

2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF HOUSTON
Sylvester Turner, Mayor

HOUSING AND COMMUNITY
DEVELOPMENT DEPARTMENT
Tom McCasland, Director



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1. Introduction

“Houston offers opportunity for all and celebrates its diversity of people, economy culture, and places. Houston promotes healthy and resilient communities through smart civic investments, dynamic partnerships, education, and innovation. Houston is a place where anyone can prosper and feel at home. Houston: Opportunity. Diversity. Community. Home.”¹

Fair housing and equal opportunity are fundamental principles to creating and sustaining communities in Houston. One way that the City of Houston (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 it proposes actions to remove or overcome these barriers over the next five years.

The City’s 2020 AI coincides with the City of Houston’s *2015-2019 Consolidated Plan* and builds upon previous analyses that were completed in 2005, 2010, 2014 (the amendment to the 2010 AI), and 2015. 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 seven 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

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 (AFFH) to mean

- Analyzing and eliminating housing discrimination in the jurisdiction
- Promoting fair housing choice for all persons
- Providing opportunities for inclusive patterns of housing occupancy regardless of race, color religion, sex, familial status, disability, and national origin
- Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act

¹ City of Houston. Plan Houston. September 30, 2015. Retrieved from: https://www.houstontx.gov/planning/GeneralPlan/docs_pdfs/Final_Plan_Houston_Report.pdf



As defined in the 2015 AFFH Final Rule, HUD defines AFFH as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

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 and planning under the Community Development Block Grant (CDBG) and Community Development Block Grant Disaster Recovery (CDBG-DR).

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 (AFFH) final rule, and the Assessment of Fair Housing Tool (December 2015). In 2015, HUD issued a final rule revising the AFFH reporting regulations for program participants and detailed the submission requirements in an Assessment of Fair Housing (AFH) to replace the AI. While the 2015 final rule was not fully implemented, HUD published an extension of the final rule in January 2018, which directed jurisdictions to continue submitting AIs in lieu of AFHs until after jurisdictions’ Consolidated Plans are submitted after October 31, 2020. Even though this is an AI, many of the tables and maps from the AFH 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

- Provide input opportunities for persons who are not usually part of the process
- Accommodate diverse views and interests
- 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.

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.

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 Housing Affordability and 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 fear of displacement.

7. Lack of Access to Financial Education / Discriminatory Banking Practices

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

8. Imbalanced distribution of Amenities, Services, and Infrastructure Between Neighborhoods
9. NIMBY Resistance



-
- 10. Lack of Transportation Options
 - 11. 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.

- 12. 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

Beginning in May 2019, the Houston Housing and Community Development Department (HCDD) engaged the public through several means to provide information about fair housing in Houston and to gather feedback for this document. Methods of engagement included express surveys, long surveys, mobile meetings, discussion groups, focus groups, and open houses. HCDD reached over 7,000 people in the community participation process in support of the AI.

Surveys

2019 Community Needs Survey

The 2019 Community Needs Survey was a quantitative survey conducted to inform the 2020 AI and 2020-2024 Consolidated Plan. The survey was made available in paper format, on downloadable digital format, and on an online survey platform from June 1, 2019 to September 30, 2019. Each survey format was accessible on the HCDD website, as well as in 5 languages: English, Spanish, Chinese, Vietnamese, and Korean. Paper surveys were disseminated in the HCDD front office and distributed by the Fair Housing Ambassadors program participants.

Survey questions focused on the availability and quality of community amenities, services, and programs. Other questions called for assessing current issues or challenges while some questions were demographic questions.

Results

The survey captured over 2,300 surveys from people who live and work within the City of Houston. There are general concerns about the availability of certain neighborhood amenities like libraries and grocery stores. Some had concerns that street and drainage maintenance is not adequately provided in some neighborhoods. Respondents also felt that access to transportation, legal services, and mental health services amongst other social services were also limited.

Express Survey

The Express Survey was a three-question quantitative survey used to identify level of knowledge that Houston residents have about fair housing laws and housing discrimination. The survey was orally conducted in person at METRO transit stations and by phone via HCDD's fair housing hotline and HCDD's main call center.

The express survey asked three questions:

- Do you know that it is illegal for someone to deny you housing based on a protected class, which are race, color, religion, national origin, sex, disability, or familial status?
- In the past five years, have you been discriminated against when you were looking for a new place to live in Houston based on your protected class?
- Do you know how to report housing discrimination?

Results

Of the 766 observations, one in four people (24%) did not know about or knew a little about the law against denying housing based on protected class. Almost one out of eight (12.7%) people surveyed had been discriminated against when looking for a new place to live in Houston in the past five years. When asked



what they would do if they were discriminated against in housing, only 15.7% said they would report it, and the majority of respondents (78.0%) said “I don’t know” or “Nothing”. When asked about reporting housing discrimination, about half of all respondents (50.9%) did not know how to report. Further, when comparing the METRO respondents to those that called HCDD fair housing hotline and call center, there were far more METRO respondents, 80%, that did not know how to report housing discrimination.



Stakeholder Engagement

Fair Housing Ambassadors Program

The Fair Housing Ambassadors Program lasted from July through September 30, 2019 and served to facilitate engagement opportunities for hard-to-reach communities or communities that are normally underrepresented on behalf of the City of Houston. The Fair Housing Ambassadors Program consisted of organizations and individuals gathering input about housing and fair housing needs and strategies for the Consolidated Plan and AI.

The Ambassadors were provided resources like the *2019 Community Meeting Presentation*, four discussion exercises, and guidelines and tips for meeting organizers, facilitators and notetakers. The Fair Housing Ambassadors were also encouraged to execute their own strategy to conduct public engagement, so long as necessary and sufficient feedback was gathered from the community regarding housing and fair housing needs and solutions.

Results

The Fair Housing Ambassadors program consisted of 21 ambassadors tasked with engaging Houston residents. Generally, the results found that residents are concerned about gentrification, illegal dumping, challenges with 311 call resolutions, estate planning, and property tax and housing cost increases. Residents would like the City to market programs more efficiently, as well as in different languages. Immigrant communities and disabled populations do not have adequate resources and government programs that meet their needs. Residents articulated that the City should play a greater role in alleviating these issues.

“Houston Be Fair” Focus Group Series

HCDD held a 5-part Stakeholder Focus Group Series entitled “Houston Be Fair” to gain qualitative information for the Consolidated Plan and AI. The focus group series was held over a two-week period between October 1-11, 2019 with several professional and community-oriented entities involved in the housing process. The focus of this series was to gather feedback on

- Housing challenges for protected classes
- Reasons for housing discrimination
- Housing discrimination tactics
- Potential private-public partnerships



- Potential policies or regulations
- Community engagement and empowerment strategies

On October 1, 2019, HCDD held the first focus group called “Houston Be Fair: Ending Lending Discrimination”. This effort convened housing lenders, banks, financial advisors, and real estate associations in the conversation. Some of the participants included Prosperity Bank, the City of Houston Controller’s Office, the Houston Area Urban League, the Houston Association of Realtors, JP Morgan Bank, and the Harris Housing Advisors.

On October 3, 2019, the “Houston Be Fair: Ending Rental Housing Discrimination” Part 1 was held with Houston rental housing providers and authorities, which included the Houston Housing Authority (HHA), the Houston Apartment Association, Avenue CDC, and the Housing Corporation.

As a part of the Fair Housing Ambassadors Program, the participants contributed to the “Houston Be Fair” conversation that was held on October 7, 2019 during their final wrap-up meeting. This meeting focused on community challenges that the ambassadors heard during the program tenure. Housing advocates also participated in Part 2 of the “Houston Be Fair: Ending Rental Housing Discrimination” conversation held on October 10, 2019. This assembled several advocates from the legal sector, unions, neighborhood/community organizations, community centers, policy fields, research institutes, and social service organizations.

The last focus group was held on October 11, 2019, Disability advocates participated in Part 3 of the “Houston Be Fair: Ending Rental Housing Discrimination”. Four of the focus groups were hosted at the HCDD Office; while, the disabilities focus group was hosted at the Mayor’s Office for People with Disabilities (MOPD).

Results

Each Focus group expressed similar concerns, like how a lack of childhood and adult education about financial management and wealth development tends to prohibit social mobility and housing choice. Additionally, low- and moderate-income neighborhoods lack resource proximity like banking institutions, grocery stores, transportation, and neighborhood amenities. These conditions exacerbate the disparities in finding a desirable home in a neighborhood that presents opportunities for a quality life.

Most participants agreed that more policies should be enacted to preserve home affordability upon transference of property upon death. A grassroots effort should be called upon to educate residents about maintaining their home and assist them with estate planning. The goal of these efforts would be to preserve the culture of the community and develop the community economically.

To also preserve current affordable housing stock, participants thought government agencies and developers should concentrate their actions on rehabilitating the existing housing stock, particularly homes for those who have a disability, receive limited income, or receive Section 8 assistance. Participants suggested incentives that could be offered to landlords who are proactive in taking measures to update their properties.



Community Engagement

Mobile Meetings & Resource Fairs

From June 1, 2019 to September 30, 2019, HCDD staff attended numerous mobile meetings and resource fairs. At mobile meetings, HCDD staff gave a presentation with maps about fair housing and impediments to fair housing choice. After the presentation, HCDD staff led a discussion using four questions and took notes. During resource fairs, HCDD staff passed out information about fair housing and encouraged residents to get involved by hosting a mobile meeting or taking the Community Needs Survey.

Results

Through mobile meetings, HCDD staff attended 45 mobile meetings or resource fairs and reached over 2,017 people. The top subjects that residents mentioned about why they liked their neighborhood included: amenities, recreation/green space, central location and proximity to freeways and downtown, safe and quiet, landscaping and ambience, and diversity. The challenges to living in neighborhoods often overlapped with the greatest concerns about housing in Houston. The top concern was about housing cost or affordability of housing. Other concerns included: traffic, gentrification, lack of neighborhood amenities, dilapidated housing, housing with poor surrounding aesthetics or poor design, lack of safety, dilapidated streets, and poor drainage.

Open Houses

HCDD held two Open Houses on September 4, 2019 and on September 10, 2019, which were open to the public to gather input for the Consolidated Plan and the AI. The initial Open House was held at Emancipation Community Center, and the second Open House was held at Southwest Multi-Service Center. HCDD held two virtual Open Houses on March 24 and April 7, 2020 to present and gather information about the Draft Consolidated Plan, Draft Annual Action Plan, and Draft AI.

A summary of the AI was presented to the City Council's Housing and Community Affairs Committee in March of 2020. During this meeting, a public comment opportunity was available for the AI.

Results

A summary of each Public Hearing/Open House is available in the Appendix of the 2020-2024 Consolidated Plan. The summary of public comments and the City's response concerning the draft of this AI are in an appendix of this document, as well.

Conclusion

In order to best inform this report, HCDD employed several methods to gather input from Houston residents and stakeholders. HCDD conducted an inclusive community and stakeholder engagement process to give all Houstonians an opportunity to participate in the development of the AI. Through every survey, community meeting, and stakeholder meeting, HCDD captured detailed information about how to improve the City's efforts towards fair housing. A summary of the captured information is presented in the section entitled *Appendix: Public Participation*.



3. Assessment of Past Goals and Actions

The following evaluates the progress made over the past five years to reduce fair housing barriers by examining the actions carried out to address the impediments from the 2015 Analysis of Impediments to Fair Housing Choice (2015 AI). The 2015 AI included 65 actions to address 14 identified fair housing impediments. At the suggestion of several community groups, impediments were 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 following progress reviews only those impediments listed in the 2015 AI and includes a summary of some activities completed. Each year, the CAPER includes a detailed accomplishment summary of completed activities addressing these impediments. Many of the actions in the 2015 AI addressed multiple impediments and will only be summarized below in one impediment. The following includes each impediment from the 2015 AI, including the impact and five-year objectives set by the City, and a review of some of the actions taken to reduce these fair housing impediments.



Impediment 1: Discrimination in Housing

2015 Impediment

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

2015 Objective

To reduce this impediment over the next 5 years, the city will take actions that will work to address the following objectives

- Monitor areas in housing discrimination to better understand discrimination in the community and how to address discrimination
- The City will work to decrease discriminatory housing practices based on the protected classes
- Provide resources for citizens who may have been discriminated against

Progress Update

HCDD continues to provide a fair housing hotline where anyone, including landlords, tenants, homeowners, Houstonians, and non-Houstonians, can call to discuss landlord/tenant or fair housing issues. This service is free to the community. In the four years since the last AI, a staff member has responded to 6,512 hotline callers. Each year, City staff gather and review HMDA data and HUD fair housing complaint data to review for new discriminatory patterns that could be addressed or highlighted in the community. Many other actions taken to address discrimination in housing are highlighted within other impediments below.

Evaluation of Past Performance

Over the past five years, HCDD has increased its staff capacity to outreach to community members with various housing and fair housing resources. HCDD continues to build capacity to complete new fair housing initiatives that can directly inform or address discrimination in housing. With six Presidentially declared natural disasters declared in Houston since 2015, some fair housing actions were not completed, including carrying out fair housing testing. HCDD will continue to build capacity and use research and data to target the location or topic of future education campaigns and allocate resources to address housing discrimination. As some actions from the 2015 AI address multiple impediments, other actions the City took over the past five years are reported in impediments below.



Impediment 2: Lack of Knowledge about Fair Housing

2015 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.

2015 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

Progress Update

Since 2015, the City of Houston has made great strides to grow fair housing education and outreach to increase Houstonians' knowledge about fair housing and decrease discrimination in housing. HCDD made fair housing education a part of the consolidated planning process and include fair housing information in presentations, as well as information about the fair housing hotline in public notices and outreach materials.

HCDD has also launched several fair housing education campaigns, which have reached more than 2 million people with fair housing information. The campaigns included

- Fair Housing + Opportunity = a Balance Between People
- SAYYES! / Can I Be Your Neighbor
- We Are All Protected

Campaign information was distributed 1) in print, through flyers located at multiple locations and provided at HCDD events, water bill inserts, online for printing, advertisements in the Houston Chronicle, and on METRO buses; 2) on social media, including Facebook (including on the Houston Chronicle's Facebook) and Twitter; and 3) through presentations at public meetings and community events.

FAIR HOUSING + Opportunity

= a Balance Between People

If you have been discriminated against in the sale or rental of housing (which may include financing, insurance coverage, advertising, real estate brokerage services, or deed restriction enforcement) because of your race, color, religion, sex, national origin, disability or family status, contact:

U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity 1-800-669-9777 or 1-800-925-9275 (TDD) www.hud.gov/offices/foia	Texas Workforce Commission Civil Rights Division 1-800-422-4719 or 1-800-925-9275 (TDD) www.twc.state.tx.us/partners/civil-rights-discrimination	City of Houston - Housing and Community Development Department Fair Housing Helpline 832-394-6240 www.houston.gov/fairhousing
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FAIR HOUSING. IT'S THE LAW.

Public Service Announcement sponsored by Houston's Housing and Community Development Department 03.26.16

I SAVE LIVES. CAN I BE YOUR NEIGHBOR?

FACT: A housing applicant's savings amount may be \$25,498. The one reasonably affordable \$829 1 month in rent. Housing-related fees for new residents can be \$948. Most non-discriminatory rental units are out of reach for many applicants. They cannot live where they help others.

SAY YES TO QUALITY HOMES FOR ALL INCOMES, IN ALL AREAS!
Learn more at www.houston.gov/housing/sayyes

SAY YES

CITY OF HOUSTON HOUSING AND COMMUNITY DEVELOPMENT

SOURCE: www.civilrightscommission.org 2015 04-03-2016

OUR RACE SHOULD NOT DETERMINE OUR ABILITY TO BUY A HOME

[RACE IS A GROUPING OF HUMANS BASED ON SHARED PHYSICAL OR GENETIC TRAITS]

RACE IS A PROTECTED CLASS UNDER THE FAIR HOUSING ACT. AN EXAMPLE OF DISCRIMINATION AGAINST A RACE: A PROPERTY OWNER QUOTES A HIGHER HOME SALES PRICE TO BLACK HOMEBUYERS THAN TO WHITE HOMEBUYERS.

If you have experienced discrimination in a housing transaction, please contact the U.S. Department of Housing and Urban Development (HUD) at 1.800.669.9777.

To learn more about fair housing contact the Fair Housing Helpline at 832.364.6200 or visit our website at houston.gov/housing/fair_housing.html.



In addition to print material, HCDD created a 30-second video about the Fair Housing and Tenant/Landlord Hotline, which was promoted via social media and on HTV. The video was also recorded and made available in Spanish, Chinese, and Arabic.

HCDD has created and grown a team of staff members (Constituent Services) that provide information about HCDD's programs and general housing services, including fair housing information, to residents. These staff members are available to attend community events on an on-demand basis and seek new partnerships with community organizations to expand HCDD's outreach.

In April 2019, HCDD staff made a fair housing presentation to two afterschool youth programs at HHA properties and to Wheatley High School seniors. After the presentation, staff worked with students in a hands-on learning activity to create comic strips that represented one instance of housing discrimination.

HCDD provided in-person training to almost 1,000 housing industry professionals and HCDD stakeholders. Highlights include a day-long fair housing training led by a HUD Fair Housing and Equal Opportunity Specialist to HCDD subrecipients in 2016 and again in 2018 and coordinating with the Houston Apartment Association on fair housing training. In April 2019, over 30,000 housing industry professionals learned about HCDD's fair housing hotline in an article in the monthly edition of ADOBE, the Houston Apartment Association's publication.

HCDD works with other City Departments to provide fair housing training to City employees. Training topics have included assisting LEP residents, HUD compliance, Community Land Trust, accessibility, and general fair housing topics. Highlights included HCDD staff providing SAYYES! training to Councilmembers and their staff and providing a half day fair housing training to 54 senior City staff members about implementing fair housing into city programs in January 2019.

Evaluation of Past Performance

HCDD has received positive feedback from those that have attended HCDD hosted fair housing training or used HCDD's fair housing informational materials. For instance, several affordable home developers have used SAYYES! materials when they meet with community members.

Although causation cannot be proven, HCDD's 2016 informational campaign may have directly led to an increase in fair housing complaints filed. In April 2016, HCDD launched its campaign: Fair Housing + Opportunity = a Balance Between People, which advertised HUD's fair housing complaint hotline. In 2016, there was a spike in fair housing complaints, over double the number of complaints in the past five years. Most of the complaints were filed in April through July of that year. HCDD's recent outreach efforts have proven successful to increase the community's awareness and knowledge of fair housing.



Impediment 3: Lack of Affordable Housing Options

2015 Impediment

There are not enough quality affordable housing units to meet the demand in Houston

2015 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

Progress Update

HCDD has surpassed many of the goals set in the 2015 AI's actions related to increasing affordable home options. HCDD funding helped to construct, repair, and reconstruct over 2,300 multifamily rental homes for developments costing over \$350 million. In addition, HCDD staff initiated a new practice and now work with apartment owners to extend the affordability restrictions for multifamily rental units that have upcoming expiring affordability. Other ways the City of Houston expanded the amount of housing options is discussed in Impediment 7: Affordability.

Evaluation of Past Performance

The goals to build or rehabilitate affordable housing set the 2015 AI were surpassed. Additionally, over the past five years, the City has received additional funding through CDBG-DR. As administrator of the funds, HCDD has initiated several new programs to expand affordable housing options over the next several years, including the Single Family Development Program, to build new affordable single family homes for sale, and the Small Rental Program, to provide nonprofit developers funding to build or rehabilitate infill developments for one to seven units of affordable rental housing. During the last five years, the City has surpassed goals and initiated groundwork for new programs to help expand the options of affordable homes in the community.



Impediment 4: Lack of Accessible Housing for Persons with Disabilities

2015 Impediment

Accessible housing is not often available to people with disabilities.

2015 Objective

The city will work to increase the number of housing choices and the access to high opportunity neighborhoods for person living with disabilities. The following objective will be addressed through proposed actions the city plans to undertake in the next five years addressing the lack of housing for person with disabilities.

- Gather research and data to better understand and describe the needs for and the supple of accessible housing in Houston
- Increase availability of accessible units for low-and moderate-income household

Progress Update

Using HCDD's CDBG and HOME funds, HCDD created or repaired 103 affordable, multifamily rental homes that were accessible for people with disabilities. In HCDD's home repair programs, households with people with disabilities are given priority.

Evaluation of Past Performance

While HCDD surpassed its 2015 AI goal of creating or repairing 50 accessible homes, the number of accessible homes that are needed in Houston is much greater. HCDD will continue to 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.



Impediment 5: Lack of Income/Lack of Funding

2015 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.

2015 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

Progress Update

The City of Houston provides direct financial assistance for home repairs and for downpayment to help residents continue to live in or purchase a home. Beginning in 2016, HCDD partnered with Rebuild Together Houston to provide home repair assistance to over 600 LMI families through the Blue Tarp Program. Many blue tarps existed years after Hurricane Ike impacted the area. In addition, HCDD assisted 60 homeowners with home repair assistance through the Home Repair Program. Also, in the past four years, HCDD provided 362 low- and moderate-income families with downpayment assistance to assist them in purchasing a home. HCDD continues to provide outreach about the Homebuyer Assistance Program through in person events, radio spots, and meetings with lenders and realtors. Over the last four years, HCDD has reached over 100,000 people with information about the Homebuyer Assistance Program.

HCDD referred available job opportunities to low-income residents and persons of color through the MWSBE / Section 3 Program. Over the past five years, HCDD conducted 215 outreach activities reaching over 25,000 people, targeting low-income residents and persons of color, with information about the MWSBE / Section 3 Program. In addition, HCDD started hosting the Section 3 Café about once a month, which is an event where residents can meet in an informal setting with Section 3 businesses searching for employees. This has helped to create a direct link to jobs for residents.

In addition, HCDD helped to create or retain 107 jobs through CDBG investments in the Houston Furniture Bank. HCDD also provided gap financing for a new HEB store, which also created jobs in a low- and moderate-income neighborhood. Also, over the past five years, HCDD funded a variety of community organizations with CDBG public service grants to provide hundreds of residents with job training. The includes training for residents to get jobs that pay a livable wage, through Capital IDEA Houston, Goodwill Industries, Houston Area Urban League, and LISC. It also includes workforce development and the provision of jobs for residents with disabilities, through H.E.A.R.T. Educational Programs Inspiring Communities and Village Learning Center.



Finally, HCDD has worked to leverage its resources by carrying out studies to assist in determining funding priorities and opportunities and by pursuing additional resources. HCDD completed its second Market Value Analysis (MVA) for Houston in April of 2017. Comparing the market value over time in Houston will help HCDD identify areas that are increasing and decreasing in value and apply targeted strategies in certain areas. HCDD will begin the next MVA in the next year. After Hurricane Harvey, HCDD procured NALCAB to create a study about the impacts of Hurricane Harvey on real estate values in Houston.

In addition, HCDD pursued additional financial resources to support fair housing activities: HCDD submitted an application for 2016 Fair Housing Initiative Program funding but was not selected. HCDD continued to work with private funders to assist in funding fair housing related activities. HCDD worked with Capital One, which funded \$130,000 for a series of trainings for community development corporations in Houston. In April of 2018, Texas Capital Bank funded the SAYYES! Affordable Homes Tour in the amount of \$8,000.

Evaluation of Past Performance

The number of households assisted over the past four years through the Homebuyer Assistance Program and the Home Repair Program was under the estimated goals. For instance, the Homebuyer Assistance number of families assisted fell short of the five-year goal of 500 families assisted. But the Homebuyer Assistance Program was restructured twice and now currently serves households earning up to 120% of the Area Median Income. Although the Home Repair Program did not hit its intended target, the Blue Tarp Program was a short-term initiative during the past five years that assisted many households with needed roof repair. In addition, several additional funding sources, through CDBG-DR, have assisted in expanding the potential number of households served with home repair in the next few years.



Impediment 6: Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status

2015 Impediment

Many neighborhoods in Houston are divided by race, ethnicity, and/or economic status

2015 Objective

The city will work to affirmatively further fair housing through the following two objectives

- Promote racial and ethnic desegregation
- Promote the de-concentration of poverty

Progress Update

In September 2015, City Council approved Houston's General Plan. It established goal(s) addressing economic and racial/ethnic stratification and fostering socio-economic diversity in the general plan:

- Equal access to opportunity and prosperity
- Supportive services for disadvantaged and at-risk groups
- An inclusive community that reflects our international heritage
- A diverse, welcoming culture that is celebrated and respected
- Job opportunities that support a good standard of living and financial stability

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.

HCDD has published four multifamily RFPs. These have had prioritization for location of new or repaired multifamily units, including near transit options and in high opportunity areas. Beginning in 2017, HCDD publishes a set of priorities for multifamily funding to assist in developer's planning efforts.

In February 2020, HCDD presented to City Council 20 resolutions of support for multifamily affordable home developments seeking tax credits from the state located throughout the city. HCDD staff implemented a new strategy to support affordable home developments in all areas of the city, without concentrating them in certain areas.

In addition, over the past four years, the Houston Housing Authority worked to affirmatively market its housing programs to families least likely to be served. HHA's waiting list was opened, which received press coverage in multiple languages. Using a new web-based portal, HHA received over 100,000 applications for assistance.

Both HCDD and HHA support NestQuest, which is a nonprofit that serves activity Housing Choice Voucher participants who have at least one school-aged child in the household. NestQuest works with participants to find housing in high opportunity areas, which could help provide additional opportunities for the children living in the household. NestQuest works with each family and each landlord to ensure a smooth transition for the family to the new neighborhood.



Evaluation of Past Performance

By promoting affordable housing in areas throughout the city, HCDD will help change the location of where affordable homes and low- and moderate-income live in the city through time. Although HCDD staff did not reach every action set in the 2015 goal, including seeking clarification about whether state law prohibits affordable housing density bonus requirements, there were strides made to integrate future affordable homes in the city, which will have a lasting impact.



Impediment 7: Affordability

2015 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.

2015 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

Progress Update

As discussed in Impediment 5: Lack of Income, HCDD provides homebuyer assistance to households earning up to 120% of the area median income, allowing them to have additional funding to purchase a home in areas throughout the City.

Houston Community Land Trust, incorporated in 2018, maintains its mission is to make affordable homeownership achievable for limited-income households in Houston. The Houston Community Land Trust (HCLT) connects income-qualified homebuyers with perpetually affordable homes in neighborhoods across our city. Houston Community Land Trust also provides stewardship services and long-term support necessary for homebuyers to be successful in homeownership.

The City of Houston, through HCDD, is working closely with the HCLT to provide homes for sale that will become perpetually affordable through the CLT model. Because the HCLT will own the land, these homes will be less expensive to purchase for families looking to gain equity but cannot afford to purchase a home through a more conventional method. In addition, the Land Assemblage and Redevelopment Authority (LARA) was recertified as the Houston Land Bank in 2018 to partner with the City on new initiatives, including supporting the Houston Community Land Trust.

Evaluation of Past Performance

Over the past five years, the City of Houston has provided additional foundation through organizational development to carry out new initiatives that will help keep housing affordable throughout the city over a longer term or in perpetuity.



Impediment 8: Lack of Financial Education

2015 Impediment

Some residents do not understand or are not exposed to financial education opportunities.

2015 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

Progress Update

Beginning in 2017, Mayor Sylvester Turner expanded the Summer Jobs Program to employ youth from the age of 16 to 21 years of age and made no-cost or low-cost bank accounts and financial education information available to participants. In addition, Mayor Turner announced in January 2020, in partnership with a national nonprofit organization Cities for Financial Empowerment Fund and Regions Bank, the opening of two Financial Empowerment Centers. Located in Acres Homes and the East End area, the Financial Empowerment Centers will provide one-on-one, professional financial counseling to Houstonians at no cost to residents.

During these five years HCDD partnered with numerous organizations, including Harris County Housing Authority, United Way Thrive, BankOn Houston, and Neighbor Works. HCDD partnered with the Harris County Appraisal District and the Earl Carl Institute of Legal and Social Policy to hold five free Homestead Exemption Workshops in March and April 2017. HCDD also requires participants in the Homebuyer Assistance Program to complete an eight-hour homebuyer course from a participating HUD certified homebuyer counseling agency.

Also, after the City's payday lending ordinance took effect in mid-2014, there was a large decrease in the number of licensed payday and title loan companies in Houston, which plunged by 40% between July 2014 and July 2016. This led to a significant decrease in payday lending transactions across the Metro area over the past five-year period.

As discussed in Impediment 7: Affordability, the Houston Community Land Bank will offer lower priced homeownership opportunities for residents to help build equity and long-term wealth for homebuyers who are unable to access homebuying through traditional market approaches.

Evaluation of Past Performance

The City of Houston and HCDD made steps over the past five years to provide and promote a variety of financial education to Houstonians.



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.

2015 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

Progress Update

In the past five years, HCDD funded 32 completed public facility improvements in LMI areas, which included rehabilitating parks and creating new community facilities, including Pro Vision Charter School, SER Jobs for Progress, and Independence Heights Community Center.

HCDD developed an RFP for economic development activities. From this RFP, HCDD funded a new HEB grocery store in the Greater OST/South Union neighborhood, Avenue Center in the Near Northside, and East End Innovation Maker Hub in the East End neighborhood. HCDD has allocated almost \$30 million of Section 108 loans and additional CDBG funds to these economic development projects. HCDD also received feedback in the fall of 2019 about economic development needs from an EDI workshop for economic development stakeholders to help shape future programming. Also, HCDD used funds to expand access to supermarkets in food deserts, including Pyburn's, HEB, and TeloMarket.

HCDD has used disaster recovery funding to address infrastructure issues in low- and moderate-income areas over the past five years. HCDD funded three infrastructure projects to improve drainage in low- and moderate-income areas with CDBG Disaster Recovery funds from the 2015 floods. Improvements of open ditches in the Greater Fifth Ward and the Hernandez Tunnel were completed using CDBG-DR2 funds.

HCDD continued to partner with other City Departments and organizations to promote access to opportunity in all neighborhoods. HCDD continued to fund code enforcement activities to assist in the redevelopment of neighborhoods. In the past five years, HCDD has created a team of staff members to manage relationships with other City Departments and the Letters of Agreement (LOAs) process, which includes managing the Department of Neighborhood's code enforcement activities. HCDD staff continued to update and show the locations of banks in relation to other communities and made several presentations about lending deserts and bank locations to bankers and lenders at BankOn meetings and roundtables with the FDIC.

The City of Houston embarked on a new initiative, called Complete Communities, to promote development in areas of predominately of persons of color by meeting with business owners, developers, and residents and creating a plan. In addition, City Council approved a Parks Master Plan in October 2015, which included intensive public engagement in several low- and moderate-income areas. The goals of the Parks



Master Plan are to: 1) Create equity and balance in the system, 2) Create connections, 3) Demonstrate environment leadership, and 4) Provide equitable services for all citizens. The City of Houston continues to work towards creating a more equitable and inclusive City.

Evaluation of Past Performance

Over the past five years, the City implemented citywide strategies to improve opportunities in low-income and/or areas where the majority is persons of color, through initiatives such as the Complete Communities and the Parks Master Plan. Identifying new funding and retargeting funding to these initiatives is still in progress. HCDD exceeded its 2015 AI goal of funding public facilities in low- and moderate-income areas. HCDD will continue to fund initiatives that provide improved services in low- and moderate-income areas and will continue to prioritize funding in Complete Communities.



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.

2015 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.

Progress Update

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. In April 2016, HCDD launched the "SAYYES!" or "Can I Be Your Neighbor" fair housing campaign. To develop this campaign, HCDD worked with an Advisory Committee, which consisted of housing advocates, marketing professionals, and other housing stakeholders. The campaign included the following.

- Social media effort reached almost 22,000 people in 2016 and over 47,000 in PY 2018
- Reached over 1,000 people in almost 20 SAYYES! In person presentations
- Held a tour to show participants quality, affordable homes and meet with the residents of those homes
- Presented at three national conferences, including the YIMBY Conference and Neighborhoods USA (NUSA)
- Sent SAYYES! flyers in English to more than 460,000 households in resident's water bill (April 2017)

Evaluation of Past Performance

Although HCDD did not create a formal Anti-NIMBYism policy or action statement, which was one of the action items in the 2015 AI, HCDD and the City actively worked to dispel myths of affordable homes and the people living in affordable homes. By using some real-life models, the SAYYES! campaign showed the types of working people that live in or would benefit from living in an affordable home. Measuring Houstonians' opinions can prove difficult, so that is why the City measured the campaign's reach. Qualitative information from developers and community organizations that have used the SAYYES! Campaign in community conversations about affordable home development is important to note. The campaign should be continued and grow each year to ensure the message is received and internalized by the community.



Impediment 11: Lack of Transportation Options

Impediment

Job and 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.

2015 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

Progress Update

Over the past five years, the City and coordinating agencies worked to expand transportation options. The City's Planning and Development Department utilized extensive community input to complete the Bike Plan, which was adopted by City Council on March 22, 2017. The City continues to build new bike lanes and paths and expand the Bicycle program into high- and low-income neighborhoods, including Near Northside, Third Ward, and the East End area. In addition, METRO continues to expand its service options and will complete Houston's first Bus Rapid Transit line connecting the Northwest Transit Center to the Lower Uptown Transit Center. In November 2019, voters approved with strong support a referendum that allows METRO the authority to borrow up to \$3.5 billion to enhance mobility.

HCDD continues to work with developers to develop affordable homes that are close to transit options. HCDD included a priority in the past few RFPs for multifamily developments that are transit oriented development or promote access to transportation options. HCDD partnered with METRO on several initiatives advertising fair housing information, including ways to file fair housing complaints, and community input opportunities for the 2020 AI.

Evaluation of Past Performance

HCDD continued to review changes at METRO or to METRO's services but did not make any formal public comments during open comment periods. HCDD will continue to find new ways to promote greater access to 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.

2015 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

Progress Update

Over the past four years, HCDD continued to fund youth enrichment and afterschool programs through its public services program and provided assistance to over 29,000 children and youth in low- and moderate-income areas, through the Mayor's Afterschool Program, HPD's Juvenile Delinquency Prevention Program and COH Youth Enrichment Program. This action increased the number of activities available for youth in the city.

Also, HCDD funded job training for 2,504 persons through its public services program for low- and moderate-income individuals and persons from protected classes. This action helped improve the skills of residents enhancing their previous education while preparing them for the workforce.

As discussed in an earlier impediment, NestQuest works with families with young children in the Housing Choice Voucher Program to move them to a home with access to improved schools.

Evaluation of Past Performance

HCDD utilized its resources to create opportunities for youth and for workforce development opportunity throughout the city and has or expects to exceed its goals set in the 2015 AI to address this fair housing impediment. HCDD will look for additional ways to partner with organizations in the future to enhance education opportunities for persons of color.



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.

2015 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

Progress Update

Houston Health Department (HHD) provides outreach with information about lead-based paint and other hazards to over 3,000 people annually. HCDD's home repair programs provide information about lead-based paint hazards to several hundred households through the application process. HCDD continues to provide match funding for the HHD's lead programs, to assist with lead remediation in homes with low-income residents. Over the past five years, this program has repaired homes in the East End area and the Near Northside.

Evaluation of Past Performance

As health hazards can impact communities and often need a multi-faceted approach by many different agencies at different levels of government, HCDD is committed to continue working with other agencies to address these issues.



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.

2015 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

Progress Update

Over the last five years, HCDD made great efforts to make information available to and work with community members.

HCDD staff coordinated two extensive door-knocking campaigns during the summer of 2018, which provided information about keeping safe after flooding and the City's home repair programs, specifically the availability of home repair for homes impacted by 2015 floods. Over 1,000 households were contacted and staff went back out to 185 households to give them hand delivered interest letters for the home repair program to those that were impacted by 2015 floods. In addition, the City conducted door-to-door canvassing across Houston from February through August 2019. The goal of this canvass effort was to reach low- and moderate-income homeowners at home to encourage them to take the Harvey Recovery Survey, the first step to determine eligibility for HCDD's Harvey assistance programs. Canvass teams completed a total of 181,817 attempts to reach homeowners at their homes.

To complement the door-to-door canvassing for Hurricane Harvey assistance, the City opened four Housing Resource Centers located in each quadrant of the City. Residents can walk in or set up an appointment to get help completing their program applications. The Northeast Center remains the most active center. In the summer of 2019 a total of 12,800 walk-in meetings have been held at the Centers. Also, from March to May 2019, HCDD conducted a paid marketing outreach effort that included advertising online, in social media and print ads, as well as radio spots.

HCDD continues to host and attend a variety of community events to expand information provided to residents about HCDD programs and resources. As discussed in an earlier impediment, HCDD grew its capacity in its Constituent Service section to directly go out to the community and present programs available. In 2019, HCDD began to offer Community Office Hours, where anyone can come to the HCDD office, speak with a staff member, and have any questions about HCDD answered, and in 2020 some weekly Community Office Hours will be held in the community. In addition, HCDD hosts several stakeholder groups monthly, including the Fair Housing and Neighborhood Rights group and the Housing Advocates group, to allow for HCDD to provide information about ongoing programs and for open dialogue between stakeholders and staff members.

HCDD has also been expanding its efforts to provide information to the public in other ways. In 2019, HCDD began a monthly newsletter by email. Quarterly the newsletter is printed in English and Spanish



and delivered to almost 100 community organizations. HCDD continued to translate documents on an as needed basis or as feasible. HCDD translated many of the public notices, including those about planning for entitlement and disaster recovery funding, into several languages including Spanish, Chinese, and Vietnamese. Hurricane Harvey program information was translated into other languages. HCDD translated the "We are all protected" and "SAYYES!" fair housing campaigns into Spanish, Vietnamese, Chinese, Arabic, and Urdu. HCDD translated the Draft CDBG-MIT Action Plan. HHA also translates documents on an as needed basis.

HCDD continues to look for ways to create engaging materials and content. HCDD created three fair housing campaigns in the past five years and provided electronic access to fair housing materials. HCDD created a flyer in English and Spanish dedicated to advertising HCDD's fair housing hotline. The ability to create marketing material has allowed HCDD to tailor outreach efforts to different groups with information needed. The City knows that it cannot reach all groups with information they might need and understands that there is a mistrust in the community about government; as such, HCDD initiated the 2019 Fair Housing Ambassadors Program, which was a way for community members to provide fair housing information in their own community's while gathering information to help develop the 2020 AI.

Evaluation of Past Performance

No single approach works to provide information to or gather input from community members. HCDD will continue to be flexible and provide many varied opportunities for public information and public engagement.



4. Community Profile

The *2020 Analysis of Impediments to Fair Housing Choice (AI)* assesses demographic and economic conditions of protected classes within the City of Houston (City) and the region to evaluate housing needs and obstacles. The Houston-Sugar Land-Baytown Metropolitan Statistical Area Region (Houston MSA) includes the following counties: Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller (and Austin only after July 1, 2013). In addition to comparing demographics and existing housing and economic conditions, the AI reviews current and historic conditions that may contribute to the needs and obstacles some groups of citizens face when seeking housing.

Demographic Profile

This section provides an overview of Houstonian characteristics with the characteristics of the region, state, and U.S. This section also analyzes 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.² The Houston MSA ranks fifth in population among other metropolitan areas in the country. In more recent years according to the U.S. Census 2013-2017 American Community Survey (ACS), the City of Houston's current population is more than 2.2 million residents. 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	2017	% Change 00-10	% Change 10-17	% Change 00-17
City of Houston	1,953,631	2,099,451	2,267,336	7.5%	8.0%	16.1%
Houston MSA	4,669,571	5,946,800	6,636,208	27.4%	11.6%	42.1%
Texas	20,851,820	25,145,561	27,419,612	20.6%	9.0%	31.5%
United States	281,421,906	308,745,538	321,004,407	9.7%	4.0%	14.1%

Source: 2000 Census; 2006-2010 American Community Survey (ACS); 2013-2017 ACS B01003

This growth is projected to continue. According to the Houston-Galveston Area Council, the region's population is expected to reach 9.6 million by 2040 growing by 3.8 million people over the next 30 years, from 2010-2040.³ The average annual population increase is expected to be 1.5% per year, which is a 66% increase by 2040.

Compared to the top five most populous cities in the United States, Houston ranked first (8% increase) in percent gain from 2010 to 2017, followed by New York and Los Angeles (4.7% and 4.1%, respectively). In

² Paul Mackun & Steven Wilson, *2010 Census Brief: Population Distribution and Change: 2000 to 2010*, U.S. Census Bureau (March 2011, p. 11) <https://www.census.gov/prod/cen2010/briefs/c2010br-01.pdf>.

³ *2040 Regional Transportation Plan Demographics*, Houston-Galveston Area Council (August 9, 2019), <http://www.h-gac.com/regional-transportation-plan/2040/demographics.aspx>.



terms of absolute growth for the same period of time, Houston was second with 167,885 additional residents following New York City with 384,939 additional residents.

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

Table 2: Population Comparison between the Five Largest Cities in the U.S.					
	2000	2010	2017	% Change 00-10	% Change 10-17
New York City	8,008,278	8,175,133	8,560,072	2.1%	4.7%
Los Angeles	3,694,820	3,792,621	3,949,776	2.6%	4.1%
Chicago	2,896,016	2,695,598	2,722,586	-6.9%	1.0%
Houston	1,953,631	2,099,451	2,267,336	7.5%	8.0%
Philadelphia	1,517,550	1,526,006	1,569,657	0.6%	2.9%

Source: 2000 Census; 2006-2010 American Community Survey (ACS); 2013-2017 ACS B01003

Population by Age

Although Houston has a smaller percentage of children compared to the Houston MSA and Texas, Houston has a slightly younger population overall than the Houston MSA, Texas and the U.S. Since 2000, the median age in Houston has increased from 30.9 years to 32.9 years in 2017. Even though the median age has increased across the board, the median age in Houston was still less than in the region (34.0 years), Texas (34.3 years) and the U.S. (37.8 years) in 2010.⁴

According to the 2013-2017 ACS, the Hispanic/Latino population in Houston had the youngest median age when comparing racial and ethnicity groups at 28.4 years. The oldest racial/ethnic age group was White alone, non-Hispanic, which had a median age of 42.3 years.⁵

Since 2012, the population in Houston, the Houston MSA, and Texas became slightly older with a greater percentage of the population that is 65 and older in all four geographies. The aging of the population is a phenomenon that will impact jurisdictions all over the United States in the upcoming few years.

Table 3: Age Distribution

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Under 18	569,656	25.1%	1,788,611	27.0%	7,213,117	26.3%	73,601,279	22.9%
18-64	1,469,220	64.8%	4,174,031	62.9%	16,990,589	62.0%	199,670,739	62.2%
65 and older	228,460	10.1%	673,566	10.1%	3,215,906	11.7%	47,732,389	14.9%

Source: 2013-2017 ACS S0101

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

⁴ 2013-2017 ACS S0101

⁵ 2013-2017 ACS B01002I



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 U.S. Department of Justice 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.⁶ Some advocates and community members argue that these annexed minority areas were never provided 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 central fair housing concern ever since Houston conducted these major annexations.

After the 1980s, the City 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.

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 75.1% of its population identifying as minority. A quarter of Houston residents (24.9%) are non-Hispanic Whites. This is very different from the U.S., which has a majority of racially White alone, non-Hispanic residents (75.7%). Compared to the region, Texas,

⁶ Grofmoan, Bernard & Chandler, Davidson (1992), *Controversies in Minority Voting: The Voting Rights Act in Perspective*, pg. 61-63.



and the U.S., Houston has a larger percentage of residents identifying as Black/African American alone, non-Hispanic (22.4%).

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 (36.7%) and in Texas (38.9%) 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 (17.6%) of the entire U.S. population.

Table 4: Race by Ethnicity Hispanic/Latino in Houston, Houston MSA, Texas, and U.S.

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
White Alone*	564,663	24.9%	2,469,095	37.2%	11,755,493	42.9%	197,277,789	61.5%
Black Alone*	507,466	22.4%	1,116,928	16.8%	3,199,022	11.7%	39,445,495	12.3%
American Indian and Alaska Native Alone*	2,983	0.1%	12,419	0.2%	65,883	0.2%	2,098,763	0.7%
Asian Alone*	150,302	6.6%	492,193	7.4%	1,222,975	4.5%	16,989,540	5.3%
Native Hawaiian and other Pacific Islander Alone*	966	0.0%	3,268	0.0%	20,170	0.1%	515,522	0.2%
Some Other Race Alone*	4,429	0.2%	12,200	0.2%	39,153	0.1%	715,432	0.2%
Two or More Races*	28,278	1.2%	97,454	1.5%	443,007	1.6%	7,451,295	2.3%
Hispanic/Latino	1,008,249	44.5%	2,432,651	36.7%	10,673,909	38.9%	56,510,571	17.6%
*Non-Hispanic/Latino								
Source: 2013-2017 ACS B03002								

Population Change Based on Race/Ethnicity

The next table compares the population of the city and region by race and ethnicity over time from 2010 to 2017. During this time, Houston’s population grew 8% and the region grew by 12.6%. The region has grown more than any other in the United States.⁷

Since 2010, Hispanics have been the largest racial/ethnic group in the city of Houston, currently at 44.5% of Houston. However, non-Hispanic Whites continue to be the largest racial/ethnic group, making up 37.2% of the regional population, and Hispanic are just behind at 36.7%. The Hispanic population grew 9.6% in Houston and 16.4% in the region from 2010 to 2017, which both 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 20.4% in Houston and 28.1% in the region from 2010 to 2017.

During the same period of time, Houston’s White alone, non-Hispanic racial/ethnic group grew at a slower rate than the population as a whole in the city and region, by 5.0% in Houston and by 6.4% in the region. The Black/African American, non-Hispanic racial/ethnic group increased very slightly in Houston, by 4.4%, and increased in the region at a rate of 12.4%, at a rate very similar to the population as a whole. Although there was a significant growth in the number of Black/African American, non-Hispanic residents in the

⁷ 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; also see, Table 1: Population Growth Comparison.



region, the proportion of Black/African American, non-Hispanic residents in Houston is still much higher (22.4%) than in the region (16.8%).

Table 5: Race and Ethnic Growth Rate in the City of Houston and Houston MSA from 2000-2010

	2010				2017				Change 2000-2017	
	Houston		Houston MSA		Houston		Houston MSA		Houston	Houston MSA
	#	%	#	%	#	%	#	%	%	%
Total Population	2,099,451		5,891,999		2,267,336		6,636,208		8.0	12.6
Not Hispanic or Latino	1,179,783	56.0	3,802,108	64.5	1,259,087	55.5	4,203,557	63.3	6.7	10.6
White Alone*	537,901	26.0	2,321,611	39.4	564,663	24.9	2,469,095	37.2	5.0	6.4
Black Alone*	485,956	23.0	993,599	16.9	507,466	22.4	1,116,928	16.8	4.4	12.4
American Indian and Alaska Native Alone*	3,528	0.2	13,745	0.2	2,983	0.1	12,419	0.2	-15.4	-9.6
Asian Alone*	124,859	5.9	384,366	6.5	150,302	6.6	492,193	7.4	20.4	28.1
Native Hawaiian and other Pacific Islander Alone*	711	0.0	2,906	0.0	966	0.0	3,268	0.0	35.9	12.5
Some Other Race Alone*	4,128	0.2	10,987	0.2	4,429	0.2	12,200	0.2	7.3	11.0
Two or More Races*	22,700	1.1	74,894	1.3	28,278	1.2	97,454	1.5	24.6	30.1
Hispanic/ Latino	919,668	44.8	2,089,891	35.5	1,008,249	44.5	2,432,651	36.7	9.6	16.4
*Non-Hispanic/Latino										
Source: 2000 Census; 2010 Census; 2013-2017 ACS B03002										

As with other cities in the region, the City of Houston was more diverse in 2017 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.⁸ Examining where residents are living is significant when assessing 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 2017.

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

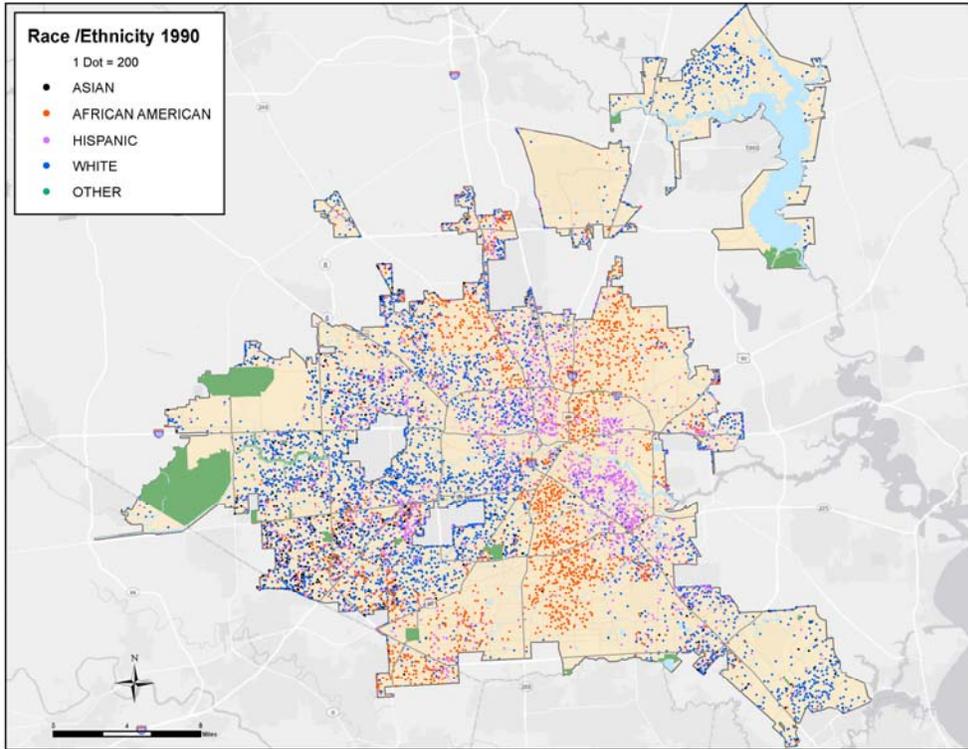
⁸ Emerson, Michael, Bratter, Jenifer, Howell, Junia, Jeanty, P. Wilner, & Cline, Mike. *Houston Region Grows More Racially/Ethnically Diverse, with Small Declines in Segregation*. Retrieved from http://kinder.rice.edu/uploadedFiles/Urban_Research_Center/Media/Houston%20Region%20Grows%20More%20Ethnically%20Diverse%202-13.pdf



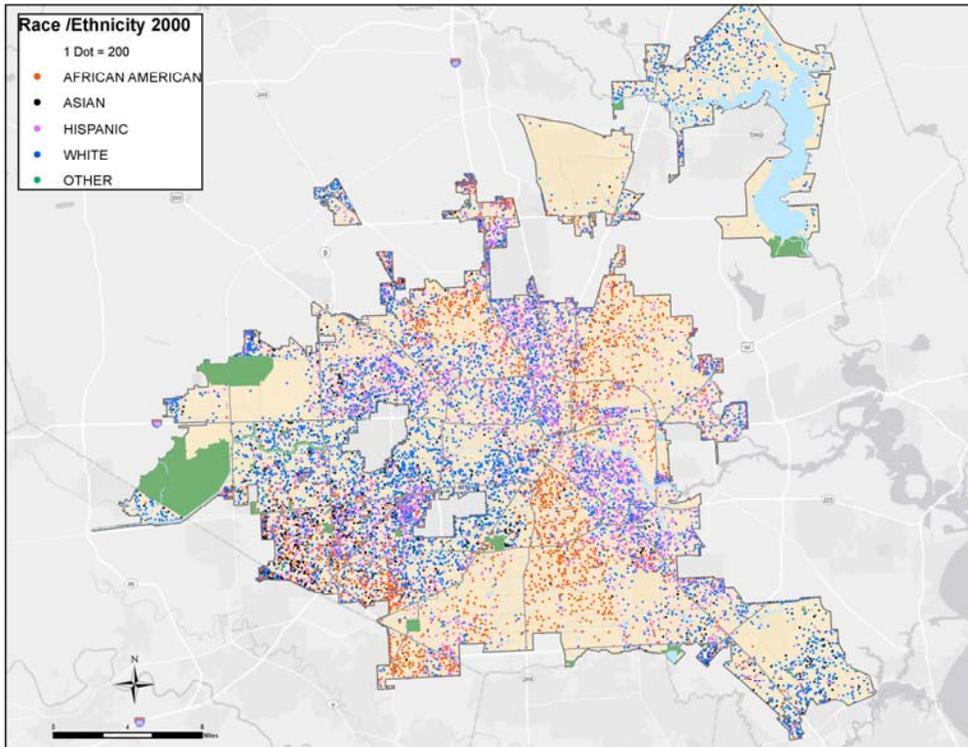
resulting from segregation. They could also represent that people of various race and ethnicities choose to live in areas with others of similar race or ethnicity. This self-steering could also be because of discriminatory attitudes in the community where minorities feel apprehensive about living in 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.



