while ignoring the discriminatory practices that distort the free housing market and produce segregative living patterns. It means proactively establishing and implementing policies and

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1. Office of Fair Housing and Equal Opportunity, U. S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, (Washington, DC. March 1996), Vol. 1, i. Emphasis in original.
 2. *Ibid.* 1–3. *Emphasis added.* The courts have long embraced this concept. “...every court that has considered the question has held or stated that Title VIII imposes upon HUD an obligation to do more than simply refrain from discriminating (and from purposely aiding discrimination by others)....This broader goal [of truly open housing] ... reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases.” *NAACP v. Secretary of Housing and Urban Development*, 817 F.2d 149, 155 (1st Cir. 1987).

practices that counteract and mitigate discriminatory housing practices and policies. While a city itself might not engage in discriminatory housing practices or policies, it should recognize that when a passive approach results in segregative living patterns, the city needs to take action to correct this distortion of the free housing market as part of its legal obligation to affirmatively further fair housing. The recommendations of this chapter present many of the tools that Houston can use to “affirmatively further fair housing” in the fullest sense of the term.

Findings and abbreviated recommendations specific to each of the 88 super neighborhoods as well as the census tracts not assigned to any super neighborhood are detailed in the analysis of each super neighborhood in Part 1 of this study.

The findings and recommendations presented here flesh out the details and expand upon the super neighborhood–specific findings and recommendations.

While Houston’s population is very diverse, separate and often very intense concentrations of Latino households of any race or African American households dominate huge geographic sections of the city. Asian households tend to be concentrated in just a few areas, albeit not nearly as intensely as Black and Hispanic households are. These different concentrations are tightly intertwined with Houston’s economic stratification,³ which is not surprising given the significant differences in median household income and income distribution between each race and Latinos of any race as discussed in Part 1 of this appendix.

The Free Market Analysis™ in Part 1 of this appendix identified what the racial and Latino composition of each census tract would be in a free housing market absent the discrimination that distorts housing markets. By taking actual household incomes into account as well as housing costs, the analysis enables readers to pinpoint the census tracts where historic and/or current housing discrimination has been taking place. ***Achieving the “expected” free market composition of each census tract can serve as a long-term goal for Houston’s efforts to affirmatively further fair housing choice.***

It is important to stress that the levels of segregation reported in this study here are *not* primarily due to economic stratification even though racial and economic stratification are closely related. The “expected” percentages for each

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3. The City of Houston is the sixth most economically–segregated city in the U.S., after Tallahassee, FL; Trenton, NJ; Austin, TX; Tucson, AZ; and San Antonio, TX. The Houston metropolitan area has the seventh highest level of overall occupational segregation among large metropolitan areas, and thirteenth among all U.S. metro areas. In terms of segregation of the “creative class,” Houston is second only to Los Angeles. Houston is the eighth most segregated large metropolitan area for the working class but only the 241st most segregated city for people in poverty. Richard Florida and Charlotta Mellander, *Segregated City: The Geography of Economic Segregation in America’s Metros* (Toronto: Martin Prosperity Institute, Rotman School of Management, University of Toronto, February 2015) 9, 14, 38, 45, 49.

group can be attained by ending discriminatory practices and expanding housing choices — they assume no changes in household income or housing costs.

Even though 22.5 percent of the city’s white households have annual incomes under \$25,000, far fewer Caucasians live in most lower-income neighborhoods than would be expected in a free housing market absent discrimination. This phenomenon strongly suggests that even though Houston’s racial stratification and economic stratification are intertwined, racial segregation is *not* the primary cause of the city’s widespread economic stratification.

But that is only part of the picture.

If households with modest incomes regardless of race or ethnicity are to ever achieve upward mobility, they need to access the greater opportunities of better schools, health care, and jobs available in areas outside lower-income concentrations. It is essential for Houston to get housing that households with modest incomes can afford built in middle- and higher-income areas of the city as well as preserving existing housing they can afford.

Houston is a very “understudied” metropolis. When we could not find any research on Houston for many of the topics covered in this study we thought we were looking in all the wrong places. But interviews with local stakeholders and local academics revealed that very little research has been conducted on housing segregation and discrimination in Houston and the surrounding metropolitan area.

According to the planning adage, the better informed decision makers are, presumably the better decisions they will make. While this study will hopefully better inform Houston’s decision makers about the nature and extent of racial and Latino stratification within the city, there is still a crying need to conduct research in the Houston metropolitan area on the factors that contribute to housing segregation and possible discriminatory private and public sector policies and practices.

The data suggest that instead of a single, unitary free housing market in which all participate, Houston has separate and distinct housing markets for whites, another for African Americans, a third for Hispanics, and a fourth for Asians. Since the “expected proportions” take into account household income and the cost of housing, it is *possible* that these differences between the actual and expected racial and ethnic composition of census tracts are due to housing discrimination *possibly* including self-steering due to apprehension and fears that have resulted from experiences with housing discrimination.

The keys to achieving a unitary housing market are ending discriminatory practices, expanding the range of geographic choices households will consider when looking for a new home to rent or buy, getting developers to build additional housing affordable to households of modest means in the areas of Houston where the supply of affordable housing is low, and promoting housing to all segments of the Houston community. The impediments identified in this chapter and the recommendations proffered here directly address these keys.

Expanding Housing Choices

Impediment #1 The concentrations of minorities in Houston that would not exist in a free market not distorted by discrimination suggest that instead of a single, unitary housing market, Houston’s housing market is divided into four separate markets, one for non-Hispanic whites, one for African Americans, one for Latinos of any race, and one for Asians.

As discussed at the beginning of this study, when minority households of all incomes include only majority-minority and integrated neighborhoods in their housing search and when Caucasian households include only predominantly white neighborhoods and do not even consider integrated neighborhoods, they ensure that integrated neighborhoods will resegregate to all-Black or all-Hispanic.⁴

If Houston is to reduce housing segregation and achieve greater integration, these households need to expand their housing choices to include all areas of the city with housing they can afford.

1. Recommendations to Expand Housing Choice

1. A. To achieve lasting stable racial, ethnic, and economic diversity, the Houston City Council needs to commit to the goal of transforming the multiple housing market into a single, unitary housing market in which all residents participate. The City of Houston should adopt an explicit goal and policy to promote the expansion of housing choice throughout the city and metropolitan area. This goal should be incorporated into the city’s forthcoming general plan which should put forward objectives, policies, and programs to achieve it. While it will likely take decades or even longer to accomplish this goal, it can be attained only if the City of Houston publicly commits to achieving it and devotes the resources needed. The more entrenched the multiple housing markets become, the more difficult and expensive it is to transform it into a unitary market. Time frame: Complete within one year.

1. B. To reduce housing segregation, it is crucial that the City of Houston establish a metropolitan-wide housing service center as soon as possible to start the city on the road to a unitary housing market free of discrimination. Time frame: Initiate process this year; expect to have housing service center operational within three years.

Face-to-face housing counseling has been a very successful tool to expand housing choice. Houston should establish a housing service center, much like the Oak Park Regional Housing Center, where home seekers are introduced to housing options beyond the racial or ethnic neighborhoods to which they often feel they are limited. In Houston, the housing service center should seek to expand

4. For a detailed explanation of these dynamics, see Harvey Molotch, *Managed Integration: Dilemmas of Doing Good in the City*, 171–173, 205 (Los Angeles, CA: University of California Press, 1972) and Daniel Lauber, *Racially Diverse Communities: A National Necessity*, 2, 14 (River Forest, Illinois: Planning/Communications, 1990, 2015) which is available at <http://www.planningcommunications.com/publications>.

the housing search of minorities beyond the census tracts where the proportion of minorities is significantly greater than would be expected in a free market without discrimination. It should seek to expand the housing choices of whites to those parts of the city where the proportion of whites is less than would be expected in a discrimination-free housing market. Expanding housing choices is the polar opposite of steering which reduces housing choices.

A housing service center, supported largely with Community Development Block Grant funds,⁵ maintains listings of rentals and for-sale housing in all price ranges throughout a city and, in many cases, the entire metropolitan area. The underlying policy is that it gives listings to clients to make a pro-integrative move. For example, an African American client receives listings of homes in predominantly white areas to expand her choices beyond Black neighborhoods. A Caucasian client is given listings in integrated and integrating areas to expand his choices beyond nearly all-white neighborhoods.⁶

The City of Houston can use the data for each census tract and super neighborhood in the Free Market Analysis™ in Part 1 of this study to help determine the locations that would constitute pro-integrative moves.

To help overcome the very real apprehension and fear of running into hostility when just looking at housing in a predominantly white neighborhood, the housing service center should escort minority home seekers to see apartments and houses in those neighborhoods.

Housing counselors need to be carefully trained and staff is also needed to recruit listings from housing providers. In a jurisdiction as large as Houston, the housing service center should have branch offices located in all four quadrants of the city connected to a central computer system with the housing listings.

The City of Houston would be very prudent to thoroughly research how to establish and operate a housing service center. We strongly urge the city to contact one of the most successful housing service centers in the country, the Oak Park Regional Housing Center.⁷ The lessons it has learned during its more than 40

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5. Housing service centers do *not* charge their clients any fee for their services.
 6. Some people confuse this approach that expands housing choices with illegal steering that reduces housing choice by, for example, telling a Latino home seeker that he shouldn't even look at housing in a predominantly non-Hispanic white or a predominantly Black neighborhood or telling a white home seeker not to even consider looking at housing in an integrated neighborhood.
 7. Although Oak Park has faced the traditional integration pattern of African Americans moving into a previously all-white community and whites then being steered away from the newly-integrated village, the principles underlying its operation apply anywhere, including Houston. The center is located in Oak Park, Illinois and can be reached at 708/848-7150; Rob Breymaier, Executive Director. Website: <http://www.liveinoakpark.org>. The center maintains a constantly updated database of available rentals in racially-integrated Oak Park, provides fair housing and marketing technical assistance to landlords, and promotes the community to all races and ethnicities. Clients are encouraged to make "affirmative moves" or pro-integrative moves that will promote racial integration in the community. The Housing Center has also provided this service in the predominantly Caucasian western suburbs of Chicago and provides affirmative marketing in its homeownership counseling program. *In all cases, the final decision of which housing to look at is the client's.* How-

years of successful operation can help facilitate creation of effective housing service centers in Houston and environs.

1. C. Expanding where people will look for housing also requires an on-going long-term educational publicity campaign to make Latinos of any race, Blacks, and Asians aware that they can move anywhere in the metropolitan area that they can afford. Time frame: Initiate planning efforts in first year; implement in second year.

Such a campaign to expand housing choices can include the use of billboards, newspaper stories, display ads, radio and television public service announcements, and Houston's own website. Houston should rent billboards to advertise that housing throughout the city and county is available to all by showing models of all races and ethnicities.⁸ Similar small display ads should be run in the real estate advertising sections of any local newspapers with substantial minority readership. The City of Houston could also use its website to remind viewers that they can live anywhere they can afford and specifically suggest looking for housing in those parts of Houston with relatively low proportions of minority residents. The idea is to change the mind set among Houston's minority population to consider housing throughout the city and environs, particularly housing closer to their jobs, rather than limiting their search to the neighborhoods in which minority households are concentrated.

Combating Housing Discrimination

Impediment #2 The data strongly suggest that elements within Houston's real estate industry have been subjecting African Americans, Hispanics of any race, and Asians to housing discrimination when seeking to move to

ever, the Housing Center expands the housing options known to its clients and 70 to 80 percent of them make a pro-integrative move. The center has provided free escorts to see rentals in suburban areas that African Americans rarely considered and were reluctant to visit, although escorts are no longer needed at this particular housing center.

8. In California, the Fair Housing Council of the San Fernando Valley instituted a large-scale advertising and public relations blitz to convince African Americans that they could move to the valley if they so chose. The campaign used newspaper advertisements, radio commercials on Black-oriented stations, billboards, and four-color brochures distributed to 40,000 households in its target area. Of the 1,100 households that responded to the advertising campaign, 120 were referred to brokers. At least 12 households actually moved to the valley; an unknown number went directly to brokers without going through the Fair Housing Council. This effort did succeed at making African Americans aware that they could move to the valley. Before it started, a random sample survey found that 20 percent of Black respondents felt the valley was receptive to minorities. After the campaign, 75 percent felt the valley was receptive. Not surprisingly, the campaign did reveal that Blacks will *not* move somewhere solely for the sake of integration. As other research has found, African Americans and whites tend to move for the same reasons. The purpose of these campaigns is to expand where minorities will look for housing. See Daniel Lauber, *Racially Diverse Communities: A National Necessity* (River Forest, Illinois: Planning/Communications, 1990, 2015) available at <http://www.planningcommunications.com/publications>.

rental or ownership housing. There is a dearth of information on real estate industry practices in Houston and the surrounding metropolitan area.

2. Recommendation to Combat Housing Discrimination

Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing as explained in Part 1 of this study.

Where one looks for housing is heavily influenced by the real estate industry. Racial and ethnic steering, which the Fair Housing Act prohibits, is a practice of real estate agents where, for example, an agent shows housing to African American only in neighborhoods with a concentration of Blacks and integrated areas rather than in neighborhoods with few minority residents. Across the nation, landlords, rental agents, and real estate agents have been known to suggest to applicants that they might be “more comfortable” living elsewhere “with their own kind.”

“Testing” the practices of real estate practitioners, in both ownership and rental housing, has long been a valuable and reliable tool for uncovering discriminatory practices that are at the heart of creating and maintaining minority concentrations. Testing can help determine the extent of steering, if any, by real estate professionals in Houston’s metropolitan area.

2. A. Houston should arrange with a qualified fair housing organization to conduct an ongoing, systematic, and thorough testing program to identify any discriminatory practices in rental and for sale housing, particularly steering. Tests should be conducted according to standards that would make their findings admissible in court proceedings. To bring an end to such practices, it is crucial that Houston follow up when testing uncovers discriminatory practices or policies by filing housing discrimination complaints against offending real estate practitioners with the U.S. Department of Housing and Urban Development or by filing lawsuits. And it is important that the findings of the testing be widely reported in language that lay people can easily understand. Testing should seek to uncover illegal discriminatory practices including, but not limited to, steering and differential treatment based on disability, familial status, religion, race, national origin, and gender. In person testing and telephone testing can be used.⁹ Time frame: Initiate testing within one year. Continue systematic testing each year.

Real estate testing is eligible for Community Development Block Grant funds.

2. B. In the absence of housing affordable to households with modest incomes in many Houston super neighborhoods, Housing Choice Vouchers offer households with modest incomes one of their few avenues to opportunity and upward mobility. The city needs to learn the extent, if any, of source of income discrimination in Houston and environs. Houston should commission testing to determine the extent, if any, to which landlords are refusing to rent to oth-

9. For an introduction to testing, see the articles in *Evidence Matters* (Washington, DC: U.S. Dept. of Housing and Urban Development, Spring/Summer 2014). The city would be well advised to retain the services of an organization experienced in real estate testing.

erwise qualified candidates who hold a Housing Choice Voucher. While 12 states and at least 45 cities have outlawed this “source of income” discrimination to at least some extent, Austin is the only city in Texas to outlaw it.¹⁰ Time frame: Conduct testing within two years. If needed, adopt a source of income ordinance within year three.

2. C. Houston should also have studies conducted to determine whether lenders are engaging in mortgage pricing practices unrelated to creditworthiness and mortgage redlining. It should commission studies to determine whether insurance redlining is taking place and whether there is discrimination in real estate appraisals. Time frame: Initiate in year one with completion by year three.

2. D. Print and online advertisements for homes and apartments have used language and photos to discourage protected classes from even looking at the advertised housing. The city should commission a study to examine print and online real estate advertising as well as the websites of real estate and rental firms to identify any discriminatory practices. Time frame: Complete in year one.

Reducing Economic Stratification

Impediment #3 While there is a serious need to expand where households will look for housing, the lower median household income of most minority groups and the relatively high cost of housing in many parts of Houston simply puts those areas out of reach. But those are the areas that offer their residents higher opportunities and avenues to upward mobility. One aspect of affirmatively furthering fair housing is enabling households of modest means to live in parts of a city with greater access to higher opportunities, which invariably are areas outside lower-income housing concentrations. As reported earlier, Houston is among the most economically stratified large jurisdictions in the nation. The absence of dwellings in these higher opportunity — and more expensive — neighborhoods that minority and Caucasian households with modest incomes can afford imposes a steep barrier to upward mobility.

3. Recommendations to Reduce Economic Stratification

While the differences between the actual composition of households and the composition expected in a free housing market absent discrimination identified in Part 1 of this study can eventually be alleviated by bringing an end to discriminatory real estate practices, households of any race with a modest income are still effectively excluded from living in the city’s middle and higher income neighborhoods due to a lack of housing they can afford — further exacerbating economic stratification throughout Houston.

10. *Expanding Choice: Practical Strategies For Building A Successful Housing Mobility Program* (Washington, DC: Poverty & Race Research Action Council, March 2015) Appendix B, 1–2, available at <http://www.prrac.org/projects/expandingchoice.php>; and “Source of Income Discrimination,” in *Tenant Talk* (Washington, DC: National Low Income Housing Coalition), Vol. 4, Issue 2, 10–11.

Like elsewhere, without government subsidies, Houston developers construct only housing that wealthier households can afford to buy or rent. To expand their housing choices and to give the city's children from lesser-income homes a realistic shot at living the American Dream, Houston needs new construction and rehabilitation of existing dwellings to increase the supply of housing affordable to modest income Houston households of all races and ethnicities outside the areas with significant concentrations of minorities and lesser-income households.

3. A. Houston should amend Chapter 42 of its codes, "Subdivisions, Developments, and Platting," to provide an appropriate density bonus to sell or rent at least 15 percent of the units in *all* subdivisions and multifamily buildings with 20 or more dwelling units affordable to households with modest incomes (low- and moderate-incomes). The requirement and density bonus should be mandatory. The ordinance should require that the affordable units be dispersed throughout the subdivision. Time frame: Amend Chapter 42 and implement the amendment within two years.

There is nothing new about an affordable housing requirement and density bonus like this. Cities and counties throughout the nation have used it since the 1970s to get developers to include in their new developments dwellings affordable to households of modest means that would otherwise be out of reach to all but higher income households. Affordable housing requirements like this have opened the door to upward mobility and the American Dream throughout the nation without harming the developer's profits or property values. It is one of the most effective tools available to get affordable housing built outside lower-income neighborhoods.

Throughout the nation, most of the cities and counties that have established affordable housing/density bonus requirements like that proposed here have made them mandatory. Voluntary requirements produce far fewer affordable units. In many jurisdictions they produce none

The American Planning Association, which has exhaustively studied this question reports:

"With inclusionary zoning, the path most chosen appears to be the more desirable. The experience of municipalities and counties nationwide demonstrates that mandatory inclusionary [housing] works as a practical and effective tool for creating affordable housing. While the success of voluntary programs is contingent on the availability of subsidies and aggressive staff implementation, mandatory programs have produced more affordable units overall, as well as more units for a wider range of income levels within the affordability spectrum — all without stifling development."¹¹

11. "The Inclusionary Housing Debate: The Effectiveness of Mandatory Programs Over Voluntary Programs," in *Zoning Practice* (Chicago: American Planning Association, Sept. 2004). Also see "Inclusionary Zoning: A Viable Solution to the Affordable Housing Crisis?" in *New Century Housing*, Vol. 1, Issue 2 (Oct. 2000) 19–20; "Inclusionary Housing" in *PAS Quick Notes No. 7* (Chicago: American Planning Association, 2006) 2; N. Brunick, L. Goldberg, S. Levine, *Voluntary or Manda-*

It is also critical that a density bonus be provided that enables the developer to make at least as much profit as she would without the inclusionary requirement. This density bonus avoids any constitutional “takings” issues.

When a jurisdiction starts to seriously consider an affordable housing requirement, it is not uncommon for developers to rush development proposals to beat the date on which the law would go into effect so they can avoid being subject to the forthcoming requirement.¹² It is critical that when Houston begins to study how to implement an affordable housing requirement, the city take steps to prevent avoidance of the forthcoming requirement. One option is to amend Chapter 42 to condition approval of all new developments on the developer agreeing to comply with whatever affordable housing requirement the city adopts. A more drastic and less desirable option is to establish a moratorium on new residential building permits until affordable housing provisions go into effect.

3. B. The City of Houston should place a restrictive covenant on land it has banked for possible residential development that requires at least 15 percent of the dwelling units built to be affordable to households of modest means, namely low- and moderate-income households as defined by the U.S. Department of Housing and Urban Development. Time frame: Year one.

The City of Houston engages in land banking in which the city purchases land for future sale to developers. The city is certainly entitled to place this sort of a restrictive covenant on the land it owns that will require future purchasers to reserve a designated percentage of dwelling units for affordable housing. The restrictive covenants should also specify that the affordable units must be scattered throughout the development, not clustered together, and that no more than the designated percentage of units in any residential structure can be affordable units. This restriction will prevent the creation of economic stratification in developments built on land banked property.

3. C. Any affordable housing requirement that Houston adopts — be it by amending the subdivision ordinance or through restrictive covenants on banked land — should include provisions that give the Houston Housing Authority priority to purchase affordable units to provide scattered-site public housing and to rent units to holders of Housing Choice Vouchers. Time frame: First year.

In every large city there is an urgent need for children from lower-income households to be able to attend schools where at least a majority of pupils come from more affluent households. Under the current school attendance policies, this need can be met most effectively if Houston emulates the very successful affordable housing requirement in Montgomery County, Maryland where more

tory Inclusionary Housing? Production, Predictability, and Enforcement (Chicago, IL: Business and Professional People for the Public Interest, Nov. 2003).

12. The District of Columbia is the latest example where developers rushed 12,000 units through the approval process to avoid being subject to the new affordable housing requirement that went into effect in 2007. Six years later, only a handful of those developments had actually been built. See Planning/Communications, *District of Columbia Analysis of Impediments to Fair Housing Choice 2006–2011* (River Forest, IL: Planning/Communications, April 2012) 155.

than 1,000 scattered-site public housing units and Housing Choice Voucher units have been built in middle- and upper middle-class neighborhoods throughout the county.

3. D. To preserve existing housing affordable to households of modest means, Houston should look closely at leveraging Community Development Block Grant monies and other funds to facilitate the conversion of rental properties, including public housing, to limited-equity cooperatives.

Limited-equity cooperatives¹³ have been one of the nation's most successful forms of ownership housing for households of modest means. Over time, this form of homeownership keeps the dwelling units affordable to the same income cohort to which it was initially targeted — unlike housing subsidies, low-equity cooperatives offer housing that is permanently affordable to households in its targeted income range. It does this two ways. First, there is a mortgage only on the building or buildings in the low-equity cooperative, not on each individual dwelling unit. So the monthly mortgage payment, which usually constitutes the largest ownership expense, does not go up every time a unit changes hands. Second, the low-equity cooperative limits how much the price of ownership shares can increase.

All cooperatives are owned by a cooperative association comprised of the cooperatives' residents. Like the owner of any cooperative, each household in a low-equity cooperative buys a share in the cooperative association which entitles it to occupy a dwelling unit in the cooperative. The articles of incorporation or the by-laws of a low-equity cooperative set a limit on how much the resale price of a share can increase each year. The maximum increase is usually tied to increases in the Consumer Price Index (CPI) or some other measure of inflation. This practice is what keeps the low-equity cooperative affordable to the same income group for which it was originally intended.¹⁴

Each month the resident household pays the cooperative association its share of the mortgage on the cooperative, its share of property taxes, and its share of monthly operating expenses, including insurance and a contribution to the cooperative's reserve. Owners of a share in a limited-equity cooperative get to deduct their mortgage interest and property taxes from federal income tax exactly like all other home owners.

Low-equity cooperative residents save money because their monthly costs rise much more slowly than in conventionally-owned housing. The mortgage payment on the cooperative remains the same because a new mortgage — the single largest component of homeownership costs — is not needed whenever a unit changes hands like it does with the sale of a condominium, house, market rate cooperative, or town home. Because monthly costs rise much more slowly than under these other forms of home ownership, many residents of low-equity

13. Also known as "low-equity cooperatives." Any physical type of housing — multi-family and single-family — can be owned as a low-equity cooperative.

14. One form of limited-equity cooperative is the no-yield cooperative where the cost of the share is fixed and does not rise.

cooperatives are able to save money to later purchase a house or condominium without *any* government assistance.

The premier low-equity cooperative program is that of the District of Columbia where the District leverages Community Development Block Grant monies to issue interest-free loans to cover the soft costs (architectural, legal, engineering, etc.) of converting rental buildings to limited-equity cooperatives. The low-equity cooperative association repays the CDBG loan when it obtains permanent financing on the private market.¹⁵

The city might also want to look at encouraging developers of housing produced with Low Income Housing Tax Credits (LIHTC) to develop the housing as limited-equity cooperatives rather than rental housing if that is permissible under the LIHTC program.

It will take some time to research this option that offers the City of Houston a very promising means to preserve affordable housing and turn renters into home owners at a price they can afford now and in the long run. Time frame: Three years.

3. E. The City of Houston should establish siting policies for housing built with Low Income Housing Tax Credits that affirmatively further fair housing choice by locating such housing outside low-income and minority enclaves. Time frame: Six months.

Incorporating Fair Housing into the Planning and Subdivision Processes

Impediment #4 Like most other cities, Houston does not appear to have integrated affirmatively furthering fair housing choice into its planning processes and implementation tools. It is critical that the city incorporate affirmatively furthering fair housing into all aspects of its planning and subdivision processes that can affect the creation and maintenance of the racial, ethnic, and economic stratification that encompasses nearly all of Houston.

4. Adding Fair Housing to the Planning and Subdivision Processes

4. A. In writing its *General Plan*, the City of Houston should establish a goal and directly address how to reduce existing economic and racial/ethnic stratification and instead foster socio-economic diversity *throughout* the city.

As of this writing, the plan's vision statement is:

Houston offers opportunity for all. We celebrate our diversity of people, ideas, economy, culture, and places. We promote healthy and re-

15. Details on how these programs work in the nation's capital are available beginning on page 150 of the *District of Columbia Analysis of Impediments to Fair Housing Choice 2006–2011* available online at <http://www.planningcommunications.com>. The District of Columbia is offered only as an example of the successful use of limited-equity cooperatives to preserve housing affordable to households of modest means.

silient communities through smart civic investments, dynamic partnerships, education, and innovation. Houston is the place where anyone can prosper and feel at home.

Houston: Opportunity. Diversity. Community. Home.¹⁶

According to the draft goal statement, “Goals further describe the vision and lay the foundation for identifying broad strategies for accomplishing the vision.” As of this writing, one draft goal for the *General Plan* touches on these concerns: “An integrated community that reflects our international heritage.”

Houston needs to establish more specific goals, objectives, policies, and strategies in its *General Plan*, expected to be completed before 2016, to achieve racial, Latino, and economic diversity *throughout* the city, prevent the creation of racially- and ethnically-segregated neighborhoods as well as economically-isolated neighborhoods, reduce existing levels of racial, ethnic, and economic segregation, and maintain existing stable, integrated neighborhoods.

It will take many generations of implementation efforts to achieve these goals. The longer Houston delays directly addressing these conditions, the more difficult it will be to reduce racial, Hispanic, and economic stratification and instead foster integration throughout the city, and to reverse current demographic patterns that are due in large part to historical and/or present discrimination that distorts the free market in housing. Time frame: By the end of 2015.

4. B. Subdivision and building permit approval should require developers of all residential developments and buildings to formally commit to take the steps needed to affirmatively further fair housing choice. The city should require every developer to comply with the guidelines suggested below in order to receive subdivision approval and/or a building permit.

Houston’s planning process needs to directly address fair housing issues that the city can help resolve and fair housing violations that the city can help prevent. The underlying concepts are to not only ensure that new housing is accessible to people with disabilities as the Americans With Disabilities Act and Fair Housing Act require, but to also make home seekers aware of the full array of housing choices available to them and to feel welcome in the proposed development. A number of cities including Hazel Crest and Matteson, Illinois have adopted ordinances that effectively require compliance with the Fair Housing Act to receive building permits or land-use control approval for new construction of all housing. A building permit cannot be issued until the city approves the developer’s plans for compliance.¹⁷

Houston should also require a developer or landlord to produce and implement a marketing plan to fulfill the mandates of fair housing laws and affirma-

16. Documents related to the developing *General Plan* are available online at <http://planhouston.gov>. As of this writing, the City of Houston is seeking feedback on this vision statement.

17. James Engstrom, *Municipal Fair Housing Notebook: A Description of Local Ordinances, Tools, and Strategies for Promoting a Unitary Housing Market* (Park Forest, IL: Fair Housing Legal Action Committee, 1983), 11, 97.

tively furthering fair housing choice.¹⁸ Goals could be established and a record could be kept on the racial/ethnic composition of current occupants and those looking for housing in the building or development solely to enable evaluating the plan's effectiveness. The legality of these types of requirements was upheld in federal court in *South Suburban Housing Center v. Board of Realtors*.¹⁹

For the developer or landlord, compliance with fair housing laws involves more than not overtly refusing to sell or rent to somebody due to the protected characteristic of the home seeker. It means taking positive steps to promote traffic from racial or ethnic groups "traditionally" unlikely to look at their housing.²⁰ Building permits and subdivision approval should require some or all of the following recommendations.

4. C. To receive subdivision approval, a developer should agree to produce print and Internet advertising targeted to the racial or ethnic groups whose actual percentages in the census tract and/or super neighborhood is 15 or more percentage points less than expected in a free housing market as shown in the tables in Part 1 of this study. To show that all are welcome to move to the advertised building or development, photographs and videos of models portraying residents or potential residents should reflect as much of the full diversity of Houston as feasible.

4. D. If a developer uses billboards to advertise her development, the billboards should use models to portray residents or potential residents who reflect Houston's rich diversity to show that all are welcome to move to the advertised building or development. Billboards should show people of different races and Latino ethnicity as well as families with children and people with mobility limitations. While no billboard could show *all* of the different protected classes, each billboard can show a variety of groups to indicate to viewers that the development is open to all in accord with state and federal law.

4. E. The developer and sales agents should give every client who comes to look at housing a brochure that clearly identifies illegal discriminatory practices and provides clear contact information on how and where to file a fair housing complaint. The city might want to provide a PDF file to each developer, real estate firm, landlord, and rental management firm to print — or

18. Marketing in accord with the Fair Housing Act is nothing new. The precursor of modern fair housing marketing rests in the 1972 federal government requirement that all developers who use Federal Housing Administration insurance must file an "affirmative marketing plan" with the U.S. Department of Housing and Urban Development to encourage a racially-integrated housing market. These plans are to specify "efforts to reach those persons who traditionally would not have been expected to apply for housing." Quoted in Phyllis Nelson, *Marketing Your Housing Complex in 1985* (Homewood, IL: South Suburban Housing Center, 1985), 10.

19. 713 F.Supp. 1069, 1086 (1989).

20. We are assuming that the building codes that the City of Houston has adopted incorporate the accessibility requirements of the Americans With Disabilities Act and the Fair Housing Act. If these requirements have not been incorporated yet, the City of Houston should amend these codes to comply with both national statutes.

provide printed brochures. Testers should be sent to each firm at least every two or three years to see if they are in compliance.

4. F. All print display advertising and online advertising as well as all printed brochures should include the Fair Housing logo and/or the phrase “Equal Opportunity Housing” and contact information to file a housing discrimination complaint. The city should also encourage the newspapers and magazines that publish real estate advertising to routinely publish a notice in non-bureaucratic language about how to recognize housing discrimination and how to file a housing discrimination complaint.

4. G. A building permit should be issued only if the proposed residential structure complies with the accessibility requirements of the Americans With Disabilities Act (ADA) and Fair Housing Act. Federal law has required compliance for over two decades. Every local jurisdiction should require compliance before issuing a building permit.

State Statutes Obstruct Cities’ Ability to Implement Fair Housing Choice

Impediment #5

It appears that several state statutes limiting the regulatory power of Texas municipalities deny the City of Houston and other Texas localities two key tools needed to affirmatively further fair housing. Section 214.905(b)(1) of the state statutes may prohibit the sort of mandatory affordable housing/density bonus requirement for ownership housing proposed in this document. If the state statute is interpreted to prohibit this kind of mandatory requirement, it creates a barrier to fair housing choice and affirmatively furthering fair housing. The state’s recently adopted prohibition of local source of income protection stymies fair housing and affirmatively furthering fair housing choice if testing shows a need for source of income protection for households that hold a Section 8 Housing Choice Voucher.

In 2005 the State of Texas may have prohibited mandatory inclusionary land-use regulations that offer a density bonus or other incentive for including housing that would “increase the supply of moderate or lower-cost housing units.”

5. Removing State Obstacles to Achieving Fair Housing Choice

5. A. Houston and other Texas municipalities should seek clarification whether Section 214.905(b)(1) prohibits mandatory affordable housing/density bonus requirements as proposed in this chapter. If the law is determined to allow *only voluntary* affordable housing/density bonus requirements, Texas municipalities should seek to amend the state statute to allow local government to establish mandatory requirements. Time frame: Two years.

Ten years ago, the state legislature amended Chapter 214, Municipal Regulation of Housing and Other Structures with Section 214.905. “Prohibition of Cer-

tain Municipal Requirements Regarding Sales of Housing Units or Residential Lots.”²¹ The statute reads:

- (a) A municipality may not adopt a requirement in any form, including through an ordinance or regulation or as a condition for granting a building permit, that establishes a maximum sales price for a privately produced housing unit or residential building lot.
- (b) This section does not affect any authority of a municipality to:
 - (1) create or implement an incentive, contract commitment, density bonus, or other voluntary program designed to increase the supply of moderate or lower-cost housing units; or
 - (2) adopt a requirement applicable to an area served under the provisions of Chapter 373A, Local Government Code, which authorizes homestead preservation districts, if such chapter is created by an act of the legislature.
- (c) This section does not apply to a requirement adopted by a municipality for an area as a part of a development agreement entered into before September 1, 2005.
- (d) This section does not apply to property that is part of an urban land bank program.²²

Whether or not this statute constitutes an impediment to fair housing hinges on how paragraph (b)(1) is interpreted. A legal analysis of the legislative history and statutory construction is needed to determine whether the phrase “other voluntary program” limits “an incentive, contract commitment, density bonus” to voluntary programs or the phrase simply is referring to other programs that are voluntary.

As discussed earlier in this chapter, voluntary affordable housing requirements coupled with a density bonus tend to produce little or no affordable dwelling units. Mandatory requirements with a density bonus, however, have been quite successful. If the statute is found to limit “an incentive, contracts commitment, density bonus” to voluntary requirements, this statute impedes fair housing and obstructs efforts to affirmatively further fair housing choice.

Note that this statute applies only to ownership housing. Texas cities like Houston are free to adopt measures that require a specified percentage of rental units to be affordable to households of lower incomes when a density bonus is granted.

5. B. This spring, the Texas legislature passed a bill that prohibits any municipality or county from adopting or enforcing any ordinance or regulation that prohibits refusing to rent due to the prospective tenant receiving “funding from a federal housing assistance program” — namely a Housing Choice

21. Act 2005, 79th Leg. Ch. 917 (H.B. 265), Sec. 1, effective Sept. 1, 2005.

22. Texas Local Government Code Annotated, Chpt. 214, Sec. 214.905 (2015).

Voucher. Once the governor signs this bill,²³ this statute will erect a barrier to fair housing choice and deny Houston and other Texas localities an important tool to affirmatively further fair housing by reducing economic, racial, and Latino stratification. Houston and other Texas municipalities should seek repeal of Senate Bill 267. Time frame: Two years.

As discussed earlier in this chapter, the refusal to rent to an otherwise qualified household that holds a Housing Choice Voucher is among the practices that real estate testing can uncover. While the nation's Fair Housing Act does not include source of income as a protected class, the absence of source of income protection tends to create a barrier to economic, racial, and ethnic integration by allowing the systematic exclusion of lower-income households from the higher opportunity neighborhoods that can facilitate upward mobility which contributes to perpetuating segregation.

The new Texas statute, however, does *not* affect any local law or regulation “that prohibits the refusal to lease or rent a housing accommodation to a military veteran because of the veteran’s lawful source of income to pay rent.”²⁴ So Houston could pass an ordinance that provides source of income protection to military veterans. The statute also exempts programs with density bonuses for providing housing affordable to lower-income households.²⁵

This statute was introduced and passed within months of the City of Austin adopting an ordinance that established source of income protection. The state statute effectively eliminates part of the settlement of a 2010 housing discrimination complaint between the City of Dallas and the U.S. Department of Housing and Urban Development.²⁶

23. It is widely assumed that the governor will sign this bill. This report assumes that the bill will be signed.

24. 84th Leg. S.B. 267, Sec. 1(b), effective Sept. 1, 2015 if signed by the governor.

25. *Ibid.* Sec. 1(c).

26. The settlement required the City of Dallas to “consider” adopting source of income protection that would include Housing Choice Vouchers. Senate Bill 267 effectively takes consideration of this off the table. Tom Benning, “Bill would wipe out part of Dallas’ settlement with federal housing agency,” in *Dallas Morning News*, published online May 22, 2015.

Appendix 5: Written Comments and Responses



February 10, 2015

City of Houston Housing & Community
Development Department
601 Sawyer St.
Houston, TX 77007

Dear Neal Rackleff:

Texas Organizing Project (TOP) would like to thank the Houston Housing & Community Development Department (HCDD) for hosting the Fair Housing Forum held January 29, 2015. We were pleased that HCDD provided an unconventional platform to receive feedback from the general public regarding upcoming plans. Although Q&A opportunities were scheduled at the end of each panel discussion, there was not sufficient time for TOP and other community members to ask questions and receive feedback. We want to make sure our comments regarding fair housing impediments and practices are directly communicated to HCDD. TOP has provided feedback about the Forum and comments to be considered as HCDD drafts its Consolidated Plan.

Forum Feedback:

1. All of the information was beneficial, however it was not presented in a way that community participants could interpret much of it. Although community members can appreciate the technical information, it should be relayed in a way that is accessible and comprehensible to all audience members.
2. Impacted community representation in the audience was disproportionate. There was a strong presence of housing industry professionals and city & county government.
3. There was not enough time after each presentation for sufficient Q&A from the audience. On 2 occasions HCDD staff posed questions to the panel, which took time away from the audience to ask questions.
4. The legal panel was not diverse. There was no representation of Civil Rights attorneys or community members that may have filed fair housing complaints that could provide insight from a community perspective.
5. The forum ended much earlier than scheduled, yet insufficient time was provided for proper questions and answers.
6. Feedback from each group was collected during the breakout sessions, but each table did not have an opportunity to report on the outcomes of their discussions. It also remains unclear as to how and if the collected information will be shared with the public. Voting on the most critical vote did not best represent some of the community representatives' needs. In some cases, table participants simply voted for points that had the most votes. This process was disproportionate and community representatives' votes were suppressed.
7. Though the venue was nice, the location was not conducive for optimal community participation.