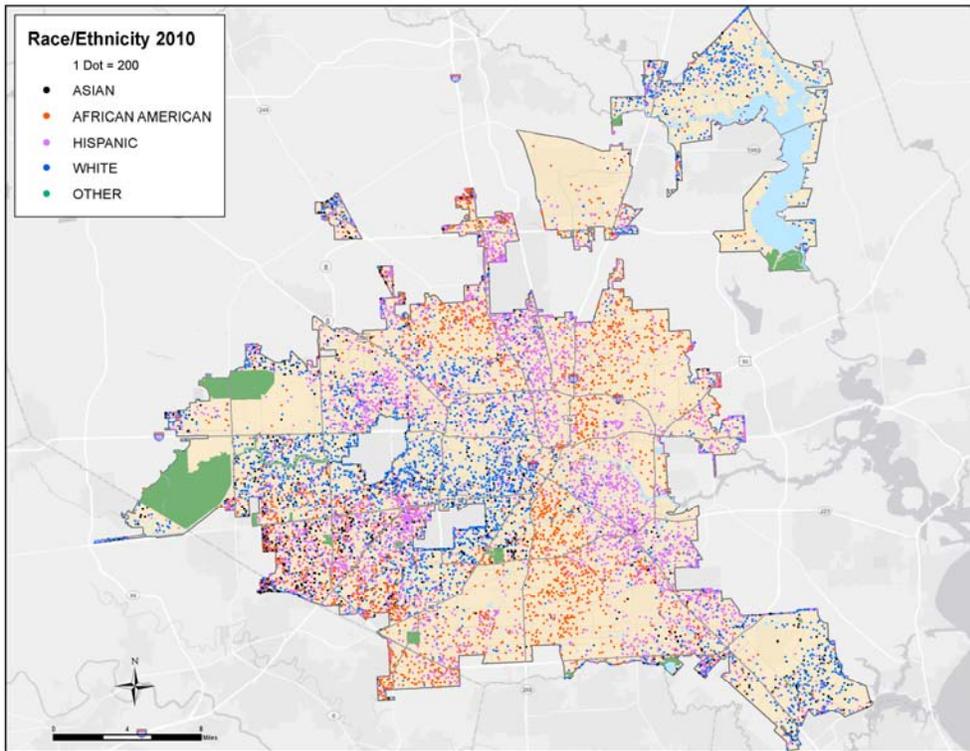
Map 1: 1990 Race/Ethnicity Dot Density for the City of Houston



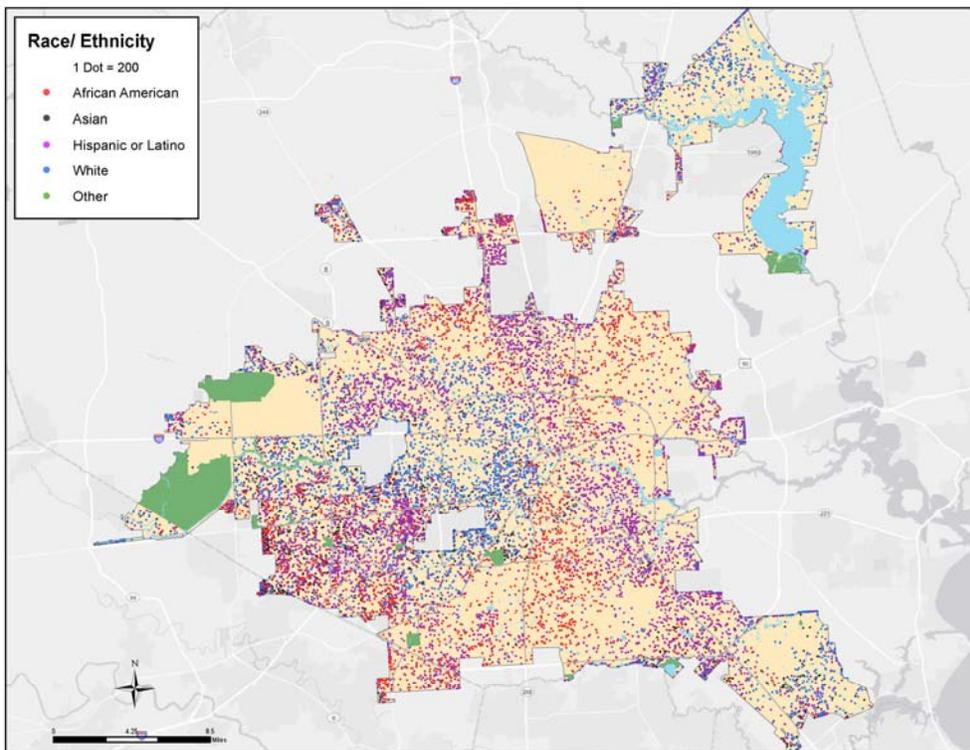
Map 2: 2000 Race/Ethnicity Dot Density for the City of Houston



Map 3: 2010 Race/Ethnicity Dot Density for the City of Houston



Map 4: 2017 Race/Ethnicity Dot Density for the City of Houston



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 2010, there has only been a minimal change in population proportion by gender.

Table 6: Sex of Population

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Female	1,131,702	49.9%	3,338,844	50.3%	13,802,635	50.3%	162,985,654	50.8%
Male	1,135,634	50.1%	3,297,364	49.7%	13,616,977	49.7%	158,018,753	49.2%

Source: 2013-2017 ACS S0101

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), or 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 increased to 48.1% of families. Similar to Texas and the U.S., just under one-third of family households in the City of Houston have children. The Houston region has a slightly 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 7: Families with Children

Family Type	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Families with Own Children	245,598	48.1%	797,060	49.6%	3,121,623	47.6%	33,552,189	42.9%
Percentage based on Total Family Households								

According to the 2013-2017 ACS, 34.6% of family households in Houston were single female-headed households with children as opposed to single male-headed family households with children, which only consisted of 8.2% 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.⁹

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 lack of 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 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 2017, these countries were almost identical to the top five countries of origin for foreign-born residents living in the Houston were Mexico, El Salvador, Honduras, Vietnam, and Guatemala, and in Houston MSA, the countries were Mexico, El Salvador, Vietnam, Honduras and India.

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 (41.8% and 40.5% respectively). Since 2000, the number of foreign-born residents has increased over 146,000 people, or by 28%, to 662,304 residents in 2017.

⁹ 2013-2017 American Community Survey B09005



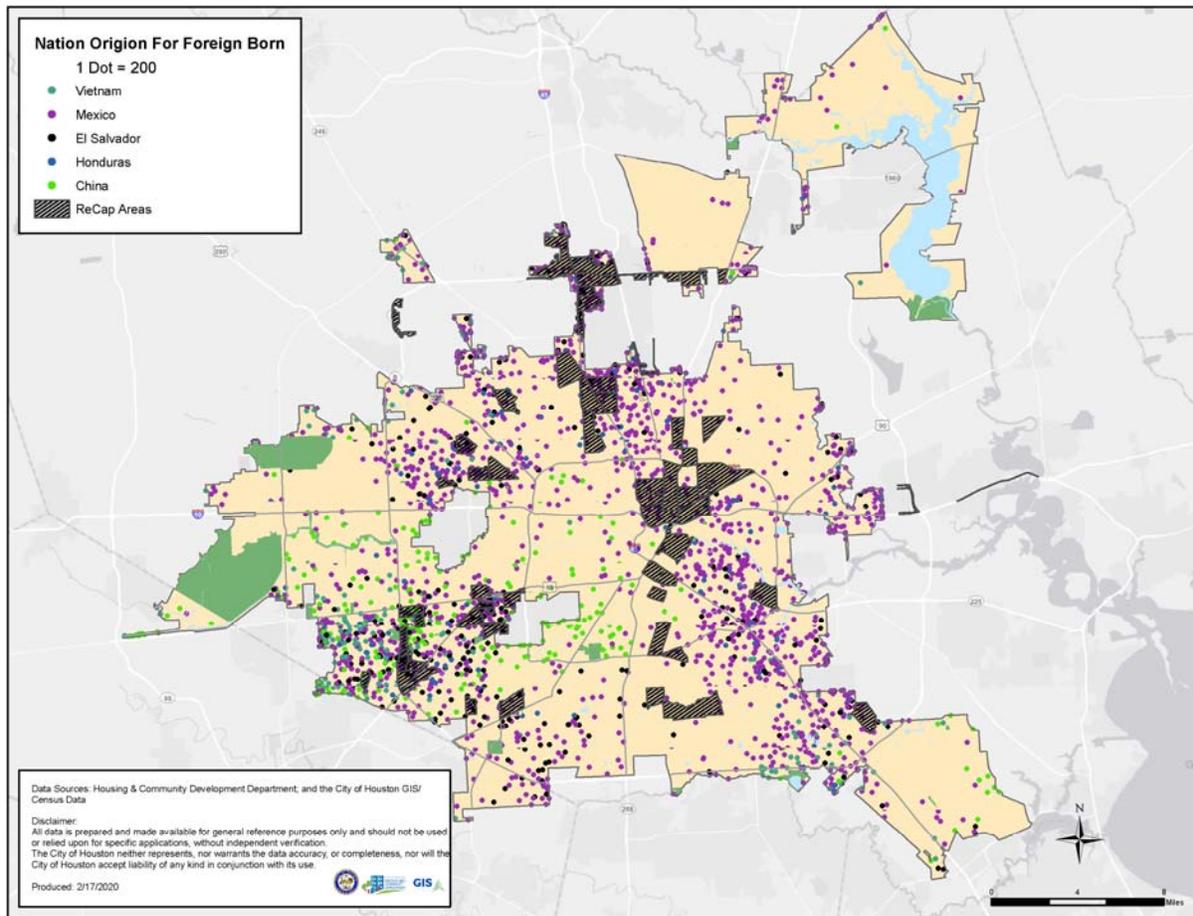
Table 8: National Origin

Houston			Houston MSA			Texas			U.S.		
Country	#	%	Country	#	%	Country	#	%	Country	#	%
Mexico	276,553	41.8	Mexico	623,349	40.5	Mexico	2,540,719	55.0	Mexico	11,513,528	26.8
El Salvador	66,596	10.1	El Salvador	118,529	7.7	India	233,197	5.0	India	2,348,687	5.5
Honduras	35,217	5.3	Vietnam	86,257	5.6	El Salvador	199,941	4.3	China	2,034,383	4.7
Vietnam	28,448	4.3	India	82,512	5.4	Vietnam	173,925	3.8	Philippines	1,945,345	4.5
Guatemala	24,603	3.7	Honduras	58,577	3.8	Honduras	102,493	2.2	El Salvador	1,323,592	3.1
India	24,427	3.7	China	43,928	2.9	Philippines	97,403	2.1	Vietnam	1,314,927	3.1
China	18,219	2.8	Guatemala	39,210	2.5	China	96,723	2.1	Cuba	1,227,031	2.9
Nigeria	13,942	2.1	Philippines	39,143	2.5	Guatemala	69,815	1.5	Korea	1,064,960	2.5
Cuba	13,063	2.0	Nigeria	35,001	2.3	Nigeria	65,701	1.4	Dominican Republic	1,057,439	2.5
Colombia	8,728	1.3	Pakistan	30,243	2.0	Pakistan	55,636	1.2	Guatemala	923,562	2.1

Percentage based on total foreign-born

Source: 2013-2017 ACS B05006

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



Source: 2013-2017 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 (44.3%) of the population living in the City of Houston speaks English and another language, which is a greater percentage compared to the United States (21.3%), Texas (35.3%), and the region (38.5%). The most frequently spoken non-English languages are Spanish, Vietnamese, and Chinese.¹⁰

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 (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 (23.3%) of the population, 5 years and older, living in the City of Houston speaks English “less than well,” which is a greater percentage compared to the United States (8.5%), Texas (14.1%), and the region (16.9%).¹¹ 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 9: 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	400,767	19.6	Spanish	801,574	13.7	Spanish	2,996,025	12.2	Spanish	16,305,893	5.5%
Vietnamese	20,147	1.0	Vietnamese	56,668	1.0	Vietnamese	117,367	0.5	Chinese	1,726,921	0.6
Chinese	14,625	0.7	Chinese	35,308	0.6	Chinese	75,070	0.3	Vietnamese	859,295	0.3
Arabic	5,297	0.3	Urdu	10,588	0.2	Other Asian languages	33,462	0.1	Korean	613,011	0.2
Other Asian languages	4,529	0.2	Other Asian languages	10,534	0.2	Korean	29,947	0.1	Tagalog	538,482	0.2
African languages	4,207	0.2	Arabic	9,527	0.2	African languages	27,231	0.1	Russian	411,921	0.1
Other Indic languages	3,262	0.2	African languages	9,367	0.2	Arabic	23,762	0.1	Arabic	386,037	0.1
Urdu	2,567	0.1	Tagalog	7,686	0.1	Other Indic languages	21,012	0.1	Other Indic languages	360,123	0.1
Persian	2,554	0.1	Other Indic languages	6,690	0.1	Tagalog	19,517	0.1	French Creole	333,271	0.1
Hindi	2,513	0.1	Hindi	6,197	0.1	Urdu	19,059	0.1	Other Asian languages	325,069	0.1

Source: 2011-2015 ACS B16001

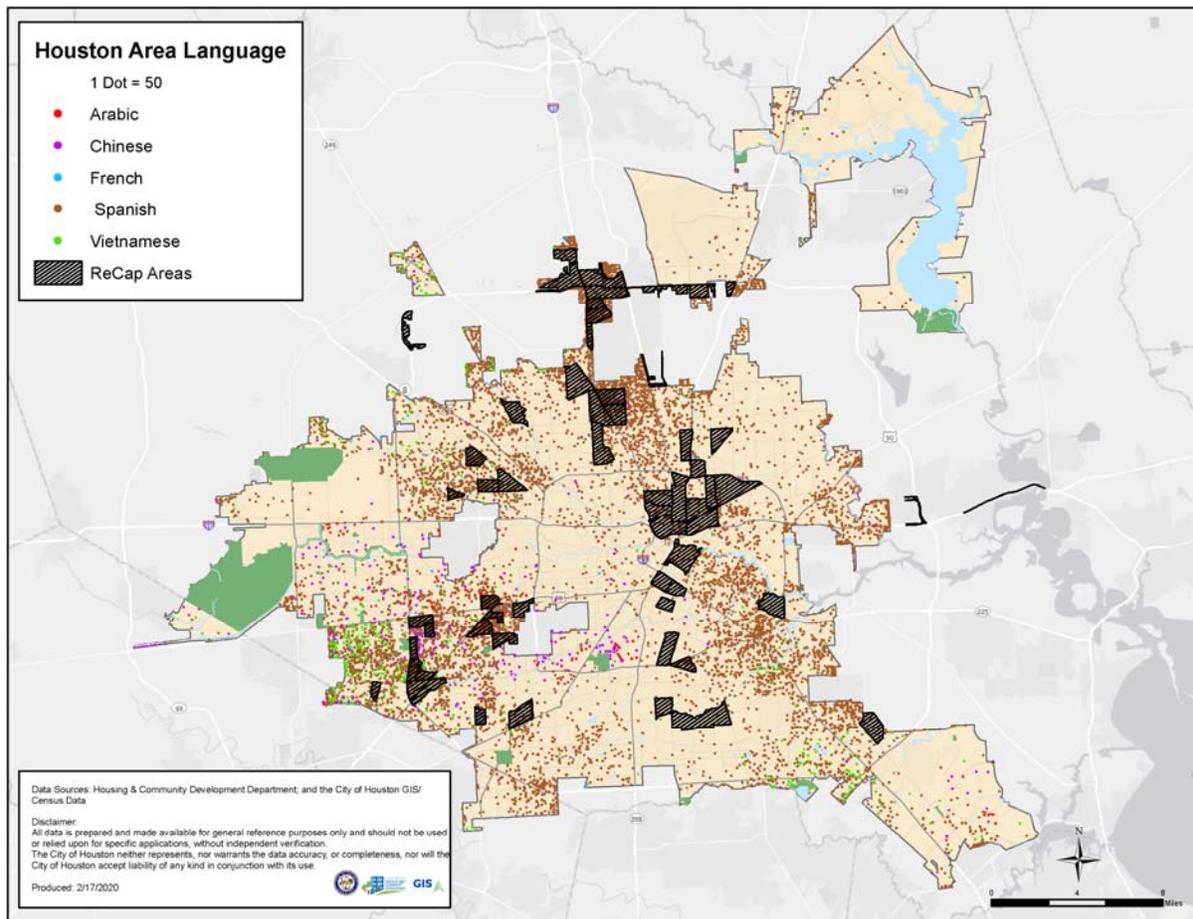
Residents that speak Spanish live throughout the city, however in certain sections of the City there are more Spanish speakers, including Northside/Northline, Greater Greenspoint, Gulfton, and in neighborhoods in southeast Houston. Vietnamese speakers tend to be located in southwest Houston, along with Chinese speakers who are also located near the cities of West University and Bellaire.

¹⁰ 2013-2017 American Community Survey, Table S1601

¹¹ Ibid.



Map 6 Map of LEP persons (by top 5 languages) for Houston with R/ECAPs



Source: 2013-2017 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
- 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 2013-2017 ACS, in 2017, 215,898 residents had sensory, physical, mental, work, mobility, and/or self-care limitations, representing approximately 9.6% of the City's civilian, non-institutionalized



population.¹² This percentage was less than Texas where 11.6% of the population have a disability and the U.S where 12.6% have a disability. The percentage of people with a disability living in Houston slightly decreased from 2012 at 9.8%.

Currently, over half (54.2%) of persons with disabilities in Houston reported having ambulatory difficulty. About one third of persons with disabilities reported having cognitive difficulty (38.1%) and approximately the same percentage (35.7%) reported having independent living difficulty.

Table 10: Disability Types in Houston, Houston MSA, Texas, and U.S.

Disability Type	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Hearing Difficulty	53,479	2.4	167,758	2.5	898,553	3.3	11,270,650	3.6
Vision Difficulty	46,865	2.1	128,191	1.9	664,238	2.5	7,390,198	2.3
Cognitive Difficulty	82,201	4.0	231,053	3.8	1,148,929	4.6	14,957,724	5.1
Ambulatory Difficulty	116,946	5.6	323,641	5.3	1,615,627	6.5	20,776,059	7.0
Self-care Difficulty	47,703	2.3	127,242	2.1	622,696	2.5	7,889,808	2.7
Independent Living Difficulty	77,131	4.6	218,676	4.6	1,041,316	4.6	14,023,060	4.9
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: 2013-2017 ACS S1810								

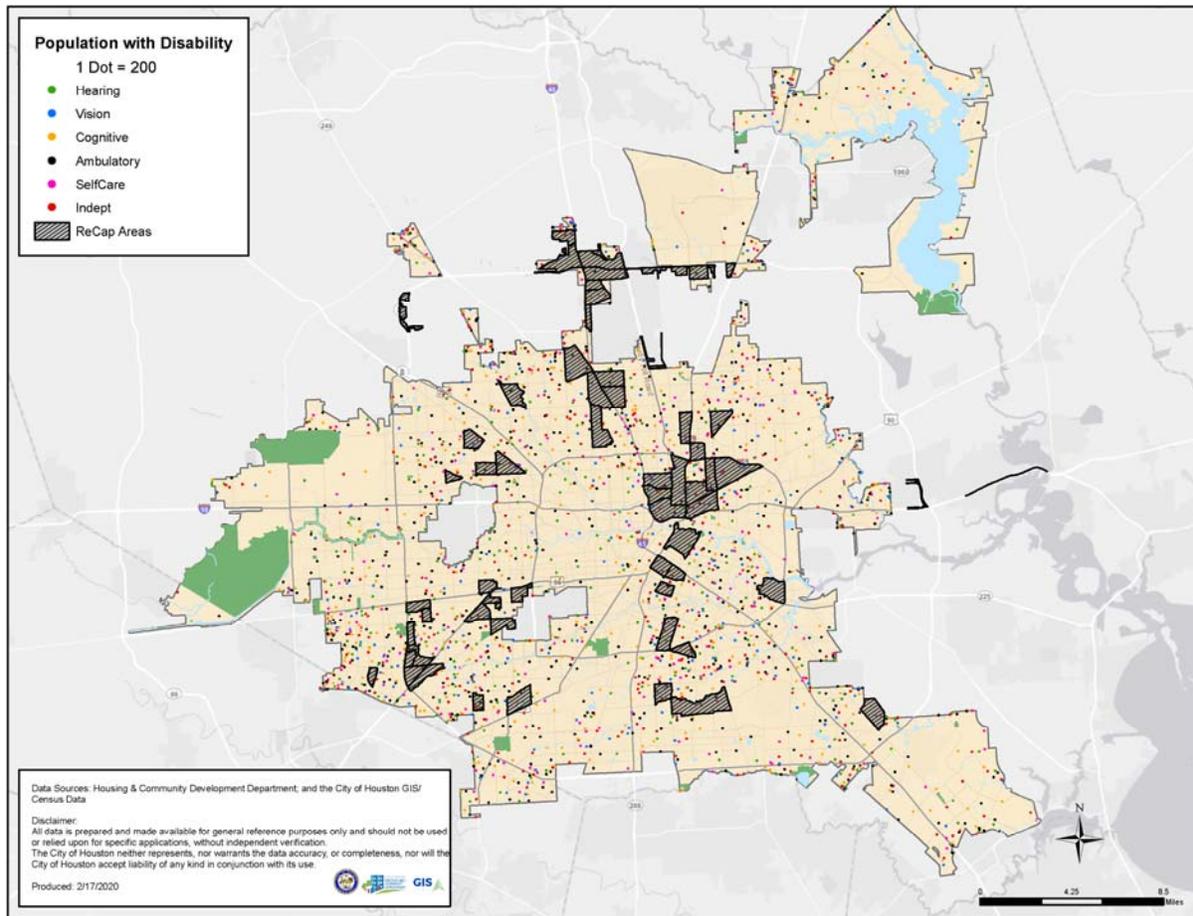
The top ten Super Neighborhoods with residents living with disabilities were located on the outskirts of the City and include the following.

- Alief
- Addicks Park Ten
- Central Southwest
- Clear Lake
- Greater Greenspoint
- Greater Inwood
- Kingwood Area
- Lake Houston
- South Belt / Ellington

¹² 2013-2017 American Community Survey, B1810



Map 7: 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: 2013-2017 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 (38.3%) residents over the age of 65 have a disability. In addition, housing and services for younger persons with disabilities is also very important for the community.

Table 11: Persons with Disabilities by Age Range

	Houston		Houston MSA	
	#	%	#	%
Under 5 years	1,276	0.1	3,169	0.0
5-17 years	17,499	0.8	57,612	0.9
18-64 years	114,385	5.0	330,411	5.0
65+ years	82,738	3.6	236,518	3.6

% represents a share of the total population.
 Source: 2013-2017 ACS S1810



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. Some persons with disabilities cannot live alone and need assistance. The City of Houston 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 who 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 January 2019. The count identified 3,567 experiencing homelessness by HUD's definition, which was a 33.3% decrease in homelessness since 2014. Approximately 42.5% were unsheltered. Approximately one in three persons (36%) experiencing homelessness self-reported mental health issues.¹³

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 *2016 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, 19% said they had been treated differentially sometime in the past 12 months because of their HIV status; 2% said they were denied services; 1% said they were asked to leave a public place. About 32% 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 assault¹⁴. 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.

¹³ Catherin Troisi, *2019 Point-In-Time Homeless Count & Survey Independent Analysis*, Coalition for the Homeless (April 2019) Retrieved from <http://www.homelesshouston.org/wp-content/uploads/2019/05/2019-PIT-Report-Final.pdf>.

¹⁴ *2016 Houston Area HIV Care Services Needs Assessment* (December 2016). Retrieved from http://www.rwpchouston.org/Publications/2016_NA/2016%20Needs%20Assessment-FINAL%2005-02-17.pdf.



Although not related to housing discrimination, religious tensions and discrimination can be seen in other ways.

As of June 30, 2019, in Houston, there have been 30 reported and confirmed hate crimes on the basis of religion since 2010.¹⁵ There have also been 38 reports of anti-Semitic incidents in Houston that ranged from vandalism to harassment to bomb threats in the same time period.¹⁶

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. According to the *Houston Chronicle*, "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 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."¹⁷

Although many religious gathering places were flooded as a result of Hurricane Harvey, several synagogues were flooded for the third time since 2015 during Hurricane Harvey. The United Orthodox Synagogue was one of these spaces that flooded three times over the past five years and as such, was demolished in April 2018.

Information on 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. According to the *Pew Research Center's Religious Landscape Study*, about 42% of the adult population in the Houston Metropolitan area attended services regularly at least once a week. Nearly three-fourths (73%) of Houston MSA population identify with a Christian-based faith. A little over one-third (39%) of those were classified as Evangelical Protestant, 19% were Catholic, and 11% were Mainline Protestant.¹⁸ 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.

¹⁵ Houston Police Department, 2010-2019 Confirmed Hate Crimes (June 2019). Retrieved from: https://www.houstontx.gov/police/department_reports/hate_crime/hate_crime_2010-Current.pdf.

¹⁶ H.E.A.T Map. Retrieved from: <https://www.adl.org/education-and-resources/resource-knowledge-base/adl-heat-map?s=eyJhcmVhlp7lmNpdHkiOiJlb3VzdG9uLCBUWCIsInR5cGUiOiJjaXR5In0slmlkZW9sb2dpZXMiOlsiTGVMdCBXaW5nIl0slmluY2lkZW50cyl6WVYJBbnRpLVNlbWl0aWMgSW5jaWRlbnQiXSwieWVhcnl6WzlwMTAsMjAxOF19>.

¹⁷ 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>

¹⁸ 2014 Religious Landscape Study (May 2015). Retrieved from: <https://www.pewforum.org/religious-landscape-study/metro-area/houston-metro-area/>.



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.

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. This division is a problem and can often reinforce discrimination when observed geographically. 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 2013-2017 ACS, the 2017 median income in Houston was \$49,339, lower than the Houston MSA at \$66,086, the State of Texas at \$57,051, and the U.S. at \$57,652. The median income in Houston increased 15% from 2010 to 2017, which was less of an increase than the Houston area at 20% and the U.S. each at 11%.

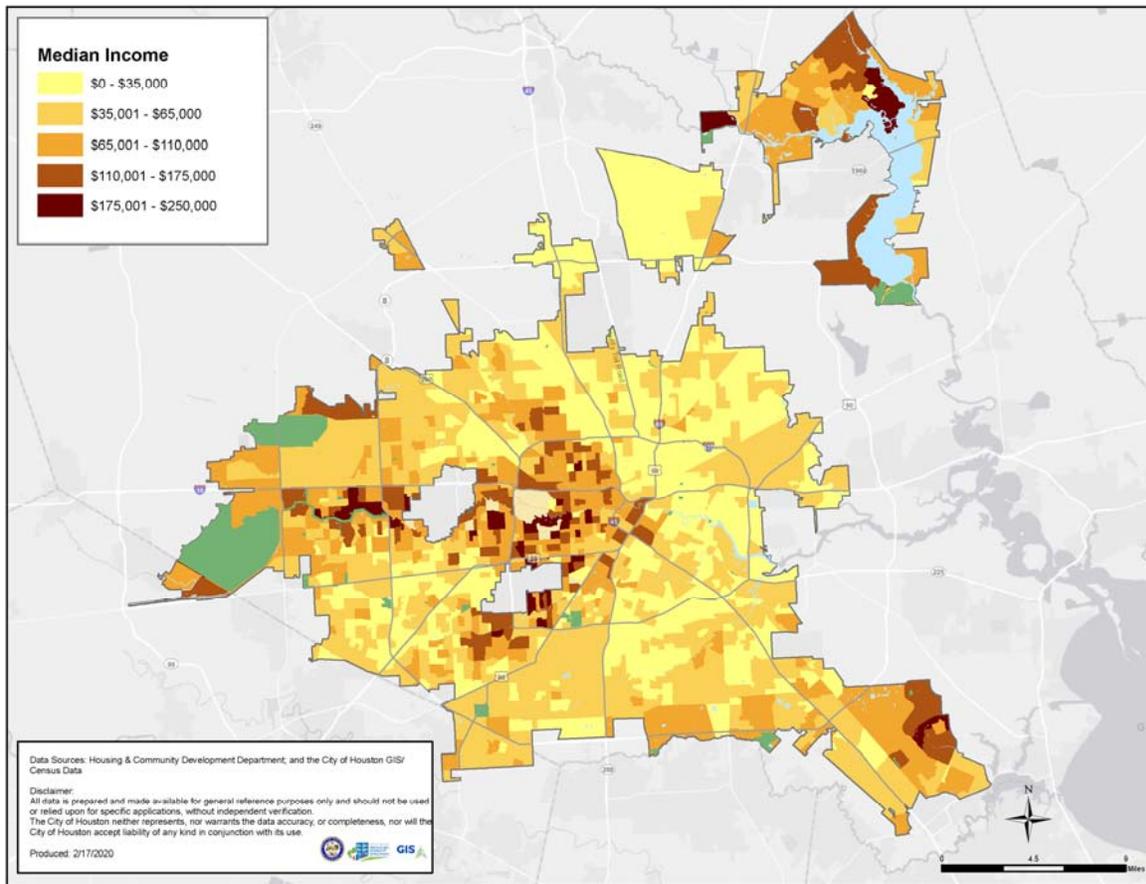
Table 12: Median Household Income

	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%
2017	\$49,339	15%	\$66,086	20%	\$57,051	15%	\$57,652	11%
*Harris County Only								
Source: 2000 Census; 2006-2010 ACS; and 2013-2017 ACS B19013								

The map below shows locations of median income by census block groups. Most areas below or that are comparable to 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.



Map 8: Median Income

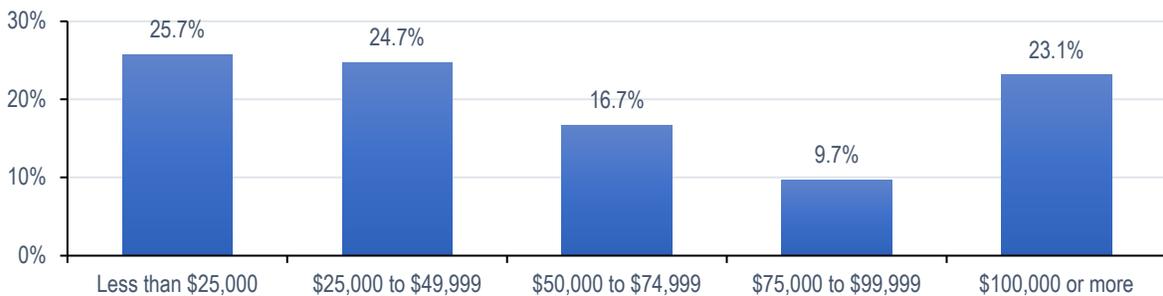


Source: 2013-2017 ACS

Income Distribution

The following graph shows the household income distribution for the city of Houston. According to the 2013-2017 ACS, more than half (50.4%) of Houston’s households earn less than \$49,999 per year and more than one in four (25.7%) households in Houston earn less than \$25,000 per year, which has decreased slightly from the 28% since 2012.¹⁹

Figure 1: Household Income Distribution, Houston



Source: 2013-2017 ACS S2503

¹⁹ 2008-2012 American Community Survey



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 table indicates HUD’s income categories.

Table 13: HUD Income Categories

Income Limit Category		Example of Latest Income Limits for Houston MSA for a Family of Four for FY 2019
Extremely Low Income	Less than 30% MFI	Less than \$25,750
Low Income	31-50% MFI	\$25,751-\$38,150
Moderate Income	51-80% MFI	\$38,151-\$61,050
Middle/Upper Income	Greater than 80% MFI	Greater than \$61,050
Source: HUD		

It is important not only to look at Houston’s distribution of current income, also 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 2011 to 2015, the number of households in the city grew at rate of 5.8%. The lower income categories grew faster compared to other income categories in Houston. The fastest growing income categories were “Extremely Low Income” households increasing at a rate of 17.1% and “Low Income” households increasing at a rate of 10.2% over the same time period. The absolute growth of the Extremely Low-Income category was almost half of all new households. The number of Middle/Upper Income households grew less than 1% in the past five years.

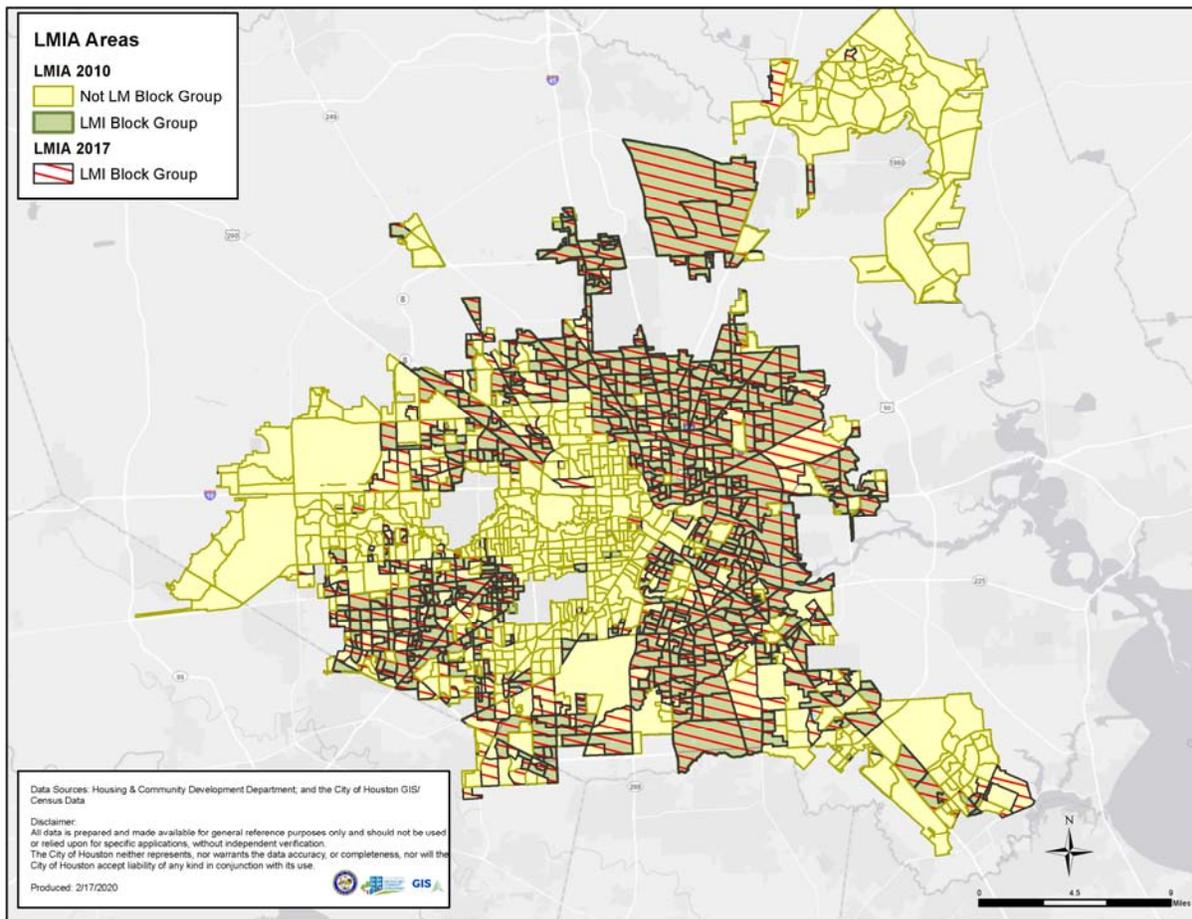
Table 14: Change in Household Income Distribution 2011 to 2015

	2011		2015		Change	
	Households	%	Households	%	Number of Households	Percent of Households
Extremely Low Income	127,120	16.5	148,805	18.3	21,685	17.1
Low Income	112,050	14.6	123,465	15.2	11,415	10.2
Moderate Income	138,750	18.0	148,585	18.2	9,835	7.1
Middle/Upper Income	391,945	50.9	393,740	48.3	1,795	0.5
Total	769,865	100.0	814,595	100.0	44,730	5.8
Source: State of Cities Data Systems: 2007-2011 CHAS; 2011-2015 CHAS Table 7						

The following map shows the way low- and moderate-income areas have changed over time. The map compares HUD information regarding areas, specifically block groups, 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 2010 continued to have majority of low- and moderate-income residents and additional block groups were added.



Map 9: Map of LMI changes from 2010 to 2017



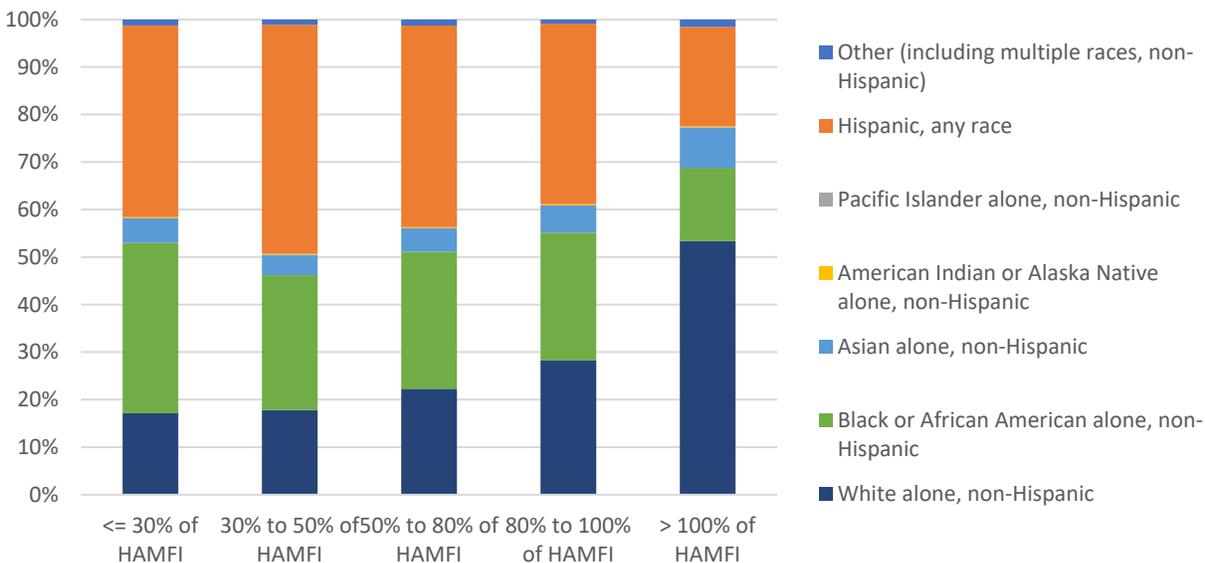
Source: HUD

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 (AMFI) compared to non-minority households. The income group earning above 100% of the AMFI is majority White non-Hispanic households at 53.4%, which is a much higher proportion compared to the White non-Hispanic percentage of the total population. The percentage of the 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 15.4% of this group. The percentage grows at each lower income category, with the highest percentage of non-Hispanic Black/African Americans making up 35.9% of the lowest income category, households earning below 30% of the AMFI.



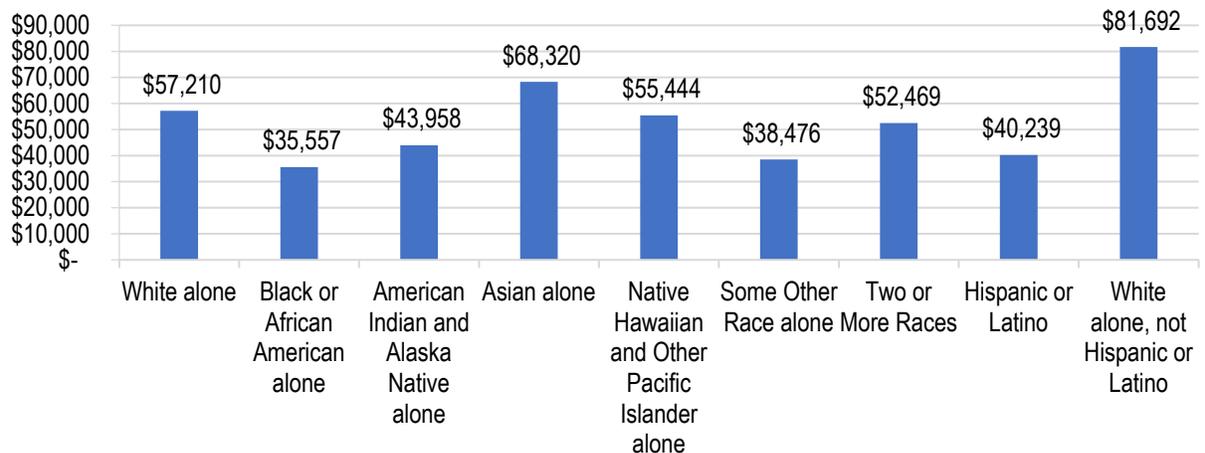
Figure 2: Income Distribution by Race and Ethnicity for the City of Houston



Source: 2011-2015 CHAS Table 1

Supporting the CHAS data findings, median income from the 2013-2017 ACS vary widely between racial/ethnic groups in Houston and the region. Black/African Americans had the lowest median income in Houston at \$35,557, while Hispanic/Latinos had the lowest median income in the Houston MSA at \$40,239. Median income was highest in both the city and the region for White non-Hispanics at \$81,692 and \$77,956. Asians had the second highest median income in the city and the highest median income in the region; however, Houston’s median income for Asians at \$68,320 was much lower than the median income in the Houston MSA at \$96,114.

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



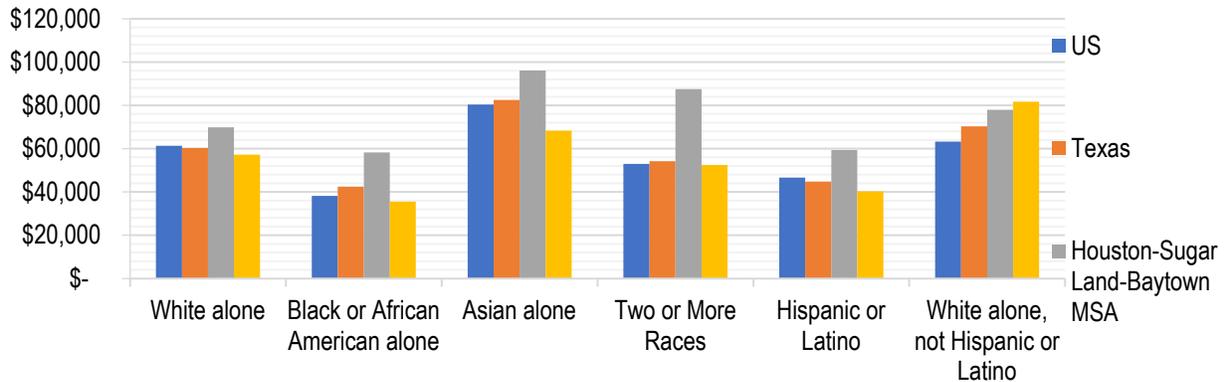
Source: 2013-2017 ACS B19013

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: 2013-2017 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 2012 to 2017 grew at a rate of 10.6%. Three racial and ethnic groups had median income increases almost double to that of the median income of Houston, which include Native Hawaiian and Other Pacific Islander alone (46.5%), Asian alone (21.3%), and Two or More Races (18.2%). The median income of Black/African American residents rose at a rate of 10.3%, slightly lower than the total city’s change in median income. Both White alone not Hispanic and Hispanic/Latino saw an increase slightly above the city rate, however the absolute increase of the income of White alone not Hispanic was much more than any other race or Hispanic/Latino group, besides Native Hawaiian alone or Asian alone.

Table 15: Median Household Income by Race in Houston

	2012	2017	% Change
White alone	\$53,432	\$57,210	7.1%
Black or African American alone	\$32,243	\$35,557	10.3%
American Indian and Alaska Native alone	\$40,577	\$43,958	8.3%
Asian alone	\$56,315	\$68,320	21.3%
Native Hawaiian and Other Pacific Islander alone	\$37,841	\$55,444	46.5%
Some Other Race alone	\$33,697	\$38,476	14.2%
Two or More Races	\$44,372	\$52,469	18.2%
Hispanic or Latino	\$36,197	\$40,239	11.2%
White alone not Hispanic or Latino	\$72,508	\$81,692	12.7%
Median Household Income	\$44,648	\$49,399	10.6%

Source: 2008-2012 ACS; 2013-2017 ACS B1901A-I

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.²⁰ 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 the largest racial/ethnic groups are growing at similar rates to the city's rate. However, because certain race/ethnicity groups have higher incomes, even if rates are even across race/ethnicity groups, it 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 2011-2015 CHAS data, approximately 62.1% of large family households were lower and moderate income. Almost half (40.4%) of all large family households earn below 50% AMI, and almost three out of four of these lower income 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 a 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 (55.8%) when compared to the total city households (51.7%).

The majority of lower income and moderate-income (70.4%) households are renter households. The only exception is elderly households. Over half 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.

²⁰ 2013-2017 ACS Table S1501



Table 16: Income by Household Type 2015

Household Type	Extremely Low (0-30% HAMFI)	Low (31-50% HAMFI)	Moderate (51-80% HAMFI)	Middle/Upper (81%+ HAMFI)	Total
Elderly (62+ years)*	21.4%	17.3%	17.1%	44.2%	100%
Small Family (2-4 persons)	16.1%	14.5%	18.3%	51.1%	100%
Large Family (5+ persons)	20.2%	20.2%	21.7%	38.0%	100%
Other	18.7%	12.9%	17.7%	50.7%	100%
Total	18.3%	15.2%	18.2%	48.3%	100%
*Family and Non-Family Households					
Source: 2011-2015 CHAS Table 7					

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 2013-2017 ACS, female-headed family households, with and without children, made up over a quarter of the families in Houston, 26.8%, and had a very low median family income at \$28,852, much lower than male-headed family households at \$43,864.²¹

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

²¹ 2013-2017 ACS, S1903



Poverty

Although it is important to understand the City’s 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 section describes Houstonians who live in poverty.

According to the 2013-2017 ACS provides that, of Houston’s total population (2,267,336), 22.5% (472,592) of the people are living in poverty, while only 13.5% of the Houston MSA’s population lives in poverty. On January 18, 2020, the ASPE released the U.S. Federal poverty guidelines for the 48 contiguous states in 2020.²² According to the ASPE, a single-household is at or below the poverty line with an income of \$12,760. A household of 4 individuals is deemed at or below the poverty line if the household income is \$26,200. However, the U.S. Census Bureau distinguishes the poverty threshold. Depending on the number of related children and the total number of people within the household, the threshold for poverty will vary as shown in the following table. For a one-person household, the poverty threshold begins at \$13,300, and for a family of four with two related children, the poverty threshold is \$25,926.

Table 17: 2019 Poverty Thresholds

Size of family unit	Related children under 18 years				
	None	One	Two	Three	Four
One person (unrelated individual):					
Under age 65	13,300				
Aged 65 and older	12,261				
Two people:					
Householder under age 65	17,120	17,622			
Householder aged 65 and older	15,453	17,555			
Three people	19,998	20,578	20,598		
Four people	26,370	26,801	25,926	26,017	
Five people	31,800	32,263	31,275	30,510	30,044

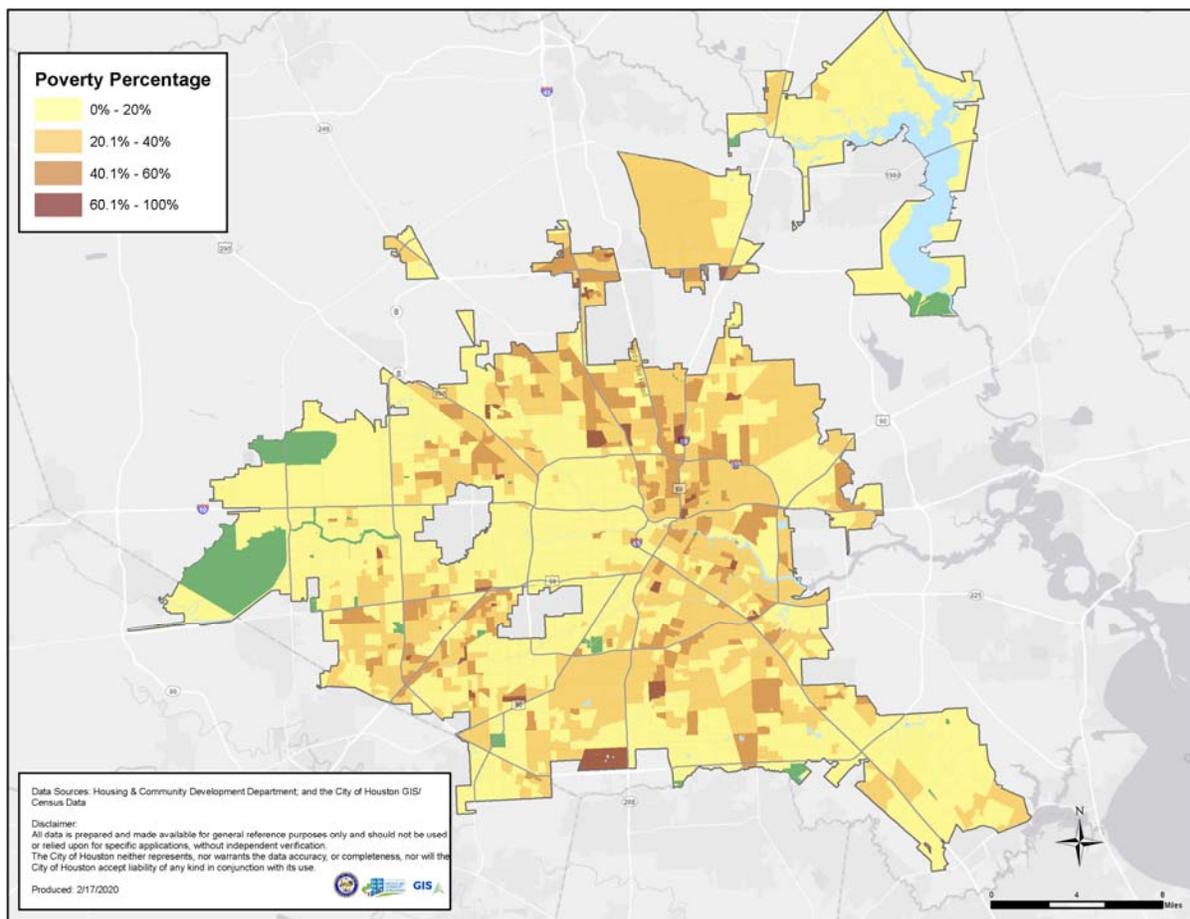
Source: Adapted from U.S. Census Bureau: 2019 Poverty Thresholds

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 the census tracts with a poverty rate of 40% or more are also majority minority. This is not 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.