8. No community members were invited to participate on the panel discussions. While its great to get expert information, its equally important for the general public to hear how fair housing affects impacted populations.
9. In an effort to provide a better balance in audience representation, HCDD should endeavor to set attendance and participation goals aiming to get 60% community involvement and 40% agency, City and County participation,

Consolidated Plan Comments:

1. Low income and minority populations' options for housing choice are very limited across the City. Subsidized housing is largely located in low-income and heavily concentrated minority areas with poor quality services.
2. Currently there are no routinely funded City programs in place for low income family or senior single family home repair.
3. Non disaster CDBG funds have been allocated for a housing repair program for Fort Bend area/west of 288, but not for the rest of the City. RFP was released by HCDD, but only 1 responding organization qualified to carry out the program. The organization has only has the capacity to serve this small area of Houston. How will the needs for housing repair be met for the rest of Houston? How many people are aware of this resource?
4. City seems to have a lack of communication and coordination within its departments; ex: Metro realignment, school closings occurring in CRAs where private investment is encouraged, not discouraged.
5. Segregated housing leads to segregated schools, which results in inequality among Houston ISD students. Both racial and income segregation leads to this inequity.
6. The strongest markets, according to the HCDD commissioned MVA, have the fewest environmental hazards, little to no subsidized housing, and a very white, non-Hispanic population. Low-income minorities are being excluded from accessing the higher quality services in these areas. (Refer to attached racial dot map)
7. There's currently no robust Fair Housing complaint process and the City has not proven to be proactive about addressing fair housing violation. A 1-800 number has been established to report fair housing complaints, but the follow up process is unclear. What happens to the data collected regarding fair housing complaints?
8. The City should partner with organizations such as Greater Houston Fair Housing Center and Houston Area Urban League to engage in a proactive anti-discrimination campaign through matched-pairs testing.
9. City should self evaluate their current policies that may cause unintentional housing discrimination. i.e. look at the siting of environmental hazards, nuisance-prone land uses.
10. The City should consider utilizing the large amount of sociological research performed on Houston as a guide for how to shape future polices and ordinances.
11. City must acknowledge and embrace their responsibility to Affirmatively Further Fair Housing in everything that they do.
12. The City should not incentivize low-income housing developments in already low-income, low-opportunity neighborhoods, especially when substantial public and private investments are not simultaneously being made in these areas. Further concentrating poverty discourages other investment that these areas urgently need such as quality grocery stores, sidewalks, and other services.



13. City should send at least 1 mailing per year, to every household regarding Houston residents' fair housing rights and the navigation of the process when reporting violations.
14. All provided community recommendations should be included and considered as collected data to inform the Consolidated Plan.

We thank you again for the open communication that we have established over the last few years in the interest of our communities. We are confident that you will receive this letter as TOP's attempt to provide significant feedback that may not otherwise be received from low income and minority communities. Upon receipt, we anticipate the City providing a response to our observations and concerns. Please let us know if you have questions or would like for us to elaborate on some of our noted issues.

Sincerely,

Texas Organizing Project

Enclosure

cc: Christina Lewis, Director Houston Field Office, Fair Housing & Equal Opportunity,
U.S. Department of Housing and Urban Development



CITY OF HOUSTON
Housing and Community Development

Annise D. Parker

Mayor

Neal Rackleff, Director
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April 29, 2015

Texas Organizing Project
1609 Shoal Creek Blvd.
STE 201
Austin, TX 78701

Subject: Comments on the City of Houston's (City) 2010 Amended Analysis of Impediments (AI) to Fair Housing Choice

Attn: Tarsha Jackson

Ladies and Gentlemen:

This letter is written in response to your letter dated February 10, 2015, wherein you commented on the Fair Housing Forum that was held on January 29, 2015. In your comments, you make specific mention of the location and audience; recommend impediments that should be included in the City's AI; and request comments to be included in the 2015 – 2019 Consolidated Plan (Con Plan). The comment period ended on April 13, 2015. All comments and responses received during the public comment period will now be included in the Con Plan.

We would like to reiterate that we used various methods of public engagement to collect data for the AI and Con Plan. TOP played an integral part in our neighborhood discussion groups, which included reviewing HCDD's presentations, identifying neighborhood outreach, and bringing people to the table through TOP's own advertisement. Also, we solicited and received input from Mr. Henneberger's office regarding the Fair Housing Forum, sought suggestions on invitees, and used all feedback given.

As you are aware, the Fair Housing Act of 1968 prohibits discrimination in housing because of: (1) race, (2) color, (3) national origin, (4) religion, (5) sex, (6) familial status (including children under the age of 18 living with parents or legal custodians, pregnant women and people securing custody of children under 18), and (7) disability. Thus, the aim for the Fair Housing Forum was to integrate the broader community of residents, businesses, representatives of public and private agencies, government staff, and persons of all incomes levels. This wide range of attendees was able to suggest impediments and recommend strategies based on their personal experiences or through their work in environments where data and research inform their knowledge of certain impediments. Further, we wanted to present an environment where participants could work together, could discuss and dialogue among themselves, and where they could prepare and submit identified impediments, in writing. These impediments were then synthesized by consultants who presented them in a report that has been used to inform the AI. A testimony-styled forum would have made it more difficult to provide this kind of succinct documentation to support the AI.

Council Members: Brenda Stardig Jerry Davis Ellen R. Cohen Dwight A. Boykins Dave Martin Richard Nguyen Oliver Pennington Edward Gonzalez
Robert Gallegos Mike Laster Larry V. Green Stephen C. Costello David W. Robinson Michael Kubosh C.O. "Brad" Bradford Jack Christie
Controller: Ronald C. Green

We appreciate TOP's participation and continue to review your information to determine where we might incorporate your data and recommendations. We will contact you shortly to schedule a meeting as we work toward completing the final 2015 AI. We look forward to continued collaboration with our community partners, including the Texas Organizing Project, to identify and eliminate barriers to fair housing choice in Houston.

Sincerely,



Neal Rackleff
Director

Walker, Millie - HCD

From: Maddie Sloan <msloan@texasappleseed.net>
Sent: Monday, April 13, 2015 11:15 PM
To: Walker, Millie - HCD
Cc: Rackleff, Neal - HCD; John Henneberger; Chishelle Palay
Subject: Additional Comments of TxLIHIS and Appleseed on the Draft AI and Con Plan
Attachments: Appleseed-TxLIHIS Comments on Houston's 2015 Con Plan and AI.pdf

Dear Ms. Walker:

Attached please find our additional comments on the City of Houston's Draft 2015-2019 AI and Con Plan.

Thank you,
Maddie

Madison Sloan
Director, Disaster Recovery and Fair Housing Project
Texas Appleseed
1609 Shoal Creek, Suite 201
Austin, Texas 78701
512-473-2800 ext. 108
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www.texasappleseed.net



April 13, 2015

Ms. Millie Walker
Planning and Grants Management Division
City of Houston, Department of Housing
and Community Development
601 Sawyer Street, Suite 400
Houston, TX 77007

**Comments on the City of Houston Draft 2015–2019 Consolidated Plan, Draft 2015 Annual Action Plan,
and Draft 2015 Analysis of Impediments**

Dear Ms. Walker:

Following please find the additional comments of Texas Appleseed and Texas Low-Income Housing Information Service (TxLIHIS) on the City of Houston’s 2015-2019 Consolidated Plan (Con Plan), Annual Action Plan, and Analysis of Impediments to Fair Housing Choice (AI). We provide these to supplement the comments previously submitted by John Henneberger on behalf of our organizations and the Texas Organizing Project.

The City of Houston receives a substantial amount of money from HUD and engages in actions that are related to housing and community development and, therefore, is required to affirmatively further fair housing in all its activities. As part of the obligation to affirmatively further fair housing, the city is required to prepare an Analysis of Impediments (AI) to fair housing choice; take actions to overcome impediments; and maintain records of actions taken. The Con Plan and Action Plan should reflect the City’s commitment to taking meaningful action to overcome the impediments identified in the AI and contain programs and actions that address the impediments.

The City’s obligations to affirmatively further fair housing fall into two categories: ensuring the availability of free housing choice in all areas of the City; and addressing the neighborhood inequity produced by decades of failure to redress the effects of government-sponsored segregation. The Analysis of Impediments to Fair Housing (AI) is a critically important document that will coordinate the City of Houston’s efforts, through its Con Plan, Action Plan, and other actions, to comply with fair housing requirements and to achieve the dual goals of the Fair Housing Act: ending housing discrimination and achieving integrated communities with equal access to opportunity.

I. Draft Analysis of Impediments

The Draft 2015-2019 AI is a substantive and well documented examination of a set of impediments to fair housing in Houston, and the Department of Housing and Community Development (HCDD) has identified several areas in which it is conducting ongoing and valuable research, including a Free Market Analysis of segregation. HCDD has addressed many of the deficiencies in its 2010 AI, including a detailed analysis of segregation, and included data suggested by HUD, including data on transportation, school quality, and environmental hazards. The Draft AI also identifies specific actions with measurable outcomes.

While we appreciate these significant improvements, there are some remaining, and substantial, deficiencies in the Draft and the associated Con Plan and Annual Action Plan.

1. Lack of Involvement and Investment by other City Departments

The City of Houston is the recipient of federal funds. This is the City of Houston's Analysis of Impediments to Fair Housing Choice, not the Department of Housing and Community Development's Analysis of Impediments to Fair Housing Choice. However, that is not reflected in the Draft AI. For example, HCDD is the agency solely responsible for carrying out the actions steps identified. The fact that the Draft AI addresses impediments almost exclusively in light of HCDD's role explains several of the deficiencies we identify below.

HCDD acknowledges, in the Con Plan, that "HCDD cannot achieve these goals alone" and that "other City of Houston Departments provide services to low-and moderate income residents by utilizing funding from various sources." The City of Houston cannot delegate its AFFH obligations entirely to HCDD, the rest of the City's departments and planning processes must incorporate their pieces of the City's civil rights and fair housing obligations.¹

2. Impediment #11

Impediment #11 is titled "Low educational attainment Among African Americans and Hispanics." This title is inaccurate and misleading. Low educational attainment by African-American and Hispanic students is not an impediment to fair housing, it is a direct result of government-sponsored segregation and ongoing conditions and affirmative policies that treat schools with high percentages of minority and low-income students inequitably.² Characterizing the impediment this way contributes to the kind of misperceptions and biases that the Draft AI points out in the context of employment:

"Sometimes there is a misconception that those living in poverty are poor because they do not want to work. Because minorities, people that do not speak English at home, and persons with disabilities are overrepresented in poverty, this may fuel the misconception that minorities and certain protected classes do not want to work. Of individuals over 16 who are in poverty, just under half are in the labor force and one third are employed."

Disparities in educational attainment are a result of existing impediments to fair housing choice, not an

¹ Other Departments that administer federal programs or funds also have civil rights obligations of their own under Title VI of the Civil Rights Act of 1964.

impediment in themselves.

HCDD has conducted an analysis of where high and low-performing schools are located, as suggested by HUD in its 2011 letter. However, HUD's letter also stated that this data should "suggest neighborhoods for development of affordable housing, especially for families with children." Funding afterschool programs is in no way a meaningful response to the impediment of educational inequity, and highlights the City's failure to address its obligation to ensure that there is housing choice for protected classes in higher opportunity areas.

3. The myth of self-segregation by minority groups

The Draft AI suggests several times that segregation "could also represent that people of various race and ethnicities choose to live in areas with others of similar race or ethnicity." While the City is careful not to say this is a major factor in the production and replication of segregation, it is important to look at actual research on this issue, as a preference for self-segregation varies widely between whites and members of racial and ethnic minority groups.

For example, studies of residential preferences have generally found that whites are willing to live with only a limited number of African American neighbors while African Americans are open to a much more diverse range of neighborhoods and prefer a "50-50" neighborhood over an all-white or all-black neighborhood.³ While self-segregation is real, the issue is that whites prefer to self-segregate, while African-Americans prefer to live in integrated settings.

4. Familial Status Discrimination

The sole examples of familial status discrimination cited in the Draft AI are examples of direct discrimination by landlords. However, another virulent form of anti-family discrimination that has a broad impact on the ability of families to access safe neighborhoods with good schools is opposition to the development of multifamily housing. This opposition takes the form not only of NIMBY opposition by residents, but also by local officials, including school districts and elected officials, in direct violation of their civil rights obligations.

Discrimination against voucher holders is also often a proxy for familial status discrimination as well as race and disability-based discrimination. This kind of discrimination can be addressed with source-of-income protections.

5. Public Transportation

The City of Houston has a population that relies on public transportation (4.5%) almost double that of the Houston MSA (2.5%) and more than double that of the State of Texas (1.6%), and the population reliant on public transportation is disproportionately African-American and Hispanic. Minorities disproportionately experienced long commute times as well.

The Draft AI states: "[i]t is also noticeable that most of the job centers are on the west side of the city away from the east areas of the city which have the most RCAP/ECAPs. Those areas with racial/ethnic

³ See, e.g. Krysan, Cooper, et.al. "Does Race Matter in Neighborhood Preferences?: Results from a Video Experiment." September, 2009. Available: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3704191/>

and poverty concentrations are longer distances from the larger job centers. . . .Costly commutes or long commuting times can cause higher-waged job to be not worth the long commute,” for example by imposing additional costs for child care, and depriving parents of time with their children, time to pursue educational opportunities, etc.

HCDD’s analysis found that light rail transit was available in areas with higher opportunity index scores, and not available in areas with lower index scores. These geographies were also those that did not have enough transit stops generally. This analysis was based on the current transit map, which will change dramatically in August 2015; an updated analysis that reflects the impact of the Reimagining plan should be conducted.

In February 2015, the METRO board approved implementation of a “System Reimagining” plan starting in August. “The Reimagining Plan also reflects the Board’s change of direction to 80% maximum ridership and 20% maximum coverage, meaning that the new primary goal for METRO will be to maximize the number of people riding instead of bus service that touches every neighborhood.” (emphasis added) In a City as segregated as Houston, this should have raised immediate red flags, and in fact, the proposed cuts to bus service affected African-American and Hispanic neighborhoods – where the Houstonians most reliant on public transit live - almost exclusively. Public opposition has resulted in some restoration of service, but Acres Home, which is 97% African-American, is still facing an almost complete loss of bus service. We have requested copies of any equity analysis METRO conducted related to the Reimagining plan several times under the Public Information Act, but METRO has gone to the Attorney General’s office attempting to prevent the public from knowing whether this analysis was done.

Denial of transit access to minority neighborhoods is a severe impediment to fair housing choice, and may be a serious violation of METRO’s civil rights obligations under Title VI of the Civil Rights Act of 1964.

6. Employment

There are a number of things the City can do to ensure that jobs created benefit low-income Houstonians and help address poverty as an impediment to fair housing choice. Section 3 of the Housing and Community Development Act is one way for the City to ensure that local low-income workers benefit from the investment of public funds. However, the Con Plan says only that “HCDD staff promote Section 3 program by conducting various seminars and workshops to create employment, training, and contracting opportunities for residents and qualified businesses interested in participating in federally assisted projects.” While it refers to HCDD’s responsibility for enforcing Davis-Bacon, there is no reference to enforcement in the discussion of HCDD’s responsibility for Section 3.

7. Population Growth and New Housing Construction

Houston is in the midst of a population and housing boom. But the boom has not increased the availability of affordable units, or brought economic benefits to inner city minority neighborhoods. The Draft AI notes that “much of the construction has occurred in greenfield developments in the Houston area outside of the city limits” and many of the multifamily units constructed “are high-end, Class A construction with high rents and smaller units.” Meanwhile, “[o]lder housing stock tends to be located in minority neighborhoods with new construction located in predominately nonminority areas. Older housing stock can be more expensive to maintain and can contain hazards such as lead-based paint,

which is very dangerous to children under six years old with long-term effects and very costly to remediate.”

However, the current market provides HCDD and the City of Houston with an opportunity to leverage developer incentives to produce more affordable units at deeper levels of affordability. These types of goals and actions are not included in the Draft AI or Con Plan.

8. Failure to Address the Location of Affordable and Assisted Housing

HCDD funds the development and preservation of affordable rental housing through several funding sources including CDBG, HOME, HOPWA, local Bond, and Tax Increment Reinvestment Zone (TIRZ). “HCDD funded units are usually for households earning below 80% AMI although in some circumstances funding could be used for other income groups.” Given rising housing costs in Houston and that the majority of housing need is in the Very Low and Low-Income categories, the City should be using its funding to create greater affordability at those levels.

HUD’s 2011 guidance clearly instructs the City that:

- The AI should include geodemographic data that will allow for review and analysis of past siting decisions for HUD assisted, tax credit and other affordable housing, and include an examination of the siting of such housing both in areas that are concentrated by race or national origin and by poverty and in less concentrated areas that offer higher opportunity.
- A spatial deconcentration analysis would be useful to identify the neighborhoods where housing for low and moderate income residents exist and how the city’s placement of affordable housing may have served to promulgate racial segregation.
- A review of the extent to which placement of this housing has contributed to segregation should be included in the AI.
- In addition, the AI should identify areas of higher opportunity in less concentrated areas which will be targeted for future development of housing.

The Draft AI’s analysis of the location of publicly supported housing found that the five Super Neighborhoods with the most developments of publicly supported housing were all majority minority (Sunnyside and Acres Homes are over 95% African-American) and impacted in other ways. Similarly, the majority of Housing Choice Voucher holders lived in minority segregated areas, and almost “no vouchers are found in the most affluent areas.”⁴

The Draft AI analysis revealed that “[t]here are several areas where publicly supported housing is not available, mainly in the area west of downtown bordered by Interstate 10 to the north and Interstate 69 to the south. This is the same area of the city where private market investment is strongest according to the MVA.” In other words, the vast majority of publicly assisted housing in Houston is located in neighborhoods where market value has been limited by the legacy of government-sponsored segregation, including failure to provide equal public infrastructure and services, low quality schools, high levels of poverty and crime, and proximity to environmental hazards.

HUD’s other suggested data and analysis – how the location of housing has perpetuated segregation and the identification of higher opportunity target areas for future housing development - are not addressed

⁴ Not only are the tenants who use this housing disproportionately African-American, they are also disproportionately persons with disabilities.

in the Draft AI, nor is the location of affordable housing addressed in the AI Action Steps, the Con Plan, or the Annual Action Plan. **Continuing to concentrate low income housing in high-poverty and minority concentrated areas perpetuates segregation, denies members of protected classes access to opportunity, and violates the Fair Housing Act.** This is also an issue for homeownership programs, past Homebuyer Assistance programs have forced homebuyers to buy in economically distressed areas of the City, not only denying them housing choice, but frustrating the goal of the program, to help families build wealth.

The number of units produced or homes purchased using CDBG or other public funding is a meaningless metric and inappropriate goal if the location of that housing is not taken into account. In order to meaningfully address one of its largest impediments to fair housing choice, the City of Houston must make a commitment, through its AI and Con Plan and the activities contained in the Annual Action Plan, to prioritizing the production of affordable housing in higher opportunity areas and offering Houstonians the opportunity to live in the neighborhood of their choice.

9. Houston Housing Authority

As both the Draft AI and other analysis have found, the vast majority of the Houston Housing Authority's (HHA) public and assisted housing units are located in minority-segregated, high-poverty, high crime areas without access to quality schools. The vast majority of households HHA serves are African-American.

HHA, however, presents an impediment to fair housing in a way that goes beyond its historically segregated portfolio and ongoing resistance to providing housing choices for its tenants in higher opportunity and more integrated areas. The Housing Authority filed an amicus brief in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project* (Oral Argument January 21, 2015) asking the Supreme Court of the United States to gut the Fair Housing Act, because compliance with the Fair Housing Act would require it to desegregate its housing and provide housing choice by developing units in higher opportunity areas.

The fact that HHA would support a result in *ICP* that would effectively strip its tenants of protection from housing discrimination, particularly on a systemic level, is breathtaking. And it did so while the City of Houston and the Mayor were engaged in passing an Equal Opportunity Ordinance that sought to expand civil rights and fair housing protections.

HHA appears to have no understanding that its obligation to desegregate does not come solely from disparate impact analysis and that it has independent civil rights obligations, including the duty to affirmatively further fair housing, that require it to do so regardless of the Supreme Court's decision in *TDHCA v. ICP*; no understanding of the difference between diversity and segregation; and no understanding of negative impact of concentrating assisted housing in low-income minority neighborhoods. Because the Mayor has the authority to appoint the Housing Authority's board, the City has the power to intervene and ensure that HHA is fulfilling its fair housing and civil rights obligations.

We note that HHA's contention that a lack of funds prevents it from building in higher opportunity areas is currently untrue. HHA has over \$30 million in CDBG-DR funding, giving it resources far beyond its annual budget and funding.

10. Community Asset Indicators and Neighborhood Inequity

HCDD's adoption of community asset indicators to analyze access to opportunity is another example of how advanced the Draft AI's analysis is, particularly compared to other jurisdictions around the United States. The summary of the Community Asset indicators analysis contains the heart of the Analysis of Impediments:

The indicators for community assets have imbalances that can be clearly visualized and quantified. The majority, or clustering, of the community assets are divided into neighborhoods don't have high concentrations of poverty. **There is a geographic pattern in the lack of community assets, which is consistent with the geography of concentrated race, ethnicity, and poverty.** Within this geography is the largest exposure to health hazards in the entire environment of Houston.

The spatial index distribution for job access, transit access, and labor market engagement creates a pattern that is based on where the job centers are located. Transportation lines follow this pattern but access to transportation is widely distributed other than LRT. Labor engagement index scores are clearly divided based on where race/ethnicity and poverty exists. The concern for fair housing choice is that the **location of economic development is a strong determinant for access to community assets**, whereas households in neighborhoods without economic development have imbalances as it relates to access. (emphasis added)

This aligns with the Market Value Analysis' finding that:

Private investment occurs most in neighborhoods where the private market is strongest. Many areas where low income families and/or minority residents live have the least private market investment. Although this MVA only studies one period of time, comparing MVAs at different times could show a pattern that the private market is more likely to invest in locations with low percentages of minority residents and higher median income. Although this would not indicate overt discriminatory practices, it could indicate **that certain areas of the city are in need of market intervention by increasing government spending or services in those areas.** (emphasis added)

In Houston, every single one of the census tracts with a poverty rate of 40% or more is also majority minority, persons with disabilities are overrepresented among persons living in poverty, and families with children are more likely to be living in poverty than families without children. Poverty itself is a stressor that has long-term negative effects on both adults and children.

The location of economic development and public services funding is not described or analyzed (with the exception of one luxury hotel project), but the Draft AI clearly indicates that these investments should be targeted to areas of the city with the least access to community assets.

What's missing from the evaluation of community assets is an assessment of infrastructure disparities. The Con Plan contains a slightly more detailed discussion of infrastructure needs, including drainage and streets, pedestrian improvements like sidewalks that increase mobility for persons with disabilities, access to utilities, and upgrading aging water and wastewater systems. However, the Con Plan states that "[t]he citizen participation process greatly influenced the public improvement needs," and does not mention what kind of data the City uses to evaluate and prioritize infrastructure needs. There may be

infrastructure needs in all areas of the City, but the level of political participation and social capital should have no role in determining how these needs are prioritized. The City's AFFH obligation, in fact, mandates that Houston prioritize specific areas of the City.

For example, while the Draft AI includes the City's history of annexation, and the fact that the persons affected by these annexations have been Hispanic and African-American, it does not include the most relevant point about this history – that these annexed minority areas were never given the same level of public services or infrastructure as white areas of the City. Minority neighborhoods in Houston disproportionately lack access to standard city infrastructure, especially storm water drainage. Many of these communities developed as subdivisions before being annexed by the City.⁵ Platted outside of municipal boundaries, they were not provided engineered storm water drainage systems, and because they were developed for low-income people and people of color, these subdivisions were often located in low lying or flood prone areas. The City annexed these subdivisions but never upgraded city services or corrected flooding. As surrounding areas developed for higher income and non-minority populations they received drainage infrastructure that directed storm water out of those communities and into waterways that ran through the predominately minority subdivisions, further exacerbating community flooding. Many of these neighborhoods still do not have engineered drainage.

In addition to a comparison of infrastructure conditions between neighborhoods in order to prioritize areas with greatest need (like the study of open ditch drainage recently completed by the Public Works Department which showed that minority neighborhoods were the areas served by open ditch drainage, almost half of which functioned inadequately), the AI should include an evaluation of where public funds have been spent on infrastructure and public services over time. Just as the historical concentration of low-income housing in high-poverty minority-segregated areas must be balanced by the creation of housing opportunities in higher opportunity areas, the inequity created by the concentration of spending on infrastructure, public services, and economic development in low-poverty white-segregated areas must be redressed.

11. Environmental Hazards

The same high-poverty minority-segregated neighborhoods are also disproportionately exposed to environmental and health hazards. The Draft AI acknowledges this fact, but there is no acknowledgment of the impact or environmental hazards nor any proposed action step to address this under Impediment #6 (Imbalanced Distribution of Amenities, Services, and Infrastructure between Neighborhoods). More disturbingly, the Con Plan seems to suggest that the impediment is "regulations related to noise, environmental, or site and neighborhood standards" and not the policies and regulations that allowed environmental hazards and undesirable infrastructure to be imposed on African-American and Hispanic neighborhoods in the first place. The implication that regulations protecting families from environmental toxins should be relaxed in order to continue concentrating affordable housing near the source of those toxins is appalling, and in combination with the failure to address this issue in the AI or Con Plan, raises fair housing concerns.

The policies and processes that resulted in the siting of these undesirable and hazardous land uses almost exclusively in minority neighborhoods have resulted not only in adverse health and safety

⁵ Living in Neglect / Hasty annexation left a legacy of blighted neighborhoods. MIKE SNYDER, MATT SCHWARTZ, 11/17/2002 Houston Chronicle http://www.chron.com/CDA/archives/archive.mpl?id=2002_3600610

impacts on residents of those neighborhoods, but have lowered property values in these neighborhoods and stripped minority families not only of wealth and access to opportunity.

12. Inadequate Review of City Policies and Processes

The Draft AI's review of how City policies, processes, and regulations may create impediments to fair housing choice is limited. While Houston does not have a zoning code, as the Draft AI correctly notes, the City has "enacted development regulations that specify how lots are subdivided, standard setbacks, and parking requirements . . . [and] many private properties have legal covenants or deed restrictions that limit the future uses of land, which have effects similar to zoning ordinances." One need only look at where environmental hazards and undesirable land uses are located (and not located) to see that some neighborhoods have been able to use "private zoning" to protect their communities and some have not. The Draft AI should contain an analysis of how the City's policies and processes have enabled these inequities.

Again, the Draft AI identifies issues with public programs and policies (use of 380 agreements in areas that do not need economic development assistance and the use of TIRZ to keep tax revenues in areas with significant market value and private investment, for example) but suggests no actions to deal with these issues.

In addition to its suggestion that regulations aimed at protecting the health and safety of Houston families be reduced in minority neighborhoods, the Con Plan also states that "[u]sing dated regulations, which do not take into account the dynamics of a majority-minority city such as Houston, may also present challenges for current affordable housing and mixed-income development." The Draft AI contains clear evidence of high levels of racial, ethnic, and economic segregation in Houston. The fact that Houston is majority-minority does not mean that it is not segregated and that it does not have to address segregation and the barriers to opportunity that segregation creates and reinforces. The AI and Con Plan should not be so disconnected.

13. Fair Housing Enforcement and Houston's Equal Opportunity Ordinance

There are a number of points throughout the Draft AI where the need for increased testing and enforcement is clear, including steering and discrimination against voucher holders. Increased support for testing should be specifically included as an action step in order to enable enforcement, particularly in cases where the discriminatory conduct is not visible to the victim of discrimination.

While the lack of fair housing enforcement is identified as a significant part of this impediment, none of the Action Steps proposed increased enforcement. We support the City's Equal Opportunity Ordinance, but it completely fails to meet HUD's standards for substantial equivalence.

II. Draft Consolidated Plan and Annual Action Plan

The Analysis of Impediments to Fair Housing Choice should be complete before the Consolidated Planning process, so that the Con Plan can incorporate actions to address the impediments identified in the AI. While we recognize that these documents were drafted concurrently for 2015-2019, there still appears to be a misunderstanding of the proper relationship between the AI and the Con Plan. Fair housing is not an additional or separate objective; the programs and activities proposed by the Con Plan and Annual Action Plan must be evaluated for their ability to address the City's identified impediments

to fair housing choice as part of the consolidated planning process.

The lack of incorporation of fair housing and civil rights into the Con Plan can be seen in the way that economic development and public facility improvement funds, for example, will be used for citywide projects and not targeted to the neighborhoods that most need this kind of investment. Attached is our analysis of whether and how the Annual Action Plan (AAP) carries out the action steps identified in the Draft AI. For all funds expended, whether for housing, public services, infrastructure, or economic development, there must be geographic as well as income targeting to ensure that these funds are being administered in a way that affirmatively furthers fair housing.

We appreciate the work that has gone into these drafts and HCDD's commitment to using data to create an accurate picture of impediments to fair housing in Houston. Thank you for considering our comments.

Sincerely,

John Henneberger, Co-Director
Texas Low Income Housing Information Service

Madison Sloan, Director, Disaster Recovery and
Fair Housing Project
Texas Appleseed

Walker, Millie - HCD

From: John Henneberger <john@texashousing.org>
Sent: Monday, April 13, 2015 4:26 PM
To: Walker, Millie - HCD; Rackleff, Neal - HCD
Cc: Tarsha Jackson; Kim Huynh; Maddie Sloan; Chrishelle Palay; Tiffany Hogue
Subject: Comments of TOP, TxLHIS and Texas Appleseed on Draft City of Houston Analysis of Impediments to Fair Housing Action Steps
Attachments: Houston AI Comments.pdf; ATT00001.txt

Ms. Walker and Mr. Rackleff:

Attached are joint comments of Texas Organizing Project, Texas Low Income Housing Information Service and Texas Appleseed on the Actions proposed in the City of Houston 2015 Draft Analysis of Impediments to Fair Housing.

Our comments on the balance of the draft AI will be sent to you under separate cover later today.

Thank you for your consideration of all of our comments and for the good work that has been done by the City to date on the AI.

We look forward to meeting with the City to discuss our comments in detail.

Comments on City of Houston proposed Actions in the draft AI

The Texas Organizing Project (TOP), Texas Low Income Housing Information Service (TxLIHIS) and Texas Appleseed are working together with Houston community residents and local officials for the past three years to assess the impediments to fair housing within the city of Houston and to develop action steps to overcome these impediments.

Through this collaborative process we have agreed to four Fair Housing and Neighborhood Rights for Houston. These rights encompass the essence of what we believe the City of Houston's Fair Housing policy should be. The Fair Housing and Neighborhood Rights we advocate are:

THE RIGHT TO CHOOSE

All people have a right to live in a decent home in neighborhood of their choice

THE RIGHT TO STAY

Gentrifying neighborhoods should be revitalized for the benefit of existing residents without displacement

THE RIGHT TO EQUAL TREATMENT

End discrimination, disinvestment and policies harming our neighborhoods

THE RIGHT TO HAVE A SAY

Residents should have a say in what happens in their neighborhoods

We call on the City of Houston to formally recognize these rights and to incorporate a commitment to achieving these rights as part of the City's Analysis of Impediments to Fair Housing.

In order to extend these rights to the citizens of Houston, the City will need to commit to specific actions. We are working with community residents to prepare an analysis of impediments to fair housing for Houston that we are calling the People's AI. As we work to complete this plan, we have carefully examined the City of Houston 2015 Draft AI and the City's proposed actions. We wish to offer our comments.

In reviewing the City's draft AI we found that, while we can support many of the City's proposed Actions, for the most part the Actions do not adequately address the identified impediments, often lack adequate specificity and are not, as written, "actionable." That is, they are often not sufficient to address the impediment and are not sufficiently defined in order to make clear the Action that will be undertaken by the City. Another problem is the across the board failure to propose to complete any Action for five years. It is not acceptable to ask citizens to wait until 2020 to see action on fair housing.

We also note that several City's draft Actions have "XXX" in the place of specific numbers. This makes it impossible to assess the adequacy of the City's proposed Actions. Another general problem is the apparent lack of coordination with the Houston Housing Authority to jointly undertake some proposed Actions.

TOP, whose thousands of members are residents of the impacted Houston neighborhoods as well as mostly classes of persons protected under the Fair Housing Act, and TxLIHIS and Texas Appleseed, as two leading fair housing research and advocacy organizations, have a great deal to offer to assist the City to develop successful fair housing Actions. We value our good, cooperative relationship with the City's Housing and Community Development Department developed through the disaster recovery program. We want to foster a similar cooperative relationship with respect to the development of the AI.

We appreciate the opportunity to attend the City conference on fair housing earlier this year. Lots of good speakers presented useful information about the City's demographics. However, this conference did not offer sufficient opportunity to get into the specifics of the fair housing problem in Houston. Nor have we had an opportunity to work directly with the City on the specific Actions the City should undertake to overcome the fair housing impediments. Until the current AI draft was formally released by the City for public comment, we have not seen any drafts of the AI.

As a start toward what we hope will be continued cooperation and collaboration, we offer the following comments on each of the City's proposed draft Actions, along with additional Actions, drawn from our draft People's AI, that we call on the City to include in its final AI. We request the opportunity to meet and to work with the City to improve on the Actions proposed by the City before the Analysis of Impediments to Fair Housing is submitted by the City to HUD.

Key to TOP/TxLIHIS/TX Appleseed comments of City proposed Actions in the draft AI:

1. We support this Action.
2. We support this Action with amendments.
3. We oppose this Action as inappropriate.
4. Action is not related to or is insufficient to overcome the identified impediment.
5. Action is not adequately detailed.
6. Action does not contribute or may work against overcoming the identified impediment.
7. Action is delayed too long — until late 2020.
8. Action proposes only minor bureaucratic activities rather than significant Action.
9. Action is already required under other regulations.
10. Action fails to specify appropriate coordination with the City's housing authority.

Impediment #1: Discrimination in Housing

City proposed Actions:

1. Monitor lending data annually and share results with the community on an ongoing basis (Year 5) (Comments: 2, 4, 5, 7, 8, 9)

2. Monitor HUD complaint data annually and share results with the community on an ongoing basis (Year 5) (Comments: 2, 5, 7, 8, 9, 10)
3. Partner with organizations to develop data sets describing housing discrimination among persons with disabilities (Year 5) (Comments: 1, 5, 7, 8, 9, 10)
4. Provide fair housing education and outreach to 200 housing providers and housing industry professionals (Year 5) (Comments: 1, 5, 7, 9, 10)
5. Promote fair lending by partnering with at least 20 lending institutions annually for the HAP (Year 5) (Comments: 2, 5, 7)
6. Implement Equal Opportunity Ordinance and ask HUD for substantial equivalence (Year 5) (Comments: 2, 5, 7)
7. Council 7,500 people through the City's Landlord/Tenant Hotline (Year 5) (Comments: 2, 4, 7, 10)
8. Promote the City's Landlord/Tenant Hotline (Year 5) (Comments: 1, 5, 7, 8, 10)

Additional Actions proposed in the People's AI:

- From 2015 through 2020 the City will fund and carry out, through qualified fair housing organizations, housing discrimination testing and enforcement that investigates the following: steering in sales and rental; the denial of and different terms and conditions based on race, national origin, familial status, and disability in sales and rental; predatory and disparate terms and conditions in lending and insurance; and foreclosure modification schemes targeting minority neighborhoods, with the objective to reduce measurable instances of unlawful discrimination to less than 7% of all sales and rental transactions by 2020
- By 2016 neighborhood benefits agreements with neighborhood organizations will be required of all grantees, developers and contractors receiving City, State and Federal housing, infrastructure and community development funding to carry out activities in RECA's, CRA's and low-income, minority concentrated areas

Impediment #2: Lack of Knowledge about Fair Housing

City proposed Actions:

1. Provide education and outreach to city staff (Year 5) (Comments: 1, 5, 7, 9, 10)
2. Continue to meet periodically throughout the year with city staff at the Interdepartmental Fair Housing Meeting (Year 5) (Comments: 1, 7, 8, 10)
3. Distribute fair housing materials to City Departments to inform employees (Year 5) (Comments: 1, 7, 8, 10)
4. Provide education and outreach to 500,000 citizens who may be at risk of discrimination (Year 5) (Comments: 2, 5, 7)
5. Provide education and outreach to 200 HCDD stakeholders (Year 5) (Comments: 1, 5, 7, 9)
6. Translate public notices about the Consolidated Planning process, and other documents as needed, into languages other than English (Year 5) (Comments: 1, 8, 9)

Additional Actions proposed in the People's AI:

- Beginning in 2016, the Mayor, city council members, city council aides, planning commissioners, Super Neighborhood and Civic Club officers and City department heads will receive Fair Housing training within the first 12 months of their election, employment or engagement

Impediment #3: Lack of Affordable Housing Options

City proposed Actions:

1. ☐ Fund the preservation of 418 affordable housing rental units (Year 5)
(Comments: 2, 4, 5, 7, 10)
2. ☐ Fund the creation of 1,135 new affordable housing rental units (Year 5)
(Comments: 2, 4, 5, 7, 10)
3. ☐ Fund the creation or preservation of 75 Section 504 accessible rental units (Year 5) (Comments: 2, 4, 5, 7, 10)
4. Identify areas where the cost of land is increasing (Year 5) (Comments: 1, 5, 7, 8)

Additional Actions proposed in the People's AI:

- By 2030 provide an additional 10,000 units of affordable, subsidized housing in high opportunity neighborhoods across the city and give residents of subsidized housing a choice of neighborhoods
- Beginning in 2016 and completed by 2025, all project-based housing authority residents living in high poverty or racially segregated neighborhoods will be given an option to use a housing voucher to move to a higher opportunity area
- Honor the City's commitment to redevelop, prevent gentrification and achieve high opportunity, economically, racially and ethnically integrated communities without displacement in the Community Reinvestment Areas by allocating to the CRAs \$25 million in TIF or TIRZ and other non-federal city funding each year from 2015-2020
- Correct substandard living environments in existing subsidized housing developments by 2025 by rebuilding and/or relocating 10,000 severely distressed multifamily housing from RECA's and concentrated minority areas and rehabilitating and rebuilding 10,000 mixed income subsidized housing units in City identified Community Revitalization Areas

Impediment #4: Lack of Accessible Housing for Persons with Disabilities

City proposed Actions:

1. Meet with the Plan Review Department to advocate for inclusion of an accessibility features scope of work in the plan submittal for all residential permits (Year 5) (Comments: 2, 5, 7, 8)
2. Use the Census Bureau's characteristics by age group at the census tract level or smaller based on availability (Year 5) (Comments: 1, 4, 5, 7, 8, 9)
3. Create projects/internship credits for students to collect quantitative and qualitative data (Year 5) (Comments: 1, 4, 5, 7)

Additional Actions proposed in the People's AI:

- Create a comprehensive database of sidewalk locations and curb cuts and their condition by 2017 and use the database to prioritize unsafe conditions for pedestrians and those with an ambulatory disability and make available funds to provide no less than 100,000 linear feet of sidewalk improvements in these priority areas each year from 2016 through 2020
- By 2017 the City and Housing Authority will contract for a survey of the geographic incidence of landlord's refusal to rent to Housing Choice Voucher holders and the City Council will hold a hearing on the results of the study and consider the need to adopt an ordinance outlawing source of income discrimination in the city
- By 2017 the City will adopt a "Visitability Ordinance" substantially equivalent to that in Texas State Statutes, Local Government Code 2306
- By the end of 2017 the City will review all City planning documents for housing growth or redevelopment and revitalization plans to amend them as necessary to require them to permit and incentivize mixed income affordable housing and provide incentives for development of this type of housing in areas that are not now concentrated with concentrated poverty or members of protected classes.