²² HHS Poverty Guidelines for 2019, Office of the Assistant Secretary for Planning and Evaluation (2020) <https://aspe.hhs.gov/poverty-guidelines>.



Map 10: Poverty Distribution by Census Tract



Source: 2013-2017 ACS

Since the 2008-2012 ACS, there has been an overall decrease in poverty. ACS data from 2008-2012 ACS, showed the poverty rate in Houston at 22.2% and 15.8% in the region. However according to the 2013-2017 ACS, the Houston's poverty rate decreased by 1.6% to 20.6% while the poverty rate of Houston MSA has decreased to 13.9%, showing a reduction of 1.9%. However, the percentage of the Hispanic/Latino ethnic group living in poverty has marginally increased. Of the population experiencing poverty, Hispanic/Latino ethnic group currently make up about 56.4% and 54.0% of the city and the region, respectively. The Black/African American racial group encompasses 28% of the Houston and 22.6% of Houston MSA. Compared to other races and ethnicities, 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 17.3% compared to the city at 10.4%.



Table 18: Poverty by Race/Ethnicity

	Houston		Houston MSA	
	#	%	#	%
Income in the past 12 months below poverty level	472,592		969,176	
White alone	248,530	52.6%	572,173	59.0%
Black or African American alone	132,555	28.0%	219,137	22.6%
American Indian and Alaska Native alone	1,879	0.4%	5,205	0.5%
Asian alone	21,474	4.5%	46,138	4.8%
Native Hawaiian and Other Pacific Islander alone	268	0.1%	807	0.1%
Some Other Race alone	58,833	12.4%	103,641	10.7%
Two or More Races	9,053	1.9%	22,075	2.3%
White alone, not Hispanic or Latino	48,918	10.4%	168,093	17.3%
Hispanic or Latino	266,487	56.4%	523,700	54.0%
Source: 2013-2017 ACS S1701				

For both the city and the region there is a slight over representation of persons with a disability living in poverty. Over one quarter (26.5%) of those with a disability in Houston are living in poverty while only one fifth (19.7%) of individuals with a disability in the region are living in poverty. People with disabilities have higher rates of poverty than the city and region as a whole. This could be problematic in housing when the resident must provide their own reasonable accommodations, which could be too expensive.

Table 19: 2019 Poverty with Disability

	Houston		Houston MSA	
	#	%	#	%
Income in the past 12-months below poverty level	57,133	26.5	123,566	19.7
Income in the past 12-months at or above poverty level	158,072	73.2	502,679	80.1
Total Civilian noninstitutionalized population for whom poverty status is determined with a disability ²³	215,898		627,710	
Source: C18130, S1701 2013-2017 ACS				

Whereas Houston has a greater percentage of people in poverty than the region, Houston, likewise, has a greater percentage of families in poverty in the city (18.1%) compared to the region (11.9%). Since the last AI, the percentage of families, both in the city and in the region, living in poverty with children under the age of 18, remains near 80% of families living in poverty. However, families with income above poverty and children under 18 account for about 50% of the total amount of families with income above poverty.

²³ Poverty status is determined by the poverty status of the householder. *American Factfinder Glossary*, U.S. Census Bureau, <https://factfinder.census.gov/help/en/index.htm#glossary.htm>.



Table 20: 2019 Poverty Status by Family and Presence of Related Children under 18

	Houston		Houston MSA	
	#	%	#	%
Total Families	510,538		1,606,319	
Families with Income in the past 12 months below poverty level	92,291	18.1	191,377	11.9
with related children under 18	74,116	80.3	151,944	79.4
with no related children under 18	18,175	19.7	39,433	20.6
Families with income in the past 12 months above poverty	418,247	81.9	1,414,942	88.1
with related children under 18	201,268	48.1	730,989	51.7
with no related children under 18	216,979	51.9	683,953	48.3
Source: 2013-2017 ACS B17010				

Almost two-thirds (59.8%) of people in poverty speak a language other than in English, and although only 9.3% of the total city population persons five years and older live in poverty speak Spanish at home, this group accounts for 51% of all impoverished Houstonians. 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: 2019 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	413,916	18.3	
Speak Spanish	210,998	9.3	51.0
Speak Asian and Pacific Island languages	14,527	0.6	3.5
Speak other Indo-European languages	12,050	0.5	2.9
Speak other languages	10,110	0.4	2.4
Source: 2013-2017 ACS B16009			

Almost half, 47.6%, of individuals living in poverty are included in the labor force and over one-third (37.9%) of those individuals are employed. However, 52.4% of people living in poverty are not included in the labor force at all.

Table 22: Poverty Status by Employment Status

	Houston		Houston MSA	
	#	%	#	%
Total	1,726,798		4,971,134	
Income in the past 12 months below poverty level:	301,306		624,799	
In labor force:	143,559	47.6	290,568	46.5
Employed	114,161	37.9	231,330	37.0
Unemployed	29,398	9.8	59,238	9.5
Not in labor force	157,747	52.4	334,231	53.5
Universe: Civilian population 16 years and over for whom poverty status is determined				
Source: 2013-2017 ACS B17005				

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 disability assistance. Therefore, income may be a considered substantially influential for increasing fair housing choices.



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. In 2019, the Houston region was home to the headquarters of 22 Fortune 500 companies. All but three of the 22 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.²⁴

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. In 2017, the region's gross domestic product was 490.1 billion, which is a 6.9% decrease from its \$507.2 billion GDP in 2014, which could be attributed to Hurricane Harvey.²⁵ However over the past ten years, there has been a net growth of 600,000 jobs in Houston, and Houston is expected to create 71,000 jobs in 2019.²⁶ Since the bottom of the recession the Houston metro area has created 508,600 jobs, equaling three jobs for every one lost during the downturn. No other major metro area can make a comparable claim.²⁷

Employment

Employment has been growing since 2000. According to the 2000 Census and 2013-2017 ACS, Texas civilian employment grew 37.4%, which was more than the United States at 16.1% and the Houston MSA at 80.8%. Although the growth was not as high in Houston, the Houston civilian employment grew by 29%, during the same period.²⁸

The total number of Civilian Employed Population has increased. While the percentage of private entity workers increased to 29%, the number of government workers gradually decreased by 5.9%. Although the percentage of self-employed workers rose to 7.3% between 2008 and 2012 followed by a decrease in the next five years to 6.8%, self-employed workers have almost doubled in number since 2000, showing a percentage change of 40.7%.²⁹

²⁴ Greater Houston Partnership (August 29, 2019). Twenty-two Fortune 500 companies are headquartered in the Houston region. Houston ranks fourth among metro areas in Fortune 500 headquarters. Retrieved from <https://www.houston.org/houston-data/fortune-500-companies>

²⁵ Greater Houston Partnership (December 2018, p. 56) *Houston Economic Highlights 2018*. Retrieved from: https://www.houston.org/sites/default/files/2018-12/Economic%20Highlights%202018_0.pdf.

²⁶ Greater Houston Partnership (December 2018). *2019 Houston Employment Forecast*. Retrieved from: <https://www.houston.org/sites/default/files/2018-12/Employment%20Forecast%202019.pdf>.

²⁷ *Houston Economic Highlights 2018* (December 2018, p. 13).

²⁸ ACS 2013-2017: *Economic Characteristics DP03; Census 2000 Summary File 3: Economic Characteristics*.

²⁹ ACS 2013-2017: *Economic Characteristics DP03; ACS 2008-2012: Economic Characteristics DP03*.



Table 23: Change in Houston Civilian Employment

	2000		2013-2017		Percent Change
	#	%	#	%	%
Total Civilian employed population	859,961		1,109,301		29.0
Private wage and salary workers	708,790	82.4	931,087	83.9	31.4
Government workers	95,871	11.1	101,495	9.1	5.9
Self-employed workers in own not incorporated business	53,331	6.2	75,043	6.8	40.7
Unpaid family workers	1,969	0.2	1,676	0.2	-14.9
Source: 2000 Census; 2013-2017 ACS DP03					

The top four industries in the City are “Educational services, and health care and social assistance” (18.7%), “Professional, scientific, and management and administrative and waste management services” (14.5%), “Construction” (10.4%) and “Retail trade” (10.4%). This trend closely resembles the US, Texas, and the Houston MSA region. On the other hand, Agriculture is higher in Texas, Houston, and Houston MSA compared to the United States. Also, the construction industry is almost twice the percentage of workers (10.4%) in comparison to the United States’ 6.4% while also superseding Texas’ 8.2% and Houston MSA’s 9.3%.

Table 24: Industry

	Houston		Houston MSA		Texas		U.S.	
	#	%	#	%	#	%	#	%
Civilian employed population 16 years and over	1,109,301		3,161,281		12,689,069		150,599,165	
Agriculture, forestry, fishing and hunting, and mining	35,434	3.2	118,801	3.8	412,873	3.3	2,817,922	1.9
Construction	115,424	10.4	293,216	9.3	1,038,063	8.2	9,564,541	6.4
Manufacturing	94,132	8.5	320,232	10.1	1,116,657	8.8	15,477,389	10.3
Wholesale trade	34,358	3.1	113,810	3.6	381,774	3.0	4,042,867	2.7
Retail trade	115,222	10.4	334,442	10.6	1,454,504	11.5	17,167,000	11.4
Transportation and warehousing, and utilities	63,650	5.7	188,529	6.0	702,367	5.5	7,681,579	5.1
Information	14,291	1.3	42,307	1.3%	227,592	1.8	3,173,300	2.1
Finance and insurance, and real estate and rental and leasing	68,066	6.1	186,656	5.9	839,234	6.6	9,908,320	6.6
Professional, scientific, and management, and administrative and waste management services	160,381	14.5	401,922	12.7	1,437,711	11.3	17,001,157	11.3
Educational services, and health care and social assistance	207,762	18.7	631,710	20.0	2,739,219	21.6	34,781,348	23.1
Arts, entertainment, and recreation, and accommodation and food services	108,219	9.8	267,635	8.5	1,154,649	9.1	14,586,646	9.7
Other services, except public administration	65,876	5.9	172,292	5.5	663,422	5.2	7,371,226	4.9
Public administration	26,486	2.4	89,729	2.8	521,004	4.1	7,025,870	4.7
Source: 2013-2017 ACS S2403								



Over the last five years, the “Agriculture, forestry, fishing and hunting, and mining” industry sector has certainly been the fastest growing industry, at 39.8%. Second behind this industry is the “Arts, entertainment, recreation, and accommodation and food services” industry at a 17.9% percentage change. Not far behind is the “Finance and insurance, and real estate and rental and leasing” industry with a 16.0% increase over the five-year period. While Art, Entertainment and Recreation occupations annually pay nearly \$56,300 in the Houston MSA, Accommodation and Food Service Occupations only pay about \$24,860-\$25,400.³⁰ The two industries in Houston with the largest absolute growth were “Professional, scientific, and management, and administrative and waste management services” adding 20,185 employees and “Educational, health and social services” adding 17,375 employees.³¹

Table 25: Industry Change over Time in Houston

	2012		2017		Change	
	#	%	#	%	#	%
Agriculture, forestry, fishing and hunting, and mining	25,348	2.50%	35,434	3.8	10,086	39.8
Construction	103,357	10.30%	115,424	9.3	12,067	11.7
Manufacturing	93,942	9.30%	94,132	10.1	190	0.2
Wholesale trade	34,081	3.40%	34,358	3.6	277	0.8
Retail trade	108,546	10.80%	115,222	10.6	6,676	6.2
Transportation and warehousing, and utilities	57,783	5.70%	63,650	6.0	5,867	10.2
Information	14,896	1.50%	14,291	1.3	-605	-4.1
Finance and insurance, and real estate and rental and leasing	58,676	5.80%	68,066	5.9	9,390	16.0
Professional, scientific, and management, and administrative and waste management services	140,196	13.90%	160,381	12.7	20,185	14.4
Educational services, and health care and social assistance	190,387	18.90%	207,762	20.0	17,375	9.1
Arts, entertainment, and recreation, and accommodation and food services	91,760	9.10%	108,219	8.5	16,459	17.9
Other services, except public administration	61,984	6.20%	65,876	5.5	3,892	6.3
Public administration	25,191	2.50%	26,486	2.8	1,295	5.1
Total employed civilian population 16 and over	1,006,147		1,109,301		103,154	10.3

Source: 2013-2017 ACS S2403

As illustrated in the table below, Houston’s unemployment rate is equivalent to Houston MSA and the United States, yet it is still higher than Texas’ overall unemployment rate. Nevertheless, this is still a downward trend compared to the unemployment rates of the 2008-2012 ACS data, which reported Houston’s unemployment rate at 9% and the United States’ unemployment rate at 9.3%. This overall decrease can be explained by the economic improvements since the Great Recession of 2008.³²

³⁰ May 2018 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates Houston-The Woodlands-Sugar Land, TX, U.S. Bureau of Labor Statistics, https://www.bls.gov/oes/current/oes_26420.htm.

³¹ 2013-2017 ACS S2403.

³² BLS Spotlight on Statistics: The Recession of 2007-2019, U.S. BUREAU OF LABOR STATISTICS, (February 2012, p. 2) https://www.bls.gov/spotlight/2012/recession/pdf/recession_bls_spotlight.pdf.



Table 26: Unemployment

	Houston	Houston MSA	Texas	U.S.
Percent Unemployed in 2017	6.6%	6.6%	5.8%	6.6%
Source: 2013-2017 ACS DP03				

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 and American Indians/Alaska Natives face higher levels of unemployment compared to Whites and Asians. Examining unemployment by race over the past two decades we find that despite some progress, racial employment gaps persist in Houston. African Americans are the only group who are currently experiencing unemployment levels above 10% in Houston, which is double that of Whites and Asians. A small notation to consider is that the absolute number of all groups increased, with the exception of American Indian and Alaska Natives, who were not previously included in the data, and Native Hawaiians/Other Pacific Islanders.

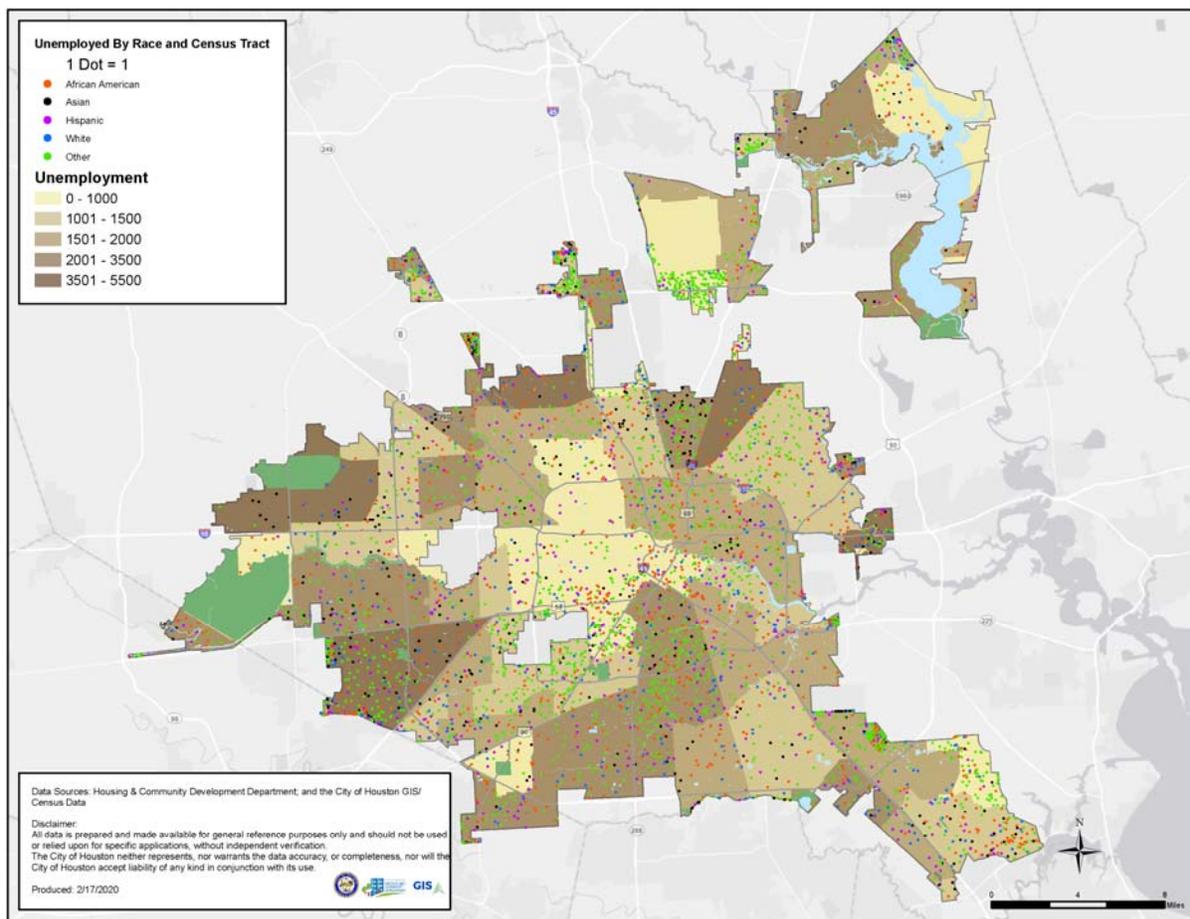
Table 27: Employment Status by Race and Ethnicity in Houston

	% In Labor Force	# In Labor Force	% Unemployed	# Unemployed
White alone	68.2%	1,025,774	5.0%	51,289
Black or African American alone	64.6%	406,927	11.7%	47,610
American Indian and Alaska Native alone	68.9%	6,017	7.0%	421
Native Hawaiian and Other Pacific Islander alone	72.7%	959	6.0%	58
Asian alone	67.4%	126,608	4.8%	6,077
White alone, not Hispanic or Latino	66.9%	487,862	4.2%	20,490
Hispanic or Latino	70.2%	715,262	5.8%	41,485
Source: 2013-2017 ACS S2301				

The next map illustrates the disparities between the residential location of unemployed individuals and the location of jobs. 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 2017 and 2013-2017 ACS

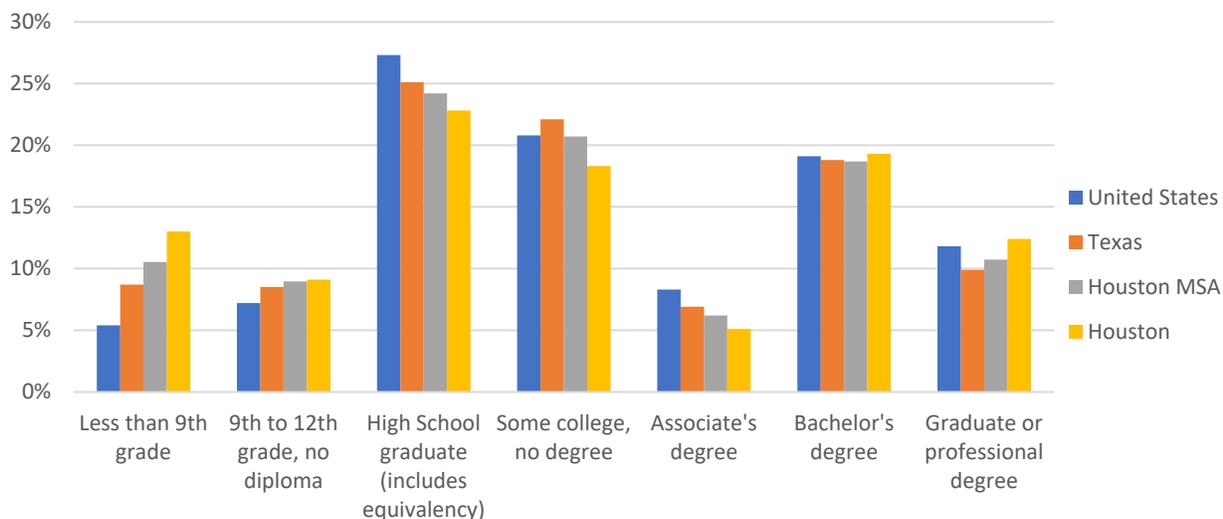
Workforce

Educational attainment has a strong correlation with both higher wages and higher workforce potential.³³ Therefore, education is important when describing Houston’s workforce. Houston exceeds the nation, state, and region in the percentage of the population holding bachelor’s and graduate/professional degrees. However, compared to the United States’ population at 8.3%, Houston has fewer Associate degree holders—5.1%— and also has fewer higher school graduates —22.8%— compared the Nation’s 27.3%. Houston’s population also encompasses more people over the age of 25 who do not have a high school diploma or equivalent.

³³ Vernon Brundage, Jr., Profile of the labor force by educational attainment, U.S. Bureau of Labor Statistics (August 2017) <https://www.bls.gov/spotlight/2017/educational-attainment-of-the-labor-force/pdf/educational-attainment-of-the-labor-force.pdf>.



Figure 5: Educational Attainment for Population 25 and over



Source: 2013-2017 ACS C15002 S1501

Educational Attainment by Race/Ethnicity, Sex, and Nationality

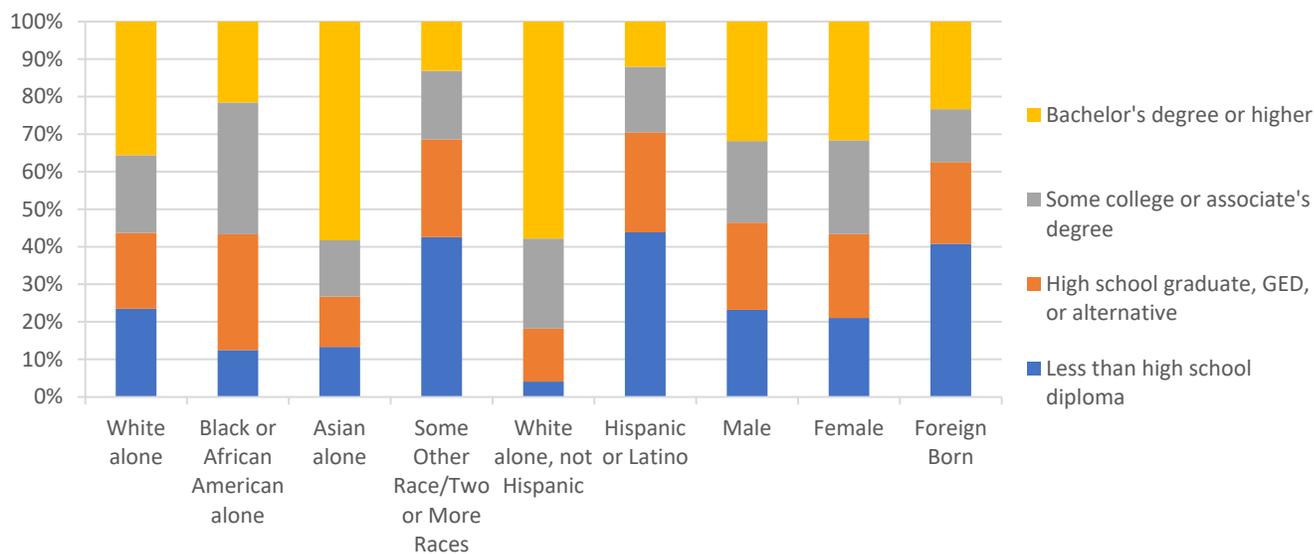
Educational attainment of residents in the City of Houston differs by race and ethnicity. When compared to other groups Hispanics (70.5%) and Foreign Born (62.6%) show a disparate percentage of people who are 25 years and older and have only a high school diploma (HS diploma) or less. These two race/ethnicity groups not only have the highest percentage of people without a high school diploma and are also the two groups with the least percentage of residents who have a bachelor’s degree or higher— 12.0% for Hispanic and 23.4% for Foreign Born residents.

On the contrary, 81.8% of the group non-Hispanic White Alone in Houston have obtained some level of college education or better. The Asian population over 25 years, likewise, is composed of 73.3% of people who are college educated or better. Both non-Hispanic White and Asian residents have the lowest percentages of people with a HS diploma or less—18.2% and 26.7%, respectively. However, the racial group White Alone, which includes those of Hispanic/Latino origin, has an even distribution amongst all levels of education, averaging 21.5%, except for Bachelor degree attainment, which is at 35.6%. 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 42.4%.

Since the 2008-2012 ACS, the education demographics for Black/African Americans has changed from their highest educational attainment as a high school diploma and less. More recent data shows that 56.3% of Black/African Americans have some college education or better; 35% have an Associate’s degree or some college, and 21.3% have a Bachelor’s degree or higher.



Figure 6: Educational Attainment by Race/Ethnicity/Sex/Foreign Born



Source: 2013-2017 ACS B06009

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 2017 U.S. Census Bureau Data, holders of a bachelor's degree or higher experienced the lowest level of poverty in the United States, compared to other education attainment levels.³⁴ According to the 2013-2017 ACS, approximately 68.6% of the population over 25 years old fall at or below poverty. Of those, 68.1% of residents living in poverty did not have any college or an Associate's degree: 22.1% had less than a high school diploma and 22.6% 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.³⁵ The median income for a person with HS diploma or less is about \$22,901.³⁶ 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.³⁷ Of the population between 25 years and older, those with a Bachelor's degree or higher had the highest percentage of people in the labor force at 78.7% and the highest percentage of persons employed (74.3%), according to the 2013-2017 ACS.³⁸ The unemployment rate was higher for residents with some college or Associate's degree (6.8%), with a high school diploma (7.3%), or with less than a high school diploma (6%) compared to residents with a Bachelor's degree or higher who had a 3.5% 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.

³⁴ Income and Poverty in the United States: 2017, U.S. Census Bureau, (September 2018, p. 11) <https://www.census.gov/content/dam/Census/library/publications/2018/demo/p60-263.pdf>.

³⁵ Vernon Brundage, Jr., Profile of the labor force by educational attainment, U.S. BUREAU OF LABOR STATISTICS (August 2017, p. 8) <https://www.bls.gov/spotlight/2017/educational-attainment-of-the-labor-force/pdf/educational-attainment-of-the-labor-force.pdf>; 2013-2017 ACS S1501.

³⁶ 2013-2017 ACS S1501.

³⁷ 2013-2017 ACS SDP03.

³⁸ 2013-2017 ACS S2301.



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, METRORail, METROLift, and High Occupancy Vehicle (HOV) lanes. Feedback gathered from residents and stakeholders during public participation events held throughout the development of this report showed that transportation was a barrier for many to find and maintain housing.

Ridership

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 2014 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 43.1% of the total riders and almost half (36.5%) of the riders on local bus routes. White riders, only making up 22.4% of the total riders, represented over half (39.4%) of the riders in the Park and Ride routes and almost one third (29.8%) in the METRORail route. The Park and Ride routes had the highest percentage of riders making above \$81,000, at 57.2% of the riders and the lowest percentage of people without vehicles available (1.7%). The majority of local bus riders was low- and moderate-income riders and over one-third 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.

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.



Table 28: METRO Ridership

	Fixed Route System (Total)		Local Routes		Park and Ride Routes		METRORail	
	#	%	#	%	#	%	#	%
Respondents-boardings	270,814		178,821		33,417		58,576	
Average Age								
Male		52.5		53		43.8		55.8
Female		47.4		46.9		55.7		44.2
<i>Vehicle Available</i>								
Yes		68.5		62.9		98.2		71.1
No		31.4		37.2		1.7		28.8
<i>Race/Ethnicity</i>								
No Response								
Hispanic/Latino		24.5		26.7		17.6		22.5
Asian		6.3		3.7		19.8		5.9
Black/African American		43.1		36.5		20.3		50.1
White		22.4		16.2		39.4		29.8
Of another race or Other		3.7		4.2		2.9		5.4
<i>Household Income</i>								
<\$16,000		18.7		21		1.5		22.6
\$16,000 to \$31,999		28.6		34.8		4.9		25.9
\$32,000 to \$53,999		26.2		28.7		14.1		26.2
\$54,000 to \$80,999		12.6		10.4		22.2		13.1
Above \$81,000		13.9		5.2		57.2		12.3

Source: METRO 2014 Transit Rider Survey

Table 29: METROLift Services FY2018

Eligible Patrons	17,000
Avg. Passenger Trips/Weekday	6,597
Avg. Vehicle Trips/Weekday	5,673
Trip Request Denials	0
Total Passengers	2.0 million
Average Trip Length	13.2 miles
Total Vehicle Miles	23 million
Average Cost per Trip	\$30.49
Fare	\$1.25 single ticket; \$12.50/11 ticket booklet

Source: METRO



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. During the period between 2000 and 2017, the number of housing units in the Houston area increased about two-thirds (40.6%) and the number of units within the City of Houston increased slightly less at 20.6%.

Table 30: Population and Housing Units

	2000				2017				% Change City 2000-2017	% Change MSA 2000-2017
	Houston		Houston MSA		Houston		Houston MSA			
	#	%	#	%	#	%	#	%	%	%
Population	1,953,631		4,669,571		2,267,336		6,636,208		16.1	42.1
Housing Units	782,009		1,777,902		943,183		2,499,292		20.6	40.6
Occupied Housing Units	717,945	92	1,639,401	92	838,950	88.9	2,270,573	90.3	16.9	38.5
Vacant Housing Units	64,064	8	138,501	8	104,233	11.1	227,588	9.7	62.7	64.3

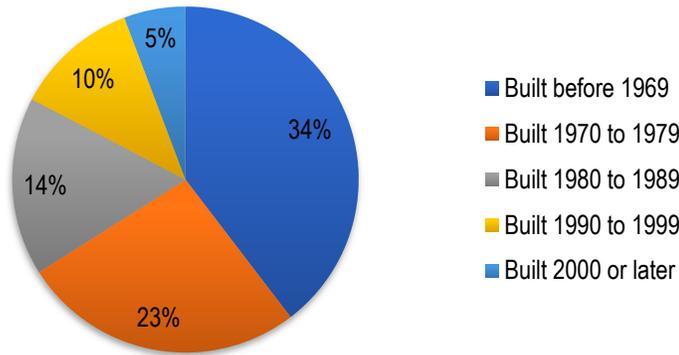
Source: 2000 Census; 2013-2017 ACS DP04

Housing Stock

The housing stock in Houston is relatively new with 28% of the housing built since 1980. The decade with the largest percent of housing units built in Houston was the 1970s with 23% 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 7: City of Houston Age of Housing Stock



Source: 2013-2017 ACS DP04

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 increase after 2012 and have remained steady increase to reach the highest number of permits with the highest median and average permit value in 2014.

Table 31: Single Family Permits in the City of Houston

	2012	2013	2014	2015	2016	2017	2018
Median Permit Value	\$213,837	\$216,000	\$230,000	\$230,000	\$231,000	\$210,000	\$225,000
Average Permit Value	\$239,985.55	\$245,956.80	\$260,003	\$262,950	\$265,526	\$250,739	\$271,349
Value of All Permits	\$852,188,687	\$1,312,671,467	\$1,420,916,724	\$1,360,769,588	\$1,113,351,915	\$1,375,303,774	\$1,487,535,287
Number of Permits	3,551	5,337	5,465	5,175	4,193	5,485	5,482
Number of Units	3,482	5,100	5,437	5,148	4,175	5,488	5,483

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 fluctuated. As the market recovered and Houston became a popular destination for people to move, many 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 and 2015, over 25,000 multifamily units were approved to be built within Houston, much higher from the 7 year low in 2017 in which the City only permitted 4,430 multifamily units.



Table 32: Multifamily Permit Data

	2012	2013	2014	2015	2016	2017	2018
Median Permit Value	1,900,000	1,550,000	1,800,000	1,524,917	893,248	1,416,064	893,112
Average Permit Value	2,796,164	3,036,848	2,792,209	2,906,992	2,506,135	3,747,248	2,431,372
Value of All Permits	685,060,058	889,796,514	1,320,714,957	1,186,052,823	501,226,943	547,098,246	838,823,387
Number of Permits	245	288	473	408	200	146	345
Number of Units	8,398	9,030	14,174	12,032	4,845	4,430	6,384

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 and 2015, the value of multifamily permits became almost as high as the value of single family permits for the first time in the last ten years.

Figure 8: Number of Units Permitted and Demolished and Estimated Value of Permits 2008-2014



Source: City of Houston Planning and Development Department

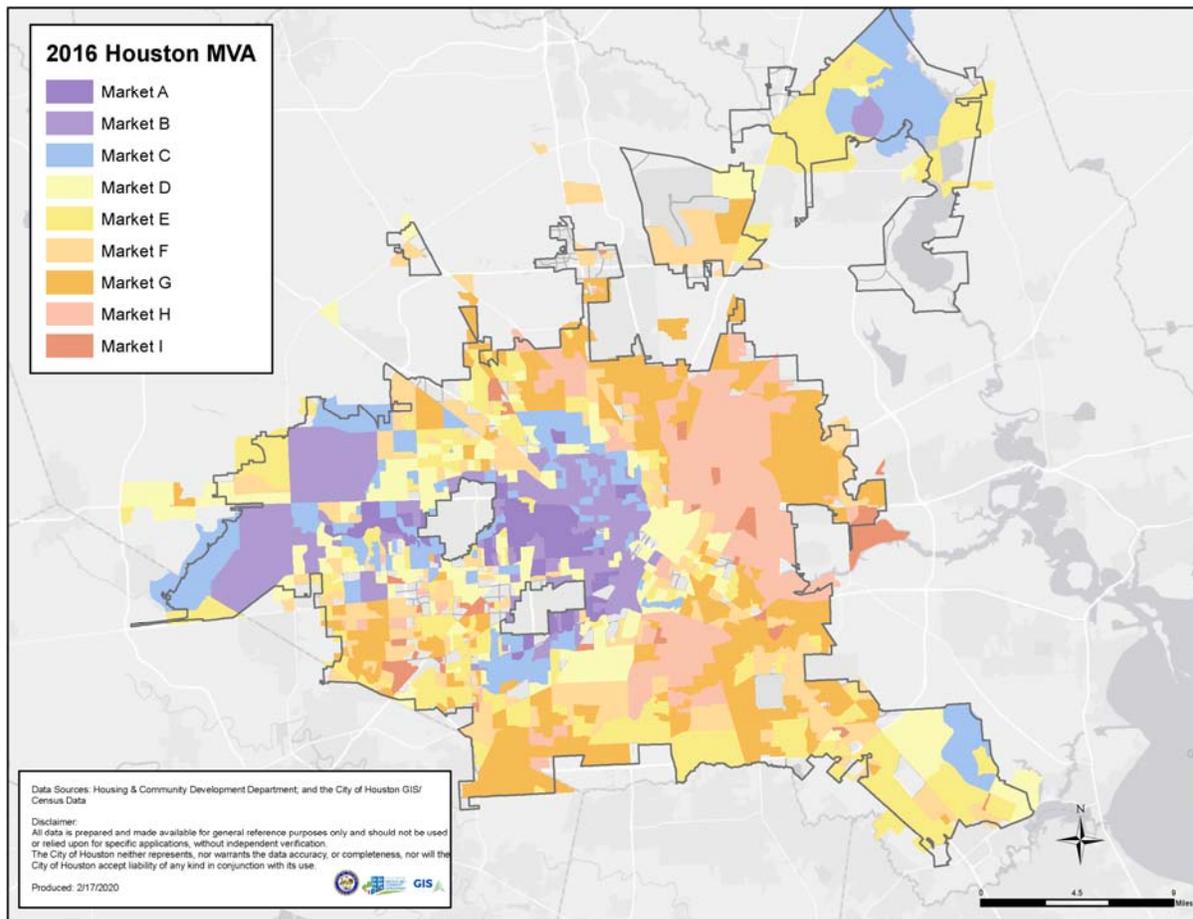
The increase in building activity over the last few years has put a strain on Houston’s construction market. Additionally, after Hurricane Harvey, construction costs also increased.

Houston Real Estate Market

Beginning in 2012, HCDD partnered with a nonprofit organization, Reinvestment Fund, to prepare a Market Value Analysis (MVA) for the City of Houston. In 2016, the next MVA was produced, so that longitudinal inferences can be made. 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 Reinvestment Fund and the City took 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.

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 2017, the number of households increased at a greater rate in the Houston metro region, at 38.6%, than in Houston, at 16.9%. 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 decreased between 2000 and 2017.

Table 33: Household Size and Composition

	2000		2017		% Change 2000-2017	
	Houston	Houston MSA	Houston	Houston MSA	Houston	Houston MSA
Population	1,953,631	4,669,571	2,267,336	6,636,208	16.1	42.1
Households	717,945	1,639,401	838,950	2,271,561	16.9	38.6
Family Households	457,549	1,169,507	510,538	1,606,319	11.6	37.4
Nonfamily Households	260,396	469,894	328,412	665,242	26.1	41.6
Housing Units	782,009	1,777,902	943,183	2,271,561	20.6	27.8
Household Size	2.67	*	2.30	2.51	-13.9	
*Not Reported						
Source: 2010 Census; 2013-2017 ACS S2501 & DP04						

Tenure (Owner vs Renter)

The ratio of owner and renter housing in Houston remained steady from 2000 to 2017 with homeowners representing 43.3% 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 58.4% in 2017. 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 but that percentage has decreased from 2000 to 2017.

Table 34: Tenure

	2000				2017				% Change 2000-2017	
	Houston		Houston MSA		Houston		Houston MSA		Houston	Houston MSA
	#	%	#	%	#	%	#	%	%	%
Occupied Housing Units	717,945		1,639,401		838,950		2,271,561		16.9	38.6
Owner Occupied	328,741	45.8	994,347	60.7	362,878	43.3	1,373,056	58.4	10.4	38.1
Renter Occupied	389,204	54.2	645,054	39.4	476,072	56.7	898,505	41.6	22.3	39.3
Source: 2000 Census; 2013-2017 ACS DP04										



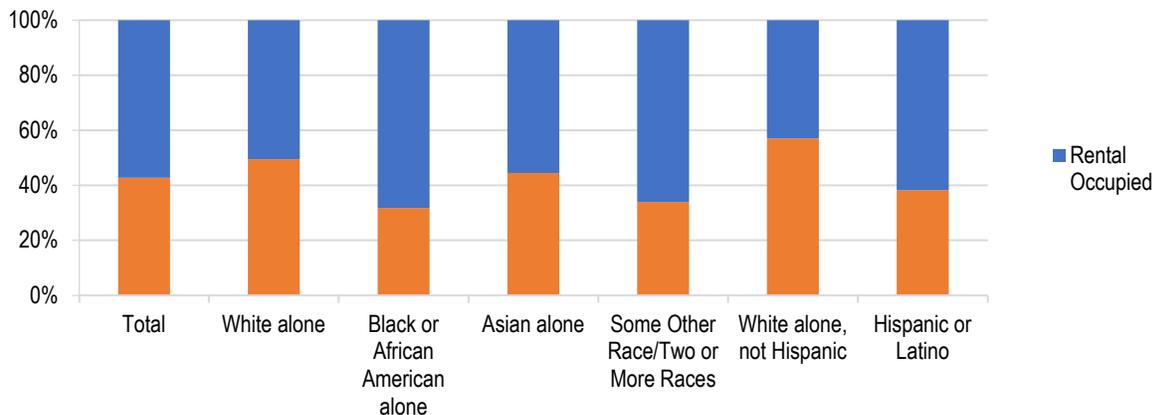
Tenure by Race

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 (57.0%) of White, non-Hispanic residents own their homes within the City, which is the racial/ethnic group with the greatest proportion of homeowners. Non-Hispanic Black/African American Houstonians are the most likely group to rent (68.2%) followed by Non-Hispanic Other Races (66%) and Hispanic/Latino (61.7%).

The homeownership rate in the Houston MSA (60.4%) is much higher than in the City of Houston (42.8%). 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 (42.4%). Almost three fourths (71.7%) of white non-Hispanic residents are homeowners.

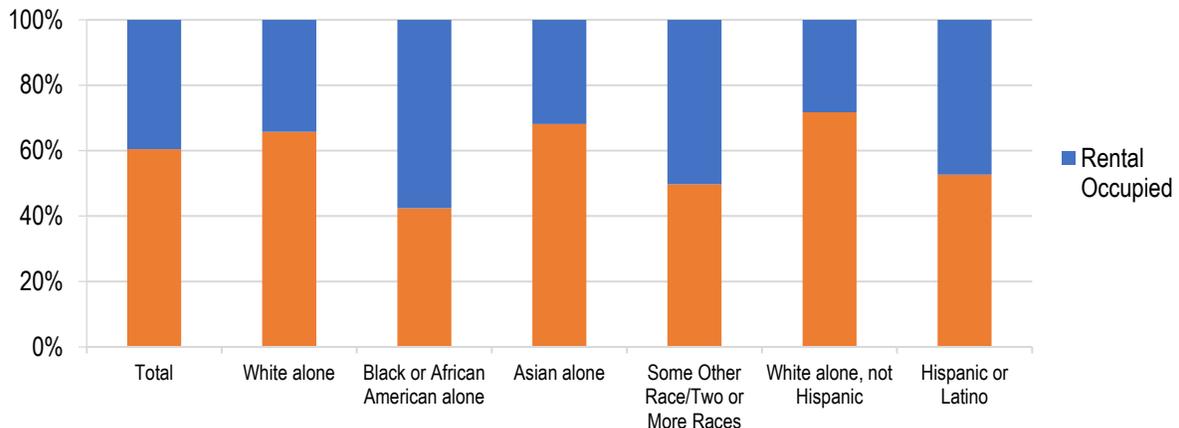
Historically, homeownership has been a way to build wealth in the United States. While this is not always the case, homeownership can be an important asset to families. The stark difference in tenure and racial/ethnic groups may indicate a need for financial education or homebuyer education in minority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

Figure 9: Houston Tenure by Race/Ethnicity



Source: 2013-2017 ACS B25003A-I

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



Source: 2013-2017 ACS B25003A-I



Disproportionate Housing Needs

CHAS data illustrates 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 (40.1%) 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 of households with housing problems and the overall population, at 7.9% in Houston and 8.8% 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 35: Households experiencing one or more housing problems in Houston by race/ethnicity and family size

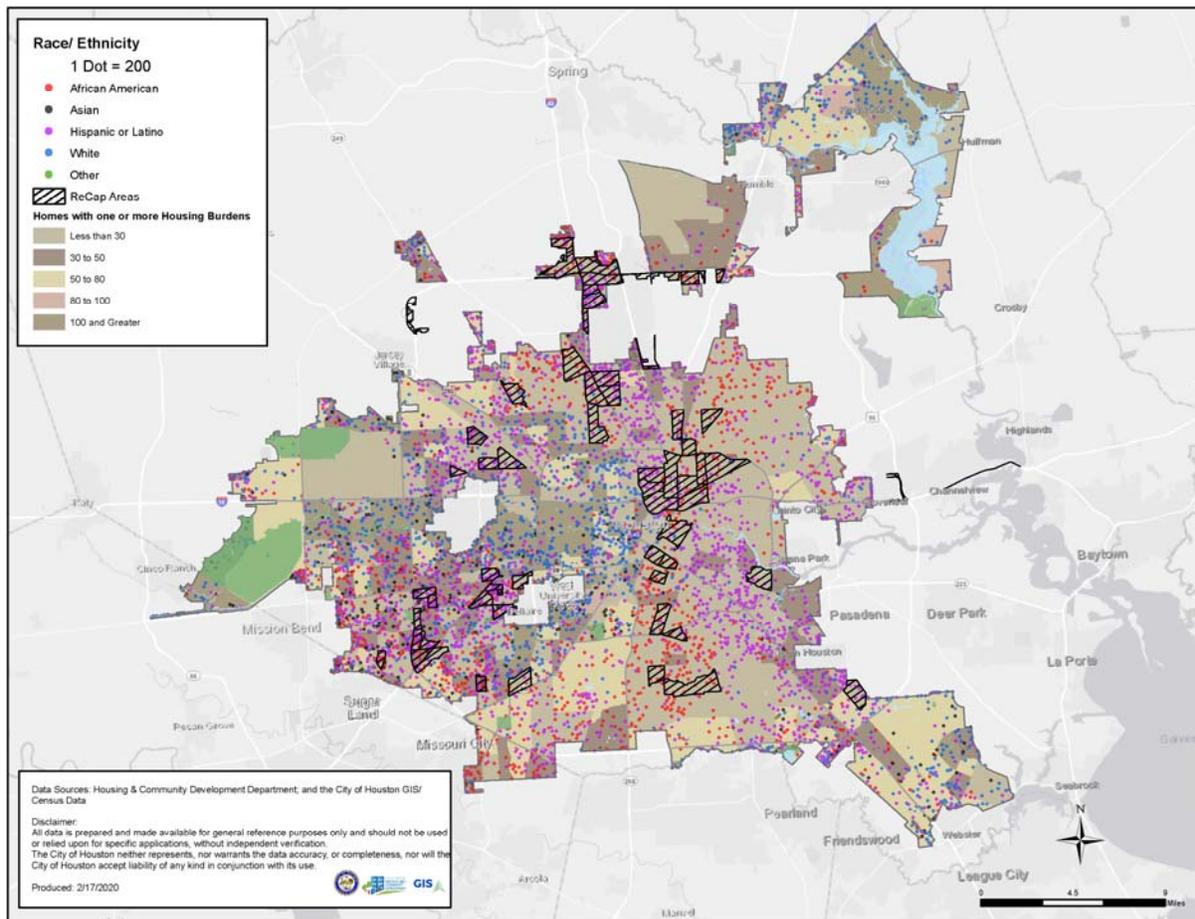
Race/Ethnicity	City of Houston		Houston MSA	
	% of Total Households	% of Households With Housing Problems	% of Total Households	% of Households With Housing Problems
White alone, non-Hispanic	33.5	22.9	45.7	32.6
Black or African-American alone, non-Hispanic	24.6	28.4	17.8	22.8
Asian alone, non-Hispanic	6.4	5.2	6.5	5.7
American Indian or Alaska Native alone, non-Hispanic	0.2	0.2	0.2	0.2
Pacific Islander alone, non-Hispanic	0.1	0.1	0.0	0.1
Hispanic, any race	34.0	41.9	28.4	37.2
Other (including multiple races, non-Hispanic)	1.3	1.3	1.4	1.4
Total	100	100	100	100
Household Type and Size				
Family households, <5	49.5	42.2	57.3	46.8
Family households, 5+ people	11.6	17.5	13.3	18.8
Non-family households	38.9	40.3	29.4	34.4
Total	100	100	100	100

Source: 2011-2015 CHAS Tables 1, 4, 9, 16

As illustrated in the following map, there are higher proportions of households with populations of minority residents experience housing problems. The areas of Houston with the lowest percentage of households experiencing housing problems resemble 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: 2013-2017 ACS; 2011-2015 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 more pronounced. Again, the proportion of Hispanic households experiencing severe housing burdens was more than the proportion of Hispanic households, showing that Hispanic households are disproportionately affected by severe housing problems. Black/African American households experienced severe housing problems at a slightly higher proportion than of the percentage of Black/African American households in the total population. 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 36: 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*	33.5	20.5	45.7	28.6
Black or African-American alone*	24.6	27.8	17.8	22.7
Asian alone, non-Hispanic*	6.4	5.2	6.5	5.7
American Indian or Alaska Native alone*	0.2	0.2	0.2	0.2
Pacific Islander alone*	0.1	0.1	0.0	0.1
Hispanic, any race	34.0	45.0	28.4	41.4
Other (including multiple races)*	1.3	1.2	1.4	1.4
All/Total	100	100	100	100
* Non-Hispanic				
Source: 2011-2015 CHAS Table 9				

Publicly Supported Rental Housing

Publicly supported rental housing is housing funded through federal, state, and local programs that offer lower rents to eligible 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 is 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 creates housing mainly for families earning below 60% AMI.

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.

Finally, various other government funding sources can be used to finance affordable housing including affordable housing for special needs groups. Some 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.

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.

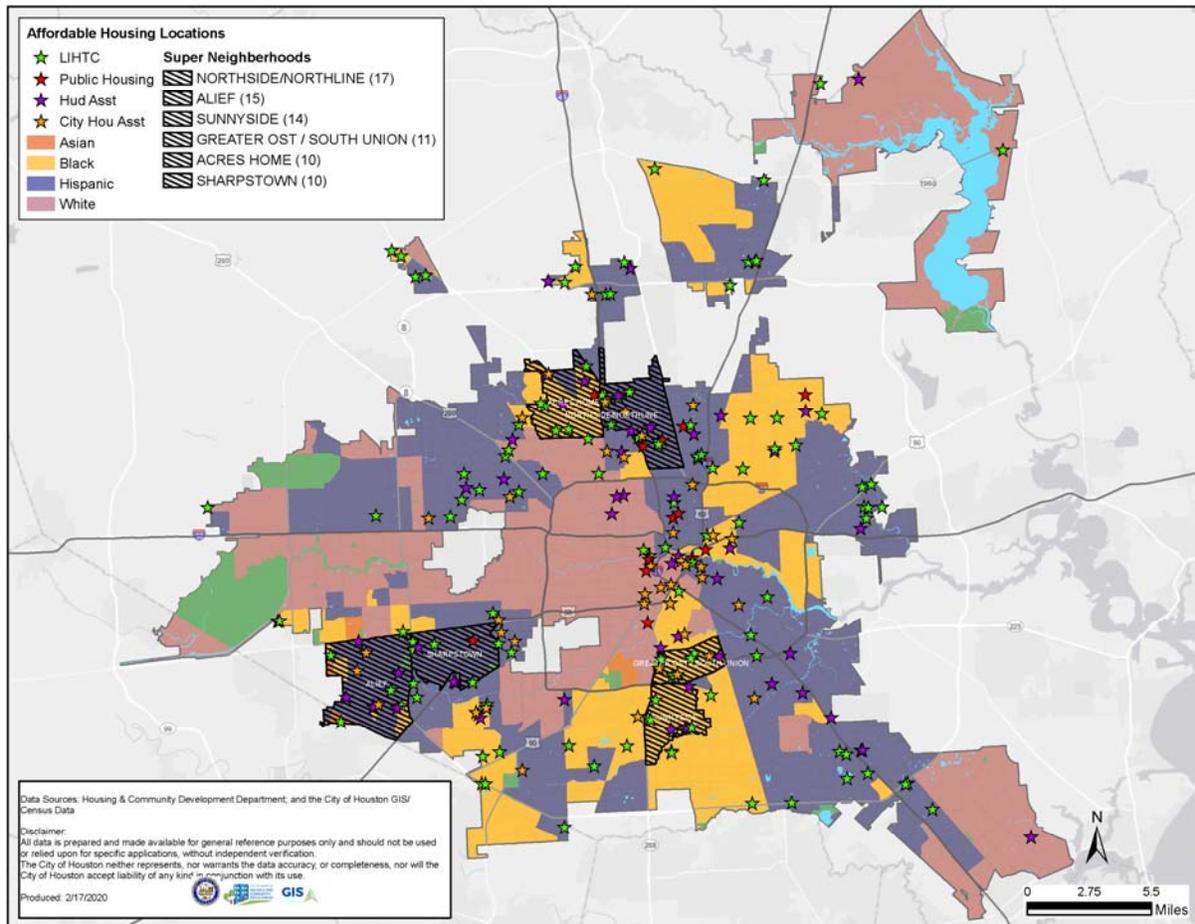
Publicly supported housing units are located in most areas of the city. The top five Super Neighborhoods with the most developments of publicly supported housing include

- Northside / Northline (17 developments)
- Alief (15 developments)
- Sunnyside (14 developments)
- Greater OST / South Union (11 developments)
- Acres Homes (10 developments)
- Sharpstown (10 developments)

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.