Impediment #5: Affordability**City proposed Actions:**

1. Fund XXX downpayment assistance loans through the Workforce Development Program (Year 5) (Comments: 2, 4, 5, 7)

Additional Actions proposed in the People's AI:

- No later than the end of 2017 the City will seek authority from the Texas Legislature and establish Homestead Preservation Districts to reduce the escalation of property taxes and improve housing quality in RECA, CRA and low-income, minority concentrated areas
- Take appropriate action to increase minority homeownership rates to at least 45 percent citywide and in each RECA, CRA and low-income, minority concentrated area by 2030
- By June 2018 the Houston City Council will hold a public hearing to consider adoption of expedited permitting and review processes and establish density bonuses for affordable housing projects within high opportunity areas

Impediment #6: Imbalanced Distribution of Amenities, Services, and Infrastructure between Neighborhoods**City proposed Actions:**

1. Fund XX public infrastructure and facility improvements in LMI neighborhoods (Year 5) (Comments: 2, 5, 7, 10)
2. Fund economic development activities to create XX new services benefitting LMI neighborhoods (Year 5) (Comments: 2, 5, 7, 10)

3. Monitor code enforcement activities to discover if any imbalances exist in implementation (Year 5) (Comments: 1, 5, 7)

Additional Actions proposed in the People's AI:

- Reduce substandard housing in RECA, CRA and low-income, minority concentrated areas to less than twice the citywide rate by 2030 through low-interest loans, grants and volunteer programs
- Equalize public infrastructure, in particular stormwater infrastructure, streetlights, sidewalks and street quality, between RECA, CRA and low-income, minority concentrated areas on the one hand and higher-income majority white neighborhoods on the other through a comprehensive assessment of available infrastructure and a priority allocation of "Rebuild Houston" funds. CDBG funds, TIF funds and city funded CIP projects

Impediment #7: Lack of Income / Lack of Funding

City proposed Actions:

1. Provide downpayment assistance funds for XX low-income families to purchase a home (Year 5) (Comments: 2, 4, 5, 7)
2. Provide home repair assistance for XX low-income families (Year 5) (Comments: 1, 5, 7)
3. Partner with 25 other organizations to promote fair housing education (Year 5) (Comments: 1, 5, 7, 9)
4. Find alternative sources of funding to promote fair housing education (Year 5) (Comments: 1, 7, 8, 10)
5. Carry out various economic development activities to create or retain XX jobs (Year 5) (Comments: 2, 5, 7, 10)
6. Support programs that provide job training to LMI individuals and individuals from protected classes (Year 5) (Comments: 2, 5, 7, 10)

Additional Actions proposed in the People's AI:

- By the end of 2015 redesign the City's Section 3 program so that it produces each year no less than 500 jobs for people with lower incomes by requiring RECA, CRA and low-income, minority concentrated area hiring vs metro-wide targeting of job beneficiaries with priority to job applicants earning less than 60 percent of Area Median Family Income

Impediment #8: Lack of Financial Education

City proposed Actions:

1. Partner with other organizations to encourage financial literacy programs, including housing counseling agencies (Year 5) (Comments: 1, 5, 7, 10)
2. Promote HCDD's Homebuyer Assistance Program (HAP) which requires an 8-hour course (Year 5) (Comments: 1, 7)

Impediment #9: NIMBY Resistance

City proposed Actions:

1. Promote housing developers funded by HCDD to conduct community engagement activities (Year 5) (Comments: 2, 5, 7)
2. Attend city and non-city events to spread the word about the number of people HCDD assists and how HCDD and other affordable housing programs work (Year 5) (Comments: 1, 7, 8, 9)
3. Develop an Anti-NIMBYism policy and/or action statement (Year 3) (Comments: 2, 5, 7, 10)

Additional Actions proposed in the People's AI:

- By the end of 2015 the City will establish a formal meet and confer process and training with neighborhood organizations in RECA's, minority and target revitalization neighborhoods to develop selection criteria, definitions for "revitalizing" and "high opportunity" areas and to prioritize award of City points scoring Low Income Housing Tax Credit developments under the State of Texas Qualified Allocation Plan in a manner that Affirmatively Furthers Fair Housing.

Impediment #10: Lack of Transportation Options**City proposed Actions:**

1. Develop a bike plan for the City (Year 5) (Comments: 2, 4, 7)

Additional Actions proposed in the People's AI:

- By mid-2016 the City and Houston Metro should cooperate to develop a comprehensive transportation plan to provide access to public transportation and prevent service reductions (including flex-routes) to serve residents of RECA's, CRA's and low-income, minority concentrated areas

Impediment #11: Low educational attainment Among African Americans and Hispanics**City proposed Actions:**

1. Fund youth enrichment and afterschool programs to children in low- and moderate-income areas (Year 5) (Comments: 1, 4, 5, 7, 10)

Additional Actions proposed in the People's AI:

- Mayor will commit the City to cooperate with the School District to equalize school performance across all schools in the region by 2025
- Establish a joint City and School District initiative to secure financial incentives to recruit and maintain highly qualified, subject matter certified teachers in currently low-performing schools in RECA's, CRA's and low-income, minority concentrated areas by 2020
- Assess and equalize school physical plant facilities and teaching materials between schools across the district by 2020
- By 2017 the City's Police Department and School District adopt policies that eliminate the school to prison pipeline from RECA, CRA and low-income, minority concentrated area schools

Impediment #12: Increased Health Hazard Exposure in Certain Neighborhoods

City proposed Actions:

1. Work with partners to explore ways to increase knowledge of health hazards (Year 5) (Comments: 2, 4, 5, 7, 8)
2. Provide lead-based paint information to families who might be at risk lead poisoning (Year 5) (Comments: 1, 4, 5, 7, 8, 9)

Additional Actions proposed in the People's AI:

- Inventory, license and monitor hazardous incompatible land uses in RECA's, minority concentrated areas and other neighborhoods by 2016
- By mid-2016 the City will enact a neighborhood environmental protection ordinance that inventories and assesses risks posed by hazardous sites and businesses located near homes in RECA's, CRA's and low-income, minority concentrated areas, conducts adequate ongoing environmental monitoring and testing, posts information about the test results and the plans and progress on remediation on the City's website, commits to prompt environmental enforcement and City coordinated cleanup of hazardous environmental spills and upsets and prioritizes removal of land uses that pose a risk to the health and safety of residents

Impediment #13: Lack of Communication between Government and Resident

City proposed Actions:

1. Review fair housing impediments and strategies annually and report on the progress in the CAPER (Year 5) (Comments: 2, 7, 8, 9, 10)
2. Widely promote HCDD housing programs to eligible applicants (Year 5) (Comments: 2, 7, 8, 9)
3. Translate public notices about the Consolidated Planning process, and other documents as needed, into languages other than English (Year 5) (Comments: 1, 7, 8, 9)
4. Create education material, or electronic access to material, as an on demand communicative cheat sheet for government staff and community (Year 5) (Comments: 2, 5, 7, 8)

Additional Actions proposed in the People's AI:

- Establish by mid-2016 a Houston Fair Housing & Neighborhood Rights Commission with representation of democratically selected representatives of RECA's, CRA's and other African-American and Hispanic neighborhoods to oversee Housing and Community Development and Public Works and to monitor the implementation of the implementation of all the Actions set forth in the AI



CITY OF HOUSTON
Housing and Community Development Department

Annise D. Parker

Mayor

Neal Rackleff, Director
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April 29, 2015

Mr. John Henneberger
Co-Director Texas Low Income Housing Service,
Madison Sloan, Director, Disaster Recovery
And Fair Housing Project Texas Appleseed
1609 Shoal Creek Blvd.,
STE 201
Austin, TX 78701

Subject: Comments on the City of Houston's 2015-2019 Consolidated Plan (Con Plan) and 2015 Analysis of Impediments (AI)

Ladies and Gentlemen:


This letter is written in response to your letter dated April 13, 2015, with your comments regarding the subject documents. In a portion of the letter, specific actions are recommended to address the impediments that are included in the 2015 Draft AI. Additionally, you have requested a meeting with HCDD staff and your group before completing the final AI document. We will schedule a meeting in the very near future per your request.

Ms. Sloan's portion of the letter covers 13 topics related to the impediments. They are: (1) lack of involvement and investment by other City departments, (2) low educational attainment, (3) myth of self-segregation, (4) familial status discrimination, (5) public transportation, (6) employment, (7) population growth and new housing construction, (8) failure to address location of affordable and assisted housing, (9) the Houston Housing Authority, (10) community asset indicators and neighborhood inequity, (11) environmental hazards, (12) inadequate review of City policies and processes, and (13) fair housing enforcement. There is also some discussion on Houston's equal opportunity ordinance. In some instances additional data was provided.

As you know, after a competitive procurement process, HCDD selected an individual to perform extensive research that addressed some of the topics listed in your letter. The individual selected was recommended by your office. This included a review of legal policies as well. This research was not completed for inclusion in the Draft AI, but will be made available to your office before we publish the final AI. Thank you for your contributions to this very important process.

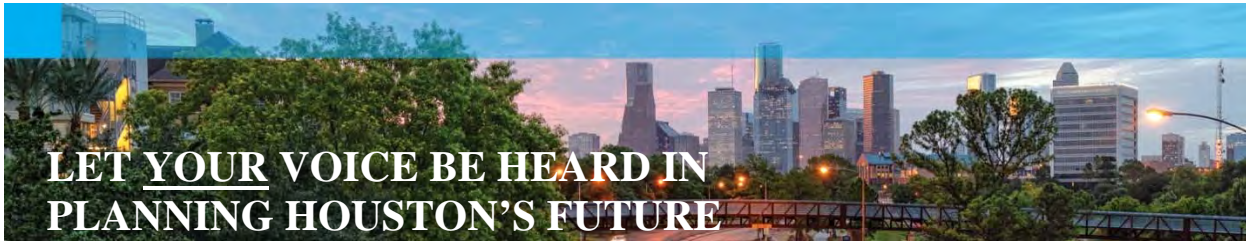
We are continuing to review your information to determine where we might be able to incorporate your data and recommendations. Again, we will contact you shortly to schedule the requested meeting, as we work toward completing the final 2015 AI. We look forward to continued collaboration with our community partners, including the Texas Low Income Housing Information Service and Texas Appleseed, to identify and eliminate barriers to fair housing choice in Houston.

Sincerely,


Neal Rackleff
Director

Council Members: Brenda Stardig Jerry Davis Ellen R. Cohen Dwight A. Boykins Dave Martin Richard Nguyen Oliver Pennington Edward Gonzalez
Robert Gallegos Mike Laster Larry V. Green Stephen C. Costello David W. Robinson Michael Kubosh C.O. "Brad" Bradford Jack Christie
Controller: Ronald C. Green

Appendix 6: Public Participation Summaries



Results for 2015 Consolidated Plan Community Needs Survey

Description: The Housing and Community Development Department's (HCDD) 5-year Consolidated Plan and Annual Action Plan serve as a community development strategy and an application to the U.S. Department of Housing and Urban Development (HUD) for Houston's CDBG, HOME, HOPWA, and ESG grants. When developing these plans, HCDD collects views from citizens on housing and community development needs. In addition, HUD encourages HCDD to explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods.

HCDD made a Community Needs Survey available online and in print from October 1, 2014 to December 15, 2014. The survey was available online through www.surveymonkey.com and PDFs were available for download and print through HCDD's website. Paper copies of the survey were available during the two fall public hearings, at other events HCDD staff participated in, and by asking HCDD staff for paper copies. The survey was available in English, Spanish, Vietnamese, and Chinese. HCDD staff was available during this time period to promote and administer the survey at neighborhood, community, and agency meetings. When administering the survey, HCDD staff used an audience response system technology.

A total of 2,120 respondents participated in the survey. The survey was completed online through SurveyMonkey by 1,529, of which 47 were in Spanish, 13 were in Vietnamese, and 11 were in Chinese. HCDD received 466 paper copies of the Community Needs Survey which included 21 surveys in Vietnamese and 15 surveys in Chinese. One hundred twenty-five (125) respondents participated in the Survey through the audience response system conducted by HCDD staff.

The survey consisted of 27 questions and some questions allowed for multiple responses. The following are the results from the survey responses.

Summary of Results

Although the Community Needs Survey is not a scientific survey, general conclusions can be made from the surveys received about the respondents. The results illustrate that affordable housing is very important to those that responded to the Community Needs Survey. Affordable housing ranked as the highest priority need in Houston. Almost all respondents agreed that more affordable housing was needed in Houston (83%) and that affordable housing should be available in all areas of the city (80%). Two out of three respondents (68%) thought that homeowner affordable housing was a greater need than rental affordable housing in Houston.



In particular, needs for homeowners and the need for repair of existing housing in the city ranked highly and included financial assistance for homeownership, repair of homeowner housing, and repair of existing rental apartments. Housing and supportive services for the elderly and homeless also ranked high. Child care services, health services, and job training ranked as the highest supportive service needs, while health facilities, child care centers, and facilities promoting community safety ranked as the three highest neighborhood facility needs. Job creation/retention, employment training, and small business lending ranked highest in the economic development needs category. The top three ranked neighborhood service needs were demolition of substandard buildings, enforcement of cleanliness and safety codes, and neighborhood crime awareness/prevention.

A large percentage of respondents were homeowners (62%), identified as female (63%), identified as White (51%), and worked fulltime (53%). More than one third of respondents were low- and moderate-income with 30% earning below \$35,000. One in six respondents considered themselves to be community advocates (16%).

Priority Needs

Respondents were asked to rank the top three priority needs in a variety of community development categories. Greatest weight was placed on the first priority selected and least weight given to the respondent's third selection. The following are the results of the priority ranking scores. On some written surveys, respondents did not prioritize their selection and instead used check marks. Therefore their answers were not calculated in the priority ranking score but were only included in the frequency count of the top three selections. Approximately two out of three respondents chose Affordable Housing and Neighborhood Facility Improvements and Services as one of three top priority needs from five broad categories.

Table 1. HCDD Priority Needs (A: 1,728)

	Priority Ranking Score	Frequency in Top 3
Affordable Housing	8,811	1,165
Infrastructure Improvements	6,708	973
Neighborhood Facility Improvements and Services	5,877	1,086
Economic Development	5,256	948
Supportive Services	4,567	877

The following are the top three needs as ranked by the respondents in the following categories:

- **Affordable Housing:** 1) Providing financial assistance for homeownership, 2) Repairing homeowner housing, and 3) Repairing existing rental apartments
- **Groups in Most Need of Affordable Housing:** 1) Elderly, 2) Low- and Moderate-Income Persons, and 3) Homeless
- **Supportive Services:** 1) Child care services, 2) Health services, and 3) Job training
- **Groups in Most Need of Supportive Services:** 1) Homeless, 2) Elderly, and 3) Persons with physical disabilities
- **Neighborhood Facilities:** 1) Health facilities and clinics, 2) Child care centers, and 3) Facilities promoting community safety (fire stations, police stations)

- **Neighborhood Services:** 1) Demolition of substandard buildings, 2) Enforcement of cleanliness and safety codes, and 3) Neighborhood crime awareness / prevention
- **Infrastructure Needs:** 1) Street reconstruction, 2) Flood drainage improvements, and 3) Pedestrian improvements
- **Economic Development Needs:** 1) Job creation and retention, 2) Employment training, and 3) Small business loans

The following are results from affordable housing and neighborhood questions:

- 83% of respondents thought that Houston needed more affordable housing.
- 68% of respondents thought that Houston needed more affordable homeowner housing and 32% of respondents thought that more affordable rental housing was needed.
- 80% of respondents thought that affordable housing should be available in neighborhoods throughout Houston.
- Over one third of the respondents reported being dissatisfied (28%) or very dissatisfied (10%) with the overall conditions of their neighborhood. Other respondents reported being very satisfied (8%), satisfied (33%), or neutral (21%) about the overall conditions of their neighborhood.

Demographics of Survey Respondents

- Over one in six respondents identified themselves as a community advocate (16%). Respondents also identified themselves as a business owner (12%), social service provider (11%), healthcare provider (7%), landlord (6%), housing provider (3%), and commercial property owner (2%). Almost two-thirds of respondents (61%) did not identify themselves with any of these categories.
- Respondents lived in the following sections of Houston: Inner 610 loop (34%), Southwest (25%), Southeast (21%), Northwest (10%), and Northeast (6%). The remaining respondents (4%) live outside of the Houston city limits.
- Almost two-thirds (62%) of the respondents owned their home, while 25% rented, 10% stayed with a friend or family member, 2% had other living arrangements, and 1% considered themselves homeless.
- Primary English speakers made up the majority of respondents (85%). Other respondents reported speaking the following languages at home: Spanish (10%), Vietnamese (2%), Chinese (2%), and another language (1%).
- Well over half (63%) of the respondents identified themselves as female.
- 25% respondents identified themselves as Hispanic or Latino.
- Twenty-eight percent (29%) of respondents identified as African American or Black; 51% identified as White, 18% identified as Multiracial, 6% identified as Asian, 2% identified as American Indian/Alaskan Native, and 1% identified as Native Hawaiian/Other Pacific Islander.
- Over half of the respondents (53%) were employed full time while one sixth (16%) of the respondents were retired. The remaining respondents were employed part time (11%), unemployed (6%), or do not participate in the workforce (Never worked/Do not work 15%).

Demographics of Respondents' Households

- 13% of respondents' households had incomes at \$15,000 or below and 8% had a household income of \$15,001 to \$25,000 and 9% had a household income of \$25,001 to \$35,000. The remainder of

respondents had household incomes \$35,001 or above with two in five respondents having household incomes at or above \$75,000 (39%).

- Over half of the respondents' households consisted of one member (19%) or two member households (33%).
- Most respondents reported that their households were adults only (57%). The next most reported household make up was two adults plus children (28%).
- Almost one-fifth (19%) of the respondents reported that a member of their household is physically, mentally, or developmentally disabled.
- Approximately one in six respondents (14%) reported that they or a member of their household is a Veteran.
- Respondents reported having the following problems with buying or renting property in Houston in the past two years: Limited Income (19%), Credit Issues (16%), Could not get a loan (9%) or Discrimination based on a protected class (3%). Over two-thirds (69%) of respondents reported not having these issues in the past two years.

CITY OF HOUSTON FAIR HOUSING FORUM REPORT

ABOUT THE FAIR HOUSING FORUM

The City of Houston Housing and Community Development Department (HCDD) hosted its first ever Fair Housing Forum on January 29, 2015. The Forum was held at the Federal Reserve Bank – Houston Branch building near downtown Houston from 9 am to 4 pm. The Forum was free to participants, and a boxed lunch was provided. The Forum agenda was organized around three panel discussions with experts in a variety of disciplines who provided information relevant to the issue of fair housing. A keynote speaker provided demographic information about Houston during lunch. Small group discussions were held twice during the day, one in the morning and one in the afternoon. Appendix A includes the Forum agenda.

The goals of the Fair Housing Forum were to bring together citizens and stakeholders to discuss fair housing needs and strategies for the 2015 Analysis of Impediments to Fair Housing Choice and to inform the community about relevant fair housing issues. In order to create a neutral environment and foster discussion during the Forum, HCDD hired a third-party facilitator with expertise in citizen participation and community development. HCDD procured Morningside Research Consulting, Inc. to facilitate and document the participant discussions of the Forum. This report serves as a record and summary of the citizen input gathered.

INVITING PARTICIPANTS. HCDD sent 975 email invitations to the Forum. Invitations were also mailed to 320 Houston area churches. HCDD’s executive team disseminated the invitation to their contacts and counterparts in county and state government agencies. HCDD also worked with the Houston Housing Authority (HHA) to invite the representatives of all the resident councils so public housing residents could participate. HHA provided transportation for some residents who could attend. The invitation was also posted on HCDD’s Facebook page and Twitter page.

PARTICIPATION. A total of 173 individuals attended the Forum, representing 83 organizations. The organizations represented are listed in Appendix B.

DISCUSSION GROUPS. Each participant was assigned to a table in the morning and a different table in the afternoon. Each table seated up to nine people and care was given to assign people so that the table groupings represented the diversity of stakeholders. Each table was tasked with responding to the questions shown on the agenda in Appendix A. The small groups discussed each question around their table, recorded their responses, and then indicated the response for each question that they determined to be a priority. All responses recorded at each table (including priority and non-priority responses) were collected.

METHODOLOGY FOR DEVELOPING THE REPORT. The response sheets from each table during the morning and afternoon discussion groups were collected and transcribed. The responses were sorted into groups of similar responses and categorized. Priority responses were noted. This report provides a summary narrative of the responses provided by attendees of the Forum.

PUBLIC INPUT

The input from Forum attendees is organized by theme under each of the six questions posed on the agenda shown in Appendix A. **The responses are shown in descending order of frequency and prioritization by each discussion group.** Discussion groups covered some issues multiple times in response to the different questions.

1. WHAT ARE THE CHALLENGES THAT PEOPLE FACE WHEN FINDING AND MAINTAINING HOUSING?

1.A. SUPPLY OF AFFORDABLE HOUSING. The most frequently mentioned challenge faced by Houston residents when seeking housing is finding housing that they can afford; about one-third of the discussion groups listed this as the most significant challenge. The supply of affordable housing is insufficient to meet the demand and finding good quality affordable housing in desirable locations is especially difficult. The continuing increase in housing costs exacerbates this challenge.