Map 14: Public Housing/Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs



Source: 2013-2017 ACS; LIHTC; HHA; HUD; HCDD

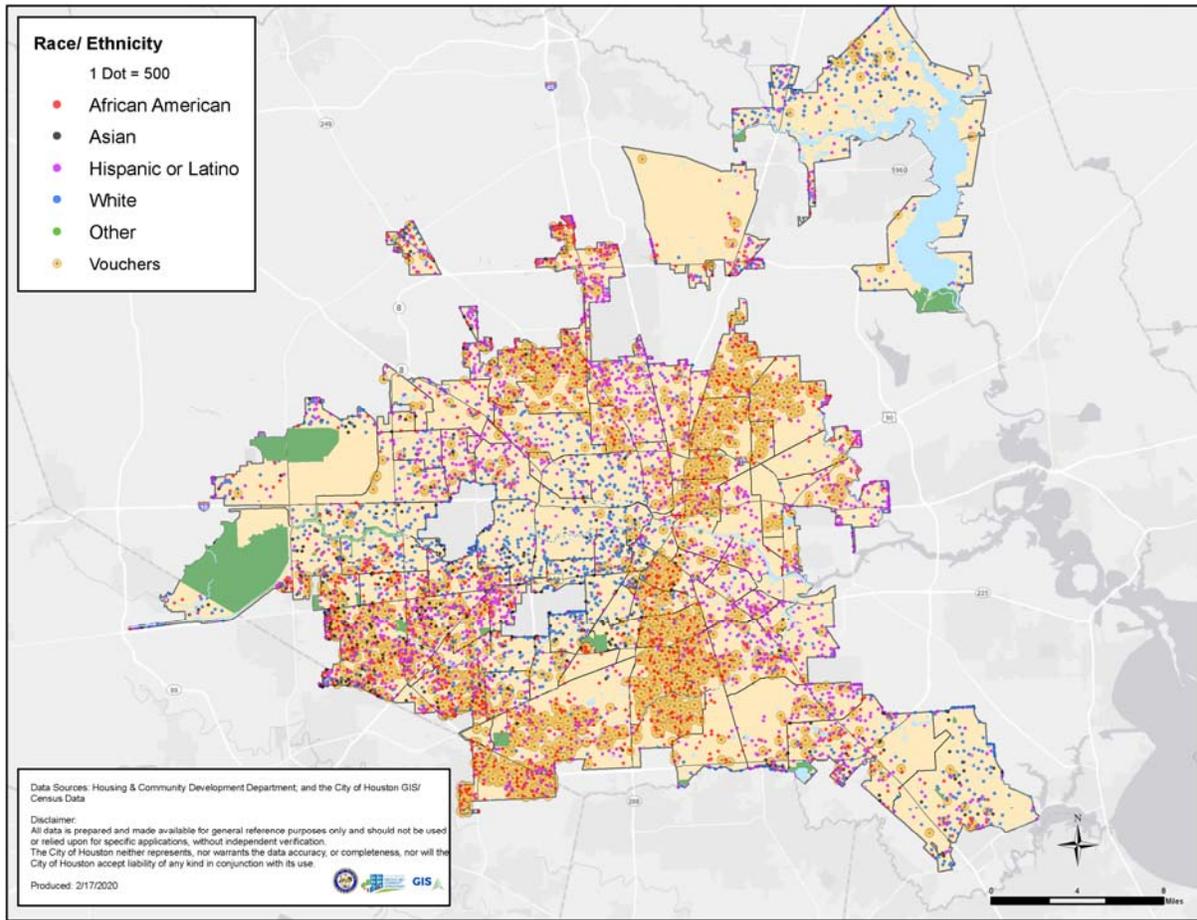
The locations of Housing Choice Vouchers are found in most neighborhoods throughout the city however neighborhoods with no or very few vouchers are found in the most affluent areas. Some areas have a disproportionate number of vouchers. The five Super Neighborhoods where vouchers make up the greatest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

- Sunnyside (7% of housing units)
- El Dorado / Oates Prairie (7% of housing units)
- Greater OST / South Union (5% of housing units)
- Fondren Gardens (5% of housing units)
- Trinity / Houston Gardens (3% of housing units)

Approximately 2% of the housing units in all of the city of Houston have housing choice voucher holders. Areas where over 5% of the housing units have housing vouchers are clustered in predominately Black/African American neighborhoods. The following map shows clusters of housing choice vouchers with race/ethnicity dot density. Although persons receiving housing choice vouchers can move to any part of the city and region, voucher holders tend to cluster in certain areas. Almost all voucher holders are Black/African American households.



Map 15: Voucher map with race/ethnicity dot density map



Source: HHA; 2003-2017 ACS



5. 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 is the foundation of civil rights because where one lives affects opportunities for education, employment, health, recreation, and quality of life issues.

Analyzing Community Asset Indicators

The following examines the location of six community assets, using metrics used by HUD to rank each neighborhood by index scores ranking from 1-100.

- 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

As recent research suggests, children that grow up in high opportunity areas with good schools have higher incomes later in life. Many families know this, and as such, many families make housing choices based on schools or other neighborhood factors. As demonstrated in the 2019 Community Needs Survey, 42.7% of families with children chose a home that was unaffordable, lower quality, too small, or in an undesirable neighborhood to ensure their child attended a high-quality school.

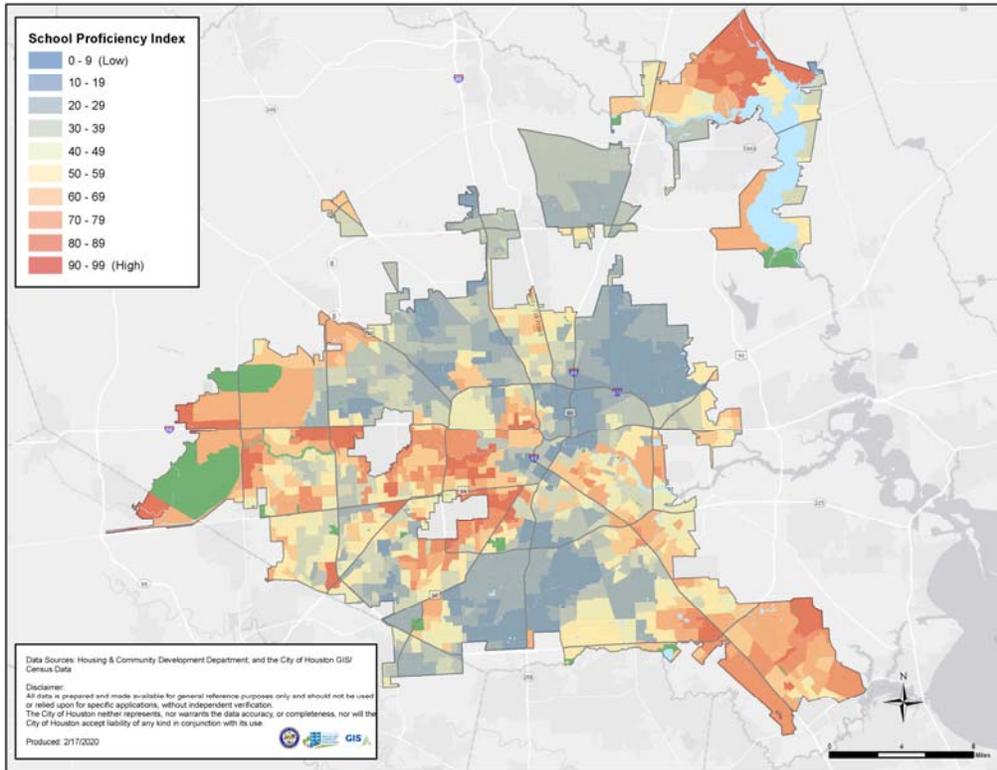
According to HUD, the neighborhood school proficiency index describes which neighborhoods have high or low performing elementary schools. Using HUD e-GIS data provided in shape file format, a spatial distribution of the index scores can be visualized. HUD's method uses the following neighborhood school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

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

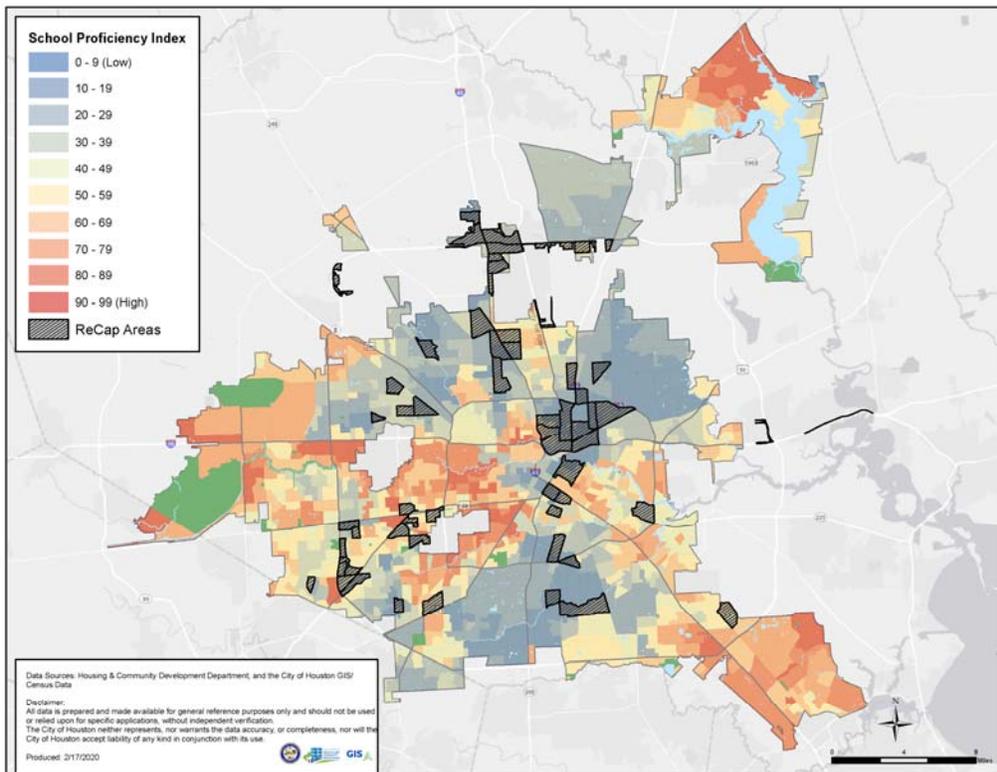
The proficiency index is a function of the percent of elementary school students proficient in reading (r) and math (m) on state test scores for the *ith* school associated with the neighborhood (*i* = 1, 2,...n) Where N is the maximum number of schools in any block group in the distribution, and school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



Map 16: School Proficiency Index Distribution



Map 17: School Proficiency Index Distribution with RCAP/ECAP



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 16, 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 17 these areas, along with the citywide distribution of RCAP/ECAPs have a significant spatial correlation with index scores less than 50.

The Houston Independent School District, with more than 209,000 students and encompassing 333 square miles within greater Houston, is the seventh largest public school system in the nation and the largest in Texas.³⁹ The race and ethnicity of HISD students in the 2018-2019 school year was 23.4% African American, 4.2% Asian, 62.1% Hispanic, 8.9% White, and 1.4% two or more races or another race. Almost one third of students (31.7%) have limited English proficiency and 7.6% are classified in Special Education. Almost four in five students (79.8%) are considered economically disadvantaged, meeting federal criteria for free and reduced-priced lunch. In the 2018-2019 school year, the graduation rate in HISD was higher in 2017 at 80.7% compared to 2012 at 78.5% and the dropout rate was slightly higher in 2017 at 12.6% compared to 2012 at 11.8%.

Poverty Index

The poverty index is considered to be a simple index by HUD's 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:

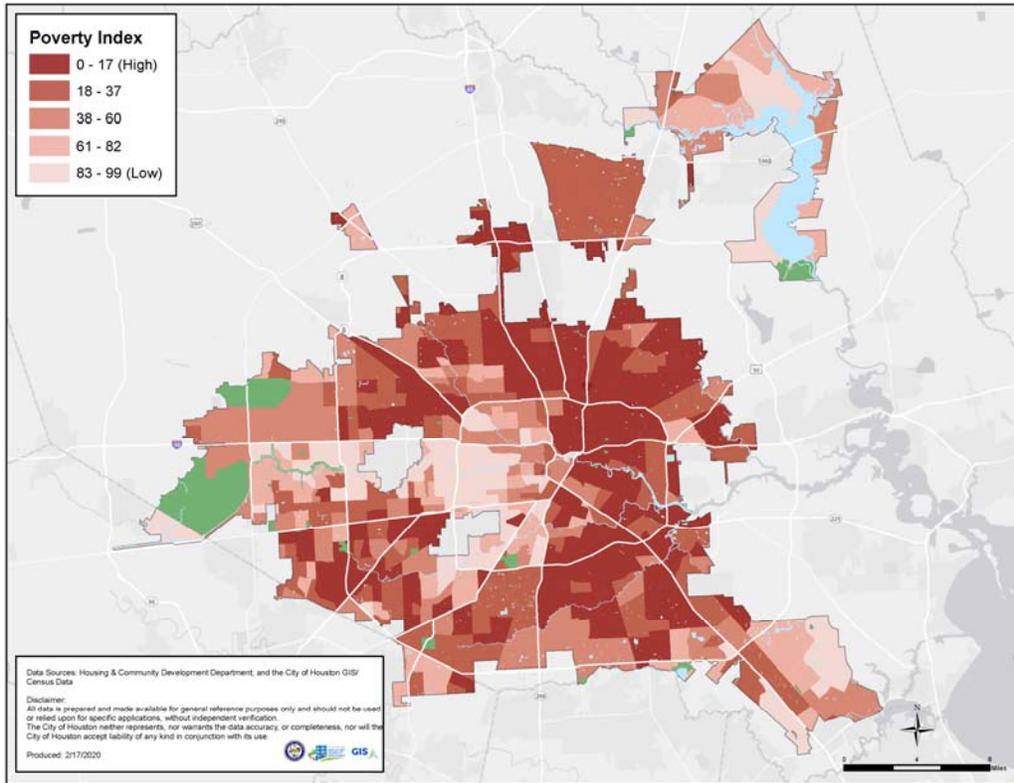
$$POV_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) - 1 \right] + \left[\left(\frac{pa_i - \mu_{pa}}{\sigma_{pa}} \right) * -1 \right]$$

Based on the spatial distribution of census block groups in Map 18, any index score from 1-30 may be considered as neighborhoods that have a concentration of poverty. The distribution of index scores also shows 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 19 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.

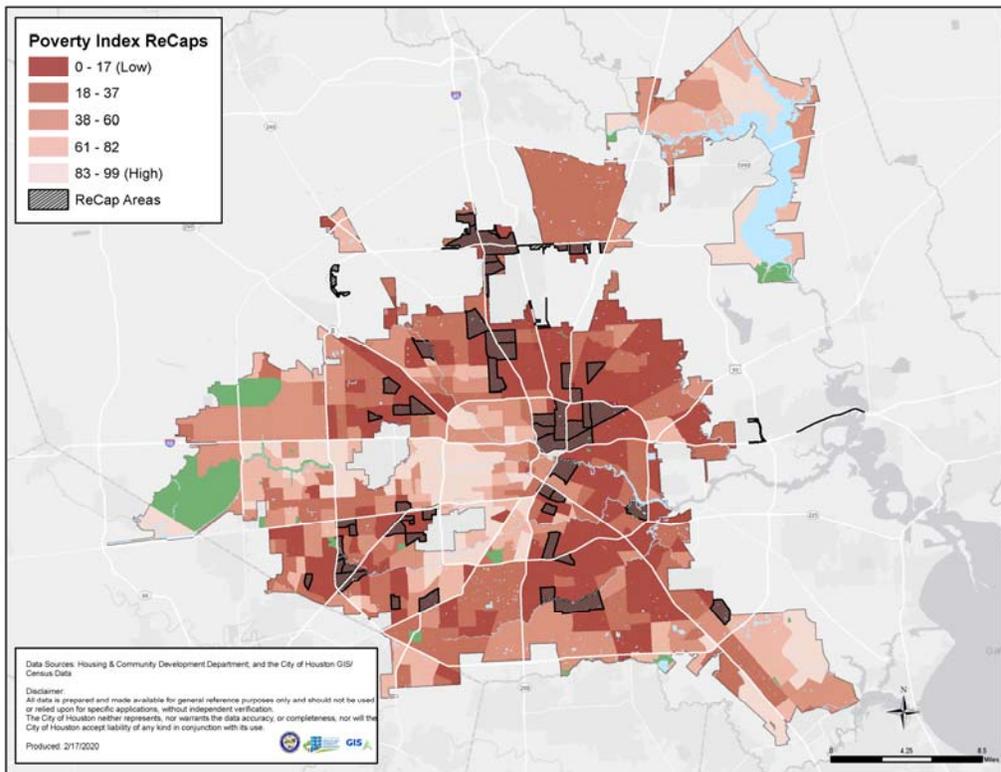
³⁹ Houston Independent School District. *2018-2019 Facts and Figures*. Retrieved from: <https://www.houstonisd.org/site/default.aspx?PageType=3&ModuleInstanceId=48525&ViewID=C9E0416E-F0E7-4626-AA7B-C14D59F72F85&RenderLoc=0&FlexDataID=244567&PageID=41879&Comments=true>



Map 18: Poverty Index Distribution



Map 19: Poverty Index Distribution with RCAP/ECAP



Job Access Index (Gravity Model)

HUD's 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 , 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:

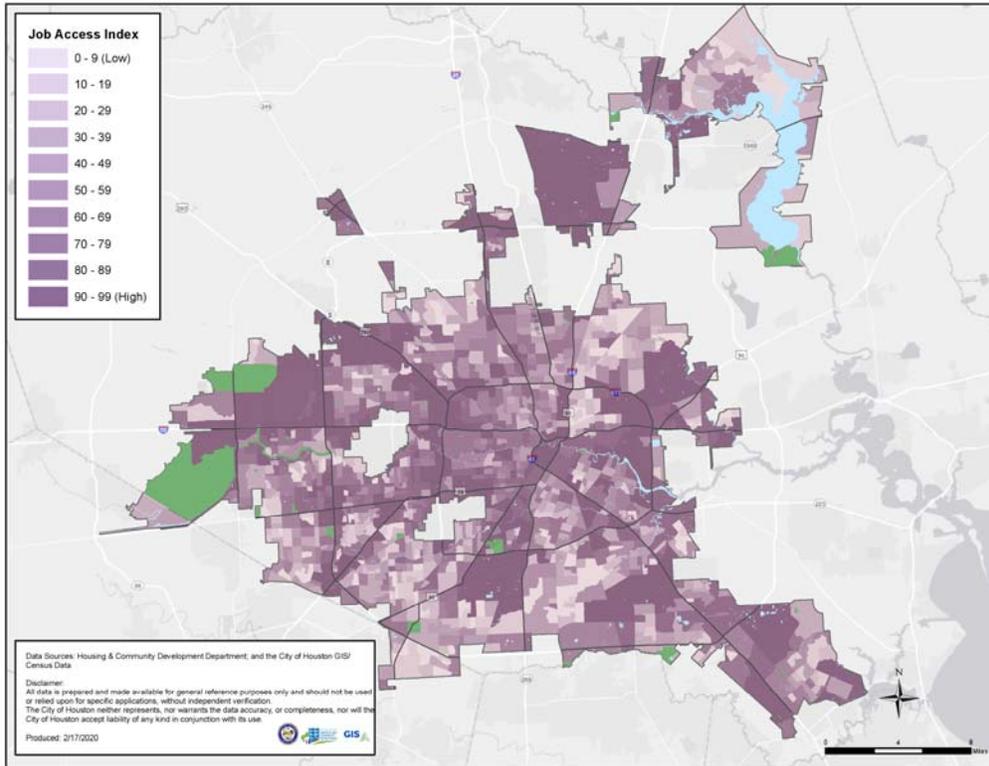
$$A_i = \sum_{j=1}^n \frac{E_j d_{ij}^{-2}}{\sum L_j}$$

Based on the spatial distribution of the model in Map 20, there 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.

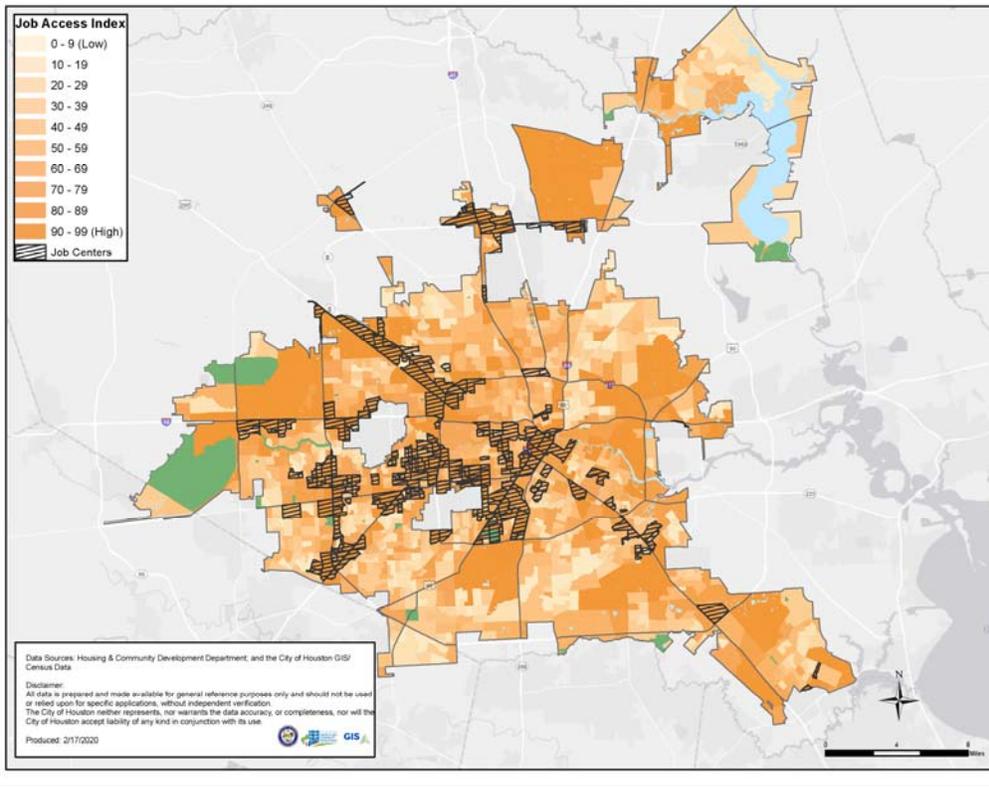
An additional factor added to the transit index, job/employment centers, supports where the higher index scores for job access are. Job/employment centers are calculated based on a density of 10,000 jobs or greater in a given traffic analysis zone. In Map 21 every job center has an index score greater 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. Areas with racial/ethnic and poverty concentrations are longer distances from the larger job centers than areas with lower racial/ethnic and poverty concentration.



Map 20: Job Access Index Distribution



Map 21: Job Access Index Distribution with Job Centers



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.

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

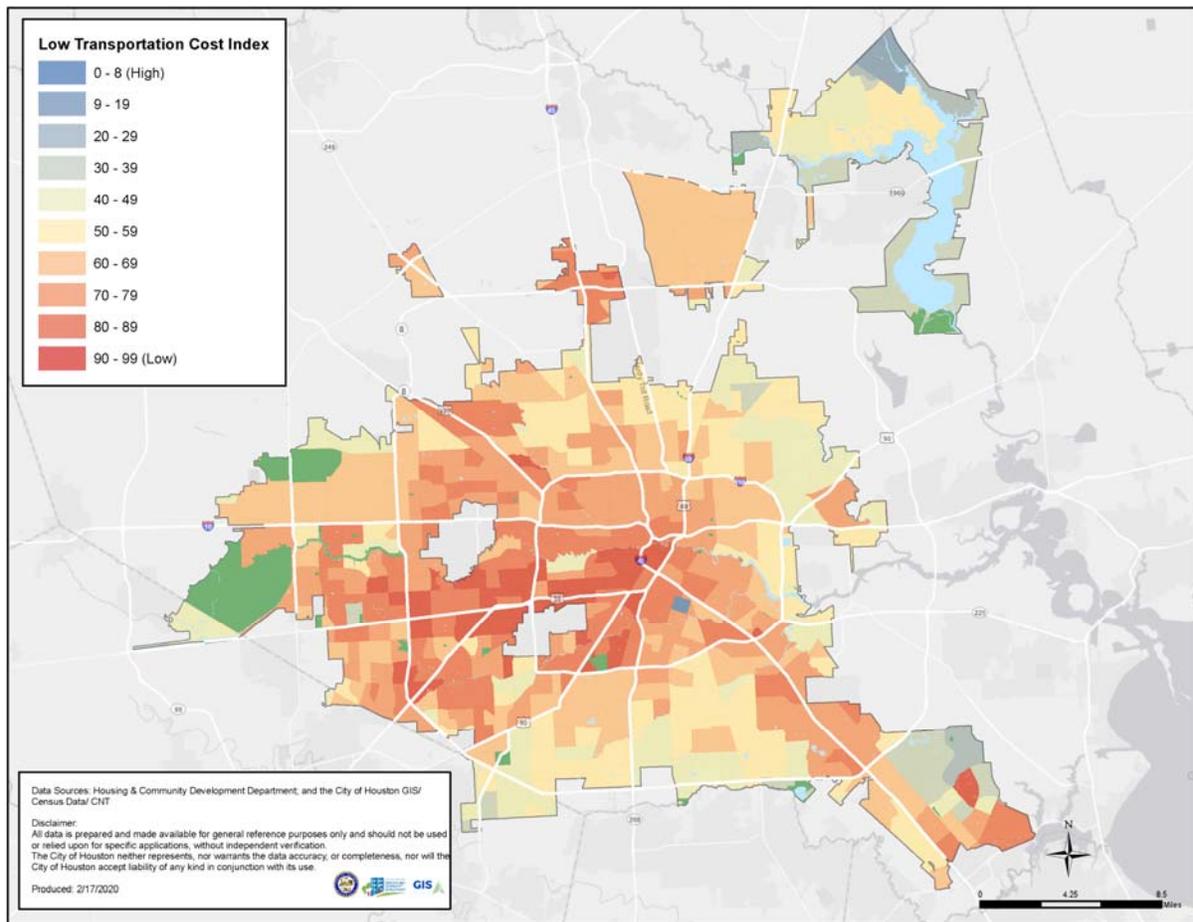
These stop-journey specific (s_{ij}) values are then summed over all journeys j (where journeys in opposite directions are counted as two trips) made in 24-hours to create a single aggregate accessibility value for each stop in the system (where k is the total stops in the system).

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

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 22 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 METRORail and METRO's high frequency bus lines correspond directly with the census block groups that have index scores ranging from 51-100.



Map 22: Transit Access Index Distribution



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.

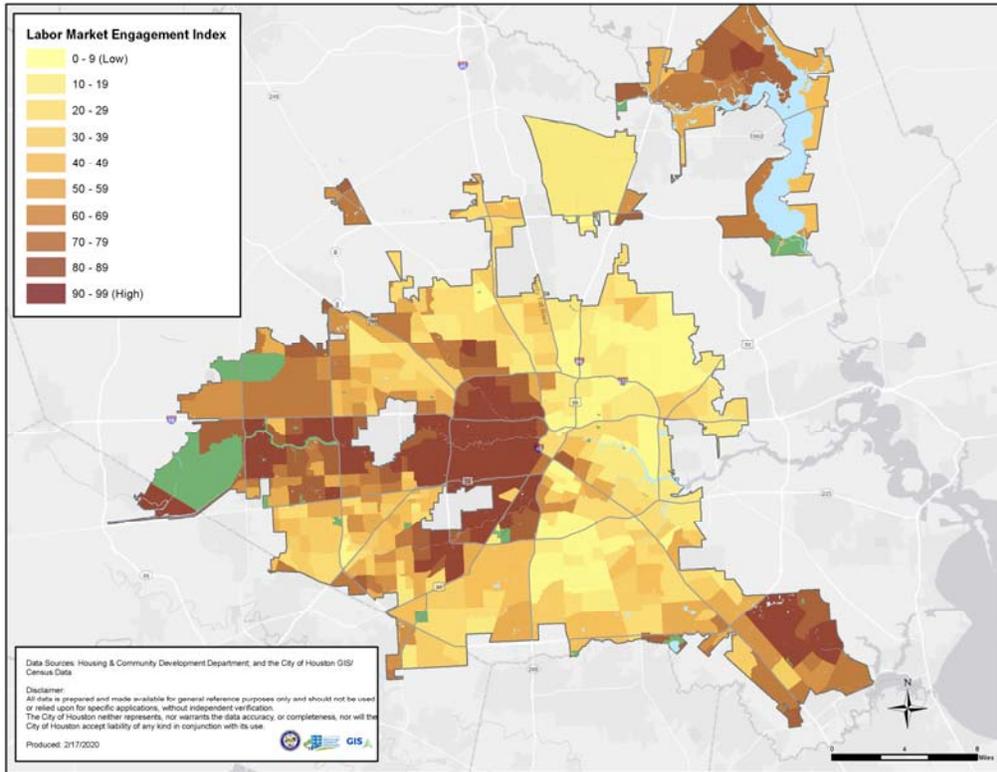
Formally, the labor market engagement index is a linear combination of three standardized vectors: unemployment rate (u), labor-force participation rate (l), and percent with bachelor's or higher (b), using the following formula where means (μ_u, μ_l, μ_b) and standard errors ($\sigma_u, \sigma_l, \sigma_b$)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

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

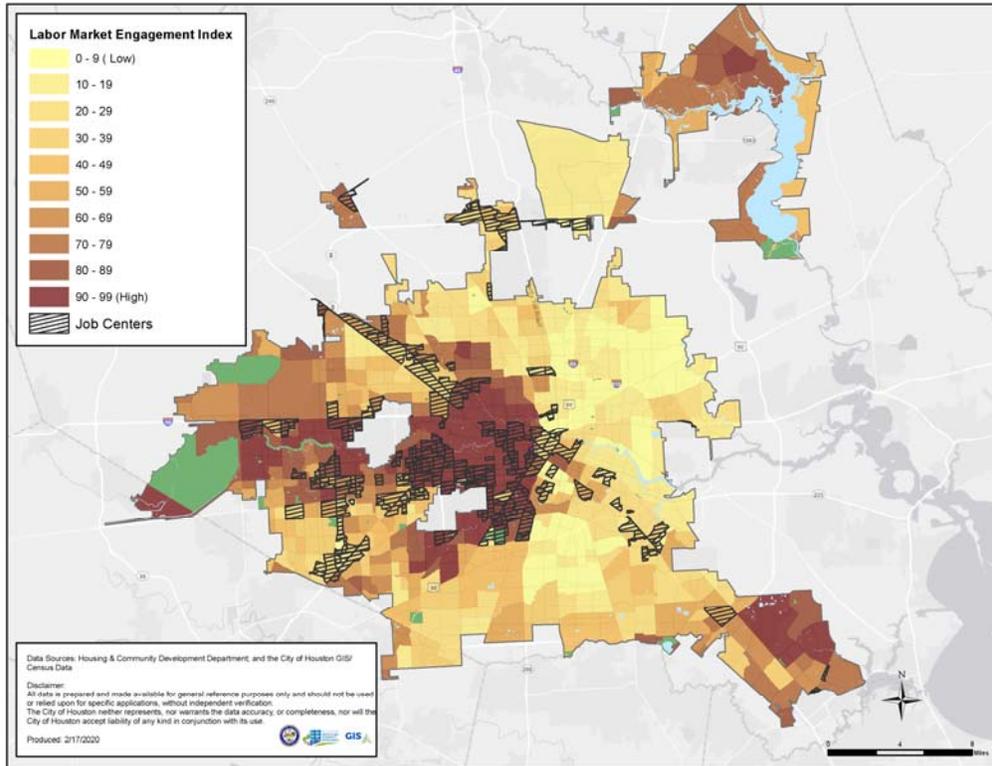
The labor market engagement index scores follow the spatial distribution of race/ethnicity, income, and access to jobs. The job density calculations for job/employment centers show that there is definitely a pattern to where opportunity exists (See Map 24). There is a small amount of census block groups that have index scores of less than 50 in the areas with job/employment centers.



Map 23: Labor Market Engagement Index Distribution



Map 24: Labor Market Engagement Index Distribution with Job Centers



Environmental Health Hazard Exposure Index

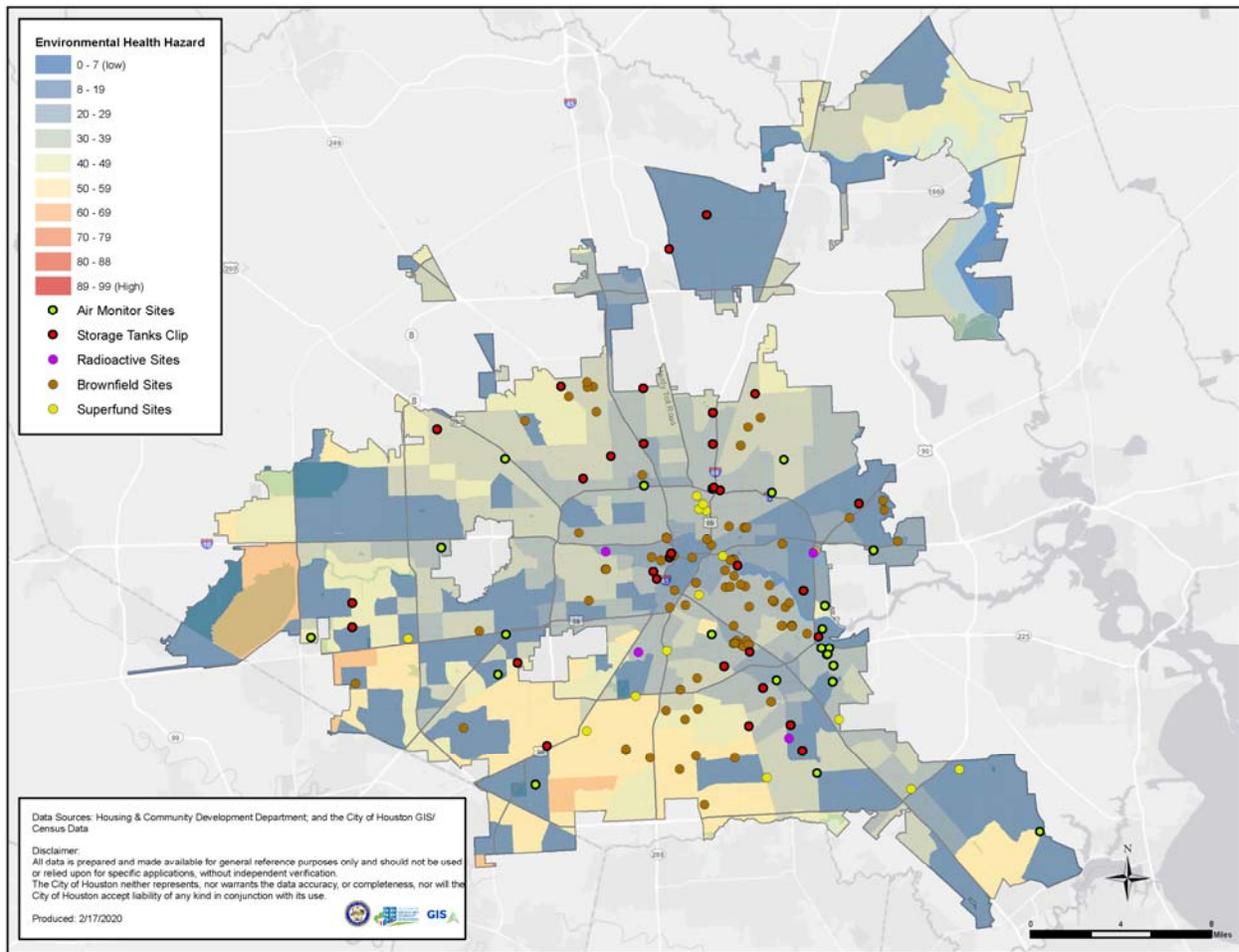
HUD has constructed a health hazards exposure index to summarize potential exposure to harmful toxins at a neighborhood level. Potential health hazards exposure is a linear combination of standardized EPA estimates of air quality carcinogenic (c), respiratory (r) and neurological (n) with i indexing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

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

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 the following map 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 25: Environmental Index Distribution with Health Hazards



Housing and health are linked; a home is one of many social determinants of health. The affordability, safety and quality of a home may spur detrimental conditions inside the home and may inhibit medical care or treatment for those who are strained financially by housing costs. Environmental and social characteristics of neighborhoods can also impact health, positively or negatively.⁴⁰

The 2019 Community Needs Survey asked several questions about health and environment. Approximately 16.4% of the survey respondents had experience with or lived with someone who experienced health issues related to environmental contamination, such as asthma, elevated blood lead levels, or COPD. Only 15.4% of survey respondents did not have concerns about environmental issues where they live. The top five environmental concerns of survey respondents were: Insects (43.0%), Air quality outdoors (40.7%), Rodents (34.9%) and Water quality (34.8%) and Illegal dumping (31.2%). For some Houston residents, negative implications of housing and health may be a concern.

Kashmere Gardens, a historically black neighborhood, is comprised of 98% residents of color and has a median income of about \$27,000. About 35% of Kashmere residents live in poverty.⁴¹ Kashmere is experiencing a concentration of cancer-related deaths and other medical issues due to toxic chemical waste and emissions. The nearby railroad yard, acquired by Union Pacific Railroad, formerly operated as a railroad wood treatment facility that used a preservative creosote, which emitted fumes into the air, soil, water, and neighboring homes.

Although the facility is no longer in operation, Union Pacific plans to leave the contaminating toxins in the soil to dissolve over time, which could lead to more toxic exposure. Additional testing is required to determine if the residual creosote plumes will negatively impact residents' health. The Texas Commission on Environmental Quality (TCEQ) has not approved Union Pacific's permit because of its deficient plan to address the remaining creosote contamination.

In Acres Homes, a proposed concrete batch plant, Soto Ready Mix, is pending review by the Texas Commission on Environmental Quality. The plant applied for a 24-hour operation schedule, and its location sits next to a home that is within a well-established neighborhood. Concrete Batching Plants, like the proposed Soto Ready Mix plant, may increase the likelihood of water quality, highly alkaline wastewater, dust emissions, noise, and acidic rain; this can in-turn trigger breathing problems, respiratory diseases or damage, and adverse effects to the cardiovascular and central nervous system.

Such plants might pose less hazards to the environment or community amenities if they were built further away from residential areas. Unfortunately, the vulnerable populations like seniors, children, and individuals with asthmatics, bronchitis or emphysema may be most affected.⁴² The Acres Home area is also densely populated by minority residents and may have a great impact on their long-term safety and health, as well. This suggests that Acres Homes, amongst other Houston residents, may be impacted by unsafe and unhealthy living due to a lack of zoning laws in Houston.

⁴⁰ *Housing And Health: An Overview Of The Literature*, Health Affairs Health Policy Brief (June 7, 2018) DOI: 10.1377/hpb20180313.396577.

⁴¹ No. 52 Kashmere Gardens Super Neighborhood Resource Assessment, City of Houston: Planning & Development Department (November 2017) https://www.houstontx.gov/planning/Demographics/docs_pdfs/SN/52_Kashmere_Gardens.pdf.

⁴² *Cement Manufacturing Enforcement Initiative*, United States Environmental Protection Agency (Retrieved September 29, 2019) <https://www.epa.gov/enforcement/cement-manufacturing-enforcement-initiative#emissions>.



In the Harrisburg/Manchester neighborhood specifically, 98.96 percent of the total population (approximately 6,000) is comprised of minority groups, of which, 96.7 percent are Hispanic. The median household income is approximately \$38,600, and nearly one-third of the population lives below the poverty level. Approximately 90 percent of people living in the Harrisburg/Manchester neighborhood live within 1 mile of a chemical facility. By comparison Bellaire, one of Houston's wealthiest and primarily white neighborhoods, has an average household income of \$226,333 and a poverty rate of 3 percent. Only 9 percent of residents live within 1 mile of a chemical facility. This study finds that the toxicity levels – derived from concentration values given by the reporting facility sources that release toxic chemicals into the air – in the Harrisburg/Manchester neighborhood are between 3 and 12 times higher than the levels of neighborhoods in west Texas. In terms of the Harrisburg/Manchester population's health, this corresponds to a cancer risk that is 22 percent higher compared with the overall Houston urban area.⁴³

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 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, 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. 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.

Health hazards often disproportionately impact low-income and communities of color due to the close proximity to the close proximity of environmental hazards and tarnished environments. Many hazards are historic hazards that still impact the community; while other hazards continue to be concentrated in certain areas of the city, some say because of a lack of zoning. As expressed by Richard Bullard, "In the United States, based on the color of your skin and the money in your bank account, you're literally breathing different air."⁴⁴

⁴³ *Double Jeopardy In Houston*. Center for Concerned Scientists and t.e.j.a.s. August 26, 2016:

<https://www.ucsusa.org/resources/double-jeopardy-houston#.Wy1uyKdKiUk>

⁴⁴ Invisible Houston: Full Interview with Dr. Robert Bullard, Father of Environmental Justice Movement. (n.d.). Retrieved February 23, 2018, from https://www.democracynow.org/2017/9/7/invisible_houston_full_interview_with_dr



6. Segregation, Integration, and Concentration

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, 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 37: 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

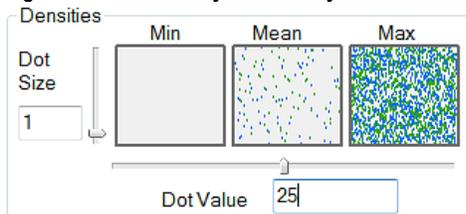
The display of spatial data in the form of points in a map can provide convincing evidence related to where segregation occurs. A dot distribution map (also known as dot density map) is a map type that is used to display a dot symbol to show the presence of where race and ethnic clusters exist. Dot distribution 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 11) 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 12). 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 11: One-to-One Dot Density



Figure 12: 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 38 are being proposed for adoption:

Table 38: 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 an even 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.

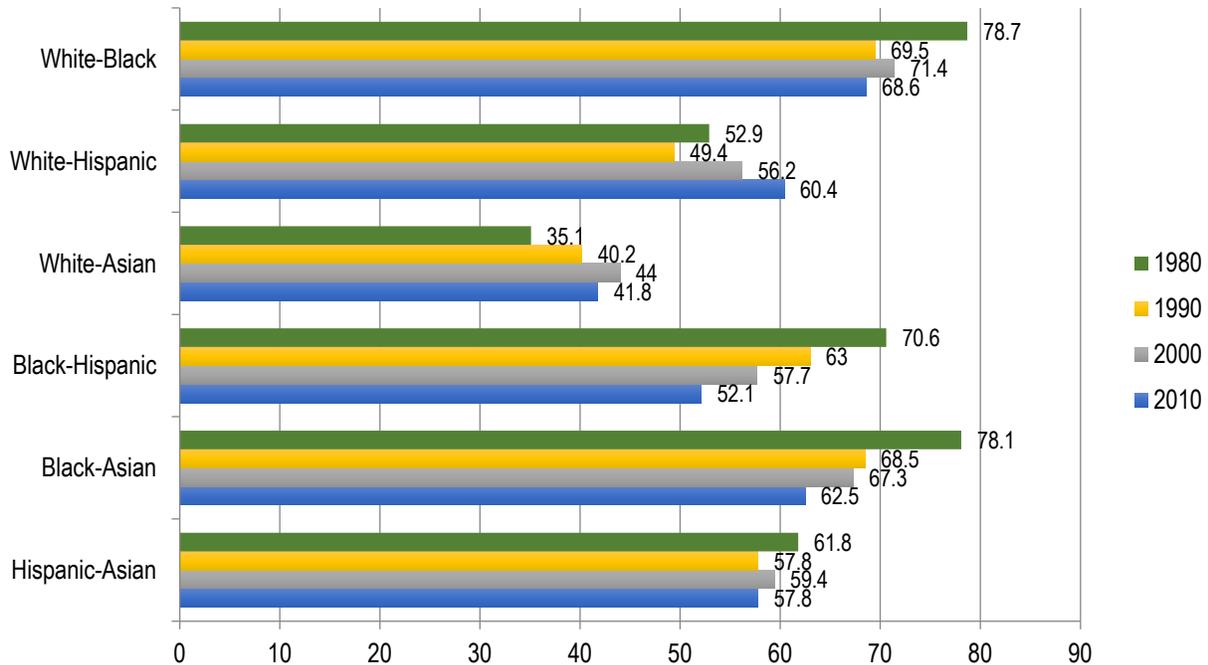
The extent of Houston's segregation is demonstrated in

Figure 13 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 13: 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 2017 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 2017 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 map shows how the two groups are currently blending together. All the dissimilarity index maps serve as points of reference for where segregation between two groups is 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 the next map shows 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 the following map.

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



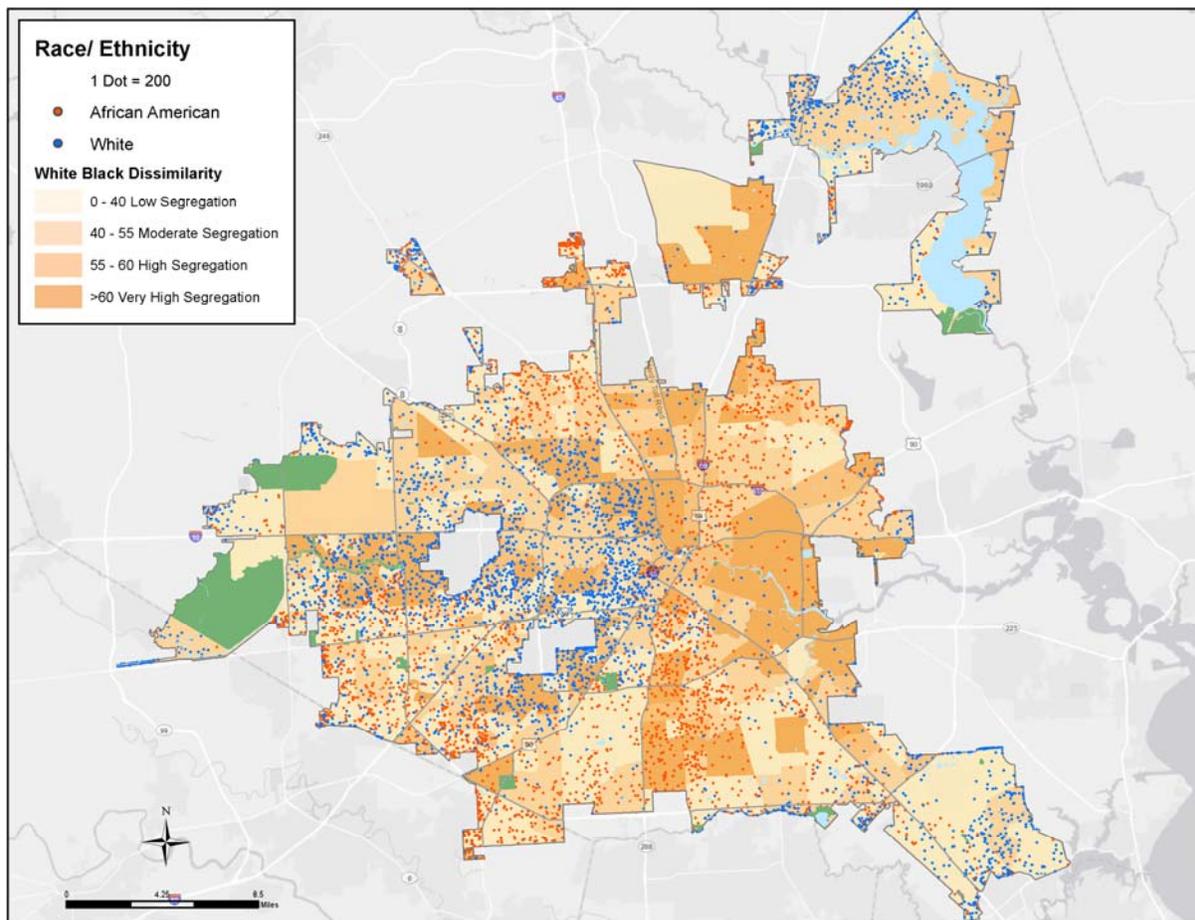
separation in space as it relates to Whites and Blacks, and based on where the dots are more dense, it may be discerned which areas need more blending of Whites and which areas need more blending of Blacks.

Table 39: 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. 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 based on the ACS 2017 5-year estimate data.

Map 26: White-Black Segregation by Dot Density and Dissimilarity Index



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. The distribution of dissimilarity in the following map shows darker 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.

The spatial distribution of dot density shows the separation in space as it relates to Whites and Hispanics. Based on the number of census tracts per quadrant, Hispanics are evenly distributed in three quadrants, as illustrated in the following table. 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 based on the ACS 2017 5-year estimate data.