1.B. HOUSING LITERACY. The next most frequently mentioned challenge was the financial and housing literacy of people seeking housing. Due at least in part to education disparities, many residents lack the knowledge needed to find affordable housing, finance their housing needs, identify financial resources to assist with home ownership, and manage and maintain housing. In particular, residents need information about the value of owning a home and what home ownership entails. Residents need information about whether they should rent or purchase, the laws and their housing rights, and responsibilities for tax and insurance. Discussion groups frequently mentioned the need for new and prospective homeowners to understand maintenance needs and costs. Assistance is needed to help people, particularly individuals who are elderly or disabled, maintain and make repairs to older or damaged homes.

1.C. INCOME. While the supply of affordable housing was the most frequently mentioned challenge, economic issues including insufficient income to pay for and maintain housing was another significant challenge. One discussion group noted that “income disparities are at the root” of housing issues. The use of payday loans, high student loans, and bad credit make it difficult to find housing. Even with assistance, finding housing is difficult; Section 8 voucher amounts are not keeping pace with expenses.

1.D. ACCESS TO AMENITIES. Areas with affordable housing are lacking many amenities. The two most frequently mentioned needs were sufficient transportation options (mentioned by three-quarters of the discussion groups) and good schools, including childcare (mentioned by half of the discussion groups). Areas where affordable housing is located are also lacking City services such as police and emergency services. Service needs in areas with affordable housing include grocery stores, dry cleaners, health care, and social services. Infrastructure needs include flood control, road maintenance, and lighting. Access to employment and cross-town transportation routes are also lacking.

1. E. PROPERTY TAXES. Property taxes drive out low-income households and will affect mixed income developments. Gentrification causes property values to increase, increasing taxes.

1.F. QUALITY. Discussion groups noted that affordable housing is typically older, in poor condition, and difficult to maintain. The safety and security of the neighborhoods in which affordable housing is located is also a concern. Accessibility for individuals with disabilities is an issue. Housing sufficient for larger families is even more difficult to find.

1.G. DISCRIMINATION. While discrimination based on race, family size, and voucher holders was noted as a significant challenge by some of the discussion groups, one group cautioned against focusing on race discrimination.

1.H. SCREENING. The paperwork and screening requirements for low-income residents create significant challenges. In particular, credit histories are a barrier. The number of forms and rules related to affordable housing can be overwhelming. Criminal background checks are also a barrier for residents with a criminal history.

1.I. SUPPORTIVE SERVICES. Nearly half of the discussion groups indicated that supportive services are needed, particularly case management, to “keep people stabilized in their homes.” Individuals with behavioral health issues and the elderly especially need supportive services. Two discussion groups indicated that “long-term support” and “permanent support” were needed.

2. WHAT ARE THE BARRIERS TO FAIR HOUSING CHOICE IN HOUSTON?

2.A. SUPPLY OF AFFORDABLE HOUSING. Responses to this question were similar to the previous question. The supply of affordable housing was again the most significant barrier listed. Discussion groups noted the lack of income, loan products, and not enough down payment assistance from the City as concerns related to affordability.

2.B. HOUSING LITERACY. The second most frequently mentioned barrier was the lack of residents’ knowledge about housing rights; residents do not know what information exists or how to identify opportunities for assistance.

2.C. DISCRIMINATION. Discussion groups noted considerably more concern about discrimination in response to this question than the previous question. Specific areas of discrimination mentioned include race, gender, source of income, age, disability, and religion. Language and cultural barriers were also noted. Two discussion groups suggested that many stereotypes are based on fear and assistance is needed to overcome those fears. “Steering” and “predatory lending” are two specific ways in which discrimination is practiced. Discussion groups noted that landlords have a lack of knowledge about fair housing laws and how to properly screen tenants and are not held accountable.

2.D. GOVERNMENT REGULATIONS AND PRACTICES. The most significant barrier indicated by one discussion group was that the “City of Houston doesn’t have policies/enforcement ordinances to counteract” the barriers to fair housing. Other groups indicated that the City “does not communicate well with the neighborhoods,” is unnecessarily spending money on other priorities, and that nothing happens when residents call 311 unless they live in a wealthy neighborhood. Others noted a lack of leadership and expressed a desire for strong leadership.

2.E. SCREENING. Screening was discussed in this question as well as in the previous question. Credit and criminal background checks were again mentioned frequently as barriers. Other barriers include receiving past assistance and the lack of uniformity of standards for personal data on applications.

2.F. AMENITIES AND INFRASTRUCTURE. Transportation is a significant barrier. Other amenities needed include good schools, job opportunities, the proximity of local services and resources, parking issues and costs, the “quality of public features”, and police presence in high crime areas.

2.G. SPECIAL NEEDS POPULATIONS. Barriers to fair housing include having mental health and substance abuse issues, being the victim of domestic violence, families with children, mixed families, and individuals who are transgender. For individuals with physical disabilities, accessibility is a barrier.

2.H. PRIVATE DEVELOPMENT. A number of issues related to development were raised by the discussion groups. Barriers include “community backlash to development” and the “not in my backyard” mentality, finding affordable land in areas of high opportunity, lack of incentives and support in certain communities, limited neighborhood revitalization efforts, and lack of land use controls. One discussion group noted that segregated housing practices continue and another suggested encouraging private developers to create more “fair housing”.

3. WHAT ARE THE CHALLENGES THAT THE CITY FACES TO DECREASE HOUSING DISCRIMINATION?

3.A. COMMUNITY CHALLENGES. The most significant challenge faced by the City is communicating with residents about housing discrimination, about fair housing laws and rights, and promoting City programs. Discussion groups noted a lack of community organization and citizen engagement on these issues. However, discussion groups noted that the community in general is resistant to affordable housing in their neighborhoods (“not in my backyard”). The most frequently mentioned challenge is getting information to residents about how to recognize discrimination, what their rights are, and what protections are available. The “stigma attached to fair housing” was noted as was tenants’ fears of retaliation if they report a fair housing violation. As a result, tenants are not reporting discrimination.

Landlords also are not knowledgeable of fair housing laws. Discussion groups noted that landlords engage in racial profiling and hold general biases, with one discussion group noting as their top barrier that “most discrimination is not overt”.

3.B. POLICIES, REGULATIONS, AND ENFORCEMENT. In the second most frequently cited challenges, discussion groups noted that the City needs to better educate the public about discrimination and reporting, dedicate staff to addressing and resolving fair housing complaints, and enforce current protections, including the Community Reinvestment Act and the City of Houston Fair Housing Ordinance. One discussion group noted that although the City should not ignore poor living conditions, the City should acknowledge that repairs create higher rental costs. One discussion group indicated that the city does not have “robust fair housing testing”. Two discussion groups were concerned about the complicated and unclear processes for resolving fair housing complaints.

Sufficient staffing is needed for training of property managers and all should be held accountable for the same rules and procedures. Another discussion group indicated they want the City to prevent excessive gentrification. One discussion group questioned whether housing would ever be really fair.

3.C. INSUFFICIENT RESOURCES. Discussion groups noted that resources are insufficient (both public and private) and City funds have not been prioritized to meet housing needs. One group is concerned that financial resources are not used efficiently.

3.D. PLANNING. Several significant challenges were noted related to planning. A lack of planning leadership was the top challenge cited by one discussion group. Another noted that public input into plans is inadequate. Other comments include a “lack of creativity”, a need to integrate all master plans, keeping programs up-to-date, and insufficient dialogue with the Metropolitan Transit Authority of Harris County (METRO) and school districts in the area. Two discussion groups noted disparities in the ways that Council districts are treated. One comment stated that “Unequal TIRZ distribution between districts” is a concern. It is unclear whether the discussion group was offering feedback on TIRZ funded programs or the Citywide TIRZ process.

3.E. PRIVATE INVESTMENT AND DEVELOPMENT. Some of the challenges noted by discussion groups include discrimination by private developers, lack of private investment in certain communities, and the need to “change minds” of developers by communicating the incentives for creating fair housing.

3.F. POLITICS. Politics is a challenge to reducing discrimination, particularly government “red tape”, negative perceptions, and lack of awareness among policy makers of what fair housing is.

3.G. LOCATION AND TYPES OF HOUSING. Challenges to reducing discrimination include the diverse geographic location of housing, older housing stock in many areas, lack of diversity in the types of affordable housing (multi-

family vs. single-family), and the types of housing being built (one group indicated that accessibility is limited in townhouses, for example).

3.H. GOVERNMENT SERVICES. Some of the challenges to discrimination are related to transportation issues, particularly the location of bus stops and overall inadequate transportation. Other issues with City services are preferred treatment in public works and not making areas of affordable housing safer.

3.I. CITY TRANSPARENCY. Some discussion groups noted that the City could be more transparent in providing access to housing assistance options, standardizing processes, providing open records access to 311 calls and responses, and providing open records access to studies and City reports.

4. WHAT CAN THE CITY DO TO DECREASE HOUSING DISCRIMINATION AND PROMOTE HOUSING CHOICE?

4.A. COMMUNICATION AND EDUCATION. Housing Forum participants suggested that the City's primary role is to communicate with and educate the public about discrimination and housing choice. Half of the discussion groups indicated that this was their priority for the City. Some of the specific suggestions made are for the City to:

- Be more visible in the neighborhoods and make people aware of current choices
- Target neighborhoods and educate residents about housing discrimination and choice
- Partner with community agencies to exchange information and assistance
- Create a form regarding fair housing that is given to tenants when they sign a lease
- Require landlord certification so they are required to know and understand fair housing compliance

The City should use a variety of methods to educate residents about their rights, encourage reporting, and communicate in a variety of languages. The City should also address property tax issues by providing tax relief seminars or loans so homeowners can stay in their homes.

4.B. EXPAND RESOURCES TO INCREASE AFFORDABLE HOUSING STOCK. Another important role for the City is to increase the public investment in subsidized housing and ensure that affordable housing options are available in more locations. The City should also partner with private developers and make an effort to engage in public/private investments. Other suggestions were to ensure diversity of housing types, attempt to get more vouchers, make changes to the down payment program to increase opportunities for home ownership, and expand the number of accessible units available for the elderly and individuals with disabilities.

4.C. ADDRESS COMPLAINTS. One discussion group had a priority for the City to encourage and make it easy for residents to communicate when their rights have been violated. Others wanted the City to encourage complainants to report potential discrimination and assess "stiff" penalties.

4.D. REGULATIONS AND ENFORCEMENT. Two discussion groups had regulations and enforcement as their top priorities for the City, including the following:

- Put more ordinances in place at the local level with enforceable penalties
- Developers should be mandated to supply affordable housing when using federal funds

Other discussion groups echoed the need to enforce policies and regulations and noted that the City should hold absentee landlords accountable for the condition of their property and not allow property to be rented when it does not meet code.

4.E. EXPAND INFRASTRUCTURE AND SERVICES. Another way that the City can promote housing choice is by providing better infrastructure in low-income neighborhoods, making sure services are available (child care,

transportation, health care, and schools), making sure the elderly can age in place, and take on more responsibility for expanding public transportation.

4.F. LEADERSHIP. Because these issues are multi-faceted, the City should take a leadership role and ensure that different city, county, private, and community entities are communicating and working together for maximum impact.

5. WHAT CAN NONPROFIT ORGANIZATIONS AND BUSINESSES DO TO DECREASE HOUSING DISCRIMINATION AND PROMOTE HOUSING CHOICE?

5.A. NON-PROFITS CAN ADVOCATE AND EDUCATE. Housing Forum participants identified two primary roles for nonprofit organizations: advocacy and educating the public. Specific advocacy activities include encouraging clients to have a voice, organizing individuals, partnering with the City, holding the City accountable, and “challenging the current mindset.” Non-profits also need to educate themselves and their employees about fair housing laws in order to be better advocates.

Education and outreach activities that nonprofits can engage in include:

- Train nonprofit organizations that are not a part of the main network
- Work closely with down payment assistance entities
- Teach people about the value of integrated communities
- Provide homebuyer classes
- Educate landlords
- Collaborate with City and the community to identify needs and develop strategies
- Continue to distribute marketing materials

Organizations working with immigrants should help with understanding of the laws and their rights in the United States.

5.B. NON-PROFITS CAN SEEK FUNDING. Two discussion groups thought nonprofits should find grants for supportive services and engage in land trusts.

5.C. BUSINESSES HAVE SEVERAL ROLES. One discussion group prioritized the development of Community Benefits Agreements and noted that businesses should “provide services to neighborhoods and make specific commitments to communities.” Other discussion groups thought businesses should build affordable housing and take risks in lower income neighborhoods. Affordable housing developers need to “affirmatively market.” More sizes of units are needed, from efficiencies to four or more bedrooms.

Non-developer businesses should be aware of the impact businesses have on communities, bring investments to areas of opportunity, and invest in communities of need. Businesses should put pressure on political leadership to create incentives for businesses to move into low-income or high minority areas. Realtors should do more marketing to members of protected classes.

6. WHAT IS A CITIZENS’ ROLE TO HELP DECREASE HOUSING DISCRIMINATION?

6.A. ADVOCATE AND PARTICIPATE. Housing Forum participants thought that the primary role of citizens is to get organized, get involved, participate in fair housing issues, and advocate for change. Citizens can establish neighborhood associations, volunteer, increase charitable contributions and engagement with nonprofits, actively participate in community forums, reach out to elected officials, and organize with other residents. In addition,

citizens should put pressure on political leaders to find solutions to housing discrimination. In particular, more organization and empowerment is needed in Latino and other non-Black minority groups.

6.B. SEEK EDUCATION AND EDUCATE OTHERS. The second most significant role for citizens is to become educated about fair housing rules and regulations, learn more about their rights, become familiar with the different forms of discrimination, provide education for youth and young adults, share stories of discrimination with others, educate neighbors and friends, and attend fair housing meetings. One idea posed is to appoint a block captain or building captain who will be the liaison to the City and help educate neighbors. Another idea was to have a citizen-staffed call center for reporting incidences and providing information.

6.C. INCREASE ACCOUNTABILITY. A third role for citizens, mentioned by more than half of the discussion groups, is to increase accountability by reporting discrimination.

APPENDIX A: AGENDA FOR THE HOUSTON FAIR HOUSING FORUM

JANUARY 29, 2014 AT FEDERAL RESERVE BANK – HOUSTON BRANCH

Registration	8:30 a.m.
Forum Call to Order and Acknowledgments Brenda Scott, Deputy Assistant Director, City of Houston Housing and Community Development Department	9:00 a.m.
Welcome and Opening Remarks Donald N. Bowers II, Vice President, Federal Reserve Bank – Houston Jackie Hoyer, Senior Community Development Advisor, Federal Reserve Bank - Houston Neal Rackleff, Director, City of Houston Housing and Community Development Department	9:05 a.m.
Panel Discussion: Defining the Problem: The impact of housing discrimination Al Henson, PhD, Staff Analyst, City of Houston Housing and Community Development Department Susan Rogers, Professor, University of Houston Community Design Resource Center Lester King, PhD, Sustainability Planner, Rice University Shell Center for Sustainability	9:20 a.m. - 10:10 a.m.
Break (10 minutes)	10:10 a.m. – 10:20 a.m.
Small Group Discussion <ul style="list-style-type: none">• What are the challenges that people face when finding and maintaining housing?• What are the barriers to fair housing choice in Houston?• What are the challenges that the City faces to decrease housing discrimination?	10:20 a.m. – 11:35 a.m.
Break for Lunch	11:35 a.m. – 11:45 a.m.
Keynote Speaker: Stephen Klineberg, PhD, Rice University Kinder Institute of Urban Research	11:45 a.m. - 12:15 p.m.
Panel Discussion: Legal Trends in Fair Housing Cynthia Bast, Partner, Locke Lord Scott Marks, Director, Coats Rose	12:30 p.m. - 1:30 p.m.
Break (10 minutes)	1:30 p.m. – 1:40 p.m.
Panel Discussion: Fair Housing Perspectives: Addressing Discrimination and Promoting Choice Daniel Bustamante, Director, Greater Houston Fair Housing Center John Henneberger, Co-Director, Texas Low Income Housing Information Service Neal Rackleff, Director, City of Houston Housing and Community Development Department	1:40 p.m. – 2: 40 p.m.
Small Group Discussion <ul style="list-style-type: none">• What can the City do to decrease housing discrimination and promote housing choice?• What can nonprofit organizations and businesses do to decrease housing discrimination and promote housing choice?• What is a citizens’ role to help decrease housing discrimination?	2:40 p.m. – 3:50 p.m.
Closing Remarks Brenda Scott, Deputy Assistant Director, City of Houston Housing and Community Development Department Veronica Chapa, Deputy Director, City of Houston Housing and Community Development Department	3:50 p.m. – 4:00 p.m.
Adjourn	4:00 p.m.

APPENDIX B: ORGANIZATIONS AND INDIVIDUALS REPRESENTED AT THE JANUARY 29, 2015, HOUSTON FAIR HOUSING FORUM

Amerifirst Home Loans, LLC	I Am Pleased Development Center
Private Attorney at Law	ICARE CMM
Avenue CDC	ITEX Group
BBVA Compass	Jackson Hinds Gardens
Capital One Bank	Kelly Village Resident Council Board
Chinese Community Center	KEW Learning Academy
City of Houston Citizens	Kimble Senior Living
City of Houston Housing and Community Development Department	Kinder Institute of Urban Research
City of Houston HTV	Knowles Temenos Apartments
City of Houston Legal Department	Locke Lord LLP
City of Houston Mayor's Office for People With Disabilities	Mason Sweeney and Company
City of Houston Planning and Development Department	MHMRA of Harris County
Cloudbreak Communities	MKP Consulting
Coalition for the Homeless of Houston/Harris County	Montgomery County Community Development
Coats Rose	Morningside Research and Consulting
Covenant Community Capital	National Association of Hispanic Real Estate Professionals
Credit Coalition	New Hope Housing, Inc.
Cuney Homes	New Penn Financial, LLC
Cuney Homes Residential Council	North Star Title
Family Houston	Oxford Place Houston Housing Authority
Family Service of Greater Houston	Pilgrim Place I Inc.
Federal Reserve Bank	Pilgrim Place II Inc.
Fidelity National Title	Pilgrim Place Management Agency Apostil
Fifth Ward Community Redevelopment Corporation	Rice University Shell Center for Sustainability
Fort Bend County Community Services Department	Salvation Army Social Services
Greater First Missionary Baptist Church	SEARCH Homeless Services
Greater Houston Fair Housing Center	Southwest ADA Center at ILRU
Greater Southeast Management District	Tejano Center for Community Concerns
Harris County Area Agency on Aging	Texas Low Income Housing Information Service
Harris County Community Services Department	Texas Organizing Project
Harris County Housing Authority	The Fifth Ward Stakeholder Partnerships
Harris County Public Health and Environmental Services	The Housing Corporation
Houston Area Community Services	The Salvation Army
Houston Area Urban League	University of Houston
Houston Habitat for Humanity	University of Houston Community Design Resource Center
Houston Housing Authority	Uplift 4th Ward
Houston Housing Authority Commissioner	Vaughan Nelson Investments
HUD - Houston Field Office	W. Leo Daniels Towers
HUD - Legal Division	Wells Fargo Home Mortgage
HUD - Office of Fair Housing and Equal Opportunity	Womack Development & Investment Realtors
	Zardenta Agency
	Zions Bancorporation

Findings from Public Participation Discussion Groups 2015-2019 Consolidated Plan (Con Plan) & 2015 Analysis of Impediments (AI) to Fair Housing Choice

Background:

In preparation for the planning of the Con Plan and AI, HCDD staff established goals and strategies to work towards over a 6-month period in a Public Participation Plan (Public Participation). Public Participation for both the Con Plan and the AI was carried out in 3 phases. Discussion groups occurred in phase 2 of the planning process for the purposes of devising strategies to address the priority needs for Houston's unique communities. The established goals for Public Participation are: Goal 1) to expand upon the outreach efforts of existing planning processes; Goal 2) to engage all citizens when gathering input on community needs, proposed strategies, and review of proposed plans; Goal 3) to increase citizen feedback, buy-in, and support of Con Plan; and Goal 4) to incorporate local data into planning process and validate the accuracy of this data. The Public Participation discussion groups allowed HCDD to achieve its four goals by creating a mechanism for citizen involvement in the development of strategies to address priority needs. Additionally, citizens were educated and informed about the Con Plan and AI process. HCDD reached out to and engaged citizens from diverse social, economic, and professional backgrounds in the planning process. This ensured that citizens held buy-in to the planning process of both the Con Plan and the AI. The comments and recommendations of the citizens will be included with the final plan submissions to the U.S. Department of Housing and Urban Development (HUD).