Table 40: 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%

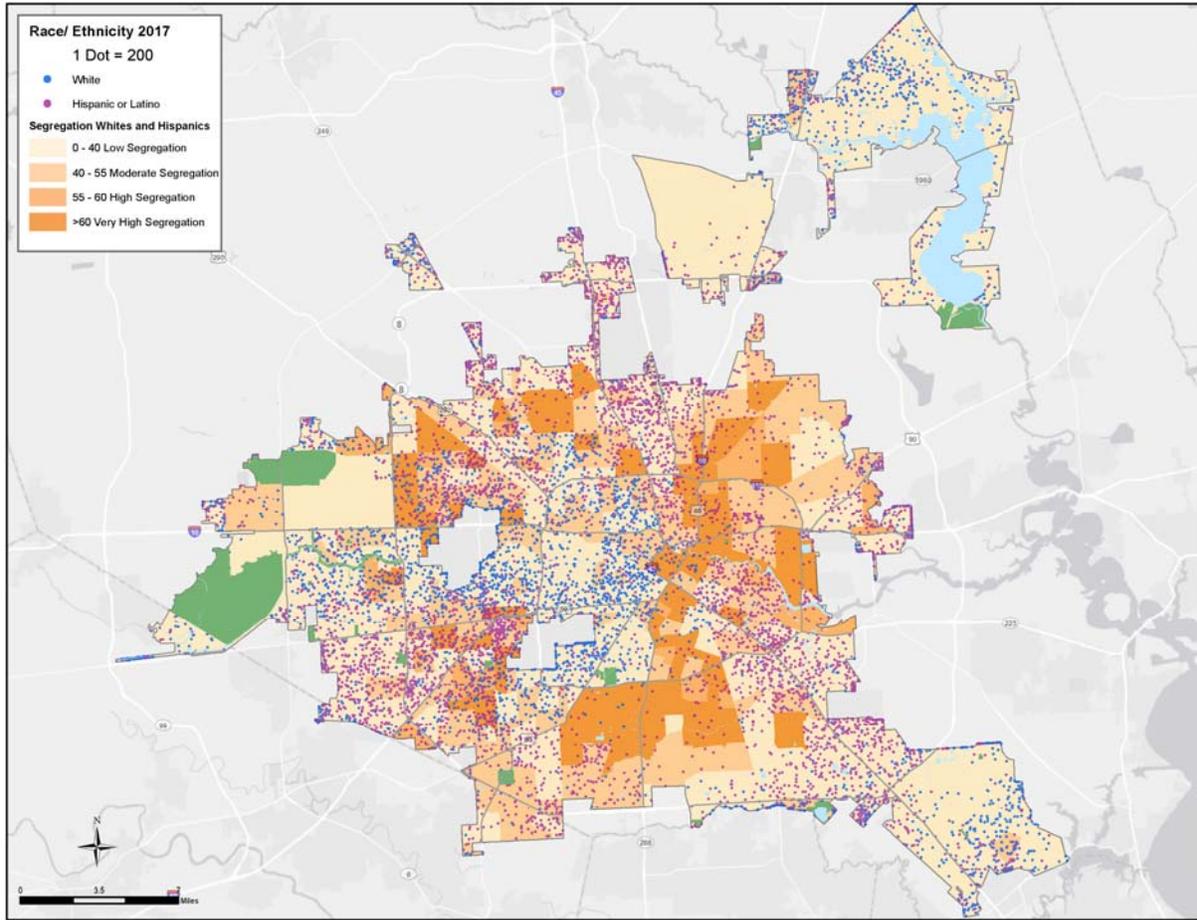
Source: 1980-2000, 2010 PL94-171 Data, US Census Bureau

*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 27: White-Hispanic Segregation by Dot Density and Dissimilarity Index

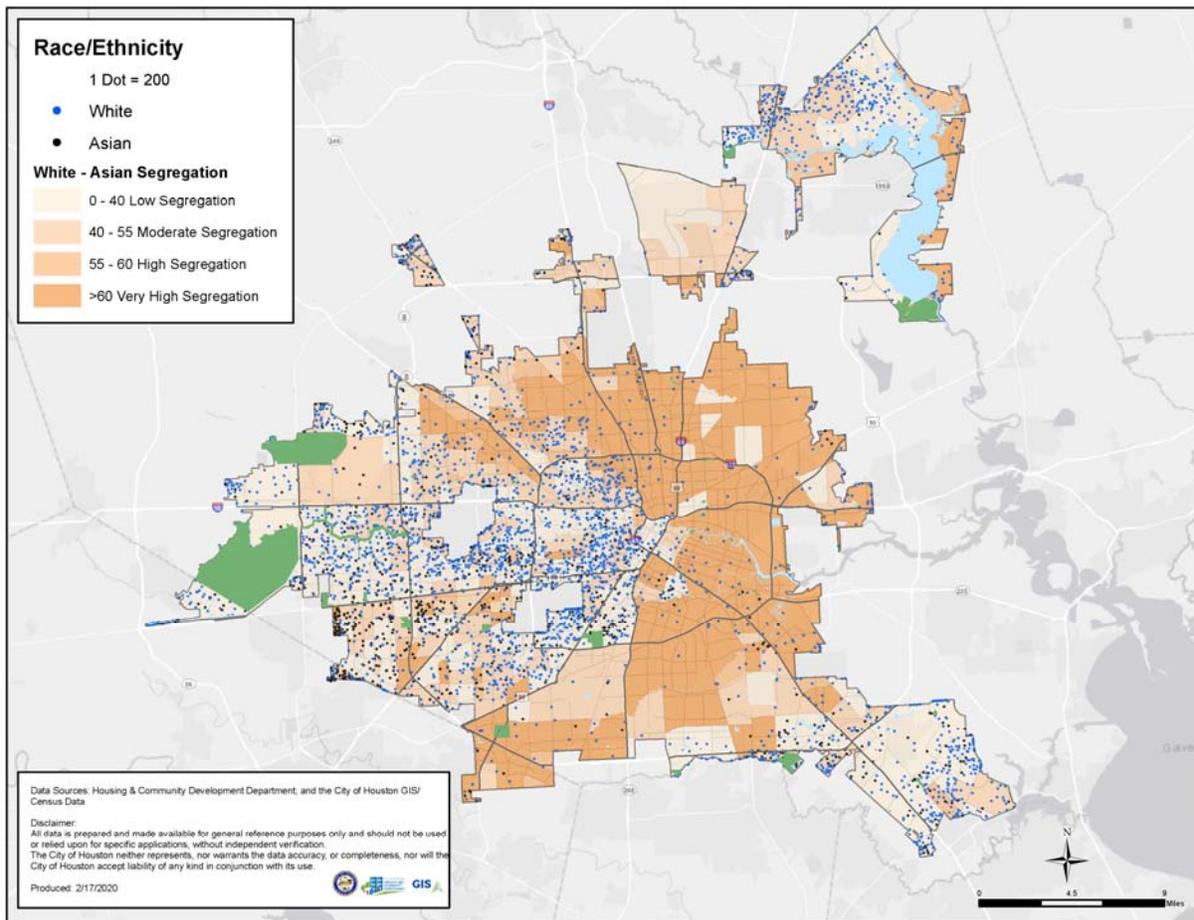


White-Asian Dissimilarity

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 are segregated on the east side of Houston, similar to the White group. There are 287 out of 665 census tracts in Houston that have high to very high White/Asian segregation based on the distribution of dissimilarity in the following map.

The distribution of blue dots in the following map show the density of non-Hispanic White individuals, and the black dots show the density of Hispanic individuals. There is not a lot of density for the Asian group, but Asian residents have a presence of at least 40% in two census tracts in the SW quadrant of Houston.

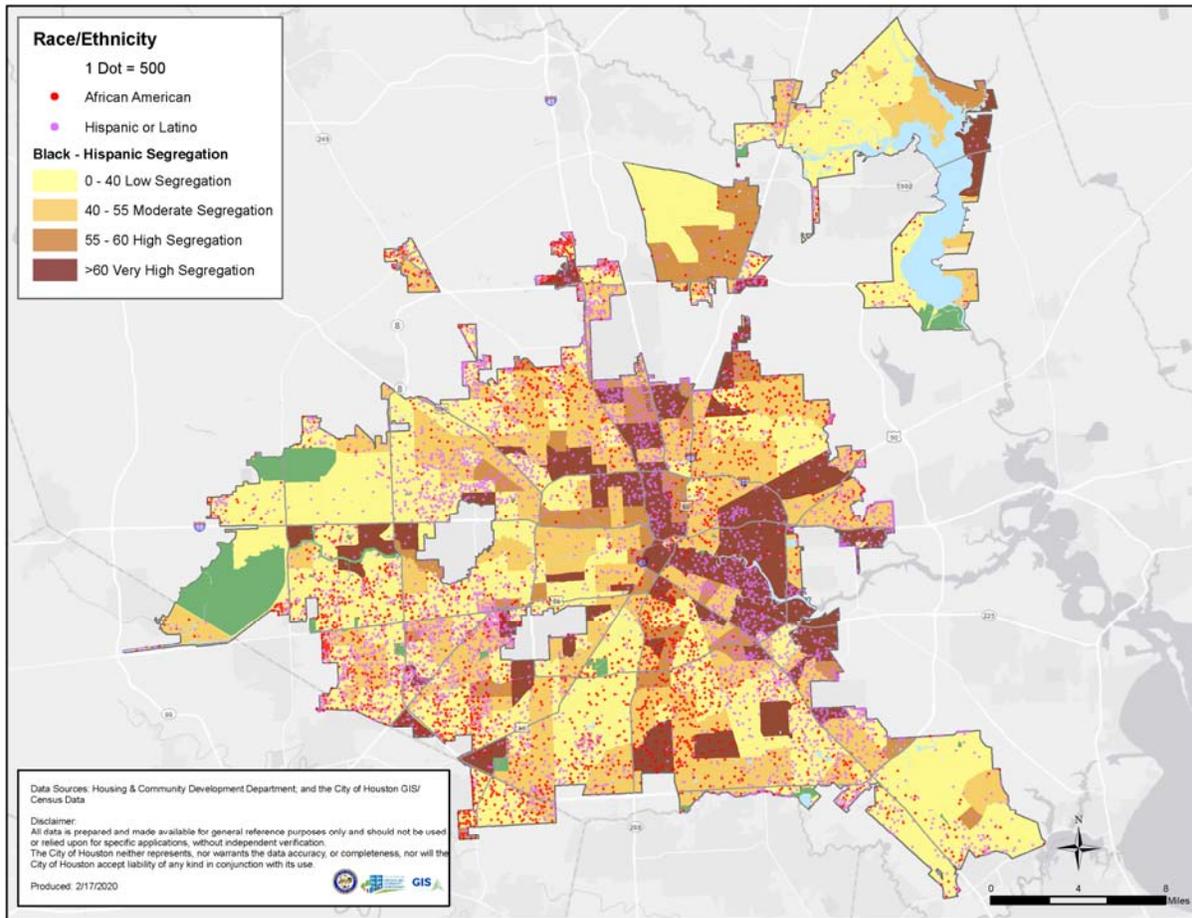
Map 28: White-Asian Segregation by Dissimilarity Index



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 it 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 group in Houston. The Black population started decreasing by 2000. The next map shows how the two groups are currently live in proximity to each other. 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. The dot distribution indicates that there are more 2017 ACS census tracts populated with Blacks and Hispanics in the SE and NE quadrants of the City.

Map 29: Black-Hispanic Segregation by Dissimilarity Index



Black-Asian Dissimilarity

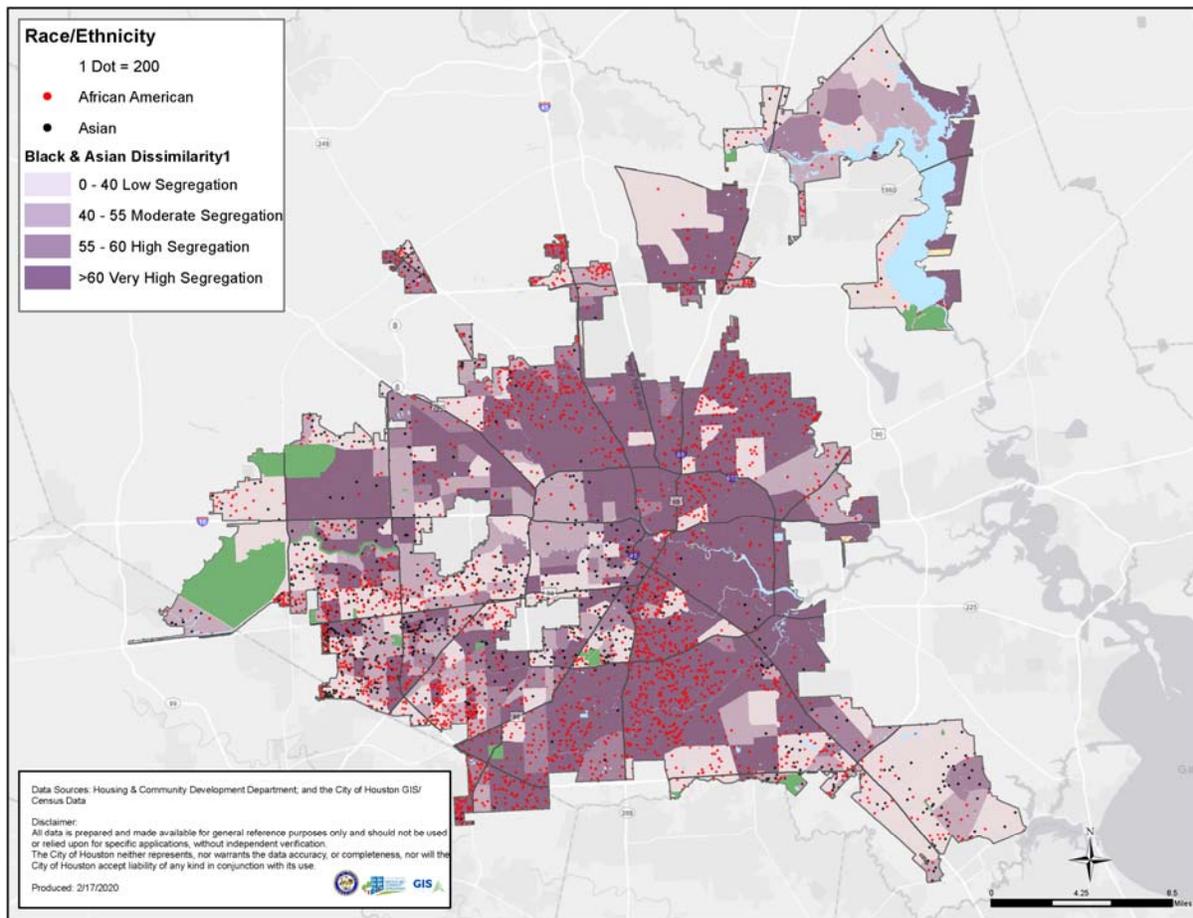
Black-Asian dissimilarity/segregation in Houston's census tracts has been very high since 1980. The dissimilarity index score has decreased from 78.1 to 62.5. Based on the 2010 index scores, White and Asian populations are most segregated from Black population. There are 446 out of 665 census tracts in Houston's jurisdiction that have high to very high Black/Asian segregation based on the distribution of dissimilarity in Map 30.

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 30 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 Black residents residing in the SE and NE parts of the city and Asian residents 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, whereas Blacks meet their percentage of the total population (23.15%) in 233 census tracts.

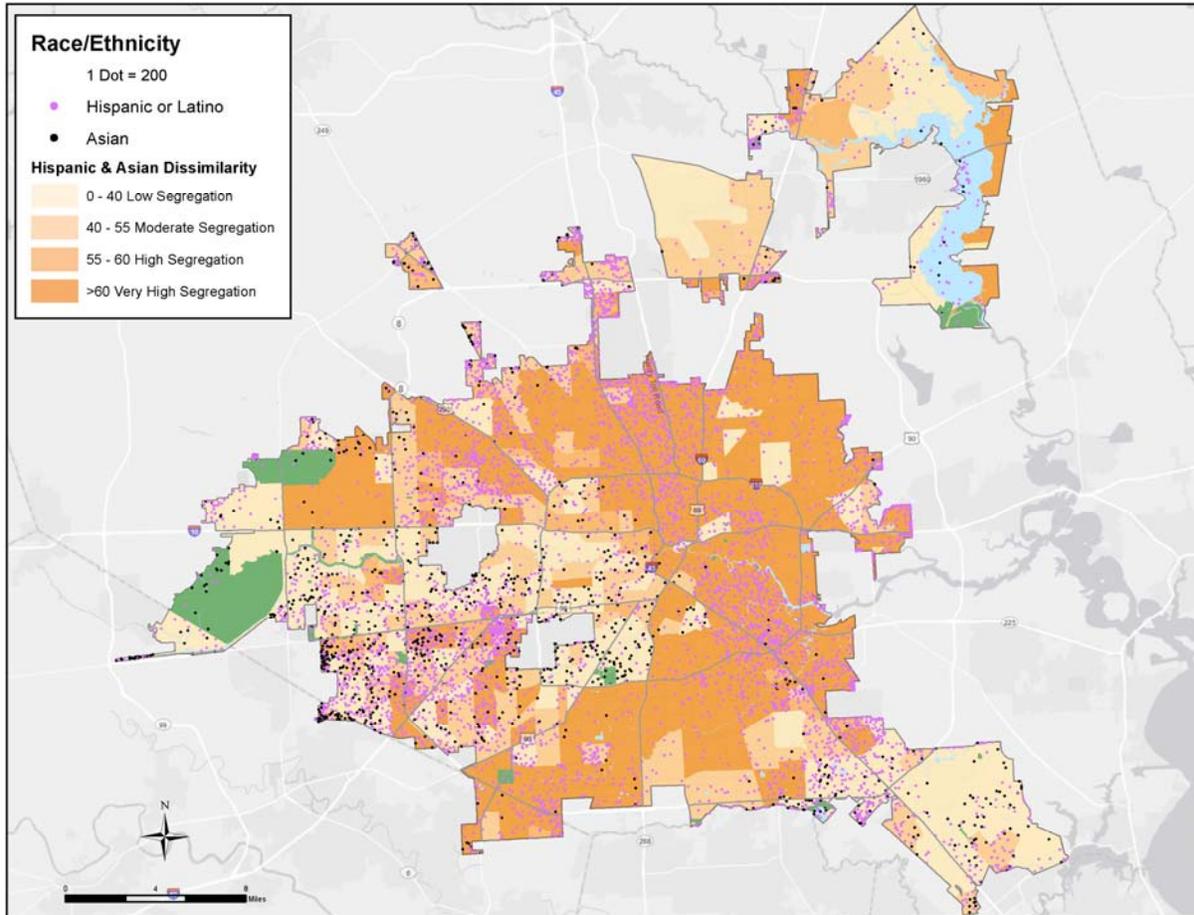
Map 30: Black-Asian Segregation by Dissimilarity Index



Hispanic-Asian Dissimilarity

Hispanic-Asian dissimilarity/segregation in Houston's census tracts was very high in 1980. 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. There are more census tracts with dissimilarity between Hispanics and Asians in the NE and SE quadrants of the city.

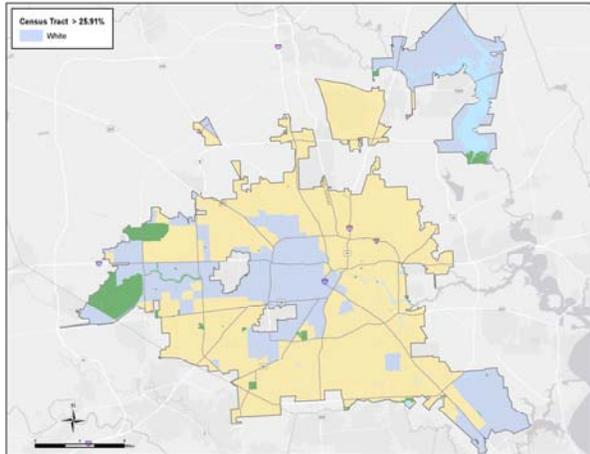
Map 31: Hispanic-Asian Segregation by Dissimilarity Index



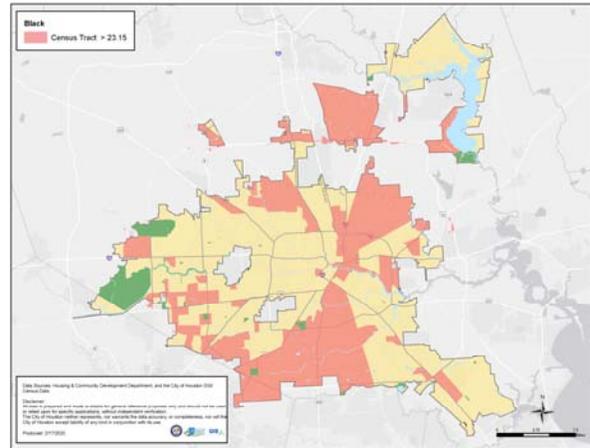
The Quadrant View of Race/Ethnicity by % of Total Population

The following maps show census tracts where the population of a race/ethnicity group is the same or greater than the percentage of that race/ethnicity group's percentage with Houston. This clearly shows the residential patterns of the four different race/ethnicity groups, both the integration and separation between the groups.

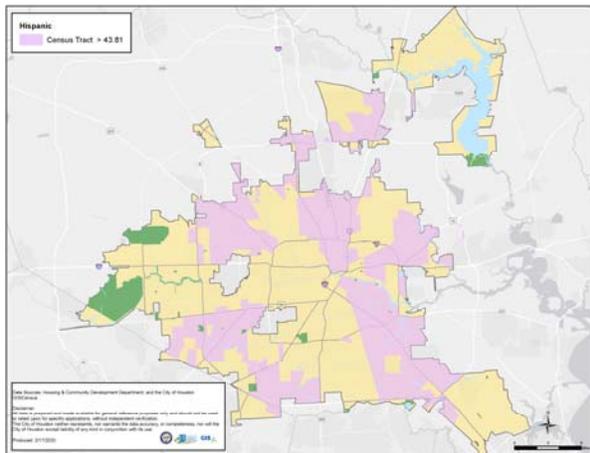
Map 32: Census Tracts $\geq 25.91\%$ Whites



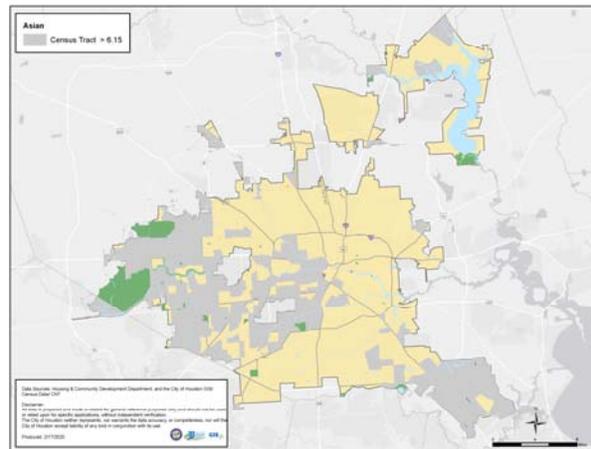
Map 33: Census Tracts $\geq 23.15\%$ Blacks



Map 34: Census Tracts $\geq 43.81\%$ Hispanics



Map 35: Census Tracts $\geq 6.15\%$ Asians



Source: 2010 U.S. Census



Majority by Race/Ethnicity

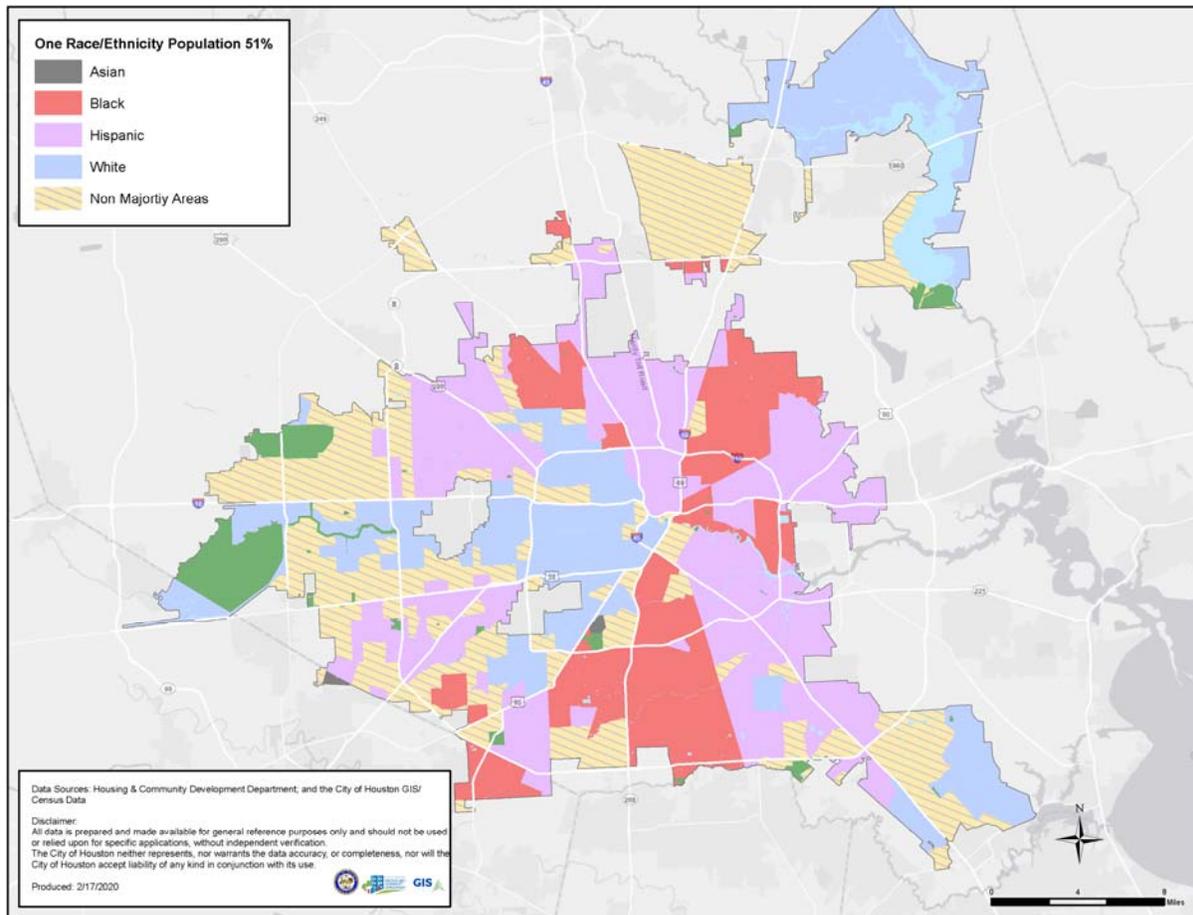
Another way to view patterns of race/ethnicity is by looking at the majority race/ethnicity group of each census tract. This does not show concentration of all groups, but it does show that almost all census tracts have a majority race/ethnicity group, even though Houston has no majority race/ethnic group.

Table 41: 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 36: One Race/Ethnicity Population Above 51%



Source: 2010 U.S. Census



7. 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, lending data is analyzed at a regional level. For the Houston Metropolitan Statistical Area (MSA), the five years of Home Mortgage Disclosure Act (HMDA) was analyzed, 2013-2017.

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 2013 to 2017

- Over 1 million loan applications were processed for home purchases, home improvements, and refinancing during the last five years. From 2013 to 2017, the number of applications for home purchases increased by 13% with the largest increase occurring from 2013-2014. Applications for home improvement loans increased by 18%, but the number of applications to refinance decreased substantially, by 42%, from 2013 to 2017.
- From 2013 to 2017, the share of conventional loan applications for home purchases has increased from the previous five-year period (2009-2013) by 9% and remains the majority of applications at 64%. Government-backed loan applications consist of 36% of the loan type to purchase owner-occupied homes, a 9% decrease from the previous five-year period (2009-2013).
- The most common reasons for denial of conventional home loans were reported much less often from 2013 to 2017. Not having this information will make it difficult to determine if housing



discrimination or other barriers to obtaining a home loan is the reason for these denials. When denial reasons were provided, Credit History was the most common reason for denial. Credit Application Incomplete followed by Employment History and Debt-to-Income Ratio were the next most common reasons for denial.

- 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. Even though females make up about half the population in Houston, the number of applications with a female as the main applicant are significantly fewer than applications where the main applicant is male.
- The percentage of home loan 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. The proportion of applicants that identified as White was more than two-thirds of all applications.
- The range of annual denial rates for Black/African American (18-22%) and Hispanic (19-22%) applicants were almost twice as much as that of White Non-Hispanic applicants, which had annual denial rates of 8-10%.
- Minorities, in particular Black/African American and Hispanic applicants, were denied loans more often than White and Asian applicants, regardless of income over the past five years. Denial rates for higher income applicants, households earning over 120% of AMI, include Black/African American at 13%, Hispanic at 11%, Asian at 9% and White non-Hispanic at 7%.
- 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. Bank and credit unions located in Racially/Ethnically Concentrated Poverty areas were very few.
- Although the majority of subprime loans were made to White borrowers, the ratio of subprime loans to loans originated is highest for Hispanics at 13% and for Black/African American at 9%. The Asian group had the lowest rate of subprime lending at 2%, followed by White, Two or More Races and Hawaiian or Pacific Islander who all had 4%.

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 refinanced 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. Despite a slight 1.2% decrease in home purchase applications from 2014 to 2015, home purchase applications increased dramatically by 35% from the previous five-year period, 2013 to 2017.

While home improvement loan applications increased slightly during this period, applications for refinancing experienced extreme variances.



Table 42: Purpose of Loan Application by Year – Houston MSA

Purpose	2013	2014	2015	2016	2017	Total	5 Year Approval Rate	5 Year Denial Rate
Home Purchase	114,783	122,558	120,999	127,052	129,986	615,378	72%	12%
Home Improvement	13,554	14,022	15,084	15,376	15,999	74,035	47%	45%
Refinancing	126,605	70,653	98,757	116,123	72,771	484,909	54%	25%
Total	254,942	207,233	234,840	258,551	218,756	1,174,322		

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017

Of the 615,378 home purchase loan applications from 2013 to 2017, 92% of these applications were for owner-occupied households, as shown in the table below. Applications for non-owner-occupied home purchase loans remained steady during this period, with one, slight 2% decrease in applications from 2015 to 2016. Overall, the number of home purchase loan applications from 2013 to 2017 increased by 44% from the previous five-year period (2009-2013).

Table 43: Owner Occupancy Status for Home Purchase Loan Application – Houston MSA – HMDA Data 2013-2017

Status	2013	%	2014	%	2015	%	2016	%	2017	%	Total	%
Owner-Occupied	104,173	91	111,597	91	145,402	92	116,864	92	119,565	92	597,601	92
Not Owner-Occupied	10,236	9	10,657	9	11,709	7	9,778	8	10,176	8	52,556	8
Not Applicable	374	0	304	0	467	0	410	0	245	0	1,800	0
Total	114,783	100	122,558	100	157,578	100	127,052	100	129,986	100	651,957	100

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017

The table below shows the number of owner-occupied applications for four types of home purchase loans: Conventional loans (loans not backed by a government agency); and Federal Housing Administration, Veterans Administration, and Farm Service/Rural Housing Service loans, all of which are insured by various federal agencies. From 2013 to 2017, the share of conventional loan applications for home purchases has increased from the previous five-year period (2009-2013) by 9% and remains the majority of owner-occupied applications. The number of government backed loan applications decreased of by 9% from the previous five-year period (2009-2013).

Table 44: Loan Type for Home Purchase Owner-Occupied Loan Application – Houston MSA

Loan Type	2013	%	2014	%	2015	%	2016	%	2017	%	Total	%
Conventional	67,829	65	75,360	68	87,090	60	73,134	63	76,877	64	380,290	64
FHA-Insured	28,538	27	27,249	24	46,116	32	34,357	29	33,047	28	169,307	28
VA-Guaranteed	6,523	6	7,977	7	11,197	8	8,783	8	9,096	8	43,576	7
FSA/RHS	1,283	1	1,011	1	999	1	590	1	545	0	4,428	1
Total	104,173		111,597		145,402		116,864		119,565		597,601	

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017

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 the table below. Between 2013 and 2017, there were 246,721 loans originated, a 52% increase from the previous five-year period (2009-2013). There were 45,196 loans denied, resulting in a denial rate of 12% over the same five-year time period. This represents a 2% decrease in the denial rate from the previous five-year period.

Table 45: Owner-Occupied Home Purchase Loan Applications by Action Taken – Houston MSA

	2013	%	2014	%	2015	%	2016	%	2017	%	Total	%
Loan Originated	46,812	69	51,518	68	48,509	69	49,390	68	50,492	66	246,721	68
Application Approved But Not Accepted	4,429	7	4,274	6	2,766	4	2,814	4	2,718	4	17,001	5
Application Denied	8,601	13	9,417	12	8,312	12	8,816	12	10,050	13	45,196	12
Application Withdrawn By Applicant	6,606	10	8,477	11	8,436	12	9,265	13	10,713	14	43,497	12
File Closed for Incompleteness	1,381	2	1,674	2	2,750	4	2,849	4	2,904	4	11,558	3
Total	67,829		75,360		70,773		73,134		76,877		363,973	

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013- 2017

Loan originations and 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 indicating discrimination in lending.

Denials of Owner-Occupied, Conventional Home Loans

The table below 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 2013 and 2017 was “Not Provided.” The number in unreported denial reasons increased by almost 20% from 27% in 2013 to 46% in 2017. Credit History, Employment History, and Credit Application Incomplete were the second, third, and fourth most common reasons for denial. The denial reasons that were provided may suggest that further education efforts may be needed for future or potential homebuyers regarding financial literacy, and revised loan applications may make applying for a home loan easier.



Table 46: Owner-Occupied Home Purchase Loan Applications by Reason for Denial – Houston MSA

Denial Reason	2013	2014	2015	2016	2017
Credit History	16%	16%	18%	18%	16%
Debt-to-income Ratio	3%	2%	3%	2%	2%
Credit Application Incomplete	14%	12%	10%	9%	7%
Collateral	9%	9%	8%	8%	8%
Unverifiable Information	4%	4%	4%	4%	4%
Insufficient Cash	6%	4%	4%	4%	4%
Employment History	12%	11%	9%	8%	8%
Mortgage Insurance Denied	1%	1%	0%	0%	0%
Other	8%	8%	8%	7%	5%
Not Provided	27%	33%	36%	39%	46%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017

Denial by Sex of Owner-Occupied, Conventional Home Loans

When comparing denial rates of owner-occupied conventional home loan applications by sex of the main applicant, females have a consistently higher denial rate and a lower application rate compared to males. As illustrated in the table below, the denial rate of females has been two to three percentage points higher for the last five years than that of male applicants. Although the number of female applicants for home purchase loans increased significantly, by 60%, from 2013 to 2017 as compared to the previous five-year period (2009-2013), the number of applications with a female main applicant is still significantly less than the applications where the main applicant is male. This trend could reflect a social convention that if a married couple is applying for a loan, then the male is listed as the main applicant. Since 19.5% of renter-occupied housing units consist of female householders with no husband present and 12% of owner-occupied housing units had female householders with no husband present in 2017, which could indicate that females would benefit from increased knowledge about homeownership, home buying, and financial literacy.

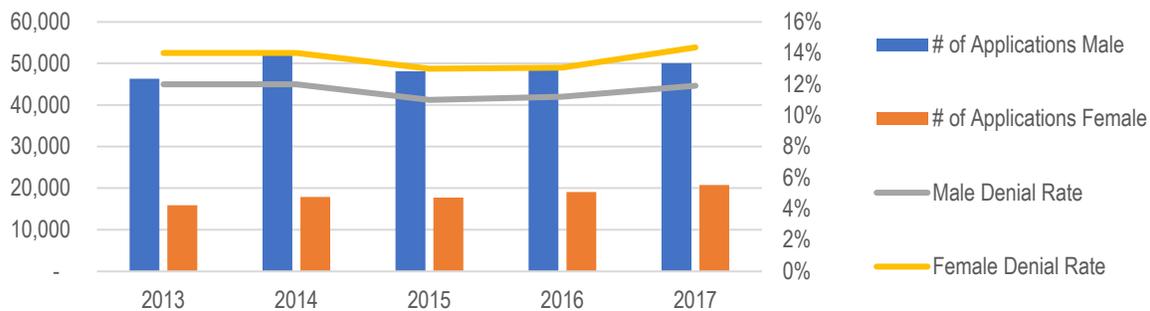
Table 47: Denial Rate for Owner Occupied Home Purchase Loans by Sex of Main Applicant – Houston MSA

	2013		2014		2015		2016		2017	
	# of Applications	Denial Rate								
Male	46,320	13%	51,981	12%	48,115	11%	48,611	11%	50,063	12%
Female	15,870	16%	17,876	14%	17,729	13%	19,053	13%	20,733	14%
Not Provided	5,630	12%	5,496	14%	4,919	14%	5,454	16%	6,074	18%
Not Applicable	9	5%	7	14%	10	20%	16	13%	7	14%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017



Figure 14: Home Purchase Owner Occupied Loan Applications by Gender in Houston MSA



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013, 2014, 2015, 2016, and 2017

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

Not only did the number of home loan applications received between 2013 and 2017 vary by gender, but applications 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 period, the percentage of applicants identifying as Black/African American was up to 7% and applicants identifying as Asian was 13%.

As a majority-minority region, the percentage of home loan 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 22.4% of the population, yet only represented about 7% of the applications for conventional mortgages as illustrated in Figure 14.⁴⁵

Asians make up approximately 6.6% of the Houston MSA population (U.S. Census Bureau, 2013-2017 American Community Survey), and in the past five years, applicants identifying as Asian made up approximately 13% 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 19% in 2017. However, the percentage of Hispanic applicants still does not represent the percentage of the population who are Hispanic in the Houston MSA, at 44.5% (U.S. Census Bureau, 2013-2017 American Community Survey).

This data could show that White and Asian residents buy and sell their homes more often than other racial 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.

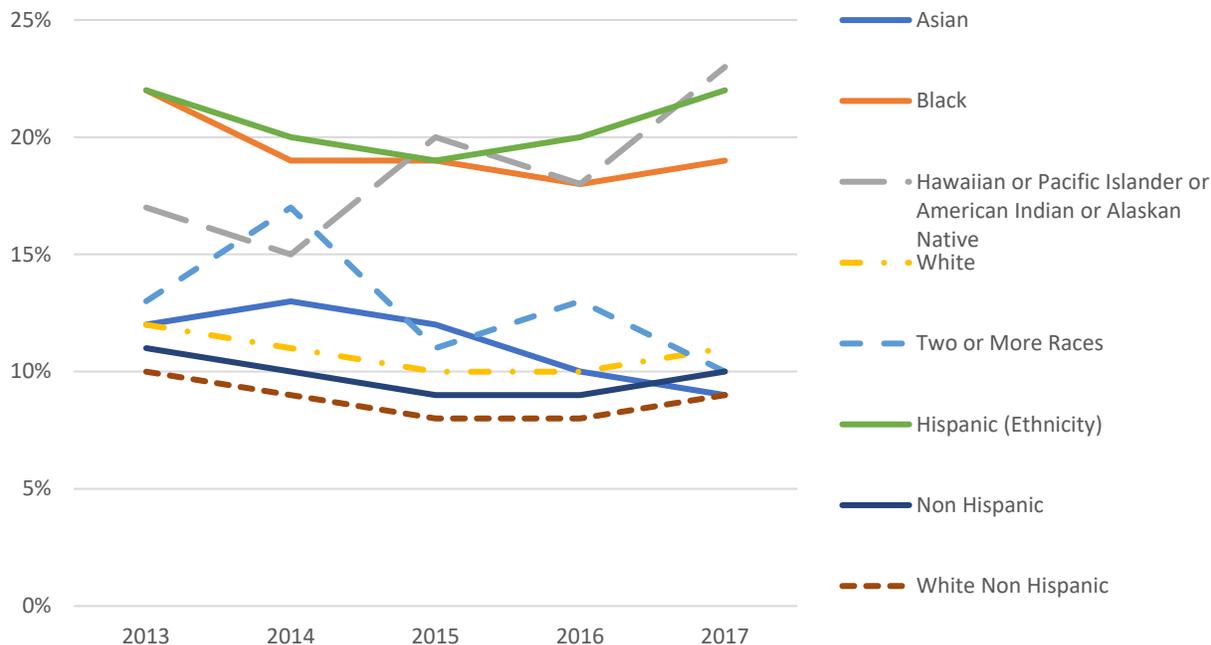
Other research, more narrative based, could reveal why some minority groups have such a low percentage of applications for homeownership loans. Due to the disparity between the number of applications received from Black/African American and Hispanic applicants compared to their share of the population in the

⁴⁵ U.S. Census Bureau, 2013-2017 American Community Survey



region, greater outreach by lending institutions may benefit or increase emphasis on financial education and the opportunities of homeownership for minority individuals may be needed in Houston.

Figure 15: Denial Rates for Owner-Occupied Home Purchase Applications by Race and Ethnicity 2013-2017



Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013, 2014, 2015, 2016, and 2017

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 White applicants. 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 2013 to 2017, denial rates were 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. Although applicants in higher income brackets have the lowest denial rates, applicants that are perceived to have darker skin tones had higher denial rates than applicants that are perceived to have lighter skin tones.



Table 48: 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)
Alaskan Native or American Indian	40%	21%	11%
Asian	19%	11%	9%
Black or African American	33%	18%	14%
Hawaiian or Pacific Islander	24%	12%	12%
White	24%	11%	7%
Two or More Races	25%	10%	10%
Hispanic (Ethnicity)	33%	18%	11%
Non-Hispanic	21%	11%	8%
White Non-Hispanic	19%	10%	7%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2013-2017

When considering income groups, color appears to be a factor when examining denial rates. Applicants generally perceived to have darker skin tones had higher denial rates than applicants generally perceived to have lighter skin tones. Black/African American, Alaskan Native or American Indian, and Hispanic applicants had the highest denial rate in two out of three income categories. Asian denial rates were lower than other minority groups and were lower than that of Whites. White Non-Hispanic applicants, which excludes Hispanic applicants, had the lowest denial rate in all income categories.

Generally, the denial rates decreased as income increased, for all racial/ethnic groups. Denial rates were highest for Low Income and Average Income groups for Alaskan Native or American Indian, Black or African American, and Hispanic. Even when income is not a factor, disparities in denial rates still exist. Black and African American High Income applicants had a denial rate of 14%, twice as high as White or White Non-Hispanic applicants at 7%.

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.

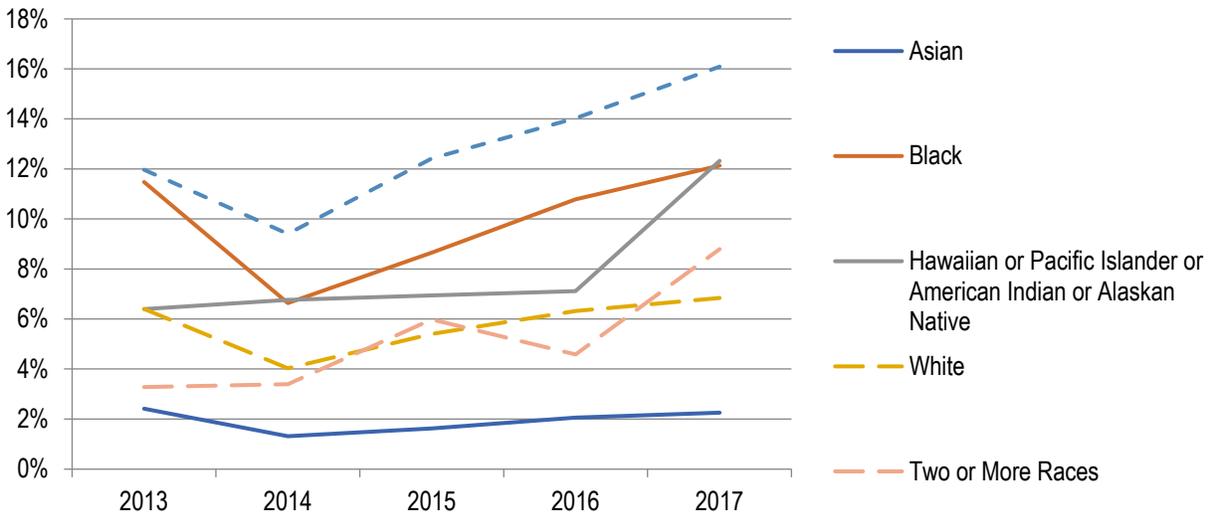
Of the 186,528 owner-occupied home purchase loans originated in the Houston MSA between 2013 and 2017, 7,971 (4%), were considered subprime by this definition (i.e., these loans met or surpassed the pricing reporting threshold required by HMDA data). This was a lower rate of subprime lending which was at 8% during the last five-year period (2009-2013). Of the subprime loans that were originated, 75% 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 eight subprime loans were made to Hispanic borrowers (13%) 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; 13% of all loans originated to a Hispanic borrower were subprime compared to 9% of loans



originated to Black/African American borrowers were subprime. This ratio is lowest for Asians; less than 2% of loans made to Asian borrowers were subprime loans.

Figure 16: Conventional Home Loans with Rate Spread by Race in Houston MSA 2013-2017



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

Review of Lending Patterns by Specific Lender

In 2017, the top ten conventional mortgage lenders in Houston received approximately 31.4% of all lending applications. Among these lenders, Wells Fargo Bank, JPMorgan Chase Bank, and Quicken Loans received 18.2% of the market share in the City.

There is a drastic reduction in the number of applicants seeking to obtain a mortgage loan with the top five most common lenders in Houston, which indicates that most applicants are applying to other lesser known lending institutions. Many of the top lenders for the region corresponded with the list of top lenders for minority applicants during 2017. Almost one in four Black/African American applicants (24.8%) applied for conventional home loans at one of the five most common lenders for Black/African Americans, a drastic decrease from almost three in four Black/African American applicants (71%) as reported for 2013. The top five most common lenders also saw a decrease in Asian applicants as 29% of this race applied to one of the top five lenders for Asians in 2017, a 28% decrease from 2013's 57%. Similar to 2013 (31%), approximately one third (32.5%) of Hispanic applicants applied to one of the top five lenders for Hispanics during the same year.



Table 49: Top 10 Conventional Home Purchase Lenders in 2017

	Overall Market Share	Approval Rate	Denial Rate
Wells Fargo Bank	9.2%	69.8%	11.2%
JP Morgan Chase Bank	4.6%	71.0%	11.0%
Quicken Loans	4.4%	69.8%	24.2%
NationStar Mortgage LLC	2.4%	50.0%	11.9%
LoanDepot.com LLC	2.0%	85.6%	4.7%
Cornerstone Home Lending Inc	1.9%	73.6%	2.8%
Flagstar Bank	1.9%	85.9%	14.0%
Bank of America	1.8%	74.6%	10.9%
Caliber Home Loans Inc	1.6%	81.6%	10.6%
Freedom Mortgage Corp	1.6%	87.5%	5.6%

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2017

The significant decrease of minority applicants to the most common conventional home purchase lenders could be due to consumer mistrust. Within the 2013-2017 time period, WellsFargo and JP Morgan Chase banks have paid billions of dollars in fines due to improper changes to mortgages without consumer knowledge or consent and discriminatory lending practices in mortgage lending. JP Morgan Chase agreed to a \$55 million settlement with the U.S. government over allegations that it's independent brokers charged minority borrowers higher mortgage interest rates from 2006 to 2009 compared to similar white borrowers.⁴⁶ Wells Fargo agreed to pay \$1.2 billion in 2016 because it had certified residential home mortgage loans were eligible for FHA insurance when they were in fact not, resulting in the government paying FHA claims when some of those loans defaulted.⁴⁷

Table 50: Top Lenders by Minority Applicants 2017

Black/African American		Asian		Hispanic	
Lender	% of Black / African American Applicants	Lender	% of Asian Applicants	Lender	% of Hispanic Applicants
Wells Fargo Bank	10.8	Wells Fargo Bank	11.2	Vanderbilt Mortgage & Finance Inc	11.3
JP Morgan Chase Bank	4.3	JP Morgan Chase Bank	6.7	Wells Fargo Bank	9.5
Cornerstone Home Lending Inc	4.2	Flagstar Bank	4.1	JP Morgan Chase Bank	4.8
Quicken Loans	2.8	Cornerstone Home Lending Inc	3.9	21st Mortgage	4.4
Vanderbilt Mortgage & Finance Inc	2.7	HM Financial Bank	3.1	Triad Financial Services Inc	2.5

Source: FFIEC Home Mortgage Disclosure Act Raw Data 2017

⁴⁶ Bomey, Nathan. (January 18, 2017). JPMorgan pays \$55M to settle mortgage discrimination lawsuit. *USA Today*. Retrieved from <https://www.usatoday.com/story/money/2017/01/18/us-accuses-jpmorgan-mortgage-discrimination-lawsuit/96710486/>

⁴⁷ Department of Justice (April 8, 2016). *Wells Fargo Bank Agrees to Pay \$1.2 Billion for Improper Mortgage Lending Practices* Retrieved from <https://www.justice.gov/opa/pr/wells-fargo-bank-agrees-pay-12-billion-improper-mortgage-lending-practices>



Banking

Having knowledge of, access to, and a good relationship with mainstream banking services and financial products can greatly assist when homebuyers apply for a home loan. For instance, credit history is the top reason for home mortgage denials. Qualitative information from small group discussions also illustrated the importance of residents being a part of the banking and credit system, but participants also stressed that those using mainstream systems must have a clear understanding of how to use banking and credit was the most important factor for residents. Various communities and types of residents have different connections to mainstream financial products, which could be attributed to protected class status.

Mainstream Financial Products

“(B)anking status in 2017 varied considerably across the U.S. population. For example, unbanked and underbanked rates were higher among lower-income households, less-educated households, younger households, black and Hispanic households, working-age disabled households, and households with volatile income.” In 2017, 6.5% of households in the United States were “unbanked,” meaning that no one in the household had a checking or savings account, and 18.7% were underbanked meaning the household has a bank account but goes outside of the bank for financial services such as money order, check cashing, and payday lending. The top reasons given for not having a bank account included: not enough money to keep in an account, lack of trust in banks, and privacy issues. The unbanked percentage declined to a rate before the first nationwide survey was conducted in 2009, at 7.6%.⁴⁸ In the Houston area, 11.8% of households were unbanked and 22.4% were underbanked, a much higher percentage than compared to the U.S.⁴⁹

Feedback received through the public engagement process revealed that some communities engage less with the mainstream financial market in Houston. These included low-income residents, renters, immigrants who may not have an understanding of the U.S. financial system and those who have fears or mistrust of banking institutions.

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. Bank and credit unions located in Racially/Ethnically Concentrated Poverty areas were very few and far between. All branch locations for banks were mapped, even ones with limited services, and all branch locations of credit unions

⁴⁸ FDIC. “2017 FDIC National Survey of Unbanked and Underbanked Households.”

https://economicinclusion.gov/downloads/2017_FDIC_Unbanked_Underbanked_HH_Survey_ExecSumm.pdf

⁴⁹ FDIC. “Unbanked and underbanked for Houston-The Woodlands-Sugar Land, TX-, 2017 by Selected Household Characteristics” https://economicinclusion.gov/surveys/2017household/documents/tabular-results/2017_banking_status_Houston_The_Woodlands_Sugar_Land_TX.pdf



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 are as follows. Nine were the same Super Neighborhoods as in the 2015 AI, However Spring Branch East replaced Kingwood as Super Neighborhoods with the greatest number of banks or credit unions.

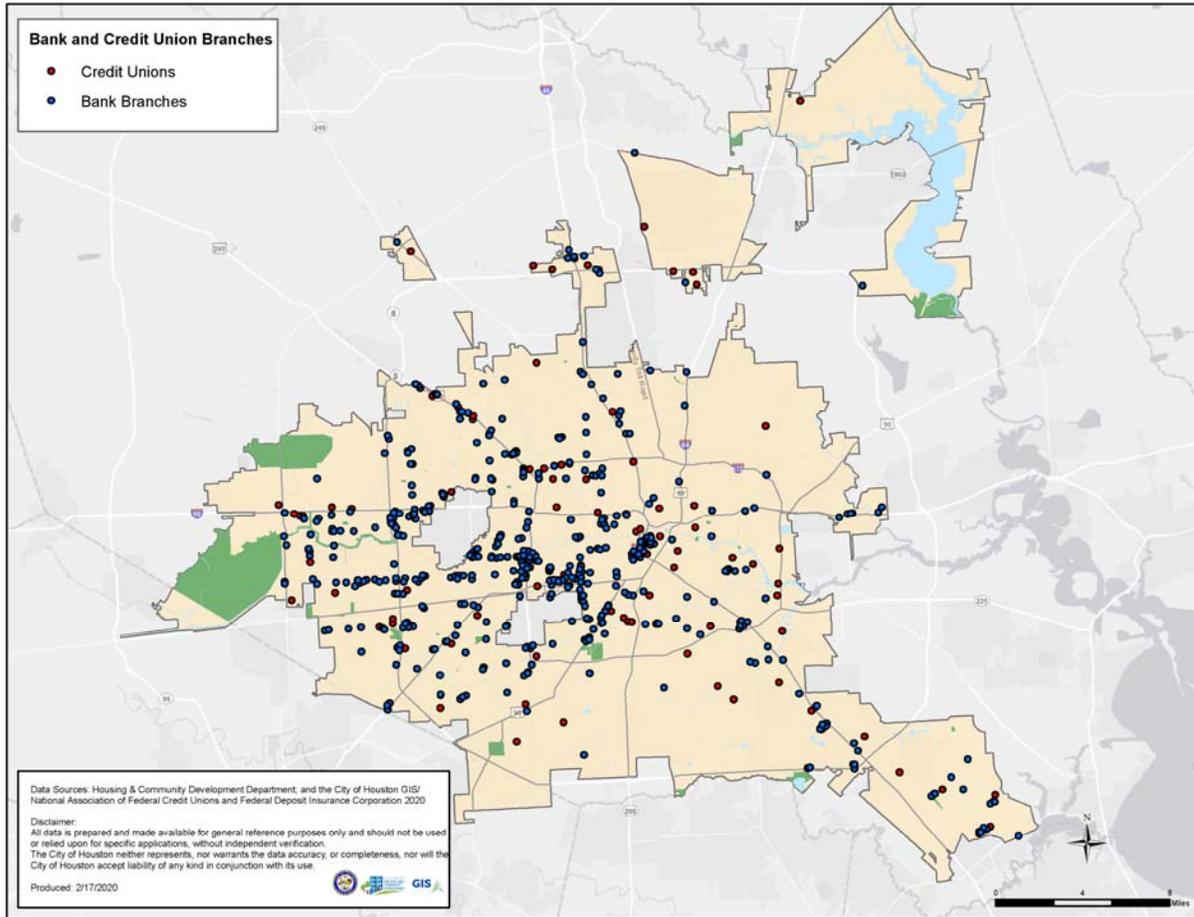
- Greater Uptown (55)
- Memorial (40)
- Greenway / Upper Kirby Area (38)
- Downtown (21)
- Sharpstown (19)
- Clear Lake (18)
- Washington Avenue Coalition / Memorial Park (15)
- Alief (14)
- Spring Branch East (14)
- Eldridge / West Oaks (13)

There are thirteen Super Neighborhoods where there are no banks or credit union branches. Many of these Super Neighborhoods have high numbers of minority residents. Since the 2015 AI, Fourth Ward and Hunterwood Super Neighborhoods now have a bank and/or credit union branch. However, Carverdale, Fondren Gardens, and Lawndale / Wayside are three Super Neighborhoods that now do not have a bank or credit union branch.