The Process:

Beginning in October of 2014, HCDD staff engaged in discussion group meetings for the development of the 2015-2019 Con Plan and the 2015 AI. Staff met and talked with residents from the local housing authority, area residents whom reside in the central, north, south, and east locales of Houston, persons with disabilities, interdepartmental city staff, partners and stakeholders, elder care service providers, and public service providers for low- to moderate-income persons. HCDD's purpose for holding the discussion group meetings was: 1) to determine local needs; 2) to discuss possible impediments to fair housing choice; 3) to formulate strategies to address needs; and 4) to strategize on ways to eliminate discriminatory practices in housing and city services. Although the presentations and the subsequent discussions that followed mirrored a similar format, the discussion questions were structured in a way to determine the specific needs, observations and recommendations from the personal and/or professional experiences of the group participants that happened to be engaged in dialogue with HCDD staff at the given time.

The Findings:

The participant responses from the nine (9) discussion groups totaling 239 participants have been characterized for this report based on the associations and similarities of the discussions groups. Neighborhood and community discussion responses are itemized by areas, unless otherwise noted. Discussion questions about the possible impediments to fair housing choice and strategies for the City of Houston to employ to address discrimination in housing were asked of all discussion groups. Discussions with interdepartmental city staff and HCDD partners and stakeholders concentrated exclusively on identifying impediments to fair housing choice and devising plans for the City to Affirmatively Further Fair Housing. The discussion groups' responses to questions are presented in either a narrative or bullet point format. HCDD staff then combined responses from each discussion questions into a general theme. The themes from the discussion groups participants' responses are identified in bold at the end of each question.

Neighborhood and Community Discussions: Total of 63 participants

For the Neighborhood and Community discussions, HCDD staff held four group discussions with the east, central, north, and south area residents of Houston. Participants were either neighborhood residents or members of Civic Clubs, Super Neighborhoods and/or affiliated with the Texas Organizing Project (TOP). A super neighborhood is a geographically designated area where residents, civic organizations, institutions and businesses work together to identify, plan, and set priorities to address the needs and concerns of their community. TOP works to improve the lives of low-income and working class Texas families through community organizing, and civic and electoral engagement. TOP is a membership-based organization that conducts direct action organizing, grassroots lobbying and electoral organizing led by working families.

The discussion questions and each area's response are summarized below.

1. What do you like most about where you live?

Central Area:

Residents value the location and the existence of single family homes and the history of the neighborhood. The churches and the new community gardens are needed and welcomed.

East Area:

Residents like the location because it has less traffic than other communities. They have friendly neighbors. Good access to amenities, a grocery store is within walking distance. The Metro (Metropolitan Transit Authority) bus services are great.

North Area:

Residents like that the area is not overdeveloped with plenty of trees and large lots. The area is quiet area, neighbors are friendly. The schools are close and there is a health clinic nearby in case of an emergency.

South Area:

Residents like the close location to freeways and the new construction of the Metro Rail that is being developed. The area's land cost is low and housing is affordable.

Theme: Good location; single family homes; friendly neighbors

2. What don't you like about where you live?

Central Area:

Infrastructure improvements are needed, basic city services are missing, and the community's public health and safety are at risk with poor air quality and lack of healthcare clinics. Residents need recreational opportunities (parks) and economic development (grocery stores, jobs).

East Area:

Residents need improvements to the infrastructure, more sidewalks and complete sidewalks. Residents believe that they are missing basic city services such as fixing potholes, more street lights and accessibility services and infrastructure for the disabled. Public health and safety is a major concern due to the poor air quality.

North Area:

Streets are too narrow making it difficult to park, and the roads are in need of improvements. Residents believe that the City needs to educate people on calling 311 to report problems. Residents are unaware that the more calls that the City receives on a specific problem in an area raises its priority. Resident would like more community engagement with the city in the form of workshops to discuss needs and educate residents on land rights and wills to eliminate information gaps.

South Area:

Infrastructure improvements are needed for the roads and streets in the area. Residents need more basic city services to make their community attractive and suggest that the city concentrate funds within the area by serving as a catalyst to bring in market forces to improve the condition of the area and the quality of housing.

Theme: Infrastructure improvements; lack of basic city services and amenities; public health compromised

3. How can where you live be maintained/preserved/improved?

Central Area:

Residents recommend that the City, Community and Developers enter into a Community Benefits Agreement, where economic development partnerships are a provision of the proposals. For instance, a multifamily developer will partner with a chain grocer to open a store in the community if there is not a grocery store within a 2 to 3 miles radius. The community needs to sustain neighborhood engagement and civic involvement with the City government, and demand more investment in education.

East Area:

Residents recommend that the City implement and enforce a fine for businesses that have repeatedly polluted the air – and the money to be reinvested in the community. This is similar to implementing a community benefits agreement. Public Health and safety is also compromised by the amount of abandoned/foreclosed apartment complexes. The City needs to do a better job of removing these crime magnets and eyesores.

North Area:

Residents need more sidewalks and street lights for pedestrians to be safe while walking (infrastructure improvements). The north area is overrun with illegal dumping, which occurs heavily in the ditches. This is a major cause of flooding in the area during storms and the City needs to do a better job of maintaining ditches (basic services). There are overgrown lots that are breeding grounds for crime (public health and safety). The junk yards along West Montgomery and Wheatley Road are eyesores and is impeding residential development (improve the quality of the area).

South Area:

Higher fines or stricter laws for certain communities to inhibit illegal dumping were suggested by residents. Residents complained about pollution from refineries and the rock quarry located in their community that affect public health and safety and make the area undesirable for new housing and economic development.

Theme: Improve the condition of the area; provide more city services; improve the quality of existing housing stock, improve public health and safety

4. What are your feelings about subsidized housing?

Central Area:

Residents recommend that the City improve the condition of existing housing stock for both rental and single family housing. The community believes that they have their fair share of subsidized multifamily developments. The City should form and enforce a policy to prohibit developers from selling the property before a certain time period (10 years of the affordability period). The City must investigate code violations and enforce occupancy codes, especially for single family and multifamily rental housing. The area needs housing – specifically elderly housing.

East Area:

The east area has a large population of renters. Residents believe that landlords are engaging in rent speculation especially in the Houston Housing Authority voucher program. The City must do a better job of monitoring rents so that the cost to rent a single family home or apartment unit falls within the market value of the area rental rates. The City needs to fill information gaps by offering more assistance in credit counseling, financial literacy, and homeowner counseling. Residents believe that low rental rates impede the maintenance and upkeep of single family and multifamily rental housing. A consequence of low rents is that landlords cannot meet the needs of tenants and address the structural wear and tear of property.

North Area:

Both single and multifamily existing housing stock is in disrepair and needs to be improved. Government funding for programs is inadequate and does not meet the housing needs of the area. There is not enough good quality housing and the housing that exists is in poor quality. The City's single family home repair activities should not restrict assistance for only persons with disabilities and the elderly but be open to all that are in need.

South Area:

While residents feel that subsidized housing is needed, they would like for their area to have more mixed-income housing. The south area has been inundated with low-income housing that has, over time, devolved into disrepair. They suggested that the City offer more incentives to developers to improve quality of the existing subsidized housing stock instead of constructing more. In addition, the residents of low-income housing do not feel connected with the community and fail to maintain the appearance. Residents suggested entering into an agreement between the tenant associations and civic associations to foster a better sense of community and shared purpose.

Theme: Poor quality housing; poor maintenance; over concentration of low-income housing in minority neighborhoods; limited financial resources to improve housing

5. What are the challenges for people to find and maintain housing?

Central Area:

Residents believe that people do not know about the availability of financial assistance. There is limited availability of housing. Discriminatory lending practices, low income and wages, maintenance cost, and property taxes are challenges for residents to find and maintain housing.

East Area:

Residents believe poor credit and financial literacy are challenges. People are unaware of the assistance for credit, financial literacy, and homeowner counseling that is available.

North Area:

Residents believe that low earnings/income/salaries are impediments to fair housing choice. Loans are difficult to obtain from banks to buy a home or improve an existing home.

South Area:

Residents believe that discriminatory lending practices, such as redlining by mortgage lenders, are an impediment to building and improving housing developments. Discrimination exists in city services based on inequitable services, including programmatic parameters that weed out residents that are in need of assistance and long, confusing processes to receive assistance.

Theme: Discriminatory practices in housing; lack of income for persons; lack of financial education; lack of knowledge about affordable housing options

6. What can the City do to decrease housing discrimination?

Central Area:

Residents recommend that the City increase the minimum wage and provide basic services to protect public health and safety, improve the condition and quality of housing stock, and provide fair housing education, outreach and enforcement.

East Area:

Residents recommend that the City actively provide fair housing education and outreach, produce fair housing PSAs, and engage in more dialogue with citizens about the impediments to fair housing choice.

North Area:

Residents recommend that the City conduct more neighborhood discussions to educate people about their rights. Residents want the City to meet with community residents through Super Neighborhoods and civic clubs to educate them on how to report and file fair housing complaints.

South Area:

Residents recommend that the City to do a better job of monitoring subrecipients of federal funds. Residents request that the City create a Citizens Review board or commission to evaluate the city's process in providing services.

Theme: Educate communities about fair housing; enforce fair housing law; provide basic city services, improve the quality of affordable housing and existing housing stock; provide financial literacy education

7. What is the citizens' role to help decrease housing discrimination?

Central Area:

Citizens must identify and report problems and take action. Citizens must hold City accountable for educating citizens on the fair housing law and enforcing the fair housing law by going after violators.

East Area:

Citizens should have a way to become more involved in the reinvestment or maintenance of the community – teach others to upkeep and care for their home.

North Area:

Citizens must be better informed about the fair housing law and share information with family and friends by filling information gaps.

South Area:

Citizens should become more informed by joining Super Neighborhoods groups and civic clubs to advocate for their communities.

Theme: Be involved; be aware of fair housing rights; take action

Houston Housing Authority Resident Council Discussion: Total of 40 participants

HCDD held one group discussion with the Houston Housing Authority (HHA) Residential Council. Members of the HHA Residential Council are elected by residents to perform a number of tasks, including planning events and activities, fundraising, addressing resident concerns and coordination with Houston Housing Authority staff and community service providers. Discussion questions and attendee responses are provided below in bullet format.

1. What do you like most about where you live?

- Location
- Proximity to downtown, freeways, nice university
- Bus service
- Amenities (Shopping)
- Proximity to schools, community center, neighborhood gathering places
- Village like/feeling of community

Theme: Good location; good transportation, has amenities

2. What don't you like about where you live?

- No stores like grocery store, retail/clothing stores
- Location is too far out
- Vacant lots
- Lack of transportation
- Condemned Buildings
- Odor
- Issue with rats/other rodents
- No close jobs for young people
- Bus does not go where I want to go
- Lighting
- Exercise/recreation facilities are not close

Theme: Poor housing conditions, poor maintenance, limited transportation, depressed area

3. How can where you live be improved?

- More grocery stores/economic development
- Keep historic nature of neighborhood
- More opportunities for community to be at the table/involvement to improve community/advise future development
- More free children's activities/afterschool care
- More police substations
- Enforce rules of affordable housing complexes for tenants
- More training/workforce programs/mentor programs/Increase entrepreneurship
- Gentrification/new expensive development is pushing people out/need more mixed-income new housing
- More security at bus stops

Theme: Economic development; workforce programs; mixed-income development; public safety

4. What are your feelings about living in affordable housing?

- Stigma about housing authority residents not working which is not true
- Proud of where I am
- Others think that other housing is better than public housing
- Others think they can treat public housing poorly when they come to visit
- The community of Houston should be educated about the face of public housing
- Positive thinking = positive lifestyle
- Not where you live, it's how you live
- Proud to be in public housing/it's been a blessing

Theme: Stigma; should be proud; should be positive

5. Do you know of any difficulties to building and maintaining affordable housing?

- Relocation is hard when landlords need to do maintenance/upgrades to units
- People don't want affordable housing in their community/NIMBYism
- Contractors don't understand Houston
- Hire people in town/in the local community

Theme: Community resistance; high maintenance costs

6. What are some strategies to promote affordable housing?

- Make the public aware of programs (Radio Stations targeting certain demographics such as other languages)
- Work with school districts – Career day
- Signage at the housing authority (represent the housing authority at tax credit properties) – show that affordable housing is nice
- Libraries
- Pay church representatives to advise the community
- Radio and TV commercials in different languages to represent different programs
- Offer classes to explain what affordable housing is in order to combat the negative stigma
- Spread the word that affordable housing is safe
- Partner with big business

Theme: Fair housing education; public services announcements; partnerships to promote fair housing; educate the public on the true face and value of affordable housing

Interdepartmental City of Houston Staff, HCDD Partners and Stakeholders Discussions:

Total of 11 participants

HCDD staff met and engaged in discussion with the appointed members of the HCDD Community Development Advisory Committee (CDAC). CDAC membership represents a broad spectrum of organizations in the fields of housing, community and economic development, and social services. In addition, HCDD staff engaged in a group discussion with an interdepartmental working group formed after the submission of the Fair Housing Action Statement – Texas (FHAAT). The FHAAT Interdepartmental Working Group holds quarterly meetings to review projects and activities to ensure compliance with the Fair Housing Law including the City's Affirmatively Furthering Fair Housing obligations.

CDAC Discussion:

1. What are some of the reasons that denial rates are higher and application rates are lower for minorities?

The area housing market value may be contributing to the high denial rates among the minority population. The City should compare denial rates in high opportunity and low opportunity areas to determine the cause. There may also be a high rate of homes purchased with cash that is contributing to the low application rate among minorities. In addition the condition or lack of infrastructure in certain communities is not conducive for development.

Theme: High and low area housing market and the conditions or lack of infrastructure

2. What are some strategies to promote homeownership among minorities?

Promote housing option programs to minority population, such as Federal Housing Administration and Veterans Administration loans. Promote areas of opportunity for downpayment assistance programs. Promote homeownership marketing campaign by targeting governmental and agencies staff.

Theme: Promotion of housing financial assistance and options

FHAST Interdepartmental Working Group Discussion:

1. What are some barriers to fair housing choice in Houston?

Lack of education on fair housing rights is the major barrier to fair housing choice in Houston. Following that is the imbalance of basic city services and amenities. Basic city services consist of alternative transportation (bike routes, public transportation); limited insurance choices; cost of housing vs quality of schools; gentrification of a neighborhood by increases in land costs and property taxes.

Theme: Lack of education on fair housing; imbalance of basic city services; limited options in housing amenities by neighborhoods

2. What does your Department currently do to Affirmatively Further Fair Housing (AFFH)?

By ensuring that appropriate city services are available in every area:

- Library branches offer the same level of services
- Parks reviews and up keeps equipment, recreation centers within the city
- Public Works uses findings from the recent ditch study that analyzes the condition and performance of ditches in comparison to storm sewers pipes
- Rebuild Houston process makes sure that infrastructure in the worse areas of Houston are made a priority
- Minimum lot size and building line program to offer a 20 year protection on lot size to preserve the character structure of a neighborhood.

Theme: Equitable city services; assist in the preservation of neighborhoods

3. What are the challenges your Department finds when AFFH?

Cost to maintain city services and infrastructure does not compete well with other needed services and infrastructure needs and wants; therefore maintenance can be neglected. Limited funding and unfunded mandates leads to the perception that areas are being neglected. Competing interest among communities reinforces the belief that more affluent areas are getting all the services, and the affluent areas believing that the poor areas are getting all the services. Political pressure exacerbates this.

Theme: Limited funding

4. How can the City, organizations, and citizens protect people from discrimination in housing?

The City could better inform the public about available services. Improve the 311 process and response times. Cross training of City department staff to identify problems. Provide general public with more education and outreach on fair housing, homeowner counseling and city budget process. Encourage citizens and citizen groups to get involved to protect their rights.

Theme: Inform public about available City services; fair housing education and outreach; provide equitable city services

Special Needs Population and Service Providers' Discussion: Total of 125 participants

HCDD staff engaged in three (3) group discussions with members of the disability community, members of a network of financial assistance providers and elderly services providers. Representing the disability community, the Houston Center for Independent Living (HCIL) promotes the full inclusion, equal opportunity and participation of persons with disabilities in every aspect of community life. HCIL's mission is to advocate on behalf of the disabled community for the right to make choices affecting their lives, a right to take risks, a right to fail, and a right to succeed. The United Way THRIVE is a network of financial assistance providers that helps families build stronger financial futures by acquiring skills and education, obtaining better jobs, developing good financial habits and building savings. And the United Way Care for Elders Access Network partnership between 211 and social service agencies that provides a one-stop referral source for older adults in need.

HCIL Discussion:

1. What are the obstacles for persons with disabilities living in Houston?

- Finding accessibility and affordable housing for persons with physical disabilities
- Discrimination
 - Landlords not providing reasonable accommodations or charging more to persons with physical disabilities
- Public transportation
- Infrastructure
 - Crossing lights that speak are great but only in a few places
 - More street and infrastructure for persons with disabilities is needed
- Public safety

Theme: Lack of accessible and affordable housing; discrimination; public transportation; poor infrastructure; public safety

2. Are there any gaps in the provider system/social service system in Houston?

- Long transition period between provider networks for benefits
 - Paperwork in transition from another state
- Income limits are too low
- Services for the disabled are difficult to obtain if you are not a senior citizen

Theme: Unattainable services; program income limits; lengthy transition periods

3. What are the challenges for persons with disabilities to find and maintain housing?

- Income
 - Affording the deposit and first month's rent
- Affordable accessible rental housing
- High maintenance costs
- Housing or services income limits are too low
- Discrimination against persons with disabilities

- Limited legal services
- Inaccessible infrastructure
 - Sidewalks, curbs, street signs
- Mold exposure remediation too expensive and is needed

Theme: Upfront costs; accessible housing; maintenance costs; inaccessible infrastructure

4. What can the City do to decrease housing discrimination and promote housing choice?

- Build accessible in residential areas (complete sidewalks)
- Increase training for people providing services
- Fair housing training for all staff of housing providers that receive funds from CoH
- CoH should pass a substantially equivalent fair housing ordinance with enforcement actions
- CoH should provide financial resources for fair housing education and enforcement
- CoH should monitor all recipients of funds to ensure that the needs of people with disabilities are met

Theme: Fair housing enforcement; monitor providers; complete sidewalks; provide financial resources

THRIVE Discussion:

1. What are some obstacles for low-income Houstonians to build wealth?

Participants list personal finances as obstacles for low-income Houstonians. Unemployment coupled with the high cost of living is an impediment to building wealth. Many low-income Houstonians lack education and do not have marketable skills to be competitive in the workforce. The high cost of maintaining personal transportation and inadequate public transportation limit employment options. These impediments lead to a high dependency on social services programs.

Theme: Unemployment; high cost of living; limited transportation options

2. What are the challenges for organizations that provide services to low-income Houstonians?

Participants list social services programs not adequately addressing the multi-faceted needs of low-income Houstonians, such as providing affordable childcare for clients. Limited funding and programmatic funding restrictions is a challenge due to the large number of people in need of assistance. There is also a lack of awareness about available resources because of cultural differences or language barriers.

Theme: Inadequate services; limited funding; program restrictions; lack of knowledge about resources

3. Are there any service gaps in the current provider system to assist low-income Houstonians?

Participants list the lack of client support while trying to obtain training/certifications for employment. Job placement for ex-offenders is extremely difficult to find. There is not enough flexibility in service programs; too many restrictions especially with government funded programs. Most service provider hours of operation are during traditional working hours and the application process for assistance is long, confusing and constantly changing. In addition, the limited availability of affordable housing units and financial assistance for rent, utility and mortgage payments leaves many eligible clients without assistance. Providers have difficulty assisting clients in need of medical care especially for the persons with mental illness.