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



Map 37: Bank and Credit Union Branch Locations



Source: National Association of Federal Credit Unions and Federal Deposit Insurance Corporation as of June 2019



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 for home mortgages. 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.

About 14% of the 2019 Community Needs Survey respondents reported having experienced housing discrimination in the Houston Area in the past five years, and 24.7% did not know whether they had experienced housing discrimination, illustrating that almost a quarter of respondents do not know how to identify housing discrimination or that discrimination is hard to identify. Of these respondents who experienced housing discrimination, 10% had a real estate professional refuse to sell or respond to their request, 9% had a real estate professional direct them to only undesirable neighborhoods, and 5.7% had a bank or credit union deny a housing loan. This shows that there could be unreported homebuying and lending discrimination. Without a large number of complaints, it is hard to measure the types 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, become burdened by loans, or be unbanked. As discussed earlier, median income is lower for minorities and income grows at a slower pace for people of color compared to non-Hispanic White residents. 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 people of color applying for home loans.



8. Public Policies

Public policies may affect the pattern of housing development, availability of housing choices, and access to housing. This chapter reviews the various policies that may impact housing choice in Houston.

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. Even though Houston does not have a city-wide comprehensive zoning ordinance, the City encourages development through various planning efforts and maintains land use and building regulations that influence development in the city.

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 adopted its first general plan in 2015 to guide development. Other planning efforts listed below also guide development in Houston.

Plan Houston

In 2015, the City of Houston adopted the General Plan. This plan served as a broad policy document for the City defining long-term success and ways to accomplish these successes. Plan Houston identified 32 goals and 9 categories and outlined the vision for achieving economic growth, neighborhood enhancement, infrastructure sustainability, and addressing social and economic inequity. These comprehensive categories cover the gamut from culture, education, and environment to transportation and housing.

With respect to housing, Plan Houston focuses on fostering an affordable city. The plan also looks to encourage mixed-income neighborhoods and adequate quality, affordable housing opportunities. Plan Houston establishes 10 actions

- Comprehensive housing policy for quality, well-maintained, and affordable housing
- Adopt housing policies that support underdeveloped communities and high-opportunity areas
- Ensure that affordable housing is connected to the community and support services
- Make affordable, workforce and mixed-income housing development more attractive to private investors
- Support opportunities to improve affordability of targeted services based on need
- Incentivize the replacement of affordable housing units lost through redevelopment and neglect
- Leverage external funds and incentives to build additional affordable housing
- Encourage mixed-income communities
- Work with external organizations to ensure permanent supportive housing for the homeless
- Ensure regulatory policies support housing affordability

Resilient Houston

In February 2020, City Council adopted Resilient Houston, a plan focused on building resilience at every scale by setting aspirational goals and specific targets to increase the resilience of Houstonians, neighborhoods, bayous, the city, and the region. The plan sets 18 high-level targets under the following five topic areas.



1. Prepared & Thriving Houstonians

Making Houston more resilient begins with supporting Houstonians with tools and resources to be resilient as individuals. Our collective resilience improves when all Houstonians have the capacity to prepare for and adapt to an increasingly uncertain future, have access to employment and wealth-building opportunities, and enjoy a safe and healthy quality of life.

- Provide at least 500,000 Houstonians with preparedness training by 2025.
- 20,000 Hire Houston Youth Summer Jobs in 2020.
- Zero traffic-related fatalities and serious injuries on Houston streets by 2030.

2. Safe & Equitable Neighborhoods

Each of Houston's 88 Super Neighborhoods has different resilience priorities, including flooding, air quality, displacement, and mobility. These challenges are best addressed by developing and implementing place-based solutions at the neighborhood scale.

- Develop 50 neighborhood plans by 2030.
- Invest \$5 million in local artists to create resilience awareness projects across the city by 2025.
- Plant 4.6 million new native trees by 2030.
- Build at least 375,000 new homes across every income level by 2050 to welcome new residents to the City of Houston.

3. Healthy & Connected Bayous

Living safely with water and embracing the role of bayous as Houston's front yard are essential to improving physical, environmental, and economic resilience.

- Remove all habitable structures from the floodway by 2030.
- Construct at least 500 miles of trails and bike lands by 2025.

4. Accessible & Adaptive City

The City of Houston will lead by example to further embed climate readiness, equity, inclusion and resilience into all City policies and practices.

- Carbon neutral by 2050 in accordance with the Paris Agreement.
- 100 new green stormwater infrastructure projects by 2025.
- Eliminate geographic disparities in life expectancy by 2050.
- Appoint Departmental Resilience Officers in every City of Houston Department in 2020.

5. Innovative & Integrated Region

By taking a regional approach to building resilience, we can extend the benefits of resilience planning to more communities while including additional partners who increase our capacity to meet these goals.

- Attract or incubate 50 Energy 2.0 companies in Greater Houston by 2025.
- Provide 100% of Houstonians access to high-frequency public transportation choices within a half-mile by 2050.
- Conserve 24% of undeveloped regional lands as natural spaces by 2040.
- Ensure that 100% of Houstonians and visitors have access to accurate, real-time emergency alerting by 2030.
- Invest \$50 billion in major recovery, mitigation, and modernization projects that increase resilience by 2040.



Complete Communities Plans

Under the direction of Mayor Sylvester Turner, the City of Houston completed Complete Communities Action Plans for five neighborhoods in June 2018: Acres Homes, Gulfton, Near Northside, Second Ward, and Third Ward. City departments worked closely with community members and outside partners to find solutions and achieve transformational change through the planning process. Five additional neighborhoods were added to the Complete Communities initiative and began the planning process in 2019: Alief - Westwood, Fort Bend Houston, Kashmere Gardens, Magnolia Park - Manchester, and Sunnyside.

These communities are diverse and unique but there are common elements that make communities complete, including: a mix of quality and affordable home choices; job opportunities and quality retail; good parks and schools; and reliable transportation options.

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 strategies to address community needs. This AI will accompany the 2020-2024 Consolidated Plan which addresses a five-year period between July 1, 2020 and June 30, 2024.

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

- 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 2020-2024 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
- Health and Safety Needs
- Economic Development Needs
- Fair Housing Needs



Action Plans for Disaster Recovery

As a result of the flood events occurring in 2015, 2016, and 2017, the City of Houston has received several allocations of Community Development Block Grant Disaster Recovery (CDBG-DR) funds totaling over \$1.3 billion to address flooding impacts. The action plans related to CDBG-DR funding prioritize activities that address housing impacts for low- and moderate-income people, as well as address public services and infrastructure improvements to benefit low- and moderate-income communities. The majority of the CDBG-DR programs are intended to increase the supply, through new construction or repair, of housing available for low- and moderate-income people. In addition, the City will receive Community Development Block Grant Mitigation (CDBG-MIT) funds, which will also be prioritized to low- and moderate-income areas to improve drainage and reducing flooding.



Economic Development and Housing Initiatives

The City of Houston utilizes incentives to spur or guide development. The following are some development incentives currently used by the City of Houston.

Economic Development Initiatives

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.

Opportunity Zones

The Opportunity Zone Program was created under the Tax Cuts and Jobs Act of 2017. Low-income or economically distressed census tracts were nominated by state governors and certified by the U.S. Department of Treasury as qualified Opportunity Zones targeted for economic development. Developers building or investing in a business within Opportunity Zones could receive tax deferments and/or incentives.

The majority of Opportunity Zones in Houston are in communities of color. With an increased incentive for investment in these areas, some feared increased land prices and gentrification in Opportunity Zones. As a result, the City created a mission statement “to encourage both practical and innovative investment in economically distressed areas that have been designated as Opportunity Zones in a manner that ensures benefit to both investors, as well as the existing residents and businesses” and set priorities for investment in Houston Opportunity Zones, which include inclusion and place making.⁵⁰

Although when announced the program had potential to spur investment, however without an extension of the program time limits and without transparent federal tracking mechanisms, Houston has not experienced an out of the ordinary amount of investment in Opportunity Zones and the investment resulting from the Opportunity Zone Program is hard to track.

Section 108/Economic Development Incentive (EDI)

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

⁵⁰ City of Houston Mission Statement of Opportunity Zones: <https://www.houstontx.gov/opportunityzones/index.html>



Currently, the City has a Request for Proposal for \$40 million in total loan commitments. This Section 108 Loan Guarantee Program seeks to provide financing for economic development, public facilities, and other development projects. The project funds should aim to serve low- and moderate-income people. Selection priorities include project located within Complete Communities and projects with community benefit.

There are three recently funded Section 108 projects. An HEB development in Houston's Third Ward benefits a low- to moderate-income area and will provide a full service grocery store promoting economic development and combating food deserts. Second, Avenue Community Development Corporation (Avenue CDC) will use Section 108/EDI funds to construct a community hub called Avenue Center, which will house community programming for health, education, and financial management and other supportive services in a Complete Community. Finally, the East End Innovation Maker Hub, also located in a Complete Community, will provide affordable long-term below market rents to small and middle-sized manufacturers and house a workforce development center.

Housing Initiatives

Houston Land Bank

Formerly known as the Land Assemblage Redevelopment Authority, the Houston Land Bank revised its name and bylaws in 2018. The Houston Land Bank strategically acquires, disposes of, and stewards vacant, abandoned, and damaged properties into productive use and helps to catalyze transformative community and economic development for the City of Houston. The Houston Land Bank is partnering with the City of Houston and HCDD to further several programs and initiatives to assist in creating new affordable homeownership opportunities in Houston, including the New Home Development Program and the Houston Community Land Trust.

Houston Community Land Trust

Incorporated in 2018, the Houston Community Land Trust is a nonprofit that helps make homeownership achievable for households with limited-income in Houston using a new model of homeownership. In this model, families purchase only the house and lease the land under it from the land trust, significantly lowering the purchase price and the annual property tax bill. In addition, buyers agree to restrictions on the home's resale value that limit the property's appreciation, which is meant to ensure the house remains affordable for successive buyers.

Some critics of the Houston Community Land Trust model worry that home designs will be cookie cutter, the homes will not be available to those inside the neighborhood in need of a quality home, or that home prices will exacerbate rising property taxes burdening long-time residents. Also, since the model is very different than traditional homeownership, many community advocates agree that education and information is key for the program, so that new homebuyers understand the limitations.⁵¹ Despite some concerns, this new initiative can provide low-income households a chance at homeownership that they would not otherwise have in the open market.

⁵¹ Morris, Mike, Houston Chronicle. "City plan to expand affordable housing will depend on land trust, subsidies" March 1, 2019.



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 27 TIRZs which all share the following common characteristics

- Each zone is created by an 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, 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 in 2012. The program provided 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 offered tax relief of \$15,000 per unit over 15 years, which abates most of the owner's property tax. The program was fully subscribed with all 5,000 units in 2015.

According to Central Houston, in 2019 there were over 10,000 residents living in downtown Houston in nearly 5,000 units, a substantial increase from the 3,800 residents living in downtown in 2013 and only 900 residential units in 1995.⁵² Some community members were critical of the Downtown Living Initiative

⁵² Hagerty, Kyle. (October 2, 2019). "No Longer Pioneering, Downtown Living is Finally Taking Root" Bisnow Houston: <https://www.bisnow.com/houston/news/multifamily/no-longer-pioneering-downtown-living-is-finally-taking-root-101107>



because it did not include affordable homes for low-income workers. With the success of the initiative to bring more households downtown, the Central Houston and the Downtown District published a 20-year vision plan in November of 2017 called Plan Downtown: Converging Culture, Lifestyle and Commerce. One planning goal is to build an additional 12,000 residential, mixed-income units in the next 20 years to achieve affordability and increase housing options.

Development Regulations

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 2017 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 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. However, parking requirements may dictate if an accessory dwelling unit is feasible to add to a property, as three parking spaces are required for two residential units. According to Chapter 42 of the Code of Ordinances, a platted single family lot may have a secondary residence up to 900 square feet.

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 Land Use Best Practices

The following is a summary of the best practices in land use and zoning for local governments as identified on the Texas Department of Housing and Community Development's webpage.⁵³ 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 2015 *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.

⁵³ <https://www.tdhca.state.tx.us/fair-housing/government-officials.htm>



- Clarification that group housing for protected classes is treated as residential uses and allowance of such homes in a broad range of zone districts.**
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.
- 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

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. In 2013, the Houston City Council passed an ordinance, which required boarding home safety regulations and instituted supervisory agency. This Council regulation standardized living conditions to improve quality of life for boarding home residents. These residents are elderly, have a disability, or have limited income and are vulnerable to victimization. The ordinance was designed to protect these residents.

After two fires resulted in three deaths and the receipt of many public safety complaints, the City identified enforcement gaps in certain types of residential facilities. On March 27, 2018, the Houston City Council passed an ordinance imposing more stringent permitting and inspection requirements on boarding homes. These facilities are, now, required to apply for annual permits and to have annual inspections to ensure compliance with Building Codes and Fire Codes. As of March 7, 2018, there were 117 boarding homes and 99 alternate housing facilities operating in Houston.⁵⁴

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. 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 Houston Chronicle, the number of licensed payday and title loan companies in Houston plunged by 40% between July 2014 and July 2016, from 310 to 187 businesses. In addition, transactions across the metro area fell by 27% in the same period.⁵⁵

Credit Access Businesses (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. Also, both CABs and regulated lenders tended to cluster in 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. Only one Super Neighborhood changed from 2015 to 2019 as one of the top five with the greatest concentrations of city licensed CABs; Greater Fondren Southwest replaced Brays Oaks. The following Super Neighborhoods have the greatest concentrations of city licensed CABs, of 10 to 15 businesses.

- Golfcrest/Bellfort/Reveille
- Alief
- Eldridge/West Oaks

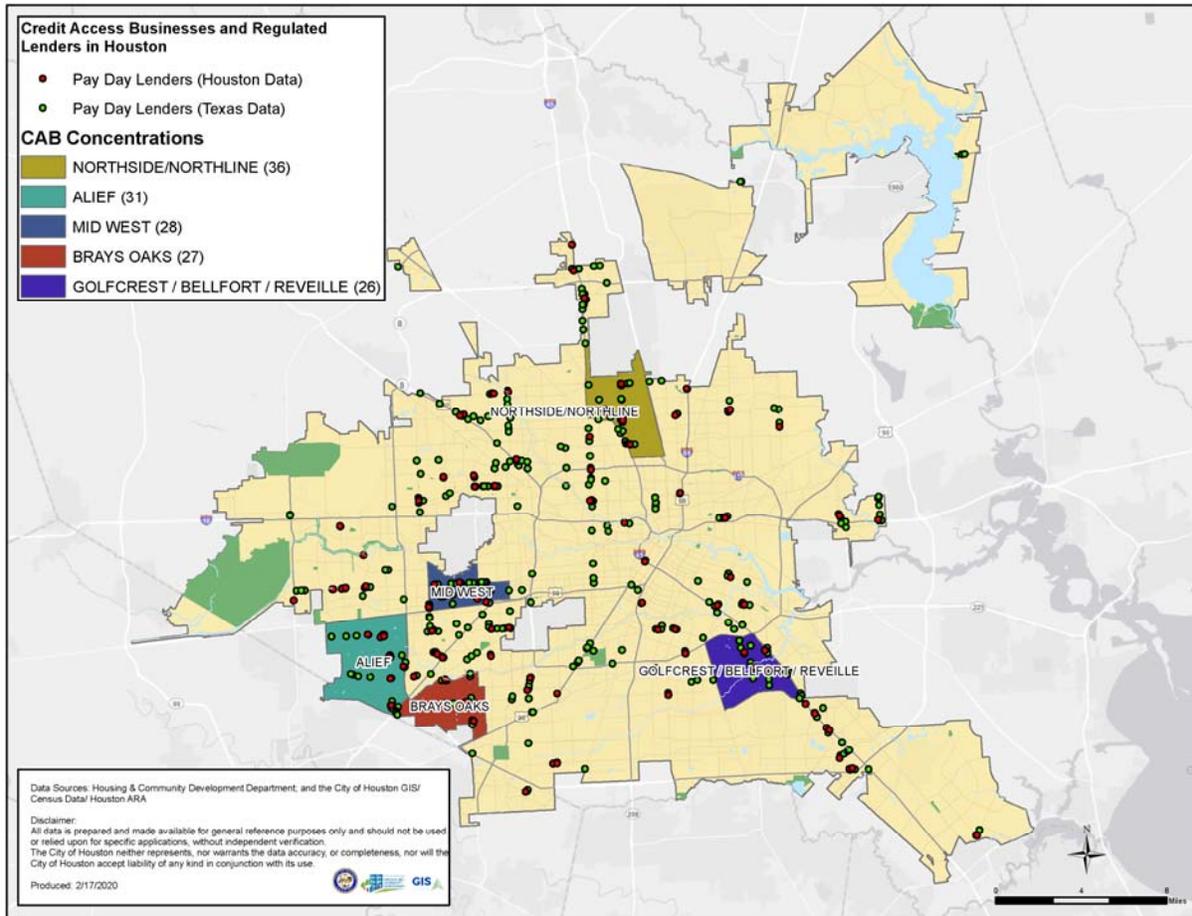
⁵⁴ <https://www.houstonpermittingcenter.org/our-services/residential-facilities>

⁵⁵ DePillis, Lydia and Morris, Mike. "Payday lenders retreat in the face of new restrictions" August 21, 2016. <https://www.houstonchronicle.com/business/texanomics/article/Payday-lenders-retreat-in-the-face-of-new-9175741.php>



- Northside/Northline
- Greater Fondren Southwest

Map 38: Credit Access Businesses and Regulated Lenders in Houston



Source: City of Houston Administration and Regulatory Affairs Department – Registered CABs as March 2019 and Texas Office of Consumer Credit Commissioner as of March 2019

Chapter 19: Floodplain Ordinance

On April 2018, the City adopted amendments to Chapter 19, which includes the City of Houston’s Floodplain Ordinance. The revisions included adding requirements for new buildings and additions within the 500-year floodplain to be elevated to two feet above the base flood elevation. While some local organizations maintain that floodplain restrictions are necessary to reduce the risk of flood loss and mitigate future impacts to residents, others have raised concerns. These concerned that the cost of compliance could exceed what many low- and moderate-income households could afford, thus creating two different sets of residents: those who can afford compliance and are more protected from future flood risk; and those who cannot afford the cost of raising their homes and remain at risk of flooding.

Infrastructure

Historically, some infrastructure improvements have shown preference to or impacted imbalance between certain neighborhoods. 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.

In the City's Capital Improvement Projects (CIPs), the SWEET Tool is a calculation method the City utilizes to determine the project priority for infrastructure renovations. It categorizes infrastructure components and, then, prioritizes projects within those components using weighted factors such as

- A critical need assessment of an area/community
- Cost-benefit analysis
- Number of needs addressed by a project
- Fund leveragability to expand a program⁵⁶

Since Hurricane Harvey, the City has prioritized CIP funding to address impacted buildings and infrastructure, delaying the timelines of previously planned and prioritized projects. Public engagement over the last few years has shown that residents would like to focus funding on recovery and to prevent future disasters, through drainage and other flooding infrastructure improvements.

Citing the legacy of unequal infrastructure placement, some community advocates encourage the consideration of demographic information when prioritizing infrastructure. They also encourage the use of updated data, free from bias, to determine infrastructure need. As new funding sources become available for infrastructure improvement, like Community Development Block Grant-Mitigation, low-income areas will be prioritized for infrastructure projects. In addition, the City is committed to improving the data used to prioritize its activities and will find new data and models to more accurately determine need.

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 geographic volume 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, may be afraid to call, or think that it is not 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.

The following are the top ten Super Neighborhoods in which calls were received in the past year. Many of these Super Neighborhoods have concentrations of non-Hispanic White residents, and the majority of these listed also were had the greatest number of calls in 2014 and 2015, as reported in the 2015 AI. 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 – 15,380 calls
- Central Southwest – 13,787 calls

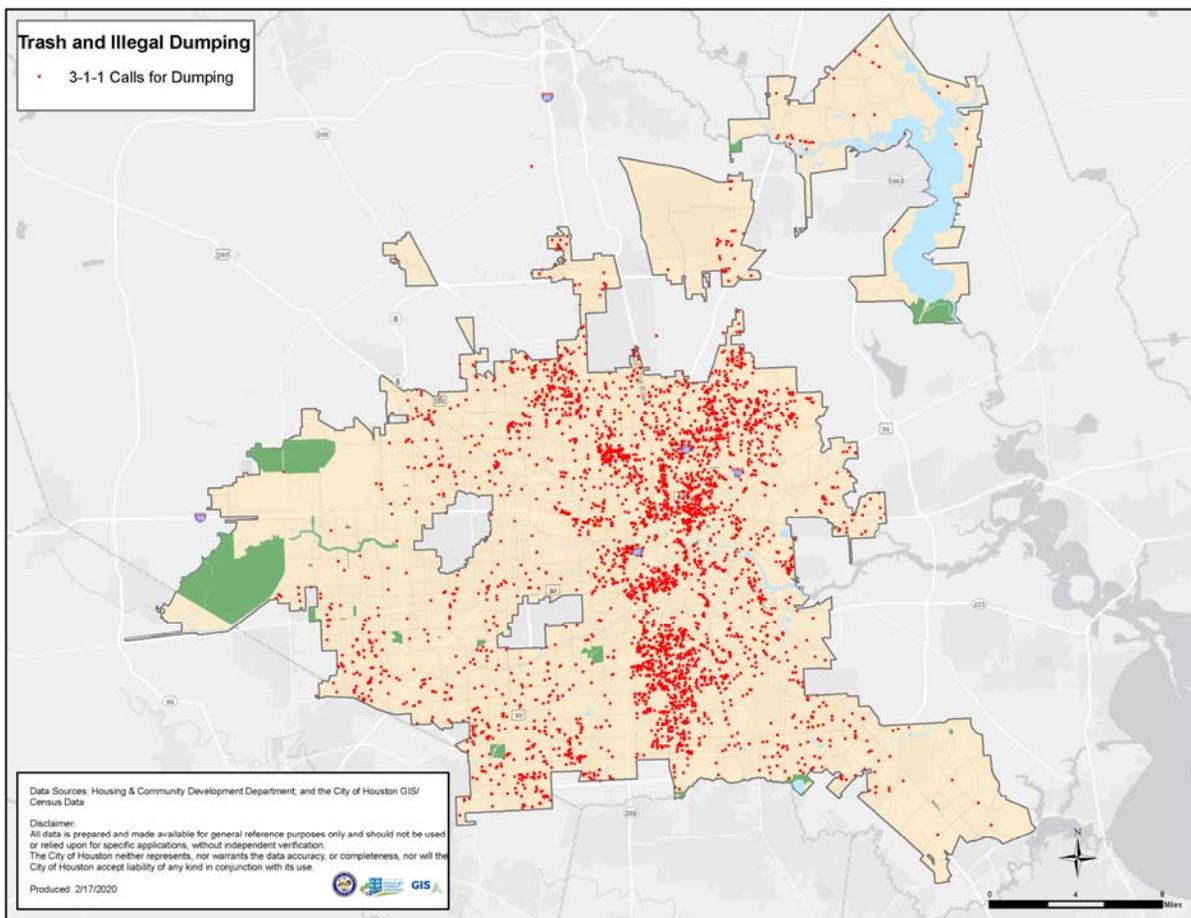
⁵⁶ *Capital Improvement Plan Process Manual for Infrastructure Programs*, City of Houston (2014)
https://www.rebuildhouston.org/images/pdf/cip_process_manual_20140731.pdf.



- Washington Avenue Coalition/Memorial Park – 13,682 calls
- Alief – 13,134 calls
- Neartown-Montrose - 10,045 calls
- Kingwood Area – 9,849
- Northside/Northline – 9,824 calls
- Central Northwest – 9,225 calls
- South Belt/ Ellington – 8,941 calls
- Near Northside – 7,671 calls

The location and the category of the 3-1-1 calls received over the past year was analyzed and revealed differences in issues reported between neighborhoods. One very stark difference was for calls categorized as Trash/Illegal Dumping. Illegal dumping was an issue that came up during the public participation process as a main neighborhood concern. As illustrated in the next map, the greatest number of calls to 3-1-1 regarding trash and illegal dumping were in areas of Black/African American concentration, including Greater Fifth Ward, Sunnyside, Trinity/Houston Gardens, Third Ward, and Independence Heights.

Map 39: 3-1-1 Calls by Houston Super Neighborhood about Trash and Illegal Dumping in 2019



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 year, trash and illegal dumping has been a disproportionate issue occurring in neighborhoods with concentrations of Black/African Americans as opposed to other neighborhoods.

I-45 Expansion/ North Houston Highway Improvement Project (NHHIP)

The Texas Department of Transportation (TxDOT) has initiated a project that includes the expansion and reconstruction of approximately 24 miles of Interstate 45 from US-59/I-69 at Spur 527 to Beltway 8 North to meet projected travel demands by increasing capacity and relieving congestion. This is described as one of the biggest transportation projects that Houstonians will see in their lifetime.

The City hosted three I-45 Community Workshops in August 2019 in which residents and stakeholders asked questions and expressed concerns about the impacts of this expansion project. Using feedback from these community workshops and written comments, the City and its technical team developed alternative designs to improve and change TxDOT's North Houston Highway Improvement Projects. These alternatives were presented at three additional community workshops in January and February 2020. TxDOT's proposal displaces 1,782 housing units, which is approximately more than 3,000 residents living in privately owned and managed apartments, rented or owned single family homes, rental homes in Houston Housing Authority-owned properties, and transitional and short-term housing complexes.⁵⁷ A portion of the housing units in Houston Housing Authority's Kelly Village and Clayton Homes will likely be purchased by TxDOT for the freeway expansion, therefore removing affordable units from the supply of affordable homes. The City's alternative proposals include restructuring parts of the freeway to reduce the number of displaced housing units, provide a program to assist residents who are displaced, and the development of new affordable homes for displaced residents.

⁵⁷ City of Houston Planning and Development Department "24+25 Housing Options" (Retrieved March 4, 2020): <https://www.dropbox.com/sh/a8foxw2f4ooy5xo/AACej8FLJMjdf1Ful8ryacia?dl=0&preview=24%2B25+Housing+Options+edit.pdf>



Houston Housing Authority

Houston Housing Authority's 5-Year Plan

The Houston Housing Authority's (HHA) PHA 5-Year and Annual Plan will guide HHA's activities over the next five years, similar to HCDD's Consolidated Plan. The following are the goals and strategies from HHA's FY 2020-2025 5-Year Plan. The goals remain the same from the previous five-year period however some strategies were added including several in the goal to increase the quantity and quality of housing.

HHA Goal: Expand efforts to ensure equal opportunity in housing

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

Strategy: Ensure 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: Apply for additional rental vouchers.

Strategy: Acquisition and new development of affordable housing.

Strategy: Seek land in high opportunity areas.

Strategy: Pursue recapitalization with tax credits.

Strategy: Utilize Capital Fund and other resources to rehab. and improve properties' condition.

Strategy: Complete and maximize performance through conversion of HHA's first four public housing developments with CHAPs, under HUD's Rental Assistance Demonstration.

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

Strategy: As funding continues to be worn thin from HUD, Housing Authorities become more and more constrained. HHA will seek partners who can access capital or subsidies that are unavailable to the HHA in order to maximize public and private funds and leverage partnerships to grow and diversify financial resources. Pursue other grants and equity opportunities like Rapid Rehousing (RRH), Choice Neighborhoods Initiative (CNI), CDBG-Disaster Recovery, Opportunity Zones, etc. HHA will apply for other similar grants as they become available. Pursue grants and other funding opportunities that increase additional funding for the agency.

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

Strategy: Partner with Centerpoint and other energy providers by seeking additional funding grants for energy saving opportunities for properties in our portfolio that qualify under their programs.

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

Strategy: Provide 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: Provide 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.

Strategy: Pursue systems alignment between housing and health care.



HHA Goal: Improve relationships with clients and external stakeholders

Strategy: Increase our client agency relationships

Strategy: Promote partnerships with other housing authorities

Strategy: Develop public relations (PR) strategy for positive publicity and perceptions

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

Many of the five-year goals and strategies in HHA's 5-Year Plan relate closely to fair housing and expanding housing choice in the community and coordinate with the 2020 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. 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.

The Family Self Sufficiency Program

The Family Self Sufficiency (FSS) program provides wrap-around services to households that are receiving housing rental assistance with the hope of establishing long-term self-sufficiency. Over the course of the five-year program, HHA will provide homeownership counseling, education, job counseling, job training, childcare, transportation, and medical assistance to these families.

Originally, HHA's strategy for the FSS program incorporates the coordination of the eligible Section 8 Housing Choice Voucher Program and Public Housing participants pursuant to applicable regulations and available funding; however, the program was rebranded as the MyGoals Program that is, now, designed to coach and assist households "to identify, plan, set, and achieve their Personal, Financial, Educational, and Career goals."⁵⁸ The program is structured to increase leasing opportunities in opportunity neighborhoods while encouraging employment and achieve professional goals.

Housing Choice Voucher Program Selection Process

The Housing Choice Voucher Program, formerly known as Section 8, is a federally funded program that provides housing choices to participants. It, generally, grants tenant-based assistance to low-income families, seniors, and people with disabilities by offsetting the cost of private market housing through a voucher. The program targets the deconcentration of poverty, self-sufficiency, and the promotion of fair housing.

⁵⁸ *Proposed FY 2020 Streamlined Annual PHA Plan*, Houston Housing Authority (Retrieved August 30, 2019, p. 7) <http://housingforhouston.com/media/56332/hhaproposedfy2020streamlinedannualphaplan50075-hp.pdf>.



HHA administers and manages the Housing Choice Voucher Program, Moderate Rehabilitation Program, Single Room Occupancy (SRO) Program, Project-Based Voucher (PBV) 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 on, 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 toward 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.



State and Federal Regulations and Other Policies Related to Fair Housing

Over the last five years, several new rules and regulations were enacted which may limit fair housing and equal housing opportunity in the future.

Disparate Impact

Disparate impact is a legal doctrine, which states that a policy may be considered discriminatory and illegal if it has a disproportionate adverse impact against any group based on a protected class, even if it was not the intent of the policy. In 2013, HUD issued a final rule that described a three-part burden-shifting test for determining when a practice or policy with a discriminatory effect violates the Fair Housing Act. First, the plaintiff must prove that the practice caused or will cause a discriminatory effect. Second, the burden shifts to the respondent or defendant to prove that the practice is necessary to achieve a nondiscriminatory result. If proven, the plaintiff must prove that such results could be served by another practice that has less of a discriminatory impact. In 2015, the U.S. Supreme Court adjudicated on the use of the Disparate Impact rule in *TDHCA v. ICP, Inc.* stating that disparate impact claims were “cognizable under the Fair Housing Act,” but the plaintiff must prove that the disparate impact was caused by the defendant’s program(s) or policies.⁵⁹

In 2019, HUD proposed changes to the Disparate Impact Rule in hopes of clarifying the rule after litigation.⁶⁰ Some argue that the Proposed Rule would effectively eliminate use of the disparate impact standard for fair housing enforcement, a key tool for rooting out and eliminating hidden discrimination. The Proposed Rule simultaneously raises the bar for victims of discrimination to bring complaints under the Fair Housing Act, while carving out new avenues for financial institutions, governments, and other housing market participants to continue discriminatory practices. As of March 2020, the proposed changes to the disparate impact rule have not been enacted.

Changes to AFFH

In July of 2015, HUD implemented the Affirmatively Furthering Fair Housing (AFFH) rule. The AFFH is a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act.⁶¹ The constructs of the rule frame actions that help to remove historical patterns of segregation and address fair housing issues. It requires program participants to take “meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” These programs, under the rule, are charged with the duty to affirmatively further fair housing⁶², and program participants are required to utilize the Local Government Assessment Tool while conducting the Assessment of Fair Housing (AFH).⁶³

⁵⁹ *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 576 U. S. ____; 135 S. Ct. 2507 (2015).

⁶⁰ Docket No. FR-6111-P-02 – Federal Register/Vol. 84, No. 160 – HUD’s Implementation of Fair Housing Act’s Disparate Impact Standard.

⁶¹ Federal Register / Vol. 80, No. 136 / Rules and Regulations (July 16, 2015) <https://www.govinfo.gov/content/pkg/FR-2015-07-16/pdf/2015-17032.pdf>

⁶² *AFFH Fact Sheet: The Duty to Affirmatively Further Fair Housing*, U.S. Department of Housing and Urban Development, <https://www.huduser.gov/portal/sites/default/files/pdf/AFFH-Fact-Sheet.pdf>.

⁶³ See 24 CFR 5.160.



Despite instituting this rule and new assessment tool, HUD indefinitely suspended the implementation of the AFFH rule on May 18, 2018.⁶⁴ Then, in January 2020, HUD published a proposed rule, eliminating the obligation for jurisdictions to create an AFH. The proposed rule also proposed to change the definition of AFFH removing segregation from the definition and removing all discussion regarding historical segregation. There are some fair housing concerns that some advocacy organizations have voiced because they argue the proposed rule: ignores the legacy of segregation and fails to address barriers to housing choice, centers on the idea that simply increasing the supply of housing will increase fair housing choice, contains no meaningful enforcement of the AFFH obligation, eliminates the AFFH public participation process required in the 2015 rule, and removes the requirement of using a data driven process to analyze fair housing issues.

“Public Charge” Rule

New rules require Department of Homeland Security (DHS) and Department of State (DOS) to consider the *totality of the circumstances* and make a prospective, forward-looking determination of whether applicants for an immigrant or nonimmigrant visa, applicants for admission to the United States, and applicants for adjustment of status to lawful permanent residence are likely to become a public charge "at any time" in the future. In January 2020, the Supreme Court lifted an injunction regarding this rule, which went into effect on February 24, 2020. This rule extremely extends the impact of public charge to apply to people who have received modest benefits from a much broader range of public programs, including Medicaid, Supplemental Nutrition Assistance program (SNAP or food stamps) and some federal housing programs. This is Federal rule that some say has further intimidated immigrants.

Verification of Eligible Status Proposed Rule

On May 10, 2019, HUD published a proposed rule that would bar “mixed-status” families from residing in public housing and using Section 8 programs. Mixed-status families are households where member(s) who are eligible for public housing assistance live with member(s) who are ineligible for housing assistance due to their immigration status. If this rule is implemented, HUD will also require all household members under age 62 to have their immigration status screened and would change the citizenship and immigration verification requirements for U.S. citizens and noncitizens over age 62.

Proponents of this proposed rule contend that it will shorten long wait times for public housing assistance. However, “advocates and Texas housing officials say that the change would do little to shorten wait times since most undocumented families don’t qualify for the assistance and mixed-status families don’t typically apply...In Austin, Dallas, Houston and San Antonio, mixed-status families consist of 1% or less of those receiving housing assistance.” In addition, there are already mechanisms in place to protect Federal funding: “The undocumented tenants don’t receive any benefits. The family gets its rents prorated based on how many documented tenants there are,” said Tory Gunsolley, president and CEO of the Houston Housing Authority. “If it is a two person household, and one of them is undocumented, they would be paying 50% full rent and then 50% discounted affordable rent.” Some say that this rule is cruel and will hurt families causing evictions of families whose children are U.S. citizens. In addition, for these low-income families or those with low credit scores could have a hard time finding a new place to live.⁶⁵

⁶⁴ HUD No. 18-044: HUD Withdraws Fair Housing Assessment Tool, HUD.gov (May 18, 2018) https://www.hud.gov/press/press_releases_media_advisories/HUD_No_18_044.

⁶⁵ Garnham, Juan Pablo. August 23, 2019. *Texas Tribune*. “Feds plan to make housing assistance harder for undocumented immigrants. Few in Texas are even getting it.” <https://www.texastribune.org/2019/08/23/texans-fear-hud-change-will-prompt-evictions-undocumented-immigrants/>



New Federal Housing Finance Agency (FHFA) Directive

In the early 2000s before the Financial Crisis and Housing Market Crash, the loan risk for borrowers increased. To mitigate another crisis and maintain affordable housing, the Financial Crisis Inquiry Commission (FCIC) developed the Financial Crisis Inquiry Report addressing lenders who made loans knowing that borrowers could not afford such a risk. Part of the problem was that the market for mortgage lending was highly concentrated, which resulted in a “systematic breakdown in accountability” and lack of fair dealing.

In 2019 as a response,⁶⁶ FHFA has instituted a new directive since that seeks to avoid concentrated market share in Government Sponsored Enterprises (GSEs) and expanding opportunities for small lenders. The goal is to prioritize affordable housing and reform housing finance as to avert the same or similar vulnerabilities that lead the Financial Crisis and Housing Market Crash in early 2000s. Thus far, the high market-share in government backed loans has been successful in reducing loan risk shared by borrowers and limiting overall mortgage risk, which will help to maintain affordability.

Sources of Income Legislation

Since public-private partnerships are important to the success of the Housing Choice Voucher Program, it is imperative to have more choices available for voucher holders. Unfortunately, many states and jurisdictions allow the discrimination of housing vouchers, which is seen as a source of income. However according to a study conducted by HUD, a state that prohibits discrimination against a renter’s source of income will have improved housing conditions. Additionally, prohibiting this kind of discrimination will allow voucher holders to obtain homes in areas with higher opportunities.⁶⁷

Several states are enacting laws that provide protections for source of income. However, many oppose this legislation. California, Delaware, Minnesota, and Wisconsin have even enacted source of income laws that exclude housing voucher holders.

After several cities in Texas, including the City of Austin, passed prohibitions against discrimination based on source of income, the State of Texas established a law, which prohibits local jurisdictions from creating regulations against source of income discrimination in housing.⁶⁸ Inclusive Communities Project (ICP), a Texas non-profit organization, filed a lawsuit in 2017 against State of Texas Officials in hopes of declaring the law unconstitutional. In 2018, the case was dismissed without prejudice stating that “an official must enforce or threaten to enforce” the statute in order to the challenge law and that “Governor Abbott ... has [not] enforced or threatened to enforce the Statute.”⁶⁹

⁶⁶ Housing Reform Plan, U.S. Department of the Treasury (September 2019)

<https://home.treasury.gov/system/files/136/Treasury-Housing-Finance-Reform-Plan.pdf>; The Financial Crisis Inquiry Report: Final Report of the National Commission on the Causes of the Financial and Economic Crisis in the United States, Financial Crisis Commission (January 2011) https://fcic-static.law.stanford.edu/cdn_media/fcic-reports/fcic_final_report_full.pdf.

⁶⁷ Alison Bell, Barbara Sard, and Becky Koepnick, Prohibiting Discrimination Against Renters Using Housing Vouchers Improves Results, Center on Budget and Policy Priorities (Updated December 20, 2018) <https://www.cbpp.org/sites/default/files/atoms/files/10-10-18hous.pdf>.

⁶⁸ Tex. Loc. Gov’t Code Ann. § 250.007(a).

⁶⁹ *ICP v. Governor Greg Abbott, et al.*, No. 3:2017cv00440 (N.D. Tex. 2018).



Although many studies suggest that laws allowing source of income discrimination “continue to perpetuate racial and income discrimination and inequality and impede the process of providing housing to all people”,⁷⁰ many states, including Texas, support such legislation by failing to repeal them.

Senate Bill 493

In 2019, the state also passed a bill allowing more than one Low Income Housing Tax Credit within two miles if “the community is located in a county with a population of four million or more; and... an area that is a federally declared disaster area.”⁷¹ This relieves restrictions and allows additional units of affordable homes to be built.

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.

⁷⁰ Samatha Floss, *Source of Income Discrimination*, Texas Homeless Network (Posted May 16, 2019) <https://www.thn.org/2019/05/16/source-of-income-discrimination/>.

⁷¹ Texas Senate Bill 493, 2019; <https://capitol.texas.gov/tlodocs/86R/billtext/html/SB00493S.htm>



9. 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 Affirmatively Furthering Fair Housing

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 finalized a new structure and process replacing the AI with the Assessment of Fair Housing (AFH) in 2015. In 2018, HUD suspended the Final Rule requiring the AFH. Then, in 2019, HUD published a new proposed rule to alleviate jurisdictions' reporting burden, revise the AFFH definition, and create a new method of incentivizing jurisdictions to AFFH. This is further discussed in the previous section.

Harassment Rule

To create a crucial tool for victims of racial, sexual, and other forms of harassment in housing to exercise their rights under the Fair Housing Act and provide unified clarity about what kind of behavior is prohibited or how harassment claims should be assessed, HUD issued a Harassment Rule in 2016, which formalizes standards for use in investigations and adjudications involving allegations of harassment on the basis of race, color, religion, national origin, sex, familial status, or disability. The rule specifies how HUD will evaluate complaints of quid pro quo harassment and hostile environment harassment under the Fair



Housing Act. It also provides for uniform treatment of Fair Housing Act claims raising allegations of quid pro quo and hostile environment harassment in judicial and administrative forums.

Disparate Impact Rule

As discussed in the previous section, HUD has taken comment on a proposed disparate impact rule.

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

The City's Code of Ordinances Chapter 17: Equal Rights is the policy of the city to promote housing opportunities for all persons. This chapter provides information about fair housing practices in the city. Currently, the City has not been named by HUD as a jurisdiction that is substantially equivalent.

Fair Housing Education and Enforcement Organizations

Houston has several organizations engaged in fair housing education and in enforcement activities. The following 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 and a qualified fair housing enforcement organization that 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 2017 FHIP funding in the amount of \$300,000 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 (Texas Housers) is a nonprofit organization based in Austin, Texas with an office in Houston. Texas Housers held two meetings for community members and stakeholders giving an overview of the AI purpose and development process in March 2020. HCDD staff attended and took notes. Texas Housers is also involved in other fair housing activities.

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.

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 2010 and 2018. 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

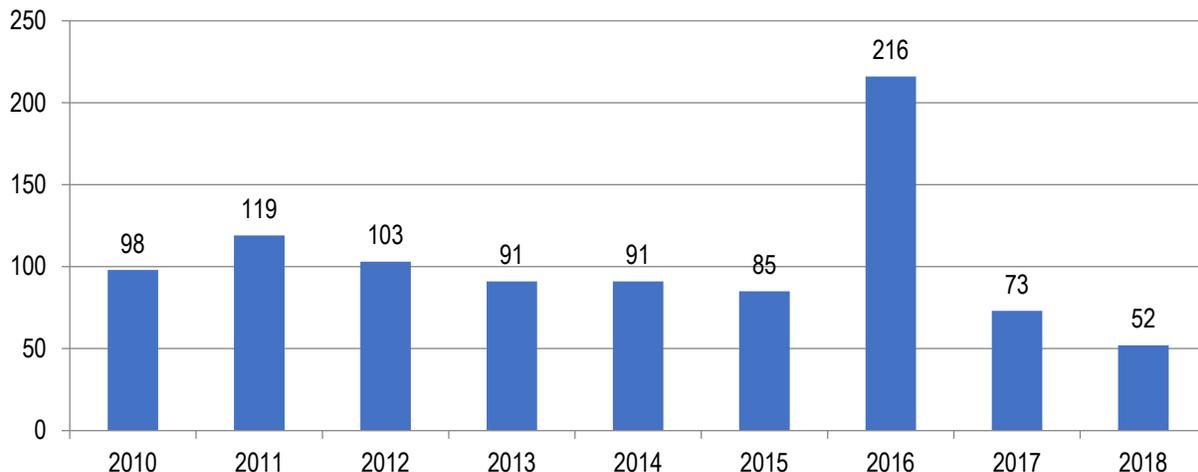
The following summarizes the analysis of complaints filed from 2010 through 2018:

- The total of closed HUD complaints filed against respondents in Houston was 928.
- The two largest shares of complaints by basis are disability discrimination (43.1%) and racial discrimination (28.8%).
- The share of complaints with the basis of disability discrimination has remained relatively steady in the past nine years, from 32% in 2010 to 33% in 2018, spiking to 72% in 2016.
- Although the third most cited basis of complaints in the last nine years, the share of complaints with the basis of national origin has decreased, from 9% in 2010 to 7% in 2018.
- 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 43% of issues alleged in 2010 to 31% of issues alleged in 2018.
- Most issues identified in complaints were related to discrimination in rental housing.
- The closure rates of settlements were higher than those settled around the nation according to HUD’s *FY 2017 FHEO Annual Report on Fair Housing*.

Housing Discrimination Complaints

The following figure shows the number of closed housing discrimination complaints filed with HUD during the period from 2010 to 2018.

Figure 17: Number of Closed Fair Housing Complaints Filed 2010-2018



Source: HUD

The total of HUD complaints was 928. The total number of complaints filed was at its peak in 2016 with 216 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.

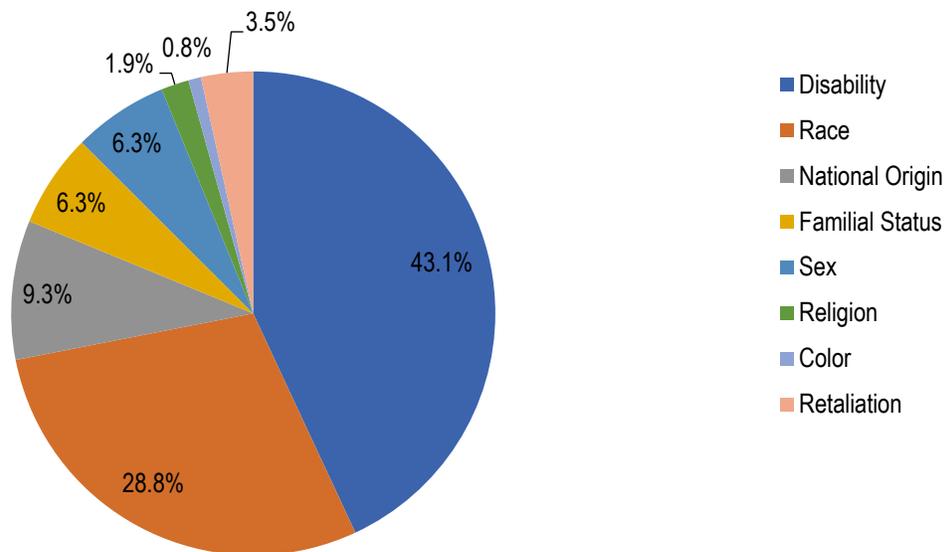


Basis of Complaints

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 2010 to 2018, a total of 1,182 basis in complaints were filed with HUD against Houston respondents. If a single complaint alleged multiple basis, it was counted under each basis alleged.

The following figure shows that the majority of complaints in the past ten years cited disability discrimination as a reason for the complaint (43.1%), being alleged as a basis of 509 complaints. Racial discrimination was the second most common basis of complaints, being cited as a basis for 341 complaints, or 29% of the total complaints within the past eight years. Although 23% of Houstonians are foreign born and 49% of the population speaks another language other than English inside the home, the percentage of housing discrimination on the basis of national origin is very low at 9%. Since Houston is a majority minority city, and residents that are American born could be experiencing housing discrimination based on their perceived national origin, this percentage may be higher, but residents are most likely not reporting these acts of discrimination. The lack of U.S. citizenship and lack of knowledge of the Fair Housing Act from foreign born residents could be factors as to why this percentage is substantially lower than racial and disability discrimination.

Figure 18: Total HUD Closed Complaints by Basis 2010-2018

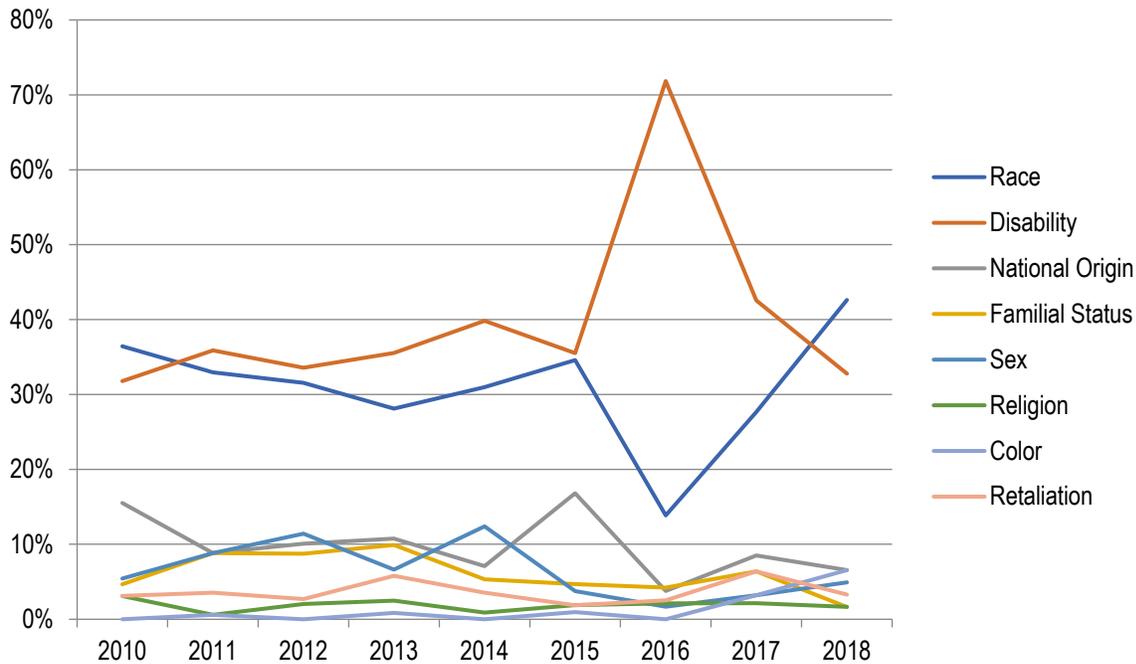


Source: HUD

This data reflects a notable trend in the share of fair housing complaints. The gap between national origin, color, religion, familial status, sex, and retaliation is narrow and accounts for a share much less of the overall complaints. Throughout the majority of 2010-2018, the levels of discrimination on the basis of race and disability remain close but for 2016 when the percentage of fair housing complaints dramatically increased for disability, to 72%, and the percentage for race decreased substantially to 14%.



Figure 19: Basis of Closed Complaints by Year



Source: HUD

National origin is the third highest basis alleged in the overall amount of complaints with 110 complaints filed in the past ten years, 9% of the overall total. Sex and familial status were the fourth and fifth most common complaints in the time period from 2010-2018. Sex was alleged in 75 complaints and familial status was cited as a basis for 74 complaints and sex was alleged in 75 complaints, both at 6% of the overall total.

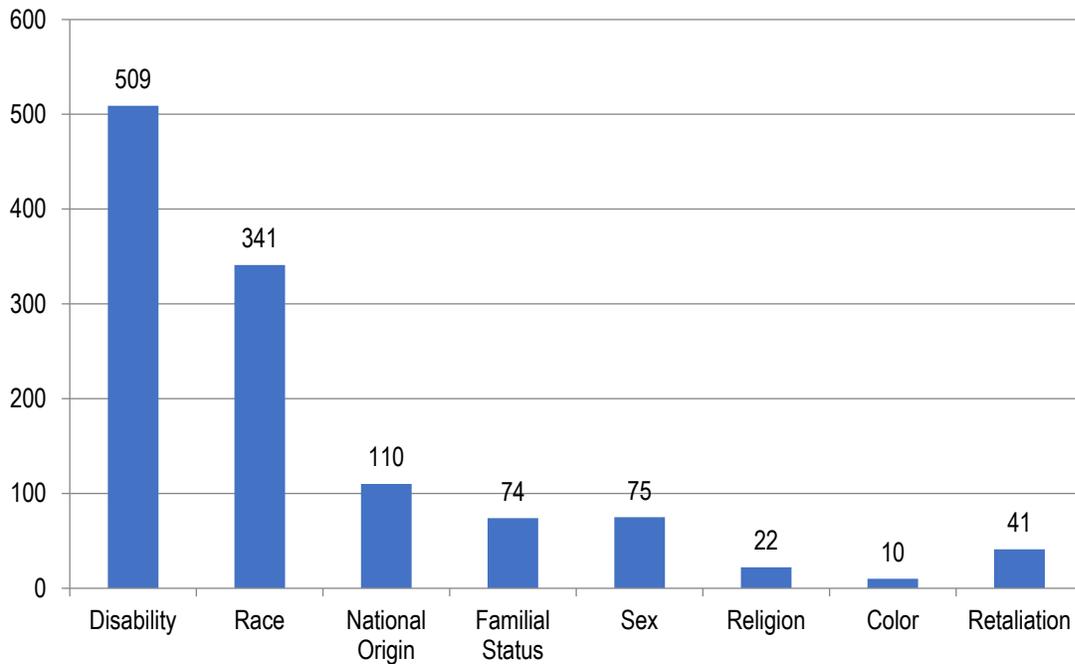
In the past nine years, retaliation, religion, and color were the least common bases of complaints filed with HUD. Retaliation was cited as a basis for 41 complaints, or 3% of the overall total. Religion was cited as a basis for 22 complaints, or 2% of the overall total, and color was cited as the basis for 10 complaints, or 0.8% of the overall total.

Although disability and race are also the first and second most common forms of housing discrimination in the National Fair Housing Alliance’s *2018 Fair Housing Trends Report*, housing discrimination on the basis of disability is more than half (56.7%) of the fair housing complaints nationwide compared to the city of Houston at 43.1%. Nationwide, fair housing complaints based on race are lower than the percentage for Houston, at 15.6%. According to HUD’s *FY 2017 Annual Report on Fair Housing*, disability complaints remain the greatest percentage of all nationwide complaints over the last year.

The figure below illustrates the 1,182 bases alleged in the 928 complaints filed between 2010 and 2018.



Figure 20: Closed Complaints by Basis Filed with HUD 2010-2018



Source: HUD

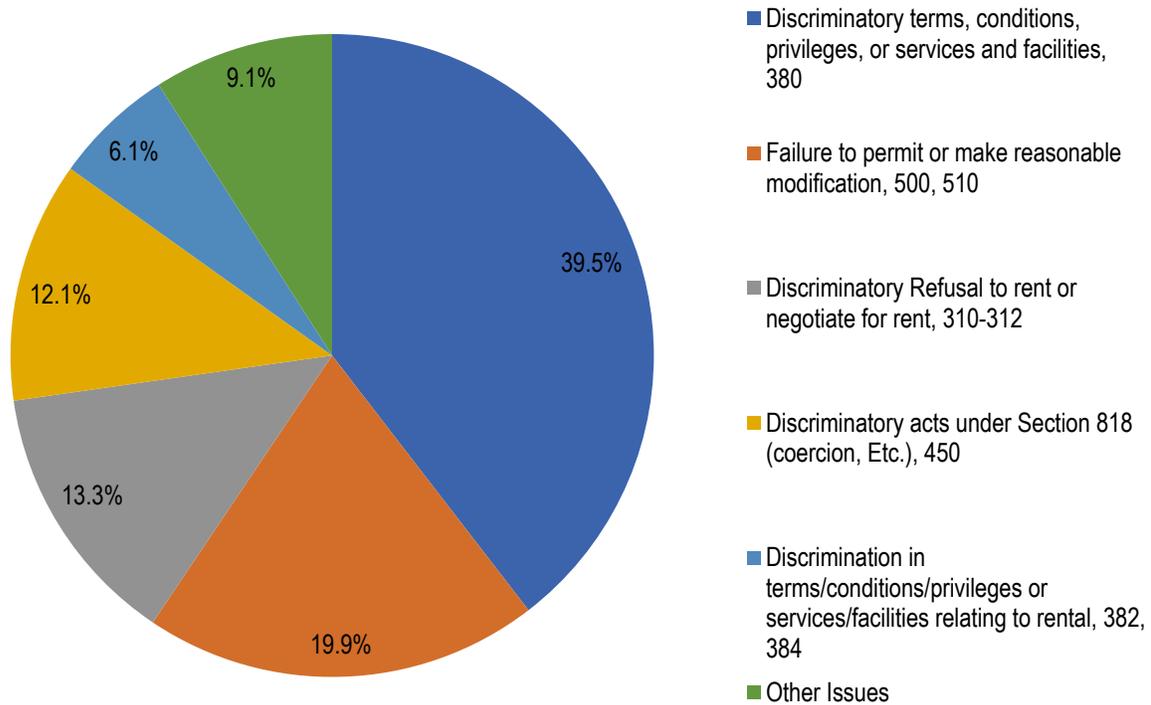
Issues in Complaints

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”.

The following figure shows the percentage of complaints by issue filed with HUD from 2010 to 2018. If a single complaint alleged multiple issues, it was counted under each issue alleged. There were a total of 1,732 issues filed in the past nine years.



Figure 21: Issues in HUD Closed Complaints 2010-2018



Source: HUD

The most common issue in complaints filed within the past nine years was discriminatory terms, conditions, privileges, services, and facilities. This was by far the most common issue in complaints cited in 39.5% of all the total issues filed in complaints.

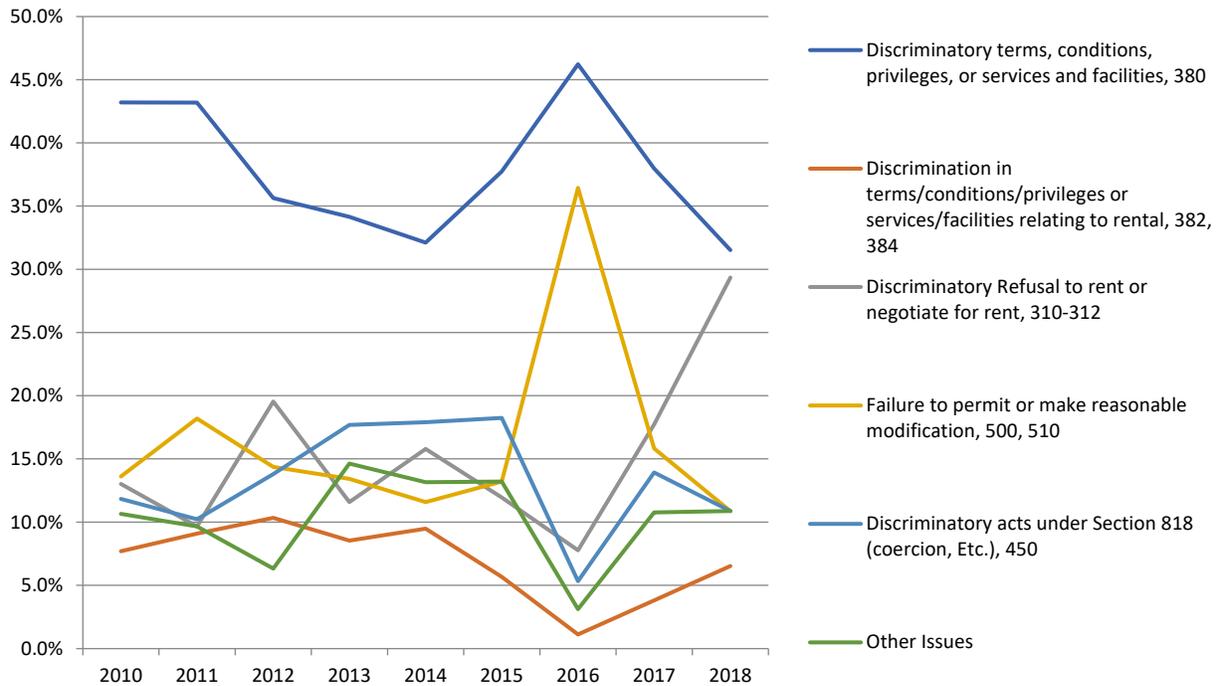
The second and third most common categories of issues in complaints were failure to make reasonable modifications at 19.9% of total issues filed and discriminatory refusal to rent or negotiate for rent at 13.3% of the overall total.

Not far behind is discriminatory acts under Section 818 (coercion, etc.), which had 210 complaints, or 12.1% of the overall total issues filed.

The remaining 15.2% of the complaints were other issues consisting of 9.1%, or 157 complaints. Lastly, discrimination in terms/conditions/privileges or services/facilities relating to rental at 6.1% with 105 complaints within the past nine years.



Figure 22: Issues in HUD Closed Complaints 2010-2018

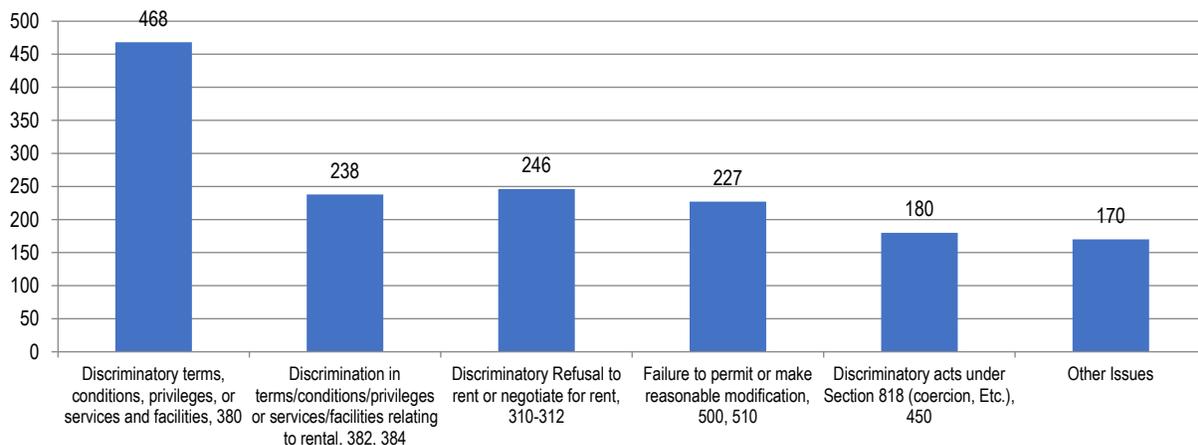


Source: HUD

The top issue cited in complaints made in Houston matched that of the nation, discriminatory terms, conditions, privileges, services, and facilities reported in the *FY 2017 Annual Report on Fair Housing*. As illustrated in Figure 23, the share of issues alleging discriminatory terms, conditions, privileges, or services and facilities has decreased slightly in the past nine years, and discriminatory refusal to rent or negotiate for rent has increased substantially over the past two years.

Figure 24 illustrates the distribution of the alleged issues for the total complaints from 2010 to 2018.

Figure 23: Closed Complaints by Issue Filed with HUD 2005-2014



Source: HUD



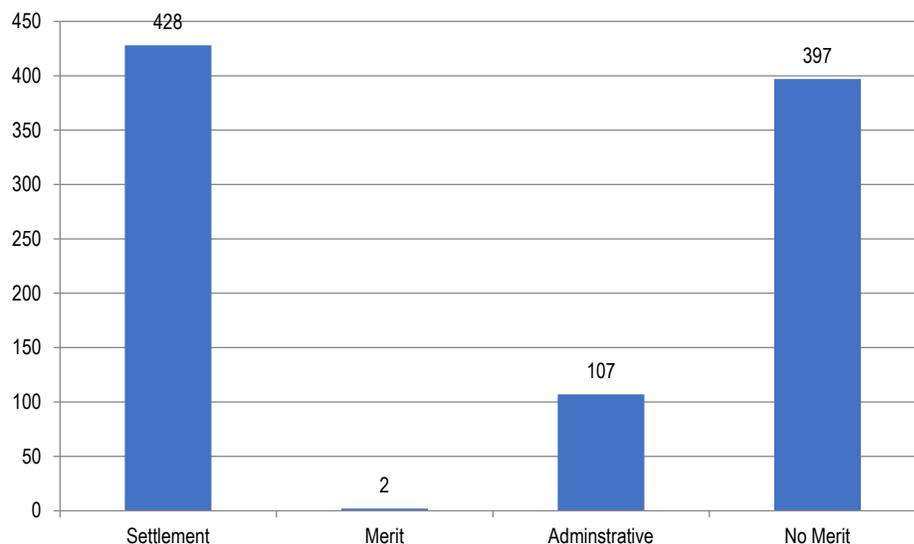
HUD Complaint Closures

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 2010 and 2018 was 932 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 eight years.

Figure 24: Number of Complaints by Closure Category with HUD 2010-2018



Source: HUD

The largest category of housing complaints was closed through a settlement at 46%, followed closely by no merit at 43% due to insufficient evidence to prove a violation. The third largest category was cases closed



were administrative closures (11%). There were only two cases closed under the merit category in the last ten years.

The closure rates of settlements were higher than those settled around the nation according to HUD's *FY 2017 FHEO 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, Race, and National Origin.

Table 51: GHFHC's Complaints Breakdown of Cases by Protected Basis*

	3/21/2014 to 3/20/2015	3/21/2015 to 3/20/2016	3/21/2016 to 3/20/2017	3/21/2017 to 3/20/2018	3/21/2018 to 3/20/2019
Race	155	144	136	181	176
Religion	2	1	2	0	1
Color	0	0	0	2	1
Sex	12	7	5	8	14
Handicap	171	168	179	197	167
National Origin	64	69	49	39	22
Familial Status	21	12	9	12	7
* 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 52: GHFHC's Complaints Breakdown of Cases by Issue*

	3/21/2014 to 3/20/2015	3/21/2015 to 3/20/2016	3/21/2016 to 3/20/2017	3/21/2017 to 3/20/2018	3/21/2018 to 3/20/2019
Rental	304	265	297	320	307
Sales	8	35	14	2	6
Advertising	0	0	0	0	0
Lending (including redlining)	2	0	3	4	1
Interference, Coercion, etc.	0	0	5	3	1
Zoning: Disability Issues	0	0	0	0	0
Zoning: Other Issues	0	0	0	0	0
* 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 five years GHFHC conducted testing on the basis of Race, Handicap, National Origin, and Familial Status. Testing predominately occurred in rental housing.

Table 53: GHFHC's Tests Breakdown of Cases by Protected Basis*

	3/21/2014 to 3/20/2015	3/21/2015 to 3/20/2016	3/21/2016 to 3/20/2017	3/21/2017 to 3/20/2018	3/21/2018 to 3/20/2019
Race	111	98	97	95	86
Religion	0	0	0	0	0
Color	0	0	0	0	0
Sex	0	0	0	0	0
Handicap	0	2	9	22	32
National Origin	9	12	12	2	3
Familial Status	0	8	3	0	0
* 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 Tenant/Landlord 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, 2018 to June 30, 2019 (PY 2018), HCDD staff received 1,395 calls through the Hotline. The majority of the calls pertained to Repairs (50.9%), Landlord/Tenant Relations (35.3%), and Miscellaneous (41.9%); Over one in three (36%) callers listed two or more issues. Repair topics included general repairs, mold, pests, and HVAC problems. Almost all of the tenant/landlord calls regarded at least one of the following: repairs, pests, fees, mold and evictions. The miscellaneous calls were given resources and other referrals to resolve their issue almost 90% of the time, including referrals to contact their landlord/management staff, the Texas Health and Human Services Commission 2-1-1 Helpline, the City of Houston’s 3-1-1 non-emergency request line, legal aid services, the Houston Apartment Association, and other government or social service agencies.

This is an important resource for residents and landlords to gain information about the laws dictating tenant and landlord relationships. Many 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. The free information and referrals that residents have access to through the Fair Housing Hotline is very important to extending education to Houstonians.

Fair Housing Lawsuits and Complaints

HUD sent Mayor Turner a letter on January 11, 2017, initiating an investigation into the City not issuing a Resolution of No Objections for the Fountain View development, owned by the Houston Housing Authority. HUD’s letter deemed that “the City’s actions with respect to Fountain View may have had the purpose or effect of discriminating on the basis of race or national origin.” On March 9, 2018, Mayor Turner announced that the City entered into a two-year Voluntary Compliance Agreement with HUD, resolving the investigation. There were four specific provisions of the agreement, which included the following issues: Houston’s Voucher Mobility Program, Actions with Respect to the Houston Housing Authority, Low Income



Housing Tax Credit Site Selection Policy, and Affordable Housing Development.⁷² Many of these actions that the City has taken since the 2018 agreement are reported in the section of this document, “Progress Since the Previous AI.”

On October 31, 2017, the Texas Low Income Housing Information Service (Texas Housers), sent a letter to Anna Maria Farias, assistant secretary for Fair Housing and Equal Opportunity at HUD asking HUD to investigate Houston’s water control infrastructure and flood plain protections for neighborhoods that are predominantly occupied by minority populations that contain significant concentrations of affordable housing. Then, in March 2018, Texas Housers worked with lawyers to file a complaint against HUD, which alleges that HUD has not enforced federal civil rights obligations against the City of Houston.⁷³ The City of Houston was not named as a defendant in the lawsuit. On December 3, 2019, the United States District Court for the District of Columbia granted HUD’s motion and dismissed the complaint.

Community Attitudes and Housing Discrimination

In the 2019 Community Needs Survey, about 14% of survey participants reported having experienced housing discrimination in the Houston Area in the past five years, and 24.7% did not know whether they had experienced discrimination, showing that almost a quarter of respondents do not know how to identify housing discrimination or that discrimination is hard to identify. The top two issues of housing discrimination that survey respondents said that they had experienced in the last five years related to rental housing, “A landlord refused to rent or respond to a request” and “A landlord gave stricter rules than the others living in same housing complex,” but third and fourth issues followed closely and were related to realtors, “A real estate professional refused to sell or respond to requests for their services” and “A real estate professional directed me/someone I know to only undesirable neighborhoods.” The top basis cited by survey respondents were race/ethnicity/color, age, gender/sex, and disability.

In addition, the Express Survey showed that 12.7% of people surveyed had been discriminated against in the last five years when looking for housing. Also, almost one-fourth of those surveyed did not know that it was illegal to deny housing based on a protected class. In addition, half of the respondents did not know what to do if they experienced housing discrimination. These surveys may show that housing discrimination is more prevalent than what the HUD complaint data shows. It also shows that people are not informed of their rights under the law and need information regarding fair housing and what to do if they are discriminated against in a housing transaction.

Fair Housing Opposition

In April 2019, the City of Houston promoted fair housing through an information campaign highlighting the seven protected classes under the Fair Housing Act advertised through print media and social media during fair housing months. The City worked with the Houston Chronicle to advertise the campaign in the Chronicle’s print edition, their website, and their Facebook page through promoted advertisements. “Facebook allowed five of the seven ads but blocked ads regarding race and religion flagging them as

⁷² Ortiz, Alvaro. Houston Public Media, March 9, 2018, “Turner Announces Agreement Resolving HUD’s Investigation that Found Improprieties on Procedures for Low Income Housing Projects.”:

<https://www.houstonpublicmedia.org/articles/news/2018/03/09/272519/turner-announces-agreement-resolving-huds-investigation-that-found-improprieties-on-procedures-for-low-income-housing-projects/>

⁷³ National Low Income Housing Coalition. March 26, 2018. “Texas Housers Sues HUD over Fair Housing Agreement.”

<https://nlihc.org/resource/texas-housers-sues-hud-over-fair-housing-agreement-houston>



'related to politics on an issue of national importance.'"⁷⁴ Even when providing information and educational material about a 50-year-old Federal law, opposition still exists.

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. Yet when affordable housing is located in some neighborhoods, opposition exists.

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

HUD reviewed emails from constituents to local representatives concerning Fountain View, the transcript of the public meeting on the project, and local news reports, and highlighted some of the local opposition that it found in part to be racially motivated and factually unfounded in its letter sent to Mayor Turner on January 11, 2017.

- "Crime in the area will go up. Do you remember how bad the crime was after Katrina? Regardless of how charitable we would like to be; the reality is that in the lower income areas of Houston the crime is higher. Bringing them here will only bring down this area."
- "I have seen low income housing developments...I have seen the trash that's around them. I've seen them move two to three families into one apartment because then they can be affordable"
- "...they have no right to come to our school?"
- "...people come in here and they steal the tires off Suburbans and we have people wandering around here?"
- "This project would cause a precipitous decline in real estate values and overload the schools."
- "Building a huge public housing project...at Westheimer and Fountainview which will crowd an already overcrowded good elementary school is a terrible project! Shame on you and city of Houston! Typical Waste of money that will only destroy a viable area."
- "It has been proven in the past what happens to the home values of neighborhoods that have seen the abuses of low income housing projects. There is so much other opportunity to develop these projects in the Houston area, and more rundown areas even that need and would appreciate improvement. Fountainview and Westheimer area is not one of these areas and we are all mystified as to why this area was even selected in the first place?"
- "I am not the only person in our area that is extremely opposed to any vote in favor of extending tax credits for this project. This real estate should be developed in accordance with the existing neighborhood as another source of income for the city and HISD, to persons or companies that can pay the high property taxes and help contribute to. Rather than bring down, this established neighborhood. Giving tax credits here just doesn't make sense!?"

⁷⁴ Smith, Sarah. May 15, 2019. "Facebook denies Houston's ads promoting fair housing over race, religion references." <https://www.chron.com/news/houston-texas/houston/article/Facebook-denies-Houston-s-ads-promoting-fair-13847765.php>



In 2019, Avenue, a Houston nonprofit organization, proposed an affordable housing development in Oak Forest. The organization had to reconsider the project after homeowners voiced concerns that the building would become a strain on the neighborhood. It was the second affordable housing proposal in the a few miles south in just a few weeks that had to be rethought after residents expressed concerns over traffic, school crowding and declining property values. Mary Lawler, the executive director of Avenue said: “It’s a growing problem here. Developments like the one we are proposing are really important to meeting those needs and to help Houston succeed economically.”⁷⁵

In November 2019 a judge put a temporary restraining order on HHA as a result of a lawsuit filed by a property owner and developer in the East End. This put a hold on two developments. The suit claims that the information included in public notices and the agenda was too vague to convey the votes related to the purchase of property along the bayou for developments. “The proposed projects, which would be owned by the Housing Authority and would contain a mix of affordable and market-rate units, have drawn pushback, with residents and small business questioning the Authority’s plans to bring so many units to an area they say is already flush with affordable housing.”⁷⁶ These new units could help to replace those lost in the east end by the I45 expansion.

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 some prejudices are so engrained it requires both informational efforts and time.

Hate Crimes

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 (2008-2017) 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 2008 and 2017, a total of 153 hate crimes were reported in the City of Houston.

⁷⁵ Sarnoff, Nancy. February 20, 2019. “Residents influence affordable housing projects.” https://www.chron.com/business/real-estate/article/Residents-influence-affordable-housing-projects-13631842.php?t=fdc7672b06&utm_content=chron_sf_realestate_recco_v1&ipid=chronsfrealestate

⁷⁶ Schuetz, R.A. November 20, 2019. *Houston Chronicle*. “Two affordable housing projects in the East End put on hold during suit.” <https://www.chron.com/business/article/Houston-Housing-Authority-sued-over-alleged-open-14847653.php>



Table 54: Hate Crimes by Bias Motivation in Houston and Texas 2008-2017

		Race / Ethnicity / Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2008	Houston	14	6	10	0	*	*	28
	Texas	166	25	55	0	*	*	246
2009	Houston	8	1	5	0	*	*	14
	Texas	111	18	36	0	*	*	165
2010	Houston	7	0	6	0	*	*	13
	Texas	103	19	34	0	*	*	156
2011	Houston	8	1	4	0	*	*	13
	Texas	67	19	43	0	*	*	129
2012	Houston	4	3	6	0	*	*	13
	Texas	83	19	49	1	*	*	152
2013	Houston	8	0	5	0	*	*	13
	Texas	79	7	44	2	*	*	132
2014	Houston	5	5	6	0	0	0	16
	Texas	83	19	40	0	1	2	145
2015	Houston	12	3	10	0	1	1	27
	Texas	107	36	41	1	1	5	191
2016	Houston	3	1	2	0	0	2	8
	Texas	104	23	37	5	1	8	178
2017	Houston	2	3	1	0	0	2	8
	Texas	117	22	43	3	1	6	192

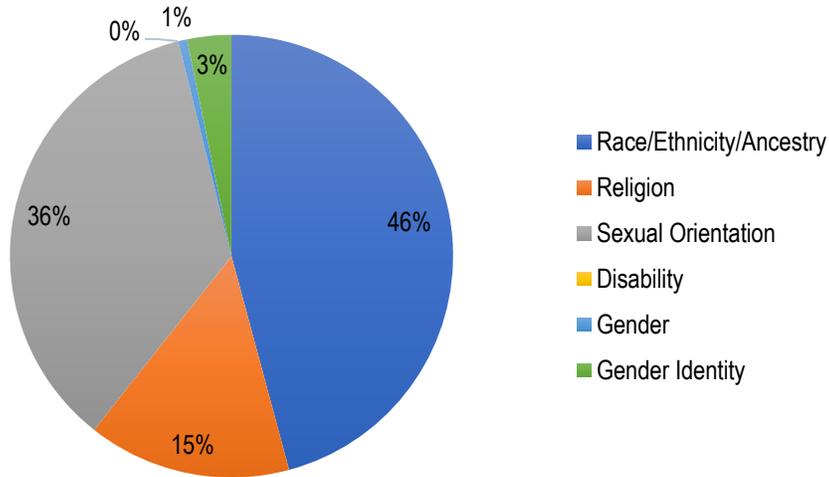
Source: FBI Uniform Crime Report: <http://www.fbi.gov/stats-services/crimestats>

*Categories added 2014

Of the 153 hate crimes reported in Houston during this period, almost half (46.4%) were motivated by race/ethnicity/ancestry which was less than the Texas percentage motivated by race/ethnicity/ancestry at 60.5%. A higher percentage of crimes reported in Houston were motivated by sexual orientation and religion compared to 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.

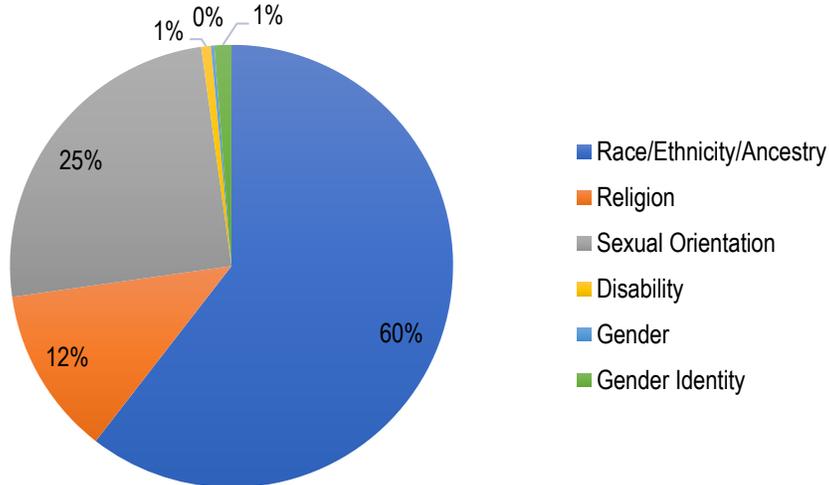


Figure 25: Hate Crimes by Bias Motivation in Houston 2008-2017



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

Figure 26: Hate Crimes by Bias Motivation in Texas 2008-2017



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. Information 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 public participation process also reveal that the lack of enforcement can be a barrier. Not only is enforcement of fair housing important but the enforcement of other codes and regulations related to conditions at multifamily properties and boarding homes for persons with disabilities is also 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.



10. Disaster Recovery in Houston

Introduction

The Houston region has experienced several storm events in the past ten years that have caused severe flooding and resulted in several presidentially declared disasters. Hurricane Ike was a category 2 storm when it made landfall in Galveston in 2008. It caused wind and flood damage to many residents of the region. In 2015 and 2016, the Texas Gulf Coast region and the wider Houston area was impacted by several storms and received unprecedented level of heavy rainfall resulting in repetitive flooding of several neighborhoods in the city. In 2017, Hurricane Harvey brought yet more unprecedented amount of rainfall that caused large-scale flooding throughout the city. Finally, Tropical Storm Imelda was a tropical cyclone that set record-breaking floods in southeast Texas, including flooding in Houston in September 2019. All these storm events received a major disaster declaration by the president.⁷⁷

The high frequency and severity of urban flooding in Houston has impacted the city's housing, infrastructure, economy and environment. The impact on housing has been relentless. Many homes and neighborhoods have flooded multiple times in the past five years and residents are dealing with rising cost of home repair, increased housing unaffordability and higher rates of homelessness. Fair housing issues are closely connected to disaster recovery implementation.

Research on Natural Disasters and Protected Classes

Although natural disasters do not discriminate, the long-term impact disproportionately falls on low-income communities of color. These are families that often lack resources to manage even minor financial emergencies, and many struggle every day to secure housing, food, and healthcare, while maintaining employment. Often, families that cannot afford to immediately cleanup after a flood are left to deal with health consequences from mold-infested, uninhabitable housing. In addition, undocumented households or individuals that do not speak or understand English well can be left out of assistance.

"Cities are often very unequal to begin with," said James Elliott, a sociologist at Rice University. "They're segregated and there are lots of income disparities, but what seems to happen after natural hazards hit is these things become exacerbated."⁷⁸ Researchers show that not only the damages from natural disasters but also the relief provided could increase the growing gap between White and Black wealth. The following shows how the main sources of disaster relief can exclude some residents from benefiting.

- NFIP is only for those who have flood insurance.
- SBA loans are available to those with a minimum credit rating.
- Tax breaks benefit those with higher incomes.⁷⁹

A study by Junia Howell and James Elliott, *Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States*, reveals that natural disasters exacerbate wealth inequality. White households and those with more education gain wealth after natural disasters, while minority households and renters lose wealth. The authors found that in counties with extensive hazard damages of at least \$10

⁷⁷ A major disaster declaration provides a wide range of federal assistance programs for individuals as well as public infrastructure. It includes funds for both emergency and long-term disaster recovery.

⁷⁸ Hersher, Rebecca and Benincasa, Robert. March 5, 2019. NPR. "How Federal Disaster Money Favors the Rich" <https://www.npr.org/2019/03/05/688786177/how-federal-disaster-money-favors-the-rich>

⁷⁹ Howell, Junia and Elliott, James R.. December 4, 2018. "As Disaster Costs Rise, So Does Inequality." <https://journals.sagepub.com/doi/full/10.1177/2378023118816795>



billion from 1999 to 2013, White households gained \$126,000 in wealth, on average. By comparison, black households lost an average of \$27,000 in wealth and Hispanic households lost \$29,000. The authors found a similar pattern with homeownership and education. Homeowners gained wealth, while renters lost it. Households with more education gained more wealth after disasters than households with less education. FEMA assistance contributed to these wealth disparities, and counties that had more FEMA assistance (net of local damages) saw even greater racial disparities in wealth accumulation.⁸⁰

In another study, NPR examined one federal disaster program and found evidence of exactly that phenomenon. The program uses federal and local money to purchase homes that have flooded or been affected by other natural disasters and permanently turn the lots into green space to reduce flood risk. The buyouts are voluntary, and the homeowner can use the money to move to a safer place. Buyouts have disproportionately gone to whiter communities. NPR analyzed records of about 40,000 property buyouts funded by FEMA and state and local governments and found that most of them were in neighborhoods that were more than 85 percent white and non-Hispanic. For context, the nation as a whole is 62 percent white/non-Hispanic, and disasters affect communities of all demographics.⁸¹

Impacts of Recent Disasters

The cumulative impact of these disasters has been devastating in Houston and the scale of damage, both physically and financially, is unparalleled. Thousands of residential and commercial buildings were damaged, some several times in the last decade. Infrastructure has been overwhelmed or destroyed, and there has been loss of life and property. Residents that have been impacted by multiple disasters have often exhausted their recovery options, leaving them more vulnerable and at risk of being further negatively impacted by future disasters. Repetitive flooding has exacerbated poverty, homelessness, health challenges, and negative economic impacts at the individual and regional scale, particularly in the most socially vulnerable communities. Houston’s future will be defined by how flood risk is addressed and investment in innovative and holistic approaches to flood risk reduction will help improve health and quality of life.

The following table presents the total estimated cost of residential damages incurred from each of these storm events, and the corresponding CDBG-DR funds that the City received.

Table 55: Federally Declared Disasters in Houston 2015 – 2017

Disaster	Year	Estimated Residential Damage	City of Houston CDBG-DR Funds
Memorial Day and Halloween Flood Events	2015	\$524,689,073	\$87,092,000
April (Tax Day) and May/June Flood Events	2016	\$157,976,496	\$23,486,698*
Hurricane Harvey	2017	\$15,871,516,366	\$1,275,878,041*

*For 2016 and 2017 disasters, the City of Houston received CDBG-DR funds from the Texas General Land Office as a subrecipient.

Source: City of Houston Housing and Community Development Department

The following describes impacts from Hurricane Harvey, as it was the most costly disaster and impacted the most number of people and businesses.

⁸⁰ National Low Income Housing Coalition, September 4, 2018. “Natural Disaster Exacerbate Wealth Inequality.” <https://nlihc.org/resource/natural-disasters-exacerbate-wealth-inequality>

⁸¹ Hersher, Rebecca and Benincasa, Robert. March 5, 2019. NPR. “How Federal Disaster Money Favors the Rich” <https://www.npr.org/2019/03/05/688786177/how-federal-disaster-money-favors-the-rich>



Hurricane Harvey

As a result of Hurricane Harvey, over one quarter of all Houston homes were damaged or destroyed by floodwater, and approximately one in ten households citywide had flooding inside their home. The majority of the flooding occurred outside of Federal Emergency Management Agency (FEMA) flood zones, signifying the enormity of the event. The direct damage to homes caused by floodwaters and the indirect impacts resulting from the flooding, such as displacement, have impacts on the broader housing market.

A total of 208,532 households in Houston were impacted, meaning the household sustained some form of damage to their home or personal property. Approximately half of the impacted households are low- and moderate-income households, incurring an estimated damage of \$5.2 billion. The damage to non-low- and moderate-income households is more than \$10.6 billion. The difference in damage amounts between these two income categories is due to housing values, where low- and moderate-income households own and rent homes that are lower in value compared to non- low- and moderate-income households.

Almost two-thirds of the federal assistance provided has been through the National Flood Insurance Program (NFIP), signifying that households without flood insurance are likely to have received little or no assistance. The citywide percentage of remaining need unmet is 81%. While there were slightly more homeowners impacted than renters, renters and owners of rental housing received less assistance than homeowners, leaving the percentage of remaining need unmet higher for renters and rental housing, at 83.3%. The amount of damage to single family homes was much higher than multifamily homes, however, single family homes have received the majority of assistance.

With high levels of flooding on the west side of Houston, many homes with high values were damaged, and even though these neighborhoods received the greatest amount of assistance, there remains a high amount of unmet need. Other neighborhoods have had very little assistance provided, and many of these neighborhoods have lower property values, resulting in lower unmet need amounts. Despite relatively lower unmet need in terms of resources, many of these neighborhoods have higher remaining unmet need in terms of percentage of damage experienced. In addition, many of these neighborhoods are least likely to cope with and recover from impacts from disasters due to poverty, disability, limited English speaking ability, or homelessness. Information gathered through community engagement is also used in this assessment. Community feedback prioritized needs like home repair, supportive services, and assistance for vulnerable populations such as seniors and persons with disabilities. The need for mitigation, infrastructure improvements, and neighborhood development were also prioritized in connection with housing.

Public Input

After Hurricane Harvey, the City engaged with the community to receive feedback regarding the needs related to the impact of Hurricane Harvey and long-term needs to assist with resilience efforts for two required action plans, one for CDBG-Disaster Recovery for Hurricane Harvey (CDBG-DR17) and one for CDBG-Mitigation (CDBG-MIT).

In May and June 2019, to support the development of an action plan for CDBG-DR17, HCDD convened 18 public meetings on long-term housing recovery. More than 800 Houstonians attended these events in person, and another 700+ participated in an online survey. More than 3,000 attended a tele-townhall co-hosted with the AARP of Texas. Initial findings from public meetings included that

- Some people have been able to rebuild, but others are stuck in unsafe homes



- In areas that didn't flood, longtime residents want protection from displacement
- In areas that flooded badly, a rise in vacant homes is threatening the fabric of communities
- Vulnerable Houstonians need special attention
- Harvey heightened housing challenges for renter
- People want clear communication from trusted sources
- People don't understand the disaster recovery process

During the comment period for the draft action plan for CDBG-DR17, HCDD received 27 comments from a range of organizations and residents. The following themes emerged from the public comments.

- Connect recovery investments to existing initiatives, especially Complete Communities
- Advance equity through recovery spending
- Use recovery funds to enhance job skills, training, and wages
- Engage communities and be transparent
- Consider accessibility in recovery planning and programs
- Conduct additional data analysis
- Income considerations

As a part of the development of the CDBG-Mitigation Action Plan, the City of Houston held two public hearings, in November 2019 and January 2020, and gathered input through discussions and public testimony. Flooding in Houston over the past five years has impacted many Houstonians and their families financially, physically, and emotionally. Many of the same feedback received as a part of the Local Action Plan for Hurricane Harvey was reiterated in the more recent public engagement forums. Residents do not want to have their homes flooded again and are frustrated when assistance seems slow to arrive. Community input received during the public hearings asked for a coordinated effort between the City and other agencies, such as the Harris County Flood Control District, to maintain, enlarge, and improve stormwater infrastructure to decrease the risk of residential structure flooding in the future. Residents also voiced their support of improving building and land development codes to address future flood risks. Additionally, some questioned the way infrastructure is prioritized and discussed how the types of data used to determine infrastructure need may be biased against low-income communities or neighborhoods with a majority of residents of color. The majority of Houstonians providing input for the development of the CDBG-MIT Action Plan wanted to continue to live in their communities or even their current flood-damaged home but wanted their community improved so that flood risk is substantially decreased.

Harvey Recovery Programs

The City of Houston received \$1.3 billion from the U.S. Department of Housing and Urban Development (HUD) through the Texas General Land Office (GLO) to address impacts from Hurricane Harvey. The following is a summary of the activities using this funding

- The **Harvey Homeowner Assistance Program (HoAP)** helps eligible homeowners rebuild after Hurricane Harvey through home repairs, reconstructions, and reimbursements.
- The **Harvey Multifamily Program** addresses the underlying shortage of affordable rental units by creating new, flood-resilient apartment complexes that can be rented affordably.
- The **Harvey Homebuyer Assistance Program** provides up to \$30,000 in down payment assistance to eligible first-time homebuyers and people replacing homes destroyed during Hurricane Harvey.



- The **Harvey Buyout Program** purchases flood-prone apartment complexes and converts these areas into green space, detention ponds, or other disaster mitigation projects
- The **Harvey Recovery Small Rental Program** supports the work of local non-profits who are building and rehabilitating small (1-7 unit) rental complexes.
- The **Harvey Public Services Program** supports the work of selected non-profits who are providing essential services to Houstonians still trying to recover.
- The **Harvey Single-Family Development Program** supports the construction of new, flood-resilient homes to alleviate the strain in the housing market, particularly for low-income households.
- The **Harvey Economic Development Program** allocates funds to small businesses that were damaged during Hurricane Harvey to help boost recovery from all sectors.

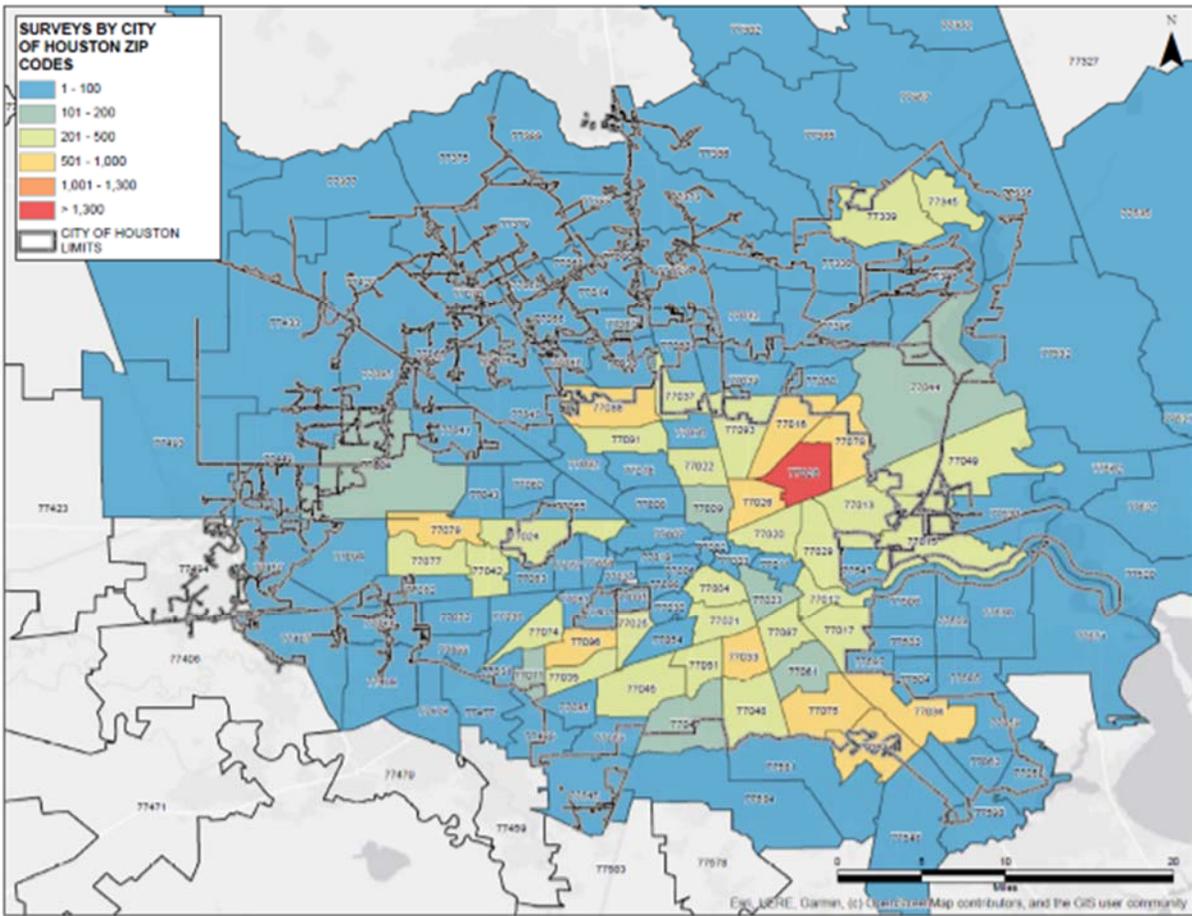
In an effort to advertise the programs to all residents in need, especially those that were part of the vulnerable populations, HCDD initiated an extensive public engagement and awareness programs. In January 2019, the City of Houston kicked off the Build It Forward program by opening the Hurricane Harvey Survey, which was the first step towards securing recovery assistance. The City of Houston opened four Housing Resource Centers and aggressively advertised the survey in a variety of ways to reach low- and moderate-income and vulnerable households. Advertising included attending 168 community outreach events and canvassing 181,817 homes, primarily in socially vulnerable neighborhoods. This resulted in

- 20,822 surveys from households in total (excluding duplicate address surveys),
- Over 80% surveys are homeowners interested in the Homeowner Assistance Program
- 71% of survey respondents are low- and moderate-income, reflecting the program's outreach goals of reaching people who are usually left behind after a disaster

At the same time, the City was building capacity to repair and reconstruct homes and reimburse homeowners for repair expenses. The first homeowners were served in April 2019, with steady ramp up since then. In an effort to serve the most vulnerable populations, the City prioritized certain households first to receive assistance: low- and moderate-income households with a household member that is 62 or over or has a disability, low- and moderate-income households with a household member under 18 years, and households with income below 50% of the area median income. The following shows the Application invitations for the HoAP, which shows how the priorities have worked to target vulnerable households.



Map 40: Build It Forward Surveys



Source: HCDD, *Hurricane Harvey Situation Report #7, February 2020*

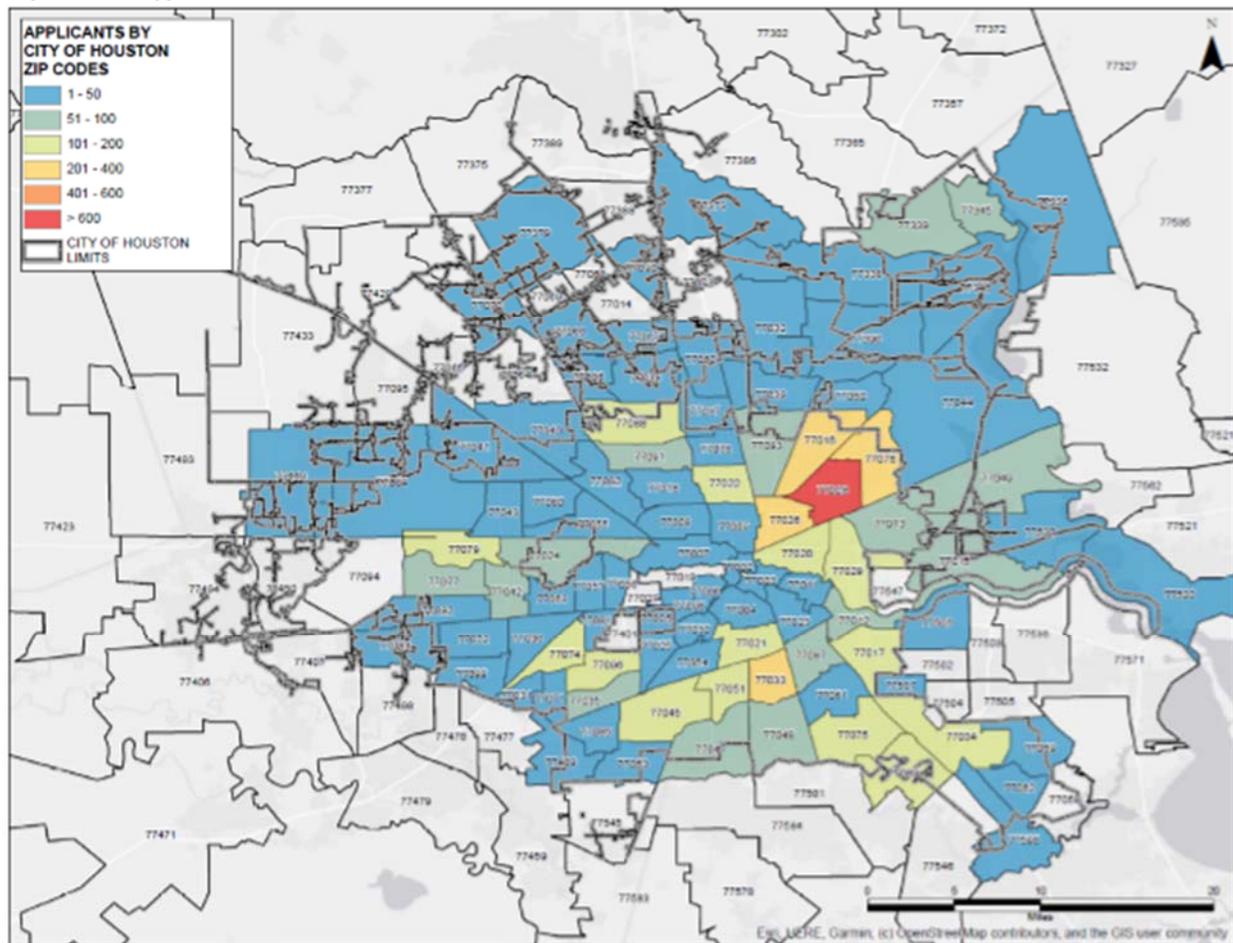
Table 56: HoAP Application Invitations as of February 28, 2020

Type	Number of Invitations
Low- and Moderate-Income Invitations	5,003
Below 30% AMI	2,503
31-50% AMI	1,480
51-80% AMI	1,020
Seniors Invitations	4,408
Below 30% AMI	2,214
31-50% AMI	1,305
51-80% AMI	889
People with Disabilities Invitations	3,908
Below 30% AMI	2,087
31-50% AMI	1,141
51-80% AMI	680
Total Invitations	5,635

Source: HCDD, *Hurricane Harvey Situation Report #7, February 2020*



Map 41: HoAP Applications



Source: HCDD, *Hurricane Harvey Situation Report #7, February 2020*

Fair Housing Concerns

Federal funding is important to help affected households' recover after disaster. But the distribution of this funding can sometimes exacerbate existing inequities. Flooding will continue to become more frequent and intense over time. But not only disasters related to flooding will be issues in the next five years. Man-made disasters and economic shifts can also impact low-income and communities of color in the same ways as natural disasters. The Houston area recently had two man-made disasters, including the fire at the Intercontinental Terminals Company storage facility in Deer Park in March 2019 impacting air quality of nearby communities of color and an explosion at a northwest manufacturing business in January 2020 damaging nearby homes. In addition, health emergencies and the recovery, such as COVID-19 pandemic, can also have a more devastating impact on low-income communities. In response to recent flooding disasters, HCDD is leading the approach to rethink disaster recovery through an equity lens.



11. 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.

As staff met with groups of residents and stakeholders during discussions at mobile meetings, residents were asked to review the impediments from the 2015 AI. Generally, residents agreed that these impediments were still barriers to fair housing choice. In an effort to consolidate and avoid reporting duplications, all but two impediments have been carried forward from the 2015 AI. 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 continue to be categorized under four fair housing and neighborhood rights that incorporate affirmatively further fair housing principles of reducing segregation and expanding equal opportunity.

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 Housing Affordability and 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 fear of displacement.

7. Lack of Access to Financial Education / Discriminatory Banking Practices

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 equitably provided to all neighborhoods.

8. Imbalanced distribution of Amenities, Services, and Infrastructure Between Neighborhoods
9. NIMBY Resistance
10. Lack of Transportation Options
11. Increased Health Hazard Exposure in Certain Neighborhoods

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

12. 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 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 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

Discrimination in rental or homeowner housing for all protected classes continues to be an issue in Houston. Disability, race, national origin, and familial status continue to be at the basis for the majority of alleged complaints made to HUD in recent years. The 2019 Community Needs Survey revealed about 14% of survey participants reported having experienced housing discrimination in the Houston Area in the past five years, and 24.7% did not know whether they had experienced discrimination. The top four bases of discrimination reported by survey respondents were: race / ethnicity / color, age, gender / sex, and disability. In the Express Survey, 12.7% of survey respondents reported they were discriminated against in housing in the past five years.

Discrimination in rental housing continues to be a concern as it is the most identified issue in HUD fair housing complaints. In the 2019 Community Needs Survey, the top two discriminatory issues survey respondents identified as experiencing were related to rental housing: “A landlord refused to rent or respond to a request” (13.6%) or “A landlord gave stricter rules than to others living in same housing complex” (10.2%). 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.

Discriminatory mortgage practices based on protected class remains an issue of concern in the Houston mortgage market. As illustrated by the most recent HMDA data, people of color had a higher rate of denial and a lower application rate, as did females. Although the majority of subprime loans were made to non-Hispanic White borrowers, Hispanic borrowers had the highest ratio of subprime loans.