Theme: Lack of client support; government services inflexibility and restrictions; limited availability of affordable housing units and financial assistance

4. What are the challenges for Houstonians to find and maintain housing?

Participants list the lack of income and low wages as challenges to finding and maintaining housing. Retention in employment, bad credit and financial history are challenges for low-income persons. Factors that affect housing stability are the lack of knowledge about personal finance and the home buying application process. In addition to the high cost of housing – property taxes and insurance are contributors to housing instability. Low-income persons are subjected to discriminatory lending practices and are unaware about the City's downpayment assistance program. Another contributing factor is the inability to find and maintain housing in areas with good schools job opportunities and affordable housing options.

Theme: lack of income; lack of knowledge about personal finance; lack of knowledge about the home buying process and available resources; the availability of affordable housing in areas with good schools and job opportunities

5. What can the City do to decrease housing discrimination and promote housing choice?

Provide public information about fair housing rights. Enforcement of the fair housing law and holds violators accountable. Promote and fund more financial education. Create incentives for developers to build more affordable housing throughout Houston.

Theme: Fair housing education and enforcement; financial education; more incentives for affordable housing developers

Care of Elders Discussion:

1. What are the challenges for organizations that provide housing and services to elderly persons?

Seniors have limited income to get into and/or maintain housing:

- Lack of funding/resources for senior housing providers and agencies.
- Lack of knowledge concerning options for home ownership (exemptions they might qualify for, loan modifications options etc.)

High cost of housing

- Includes deposits and maintenance and assisted living facilities.

Seniors lack of affordable housing options as demonstrated through long waiting lists and affordable senior housing located outside the city limits

Seniors have limited transportation options

Theme: Limited income; limited affordable housing options; limited transportation

2. Are there any service gaps in the current system to assist elderly persons?

Gaps in transportation service:

- Short trip transportation

Financial gaps:

- High costs to get into housing and/or stay in housing
- Seniors need financial assistance or waived these fees

No connection of senior services:

- Difficult identifying those in need
- Not enough awareness on how to access services
- Resources for elderly could be including in the water bills

Not enough housing or housing options:

- Waiting lists for Section 8, HUD Housing, Public Housing, etc. are too long
- Not enough shelters for seniors
- Landlords refuse to provide reasonable modifications

Theme: Gaps in transportation services; limited financial capacity; fragmented services; limited housing options

3. What are the challenges for seniors to find and maintain housing?

High cost to find and maintain housing:

- Rental increase
- Repairs maintenance
- Moving expenses/logistics

Limited knowledge of available resources for seniors:

- Knowing where to start to look for housing/resources Lack of knowledge of their rights
- No computer skills poor credit or no credit history/identify theft

Lack of safe, accessible, affordable housing:

- No amenities (like washer/dryer)
- Modifications for persons with disabilities

Unresponsive landlords:

- Landlords not making needed repairs

- Pest control
- Refusing to make reasonable accommodations (ex: accepting pets)

Limited assistance available for seniors:

- Not enough home repair assistance

Theme: High cost of housing; lack of accessible housing; unresponsive landlords; limited assistance

4. What can the city do to decrease housing discrimination for elderly persons?

Educate public about their rights:

- Public education to make elderly aware of discrimination and homestead exemptions information at senior centers, through case managers, meals on wheels, etc.
- Do more outreach at senior apartment complexes to educate the residents about their rights

Enforcement of codes/laws to ensure safety of residents:

- Do random inspections
- Conduct investigations at senior apartments to make sure seniors are being treated okay and the premises are well kept
- Senior apartment ombudsman program/corps
- Offer apartment managers incentives to streamline number of trips required to rent/waitlist (online applications/wait list registration)
- Fair housing testing

Rental Deposit Revolving Fund:

- Program that provides rental deposits/guarantees – starting a revolving fund for deposits would be great and is needed

Legal Assistance Expansion:

- Expand legal services for seniors – specifically regarding tenant landlord issues

Real Time Housing Availability:

- Routine updates of available senior housing

Theme: Educate public about fair housing, enforcement of fair law; create rental deposit fund; expand legal assistance for seniors; develop senior resource database

Summary

To summarize the findings from nine (9) discussion groups and a total of 239 participants, staff organized discussion questions into the following categories: community needs; impediments to fair housing; and strategies to address needs and eliminate impediments to fair housing choice. Similar discussion questions were combined when appropriate, except for questions that targeted special needs population, such as the disabled and elderly. The discussion questions from each group were assigned to a category. The repeated themes identified from the participants responses to the discussion questions were then coalesced together to demonstrate its importance among group discussion participants. Staff created word clouds for each category.

Community Needs:

- What do you like most about where you live?
- What don't you like about where you live?
- How can where you live be maintained/preserved/improved?

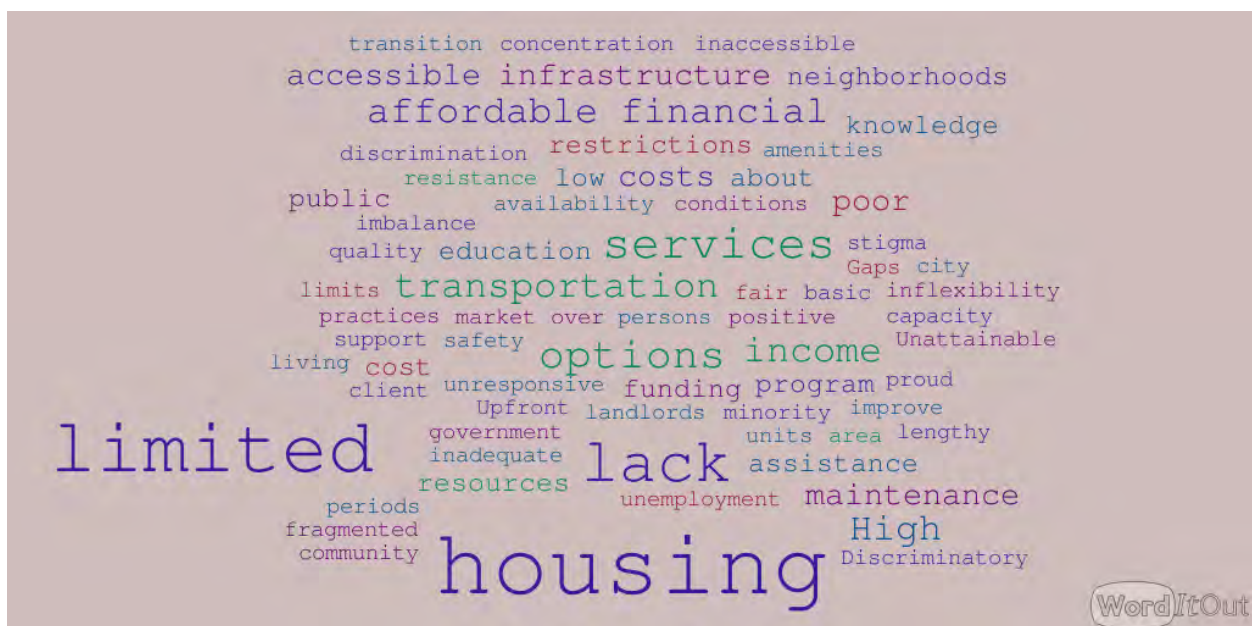
Themes: Good location; single family homes; friendly neighbors; infrastructure improvements; lack of basic city services and amenities; public health compromised; improve the condition of the area; provide more city services; improve the quality of existing housing stock, improve public health and safety; Good location; good transportation, amenities; Poor housing conditions, poor maintenance, limited transportation, depressed area; Economic development; workforce programs; mixed income development; public safety



Impediments to Fair Housing Choice:

- What are the challenges for people to find and maintain housing?
- What are some barriers to fair housing choice in Houston?
- What can the City do to decrease housing discrimination and promote housing choice?
- What are the challenges for persons with disabilities to find and maintain housing?
- What are your feelings about subsidized housing?
- What are some of the reasons that denial rates are higher and application rates are lower for minorities?
- What are the challenges your Department finds when AFFH?
- Are there any gaps in the provider system/social service system in Houston?
- What are some obstacles for low-income Houstonians to build wealth?
- What are the challenges for organizations that provide services to low-income Houstonians?
- Are there any service gaps in the current provider system to assist low-income Houstonians?
- What are the challenges for organizations that provide housing and services to elderly persons?
- Are there any service gaps in the current system to assist elderly persons?

Themes: Poor quality housing; poor maintenance; over concentration of low income housing in minority neighborhoods; limited financial resources to improve housing; Discriminatory practices in housing; lack of income for persons; lack of financial education; lack of knowledge about affordable housing options; stigma; should be proud; should be positive; community resistance; high maintenance costs; High and low area housing market and the conditions or lack of infrastructure; Lack of education on fair housing; imbalance of basic city services; limited options in housing amenities by neighborhoods; Limited funding; Lack of accessible and affordable housing; discrimination; public transportation; poor infrastructure; public safety; Unattainable services; program income limits; lengthy transition periods; Upfront costs; accessible housing; maintenance costs; inaccessible infrastructure; unemployment; high cost of living; limited transportation options; inadequate services; limited funding; program restrictions; lack of knowledge about resources; Lack of client support; government services inflexibility and restrictions; limited availability of affordable housing units and financial assistance; Limited income; limited affordable housing options; limited transportation; Gaps in transportation services; limited financial capacity; fragmented services; limited housing options; High cost of housing; lack of accessible housing; unresponsive landlords; limited assistance



Strategies to address needs and eliminate impediments to fair housing choice:

- What can the City do to decrease housing discrimination?
- Strategies to promote affordable housing.
- What can the city do to decrease housing discrimination for elderly persons?
- How can the City, organizations, and citizens protect people from discrimination in housing?
- What are some strategies to promote homeownership among minorities?
- What does your Department currently do to Affirmatively Further Fair Housing (AFFH)?

Themes: Educate communities about fair housing; enforce fair housing law; provide basic city services, improve the quality of affordable housing and existing housing stock; provide financial literacy education; fair housing education; public services announcements; partnerships to promote fair housing; educate the public on the true face and value of affordable housing; promotion of housing financial assistance and options; Equitable city services; assist in the preservation of neighborhoods; Inform public about available City services; fair housing education and outreach; provide equitable city services; Fair housing enforcement; monitor providers; complete sidewalks; provide financial resources; Fair housing education and enforcement; financial education; more incentives for affordable housing developers; Educate public about fair housing, enforcement of fair law; create rental deposit fund; expand legal assistance for seniors; develop senior resource database



Overview

The Key Stakeholder Interview process is a new public outreach method conducted by HCDD to collect input for the 2015-2019 Consolidated Plan (Con Plan) and 2015 Analysis of Impediments to Fair Housing Choice (AI). Face-to-face and telephone interviews were conducted to solicit input from local housing advocates, business owners, developers, and nonprofit and faith-based organizations.

The stakeholders selected serve low- and moderate-income persons and low- and moderate-income neighborhoods. The purpose of these interviews was to reach out to stakeholders to obtain information relevant to the issue of fair housing and affordable housing and needs of low- and moderate-income citizens. Additionally, this report will supplement the other citizen and stakeholder engagement activities associated with the Con Plan and AI preparation.

Methodology For Developing The Report

HCDD staff identified stakeholders to interview based on the consultation requirements set forth by the U.S. Department of Housing and Urban Development (HUD) in 24 CFR 91.100. The stakeholder selection process supplemented the areas not covered in other public outreach activities. Staff contacted 20 stakeholders by e-mail to invite them to participate in an interview. Each e-mail included eight open-ended questions designed to elicit the stakeholder's perspective on community needs and potential strategies that HCDD could undertake in the next five years to address community needs. If stakeholders did not respond, HCDD staff followed up a number of times by telephone or email.

HCDD staff conducted eight interviews with key stakeholders from December 2014 to January 2015. During each interview, HCDD staff used the eight questions originally e-mailed to guide the conversation and posed additional questions or clarifications as needed to encourage stakeholders to share their opinions and experiences with fair housing and affordable housing issues.

Interview responses were recorded during each interview. The responses were sorted into groups of similar responses and categorized. This report provides a summary of the responses provided by stakeholders. The primary method utilized to collect input included: face-to-face and telephone interviews.

Key Stakeholders

Key stakeholders included directors, board members, and key staff members from the following agencies and organizations:

- Mary Lawler - *Avenue Community Development Corporation*
- Ralph Cooper - *Cloudbreak Communities, Incorporated*
- Dwight Jefferson - *Metropolitan Transit Authority Board of Directors*
- Daniel Bustamante - *Greater Houston Fair Housing Center*
- Allison Hay - *Houston Habitat for Humanity*
- Assata-Nicole Richards - *Houston Housing Authority Board of Commissioners*
- Theola Petteway - *OST/Almeda Corridors Redevelopment Authority*
- L. David Punch - *Re-Ward Third Ward Community Development Corporation*

Key Stakeholder Input

The following questions were emailed to the key stakeholders. Their input is organized by consistent themes under each of the eight questions. The responses are shown in order of the questions posed and slightly edited and condensed for clarity.

1. What are the key issues to fair housing choice in the City or the surrounding area?

- The funding decisions made by mortgage companies and banking institutions about housing excludes and limits opportunities:
 - For citizens of color
 - For families with children
 - For citizens with disabilities
 - For neighborhoods to be considered in city-wide plans
- Lack of quality affordable housing in desired geographical areas
- Lack of sustainable integrated communities that provide the amenities necessary for good quality of life
- Citizens on fixed income cannot meet all of their financial obligations needed to sustain decent, safe and sanitary housing

2. What are the barriers to affordable housing? What can the City do to remove these barriers?

BARRIERS	POTENTIAL STRATEGIES
<ul style="list-style-type: none"> • Lack of knowledge of programs offered by the City • Lack of housing literacy 	<ul style="list-style-type: none"> • Develop and/or monitor a comprehensive curriculum to provide essential workshops for income eligible homebuyers emphasizing financial planning, mortgage qualification, debt reduction and maintenance
<ul style="list-style-type: none"> • Lack of detailed guidance on the how affordable housing policies will be implemented 	<ul style="list-style-type: none"> • Ensure the housing market offers enough decent homes at a price which citizens can afford
<ul style="list-style-type: none"> • Lack of information about affordable housing activities and projects • The characteristics of neighborhoods are not being maintained • Lack of sufficient amount of supportive services for homeless and near homeless veterans 	<ul style="list-style-type: none"> • Ensure a sustained supply of new affordable homes are being developed in areas that attract young professionals to maintain the cultural connections and characteristics of historical neighborhoods • Case management ratio needs to be lessened
<ul style="list-style-type: none"> • Land costs and construction costs have continued to increase • Getting a private developer to buy into building affordable housing • Private developers are challenged with leveraging resources and funds to build affordable housing 	<ul style="list-style-type: none"> • City can provide additional subsidies to defray the costs of developing and purchasing affordable housing • City fees should be waived for affordable housing (including multi-family housing) for CHDO's and nonprofit developers. These fees include the \$700/unit park fee, water and sewer impact fees, and permitting fees

3. What are the strengths and gaps of the service delivery system for special needs (elderly, frail elderly, severe mental illness, physical disability, developmental disability, alcohol/drug abuse, HIV/AIDS, victims of domestic violence) populations? How can the gaps identified be addressed?

Strengths of Service Delivery	Gaps in Service Delivery	Potential Strategies to Address Gaps
<ul style="list-style-type: none"> • City's proactive position of providing both financial and technical assistance to residential service providers • Funding resource centers for aging, disability and mental health services where citizens may access information and referral to services • Case Managers are big advocates for serving special needs populations 	<ul style="list-style-type: none"> • Housing rehabilitation particularly for the elderly, frail elderly and citizens with physical disabilities • Lack of sidewalks in economically distressed neighborhoods • Rising housing cost presents a struggle for the elderly who are living on a fixed income – A strategy is needed to keep elderly and aging veterans in housing • Funding for intensive case management 	<ul style="list-style-type: none"> • More resources are needed to provide quality supportive services • A greater subsidy to supplement agencies that provide services for special needs population • Agencies that develop affordable housing need additional technical assistance

4. Do the skills and education of the City's workforce correspond to employment opportunities? Are there any sectors where there are surpluses of workers who cannot find work and/or sectors where there is a shortage of qualified workers?

- Veterans and citizens who have criminal backgrounds are faced with many barriers to employment opportunities. Two main concerns:
 - The training that this population receives does not correspond to the jobs they are most qualified for or in the areas they are actually employed in
 - The criminal background history is a barrier to opportunities in private sector housing and employment. It is recommended the City research bonding programs (like Galveston County) that can assist citizens to remove this barrier
- Many sources attest that educational achievement and living wages provide opportunities for a better quality of life, yet there is a lack of employment opportunities for college graduates
- Many Houstonians do not receive livable wages – better, more reliable transportation will enhance economic growth
- Provide trade experience in high schools and free community college (with emphasis on trades training), which will go a long way in addressing what is needed as Houstonians move forward

5. What impact has transit-oriented development (TOD) had on communities?

- More communities need bus/rail system to give citizens access to opportunities
 - Meet the needs of residents in economically depressed communities
 - Help more working citizens get to their jobs – better and more reliable transportation will enhance economic growth
 - To empower citizens to be less dependent on owning and maintaining a vehicle therefore, supplying them more money to address housing needs
 - To reduce pollution and promote better health
- Rail development, economic development and affordable housing development should take place simultaneously
- A transit system that offers multiple modes of commuting is needed to connect citizens to work and the institutions needed to have a better quality of life

6. What are the barriers to infrastructure development?

- The amount of City investment for infrastructure development in areas of opportunity heavily out way the amount of investment for infrastructure development in neighborhoods that are economically distressed
- Lack of projects that promote sustainable and equitable growth in all communities
- Houston has a massive backlog of deteriorating buildings
- Inadequate monitoring of areas the City has neglected to invest in for years
- There is a lack of input from citizens who reside in economically distressed neighborhoods in strategic plans that address the City's inadequate infrastructure
- Lack of convenient platforms that allows low-income citizens and special needs populations to have a voice in the City's decision making process
- Accommodations for special needs populations must be considered as part of any infrastructure plan

7. What tools, resources or strategies do you recommend the City employ to attract business owners to your TIRZ corridor and/or impacted areas?

- The creation of new sources or avenues of funding
- Coordinate efforts to leverage current resources
- Upgrade streets and parks
- Address chronic infrastructure shortfalls
- The City should share the burden of job creation and business development and not leave this responsibility solely on residents and developers

8. What strategies would you recommend the City employ to:

I. Prevent Overt Housing Discrimination

1. Implement a comprehensive effort to educate the public of the need to work in collaboration with government, neighborhood and faith-based organizations
2. Realtors and non- and for-profit developers should promote reasonably priced quality housing for income eligible citizens in our communities

II. Revitalize Communities

1. Use a comprehensive approach to affordable housing by supporting developers, students, tenants and homeowners with a variety of educational programs, training and services
2. Engaging citizens in early dialogue with planning efforts
3. Local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled

III. Foster Community Economic Development and Promote Quality of Life

1. Host webinars or other training engagements to assist citizens to define their role and responsibility to their community
2. The City should invest in learning solutions to increase educational achievement
3. The City can learn from best practices of other US cities that have increased minimum wage resulting in a more viable city

IV. Eliminate Chronic Homelessness

1. Provide greater access to affordable housing units (temporary and permanent) for homeless individuals and families
2. Increase supportive services by encouraging all providers to collaborate and share resources
3. Develop creative processes to increase facilities homeless citizens can use for productive living in order to reduce loitering/congregating in neighborhoods, shopping centers and parks
4. Create tax incentives for affordable housing developments

Summary

Twelve out of twenty key stakeholders responded to a request to participate in the interview process. Eight out of the twelve commented on their perspective of community needs and potential strategies to address the needs. HCDD was able to glean key insights from a variety of partners. These efforts resulted in a formalized structure of garnering input from stakeholders for the Con Plan and AI.