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. No known local research providing fair housing choice analysis exists for incorporation into this AI. Steering can be an issue that encourages segregation. Steering is an illegal practice in which professionals only show homes in certain complexes or neighborhoods due to perceived wants or needs based on a protected class. In the 2019 Community Needs Survey, third and fourth top discriminatory issues survey respondents identified as experiencing were related to real estate professionals: “A real estate professional refused to sell or respond to requests for their services” (10.0%) or “A real estate professional directed me to only undesirable neighborhoods” (9.0%).

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.

Objective

To reduce this impediment over the next five years, the City will undertake actions that will work to fulfill the following objectives.

- Provide resources to residents who may have experienced discrimination
- 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



Impediment #2: Lack of Knowledge about Fair Housing

Impediment

Information about fair housing rights is not universally known to organizations working with people of 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 toward a protected class.

Analysis

An issue that was repeated during the resident and stakeholder engagement process was the need for additional fair housing education. Fair housing knowledge was also mentioned as a barrier for staff of governmental agencies and organizations partnering with HCDD but also for residents.

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. Also, both the 2019 Community Needs Survey and the Express Survey indicated that residents do experience housing discrimination, at 12.7% and 14% respectively. The Express Survey also showed underreporting when respondents were asked what they would do when or if they were discriminated against in housing. Only 15.7% said that they would report it and almost half (48.8%) said they would do nothing. Providing education, resources, and continued outreach is needed for city or stakeholder staff and residents who may not know about or not understand fair housing.

In addition to providing education to residents, the public engagement process also promoted the idea that residents should be involved and advocate for fair housing.

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 residents



Impediment #3: Lack of Housing Affordability and Options

Impediment

There are not enough quality affordable housing units to meet the demand in Houston. 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

Many low-income residents, including residents of protected classes, have less access to quality affordable housing. Even housing options that are affordable to moderate- or middle-income residents of protected classes are deteriorating, flood damaged, or have environmental hazards.

Many affordable housing options are located in certain neighborhoods with limited access to jobs, services, and amenities available in other neighborhoods. High opportunity in 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

Affordability was top concern that came up in almost all Mobile Meetings. In the 2019 Community Needs Survey, over half of all survey respondents had challenges related to affordability and quality when looking for housing: “having enough money for rent or mortgage payments” (64.7%), having enough money for a rental deposit or down-payment” (59.8%), and “finding a home that is good condition” (52.7%). Affordability relates to housing for all income groups rather than just the low- and moderate-income groups. Houston’s 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.

Since approximately half of Houston’s households are low- and moderate-income and the lower-income households are growing at a faster rate than middle- and upper-income households, having a number of affordable housing options in the community is imperative when helping families. The public participation process revealed that the lack of affordable housing units continues to be an issue in the community. Data from the analysis in this document also showed that Houston has a lack of affordable housing options. According to 2012-2016 CHAS data, housing cost burden is by far the most common housing problem in Houston, affecting 246,900 low- and moderate-income households, including 127,495 households with severe cost burden paying over half of their income for housing. Approximately 30.7% households are severely cost burdened: 106,420 (22%) renter households pay over 50% of their income for rent and 31,585 (8.7%) of homeowners pay half or more of their income for housing costs.

There is also a lack of affordable housing options located in certain areas of the city. Some homes affordable to low- and moderate-income families live 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 home developments are located in mostly low-income neighborhoods. In addition, market rate housing affordable for low- and moderate-income households are often in older homes, which may need a higher cost of repairs and may have additional health hazards, like lead-based paint or asbestos.

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.

Two impediments from the 2015 AI, Lack of Affordable Housing Options and Affordability, were combined to create a new impediment, Lack of Housing Affordability and Options.

Objective

The City will work towards creating more homes and preserving homes especially for persons 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 homes for low- and moderate-income households
- Expand the supply of affordable homes for low- and moderate-income households
- Increase housing choice for low-, moderate-, and middle-income households
- Support initiatives to maintain affordable housing in areas where land values are increasing



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 citywide, these households and individuals are most affected. For instance, finding housing with accessibility features is very limited. Sometimes, residents without disabilities rent homes with accessible features, which further reduces existing, available stock. In addition, accessible homes located where neighborhood conditions do not present barriers are also very limited. In the 2019 Community Needs Survey, of the survey respondents with a household member living with a disability, over one-fourth said that the following four services or amenities were difficult for the person with a disability to use or access in their neighborhood: sidewalks (37%), services and amenities (30.9%), public transportation (28.4%), and participating in community and civic activities (26.1%). 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, costs to accommodate homes, the lack of data used to describe the spatial distribution of persons with disabilities, and accessible housing as it relates to structural and neighborhood conditions. Another concern raised was how persons with disabilities are negatively impacted by natural disaster such as flooding.

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 city level is often utilized. Reliable data, as it relates to accessible housing or neighborhood conditions for the disabled, has not been readily available.

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.



-
- Increase availability of accessible units for low- and moderate-income households
 - Gather research and data to better understand and describe the needs for and the supply of accessible housing in Houston



Impediment #5: Lack of Income / Lack of Funding

Impediment

Persons with select protected characteristics, such as persons of color, females, and persons with disabilities, are disproportionately represented in the low-income category. This lack of income not only restricts these groups 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 individuals 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

Closely related to the impediment, Lack of Housing Affordability and Options, 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 for residents to pay for and maintain housing. Housing affordability was one of the top housing concerns discussed during Mobile Meetings. In addition, 37.5% of survey respondents from the 2019 Community Need Survey reported that they had trouble with paying for repairs that needed to be made to their home in the last five years. In addition, almost one in ten (9.4%) survey respondents said they were forced to move out of their home in the past five years due to rent increase. Validated in CHAS data, housing cost burden is the most common housing problem for households in Houston. In addition, increasing rent and home prices have both far exceeded the growth of incomes, creating additional housing issues.

Expanding resources to increase the number of affordable homes is one important way the City can 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 furthering fair housing and increasing 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 government resources



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 persons of color and other communities have high concentration of non-minorities. There are concentrations of Hispanic households or African American households that dominate large geographic sections of Houston. Also, Asian households tend to be concentrated in a few areas. These concentrations are partly caused by historical patterns of discrimination and currently intertwined with Houston's economic stratification.

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: Lack of Access to Financial Education and Discriminatory Banking Practices

Impediment

Some residents do not have access to financial education opportunities.

Impact

The lack of access to financial education coupled with discriminatory practices in the housing industry can prevent some residents from choosing where they live and from accumulating wealth through homeownership.

Analysis

Through the public input process, financial literacy and housing literacy were cited as barriers to housing. From the public participation process, many residents had trouble buying or renting property in Houston due to credit issues or being denied a loan. The 2019 Community Needs Survey revealed that many people have challenges looking for a place to live because of these types of issues: “Finding a home with my credit history or credit score (39.0%), Getting approved for a rental unit or mortgage loan” (37.4%), and “Dealing with past evictions” (13.1%). 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.

In addition, some stakeholders suggested that some Houstonians do not participate in the mainstream banking system because they do not know how it works or do not trust the systems. These groups include unbanked or under-banked individuals, renters, or/and immigrants, including residents with limited English proficiency. Residents who do not have or have not built credit or other types of banking relationships will have difficulty securing a loan to purchase a home.

Objective

The City will take actions to increase access in the community to financial programs and financial well-being furthering the following objective to address this impediment.

- Promote financial education



Impediment #8: Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods

Impediment

Persons of color and persons living 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 limit a family's current and future 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, depress wealth accumulation, and perpetuate existing inequalities.

Analysis

Distribution of amenities differs by neighborhood. Some communities have less access to retail amenities such as banks or grocery stores, which can limit a resident's options to financial services or healthy food options, negatively affecting a family.

In addition, resident's input revealed that residents from all over Houston often feel that there are not enough City services available for their neighborhood. According to residents who participated in discussions during Mobile Meetings, 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 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.

As previously stated in the document, 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. Having high performing schools only located in neighborhoods where certain groups of protected classes live can lead to continued inequities.

Since Hurricane Harvey, the City has concentrated on repairing infrastructure and public facilities that were impacted or destroyed due to flooding. The City continues to gather data and improve modeling to prioritize future projects based on greatest need.



One impediment from the 2015 AI, Low Educational Attainment Among Minorities, was combined with this impediment, because the low educational attainment is a product of the true barrier of unequal access to high performing schools.

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 #9: 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 affordable home development or development of housing for persons with disabilities, which will ultimately decrease housing choice.

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. NIMBY attitudes can keep affordable home developments from certain neighborhoods, ultimately making affordable homes available only in certain neighborhoods. A greater presence from HCDD in the community can help to answer questions and dispel concerns about activities.

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 about affordable home development and the residents that need affordable homes



Impediment #10: 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 residents of 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 neighborhoods or neighborhoods with a majority of residents of color.

Analysis

Transportation was an issue that was consistently mentioned as a barrier from stakeholders and residents during discussions. 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. In the 2019 Community Needs Survey, nearly one in four respondents (24.7%) indicated that the biggest barrier to getting a job they actively sought was that it was too far from where they lived.

The majority of residents that utilize public transportation in Houston are people of color. 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 people of color.

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.

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 #11: Increased Health Hazard Exposure in Certain Neighborhoods

Impediment

Some neighborhoods households have increased exposure to health hazards due to the quality or age of the homes or the location of the homes related to environmental hazards.

Impact

Certain protected classes are often more affected by health hazards, which can affect children's growth and development process or long-term health of residents.

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 more people of color in east Houston. In addition, after natural disasters, such as flooding, higher-income households can address home repairs faster than people without disposable income. Many low-income families have been living in flooded homes that have mold, which is an extreme health hazard for the residents of these homes.

In the 2019 Community Needs Survey, approximately 16.4% of the survey respondents had experience with or lived with someone who experienced health issues related to environmental contamination, such as asthma, elevated blood lead levels, or COPD. Only 15.4% of survey respondents did not have concerns about environmental issues where they live. The top three environmental concerns of survey respondents were: Insects (43%), Air quality outdoors (40.7%), and Rodents (34.9%).

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 #12: 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

As HCDD staff and Fair Housing Ambassadors presented housing data and discussed housing issues with residents during the public participation process, many residents were unaware of assistance that was available to them. Opening more avenues of communication between residents, including stakeholders, and the City will also help to address other impediments such as promoting fair housing understanding.

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 public participation through partnerships and carrying out activities at the neighborhood level to reduce this impediment over the next five years.

- Provide ways in which residents 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
- Expand partnerships with stakeholders and area organizations to increase outreach to residents



Actions and Fair Housing Implementation Plan

The following table summarizes 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 beyond the next five years, this implementation plan will address the five-year period coinciding with the consolidated planning period, beginning in PY 2020.

Using this implementation plan as a guide, HCDD will summarize which actions and impediments the City 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.

This table is intended 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 Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>1. Provide counseling through the City’s Fair Housing Hotline The City’s Fair Housing Hotline provides a year-round, free resource to residents 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 residents about their rights, giving residents 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>12. Lack of Communication Between Government and Residents</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time ● CDBG-Outreach Materials 	<p>Start: 2020 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 with resources regarding housing issues ● Monitor call data to review trends and community needs to inform outreach strategies
<p>2. Provide fair housing and HCDD housing program information to government staff and housing stakeholders. HCDD will provide education and outreach through trainings, presentations, informational brochures, and other methods to government staff and housing 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 inform staff and housing stakeholders about regulations and compliance under fair housing laws to prevent discrimination.</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: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> ● HCDD (RE) ● HUD FHEO ● HCDD subrecipients ● Developers ● HCDD contractors ● Nonprofit and for-profit partners ● HHA 	<ul style="list-style-type: none"> ● Reach 1,000 HCDD stakeholders and staff with information about fair housing
<p>3. Provide fair housing and HCDD housing program information to residents a) HCDD will create a fair housing outreach plan to inform 500,000 residents, of their fair housing rights, the fair housing complaint process, tenant and landlord relations, housing issues and issues surrounding housing opportunity, and HCDD’s general programs. The outreach will likely consist of direct mailings, social media, print advertisements, informational brochures, and presentations. 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. This may include translating informational materials into other languages and providing information in new ways that is easy to understand at a variety of education levels</p> <p style="text-align: right;">Priority: High</p>	<p>2. Lack of Knowledge about Fair Housing</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p> <p>7. Lack of Access to Financial Education / Discriminatory Banking Practices</p> <p>12. Lack of Communication between government and residents</p>	<ul style="list-style-type: none"> ● CDBG-Staff Time ● CDBG-Outreach Materials 	<p>Start: 2020 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 ● Housing authorities 	<ul style="list-style-type: none"> ● Reach 500,000 people with information about fair housing ● Create new materials and accessible materials, including in other languages



Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>4. Preserve affordable rental homes HCDD will fund the preservation of at least 30 affordable rental homes through the rehabilitation of multifamily properties in the Multifamily Housing Development Program. This action will preserve the supply of existing affordable housing for low- and moderate-income households in areas that may be at risk of gentrifying, addressing the lack of quality affordable housing options for members of protected classes. Priority: High</p>	3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • CDBG • HOME • TIRZ • BOND • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners • Lending institutions 	<ul style="list-style-type: none"> • Preserve 30 affordable rental homes • Extend affordability for 250 expiring affordable homes
<p>5. Create affordable rental homes HCDD will fund the creation of 1,500 new affordable housing rental units in neighborhoods throughout the city using entitlement and DR funding through the Multifamily Housing Development Program and Small Rental Development Program. This action will expand the supply of affordable housing for low- and moderate-income families in areas at risk of gentrifying and in high opportunity areas, addressing the lack of affordable housing options for members of protected classes. Priority: High</p>	3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • CDBG • HOME • TIRZ • BOND • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Housing developers/owners • Nonprofit organizations • Lending institutions 	<ul style="list-style-type: none"> • Create 1,500 affordable rental homes
<p>6. Fund the creation or preservation of accessible rental homes Through HCDD's Multifamily Housing Development Program, rental developments must produce a minimum number of Section 504 accessible rental units. HCDD's Home Repair Programs will prioritize persons with disabilities, seniors, and families with children. 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>	4. Lack of Accessible Housing for Persons with Disabilities	<ul style="list-style-type: none"> • CDBG • HOME 	<p>Start: 2020 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 homes
<p>7. Expand homeownership opportunities by building new single family homes available for low- and moderate-income households HCDD will build new homes through the CHDO Program and the New Home Development Program in areas that are high opportunity or having active reinvestment, such as in Complete Communities. This action will provide new opportunities not currently available for low- and moderate-income households searching for homeownership. Priority: High</p>	<p>3. Lack of Housing Affordability and Options</p> <p>5. Lack of Income/Funding</p>	<ul style="list-style-type: none"> • HOME • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Build 200 new homes
<p>8. Revise Chapter 42 Subdivision, Developments, and Platting The Planning and Development Department will work to revise Chapter 42 Subdivisions, Developments, and Platting in the City's Code of Ordinances. This process will include ways to promote or remove barriers to develop additional homes that have a range of affordability in Houston. This action could encourage the development of affordable homes, thereby increasing the supply available.</p>	3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • General Fund 	<p>Start: 2020 Complete: 2021</p>	<ul style="list-style-type: none"> • Planning Department 	<ul style="list-style-type: none"> • Update Chapter 42 through gathering community input



Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>9. Fund homebuyer assistance loans HCDD provides homebuyer assistance, through downpayment and other financial assistance, to income-eligible low-, moderate-, and middle-income households for home purchases. Interested homebuyers will attend an 8-hour homebuyer education course provided by a City partner. This action will expand housing choice for low-, moderate- and middle-income households by allowing these households to seek housing in neighborhoods that may have more opportunity.</p> <p style="text-align: right;">Priority: High</p>	3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Nonprofit housing and service providers 	<ul style="list-style-type: none"> • Fund 800 loans
<p>10. Provide home repair assistance for low- and moderate-income households HCDD's home repair programs 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, it helps to improve the homes in mostly low-income, minority areas, as well as for protected classes including persons with disabilities and families with children, which are prioritized in the programs.</p> <p style="text-align: right;">Priority: High</p>	3. Lack of Housing Affordability and Options 5. Lack of Income/Funding	<ul style="list-style-type: none"> • CDBG • TIRZ • CDBG-DR 	<p>Start: 2020 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 2,500 households • Prioritize families, households with a person with a disability, and seniors
<p>11. 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 jobs and funding to support employment training. 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>	5. Lack of Income/Funding	<ul style="list-style-type: none"> • CDBG • Section 108 • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Create or retain 300 jobs
<p>12. Prioritize affordable home development near transit options and in high opportunity areas HCDD will prioritize housing proposals near transportation options and high opportunity areas by giving priority to proposals through the RFP process. HCDD will also review the selection process of City support for housing tax credit proposals to ensure some affordable homes are developed in high opportunity areas. This action will address the lack of transportation options by creating greater access to transit opportunities by locating affordable housing near transit and will address patterns of segregation by locating affordable housing in areas with more opportunity.</p> <p style="text-align: right;">Priority: High</p>	10. Lack of transportation options	<ul style="list-style-type: none"> • None 	<p>Start: 2020 Complete: Ongoing</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 and areas of opportunity • HCDD staff will review process of selecting tax credit proposals for City support
<p>13. Monitor fair housing data HCDD will collect and analyze various data sets including from the Fair Housing Hotline, HMDA, and fair housing complaints. 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>	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	<ul style="list-style-type: none"> • CDBG-Staff Time 	<p>Start: 2020 Complete: Annually</p>	<ul style="list-style-type: none"> • HCDD (RE) • FFIEC • HUD • Texas Workforce Commission 	<ul style="list-style-type: none"> • Update and maintain database of longitudinal fair housing data



14. Complete a regional housing study

HCDD will work with Harris County and a contractor to complete a study of housing in the City of Houston and Harris County. This will assist the City and County to work toward common objectives and align resources to address regional housing issues.

Priority: High

3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • CDBG • CDBG-DR 	Start: 2020 Complete: 2021	<ul style="list-style-type: none"> • HCDD (RE) • City departments 	<ul style="list-style-type: none"> • Complete a regional housing study
6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status				

Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>14. Identify areas where the cost of land is increasing and areas outside minority areas that would support affordable housing</p> <p>HCDD will gather research to perform its third Market Value Analysis. Performing a third 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>Priority: Medium</p>	3. Lack of Housing Affordability and Options 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	<ul style="list-style-type: none"> • CDBG • CDBG-DR 	Start: 2020 Complete: 2021	<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 third Market Value Analysis for Houston
<p>15. Complete five Complete Community action plans</p> <p>Through the Planning Department and Mayor’s Office of Complete Communities, the neighborhood will work to gather public input and submit information for the development of the plans. These include plans for: Fort Bend Houston, Kashmere Gardens, Sunnyside, Alief-Westwood, and Magnolia Park-Manchester. This will assist to align goals and funding in neighborhoods that are predominately persons of color and low-income residents.</p> <p>Priority: Medium</p>	3. Lack of Housing Affordability and Options	<ul style="list-style-type: none"> • General Fund 	Start: 2020 Complete: 2020	<ul style="list-style-type: none"> • Mayor’s Office (RE) • City departments 	<ul style="list-style-type: none"> • Complete five complete communities action plans
<p>16. Provide outreach about the MWSBE and Section 3 Programs</p> <p>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>Priority: Medium</p>	5. Lack of Income/Funding	<ul style="list-style-type: none"> • CDBG-Staff Time 	Start: 2020 Complete: Ongoing	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Conduct 50 outreach activities • Reach 10,000 individuals
<p>17. Host and attend events to provide information about HCDD and housing programs</p> <p>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>Priority: Medium</p>	9. NIMBY Resistance 12. Lack of Communication Between Government and Residents	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach materials 	Start: 2020 Complete: Ongoing	<ul style="list-style-type: none"> • HCDD (RE) • City departments • Non-profit housing and service providers 	<ul style="list-style-type: none"> • Attend 250 events
<p>18. Work to dispel misconceptions about assisted housing</p> <p>HCDD and HHA will work to dispel the perception that assisted housing is only for minorities by conducting comprehensive outreach to inform the public on assisted housing opportunities. HCDD will expand upon the SAYYES! Campaign. This action will target non-minority households to reduce NIMBY sentiment and misconceptions about assisted housing.</p>	10. NIMBY Resistance	<ul style="list-style-type: none"> • CDBG-Staff Time • CDBG-Outreach materials 	Start: 2020 Complete: Ongoing	<ul style="list-style-type: none"> • HCDD (RE) • HHA 	<ul style="list-style-type: none"> • Continue to be involved in national education campaign • Host presentations for community members



Priority: Medium

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Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>19. 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 28,075 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>	8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2020 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 27,250 children
<p>20. 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 1,585 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.</p> <p style="text-align: right;">Priority: Medium</p>	5. Lack of Income/Funding 8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2020 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 1,585 persons
<p>21. Remove lead-based paint hazards from homes HHD will remove lead-based paint hazards from homes to protect families at risk. This action will help protect families in low- and moderate-income areas, including those of certain protected classes, from health hazards in their community.</p> <p style="text-align: right;">Priority: Medium</p>	8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> • CDBG • HHD 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HHD (RE) • HCDD 	<ul style="list-style-type: none"> • Remove lead hazards from 250 housing units
<p>22. Partner with local organizations and contractors to expand fair housing activities in Houston HCDD will contract with one or more organizations to carry out fair housing activities or to build capacity to carry out future activities. These may include conducting fair housing testing or studies. This action will help to promote fair housing awareness and 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>	1. Discrimination in Housing	<ul style="list-style-type: none"> • CDBG • CDBG-Staff Time 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • Fair housing organizations 	<ul style="list-style-type: none"> • Fund organizations to carry out fair housing activities or studies
<p>23. Work with partners to expand funding for fair housing activities HCDD will pursue additional resources by applying for grants and growing relationships with banks to support its continued fair housing efforts. In addition, funding capacity will be leveraged. 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: Medium</p>	5. Lack of Income/Funding	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Increase in funding available



Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>24. 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 asset building programs. HHA will expand resources available at the HHA Opportunity Center, which provides mobility counseling for its voucher program participants promoting opportunities for housing in areas outside of their neighborhood, promoting desegregation and the deconcentration of poverty. In addition, 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 asset building programs but aren't yet ready for homeownership to the resources available to improve their financial standing.</p> <p align="right">Priority: Low</p>	<p>5. Lack of Income/Funding</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p> <p>7. Lack of Access to Financial Education / Discriminatory Banking Practices</p>	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HHA • United Way • City departments • Local government counterparts • Housing counseling agencies • BankOn Houston 	<ul style="list-style-type: none"> • Partner with 20 organizations
<p>25. Protect households from impacts of future flood events HCDD will purchase homes or properties in areas that consistently have flooded through the Housing Buyout Program and the Multifamily Buyout Programs. This action will protect Houstonians by removing homes from areas that are most likely to flood.</p> <p align="right">Priority: High</p>	<p>8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p> <p>11. Increased Health Hazard Exposure in Certain Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) • HPW (RE) 	<ul style="list-style-type: none"> • Buyout 5 multifamily properties and demolish homes • Buyout 20 single family homes
<p>26. Create a Stormwater Master Plan HPW will develop a Stormwater Master Plan based on modeling of rainfall impacts on city watersheds to identify neighborhoods at risk of flooding due to infrastructure inadequacies, overland sheet flow and/or out of banks inundation. Model outputs will be reviewed in the context of other data sources (311 service requests, FEMA claims) to direct further analyses and project development.</p> <p align="right">Priority: High</p>	<p>8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p> <p>11. Increased Health Hazard Exposure in Certain Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HPW (RE) 	<ul style="list-style-type: none"> • Model existing conditions within watersheds • Identify risk areas • Model infrastructure alternatives • Coordinate project development with HCFCD
<p>27. Review and enhance infrastructure data The City will review and seek out additional datasets for analysis of infrastructure inadequacies and imbalances and use tools to help inform strategies, such as the Housing +Transportation Decision-maker Scorecard created by LINK Houston This research action will help in the allocation of future infrastructure resources in minority</p>	<p>8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p>	<ul style="list-style-type: none"> • CDBG 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HPW (RE) 	<ul style="list-style-type: none"> • Review and enhance data annually



neighborhoods.

Priority: High

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Summary of Actions and Fair Housing Implementation Plan

Actions	Related Impediments	Possible Funding Source	Timeline (Based on Program Years)	Responsible Entity (RE) and Possible Partners	Measure for Success/Milestone
<p>28. Interdepartmental resilience coordination HCDD, Mayor's Office, Office of Emergency Management, and Houston Public Works will meet to discuss and align planning and implementation initiatives. These meetings will also include discussions regarding proposed Complete Communities improvements and other City initiatives.</p> <p style="text-align: right;">Priority: High</p>	8. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	<ul style="list-style-type: none"> • CDBG-DR • CDBG-MIT 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HPW • HCDD • Mayor's Office • OEM 	<ul style="list-style-type: none"> • Meet regularly to coordinate activities between Departments
<p>29. Support and build capacity of Houston Land Bank and Houston Community Land Trust HCDD will support the Houston Land Bank and Houston Community Land Bank through staff and financial support. This will assist the City to expand its efforts to create affordable homes available in perpetuity in Houston and provide additional housing choice for low- and moderate-income residents.</p> <p style="text-align: right;">Priority: High</p>	3. Lack of Housing Affordability and Options 5. Lack of Income/Funding	<ul style="list-style-type: none"> • TIRZ • CDBG-DR 	<p>Start: 2020 Complete: Ongoing</p>	<ul style="list-style-type: none"> • HCDD (RE) 	<ul style="list-style-type: none"> • Support HLB and HCLT to preserve affordability in areas of opportunity and in areas that are gentrifying

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, HHD: Houston Health 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, HPW: Houston Public Works Department, SWMD: Solid Waste Management Department



12. Appendix



Results for 2019 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 the Community Needs Survey available online and in print from June 1, 2019 to September 30, 2019. 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 requesting paper copies from HCDD staff. The survey was available in English, Spanish, Vietnamese, Chinese, and Korean. 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 2,309 respondents participated in the survey. The survey was completed online via SurveyMonkey by 1,910 respondents, of which 31 were in Spanish, 6 were in Vietnamese, 5 were in Chinese, and 85 were in Korean. HCDD received 399 paper copies of the Community Needs Survey which included 55 surveys in Spanish and 15 surveys in Korean.

The survey consisted of 45 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. Survey questions focused on the availability and quality of community amenities, services, and programs. Other questions called for assessing current issues or challenges while some questions were simply demographic questions.

Demographics of Survey Respondents & Households

According to the 2019 Community Needs Survey results, most respondents (66.5%) live and work within the City. About 20% of respondents say they only live in the City of Houston (City) while only 8% only work inside the City.

The majority of survey participants (56.5%) own their home. Approximately one-third of respondents rent their home; 21.9% of respondents rented apartments and 10.2% rented single-family homes. Almost one out of every ten respondents (8.3%) stayed with a friend or family member. Over one-fifth (21.7%) of respondents reported that they are or live with someone who has a disability, whether physical, developmental, intellectual, or otherwise.

About two-thirds (67.8%) identified as female, over one-quarter (27%) identified as male, and 5.2% preferred either not to say or to self-describe. Approximately 9.4% of respondents identified as part of the LGBTQ+ community.

Almost one out of seven respondents (14.7%) is an immigrant from outside the United States.



Race/Ethnicity	Percentage
Asian*	10.3%
Black or African American*	32.8%
Hispanic	21.4%
White*	32.2%
Other*	6.6%

*Non-Hispanic; survey allowed more than multiple answers for race.

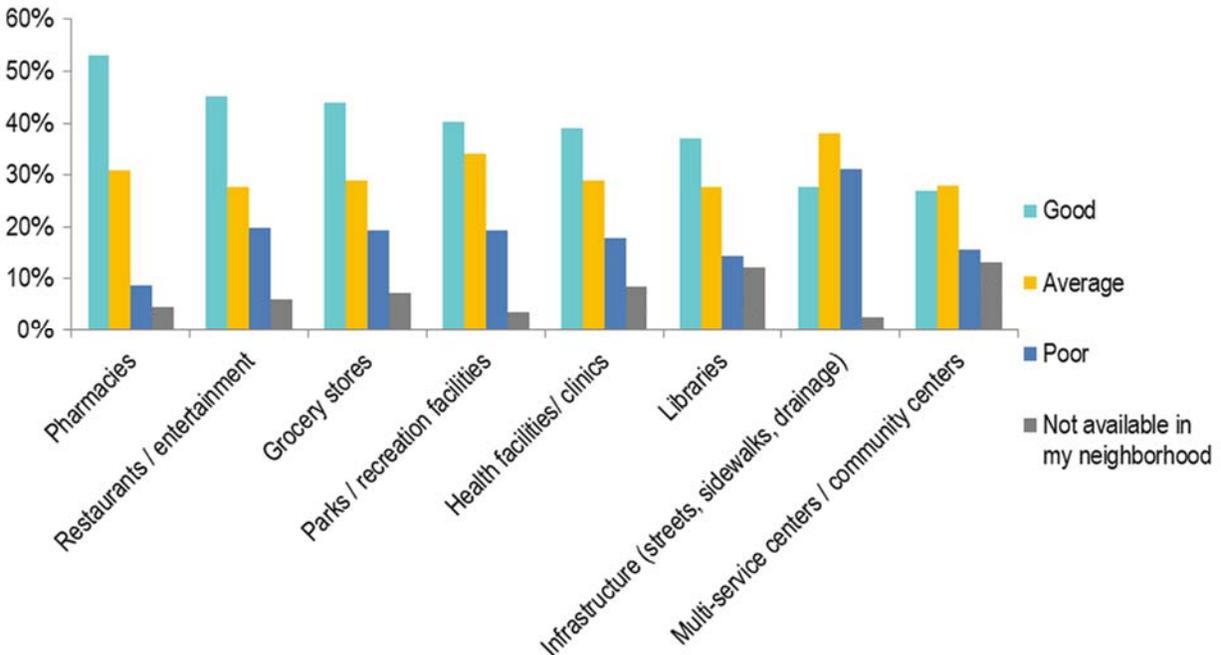
The following table outlines the income distribution amongst survey participants.

Yearly Household Income	Percentage
Less than \$16,000	15.9%
\$16,001 to \$32,000	16.5%
\$32,001 to \$61,000	25.1%
\$61,001 to \$100,000	19.2%
\$100,001 to \$200,000	17.0%
Over \$200,000	6.3%

Neighborhood & Environment

The survey respondents were asked to rate 1) Neighborhood Amenities, 2) Neighborhood Services, and 3) Neighborhood Social Services.

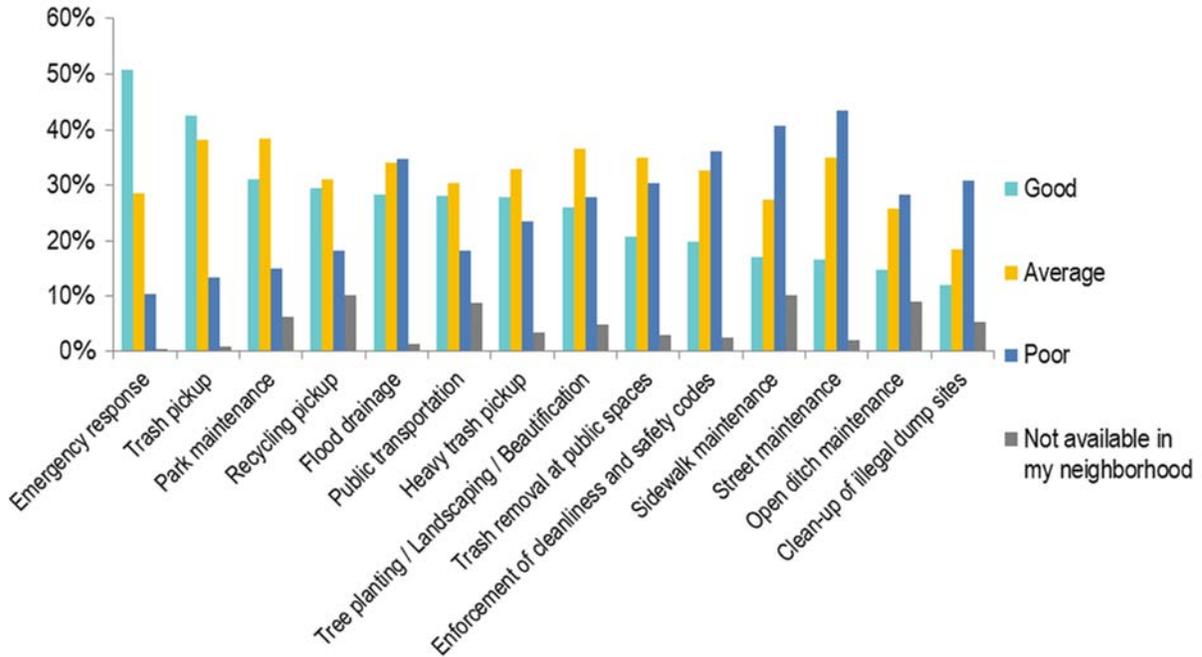
Question 3: Please rate the following amenities in your neighborhood.



The top three responses for “I don’t know / I don’t use this service” were Multi-Service Centers / community centers (16.1%), Libraries (8.8%), and Health facilities / clinics (5.8%).

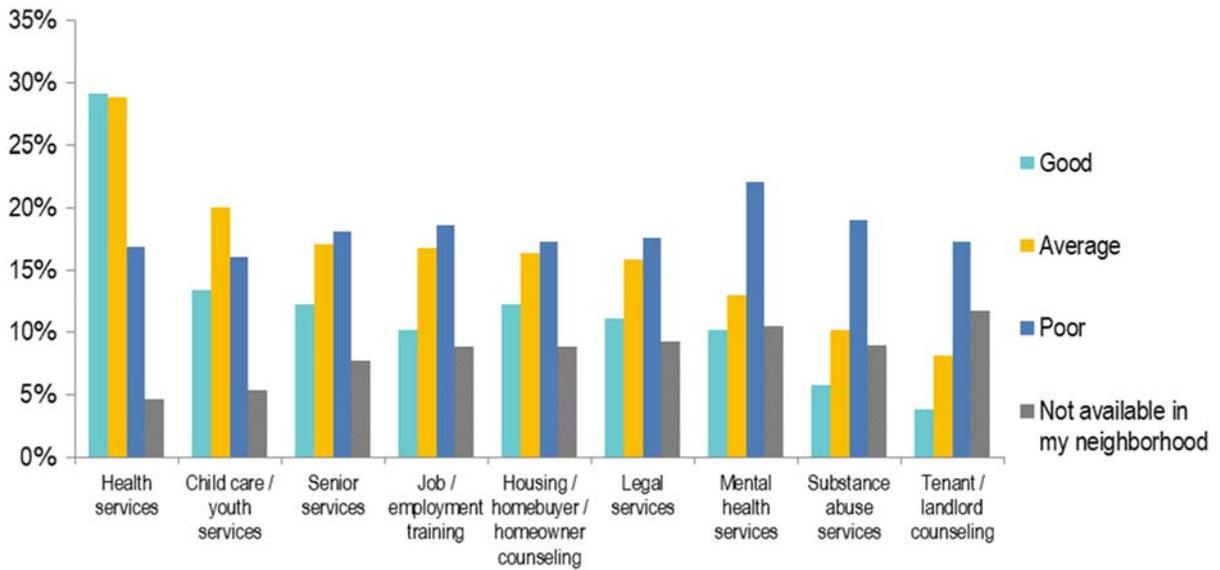


Question 4: Please rate the following neighborhood services in your neighborhood.



The top three responses for “I don’t know / I don’t use this service” were Clean-up of illegal dump sites (33.3%), Open ditch maintenance (22.1%), and Public transportation (14.8%).

Question 5: Please rate the following social services in your neighborhood.



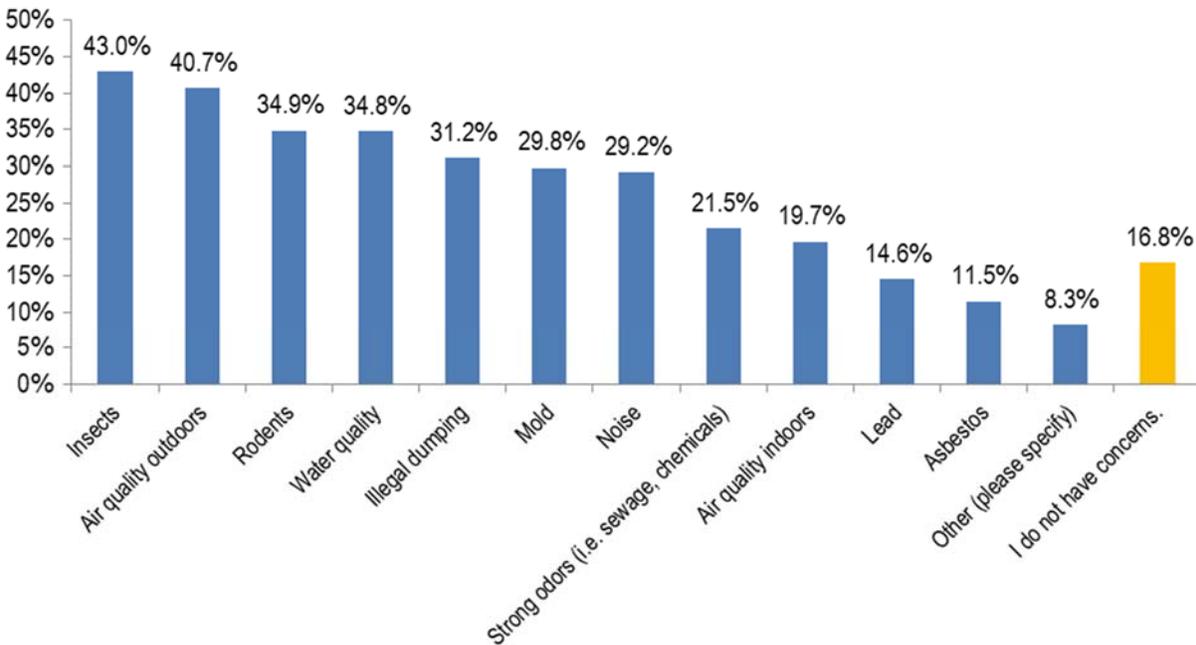
The top three responses for “I don’t know / I don’t use this service” were Tenant / landlord counseling (59.0%), Substance abuse services (56.1%), and Legal services (46.1%)



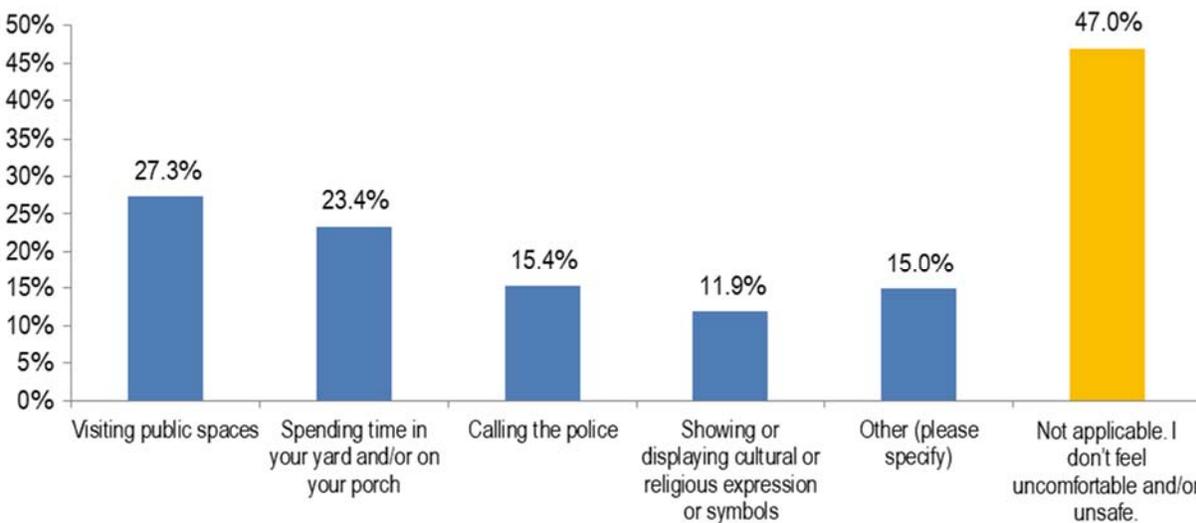
Health & Environment

The survey asked several questions about health and environment. Approximately 16.4% of the survey respondents had experience with or lived with someone who experienced health issues related to environmental contamination, such as asthma, elevated blood lead levels, or COPD. Only 15.4% of survey respondents had no concerns about environmental issues where they live. The top three environmental concerns of survey respondents were: Insects (43.0%), Air quality outdoors (40.7%), and Rodents (34.9%).

Question 6: Do you have concerns about any of the following environmental issues in or near your home? Select all that apply. (Answered: 2,012)



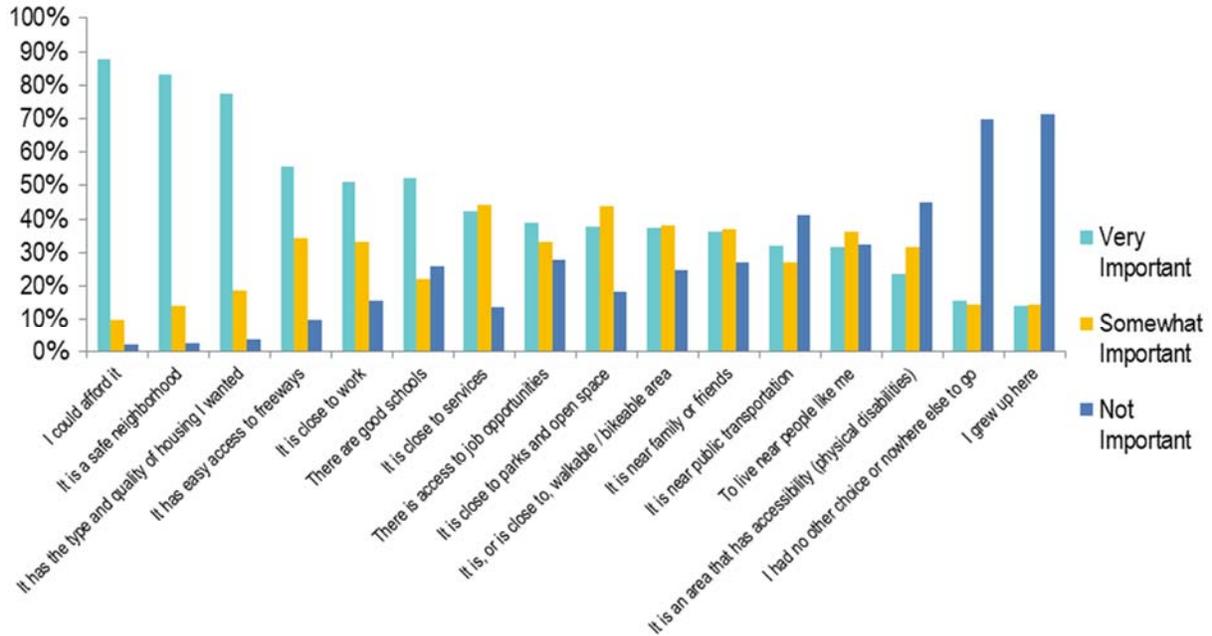
Question 8: While in your neighborhood, do you feel uncomfortable and/or unsafe in any of the following situations? Select all that apply. (A: 1,964)



Housing

The survey asked respondents about their housing choice or lack of housing choice.

Question 9: When you chose to live in your neighborhood, how important were the following factors? (A: 1352)



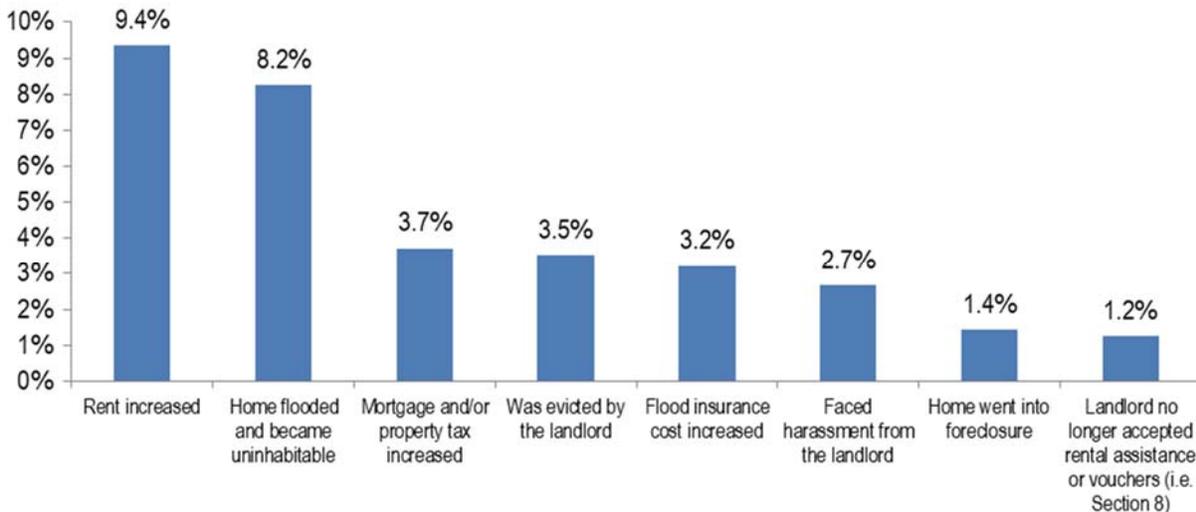
Question 10: About two-thirds (65.3%) of survey participants wanted to continue living in their neighborhood. Less than one-fifth (17.3%) were not sure and less than one-fifth of respondents (17.5%) did not want to continue to live in their neighborhood. (A: 1,901)



Question 11: In the past five years, have you had trouble with the following issues? (A:1,283)

	Yes	No	I don't know
Being able to get to/from my home when it rains	54.9%	42.7%	2.4%
Dealing with flooding in a natural disaster or heavy rain	47.0%	50.2%	2.8%
Paying for repairs that need to be made	37.5%	57.6%	4.9%
Finding a better place to live	31.2%	63.8%	5.0%
Paying for home insurance (including flood insurance)	29.1%	65.6%	5.3%
Paying for property taxes	22.5%	71.5%	6.0%
Homeowners' association or landlord restrictions/requirements	21.5%	71.5%	7.0%
Rent increased to an amount I couldn't afford	18.1%	75.3%	6.6%
My landlord refused to make repairs despite my requests	12.9%	78.8%	8.2%
Being able to make my home accessible for my physical disability	11.5%	81.9%	6.7%
Being evicted or going into foreclosure	8.7%	87.9%	3.5%
If I made a request for repairs, it resulted in a rent increase, harassment, or eviction	6.6%	83.8%	9.6%
My landlord refused to make accommodations for my disability despite my requests	4.1%	86.5%	9.5%
If I requested an accommodation for my disability, it resulted in retaliation	3.5%	86.6%	9.9%
My landlord stopped taking rental assistance or vouchers (i.e. Section 8)	3.2%	83.0%	13.8%
Other	13.0%	62.9%	24.1%

Question 12: In the past five (5) years, were you forced to move out of your home for any of the following reasons? (Check all that apply.) (A: 1,613)

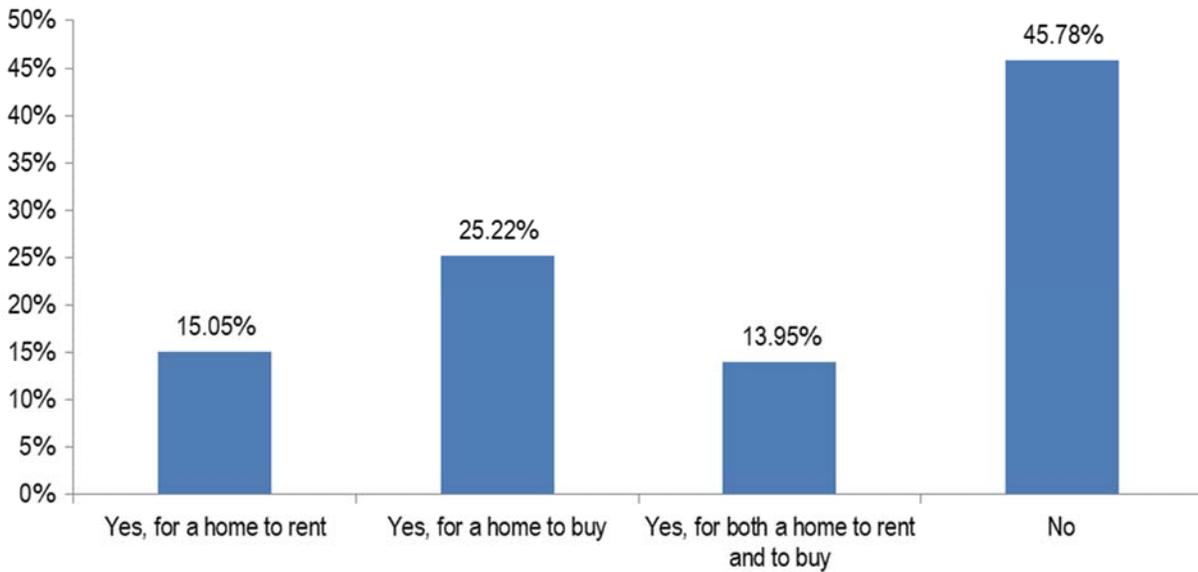


The chart above does not include 71.6% respondents that answered “Not applicable – I did not have to leave my home.”



While over half of Houstonians did not look for a new place to live in the past five years, about 40.3% of respondents desired to move out their home. Also, 25.2% looked for a home to buy, and 15.1% looked for a home to rent.

Question 13: In the past five years, have you looked for a new place to live? (A: 1,796)



Question 14: In the past five years, which of the following were challenges when you looked for housing? (A: 1,850)

	Was a Challenge	Not a Challenge	I don't know
Having enough money for rent or mortgage payments	64.7%	31.6%	3.7%
Having enough money for a rental deposit or down-payment	59.8%	35.6%	4.6%
Finding a home that is in good condition	52.7%	41.9%	5.4%
Finding a home that is close to my job	48.3%	44.9%	6.8%
Finding a home near services and amenities, like grocery stores and banks	41.0%	54.3%	4.7%
Finding a home with my credit history or credit score	39.0%	55.0%	5.9%
Getting approved for a rental unit or mortgage loan	37.4%	54.1%	8.5%
Being told homes I was interested in were no longer available	36.2%	53.8%	10.0%
Feeling welcome/safe in the neighborhood(s) where I was looking for housing	35.2%	57.5%	7.4%
Being shown housing in the neighborhood(s) I wanted to move to	34.7%	55.5%	9.8%
Finding a home with access to public transportation	32.6%	57.5%	9.9%
Finding a home that is large enough for my household	31.7%	64.7%	3.7%
Finding a home near family and friends	30.4%	62.8%	6.8%
Finding a home that is accessible to someone with a physical disability (i.e. wheelchair accessible)	15.4%	65.9%	18.7%
Dealing with past evictions	13.1%	77.6%	9.3%
Dealing with a felony/criminal record	10.2%	81.6%	8.2%



Discrimination

About 14% of survey participants reported having experienced housing discrimination in the Houston area in the past five years, and 24.7% did not know whether they had experienced discrimination, showing that almost a quarter of respondents do not know how to identify housing discrimination or that discrimination is hard to identify.

Question 16: Which of the following ways have you or someone you know experienced housing discrimination? Select all that apply.

	I experienced this	Someone I know experienced this	I don't know	Neither I nor someone I know has experienced this
A landlord refused to rent or respond to a request	13.6%	24.8%	34.8%	26.8%
A landlord gave stricter rules than to others living in same housing complex	10.2%	17.1%	41.1%	33.2%
A real estate professional refused to sell or respond to requests for their services	10.0%	8.5%	42.2%	40.6%
A real estate professional directed me/someone I know to only undesirable neighborhoods	9.0%	11.4%	42.5%	38.4%
A landlord falsely claimed that housing was not available when it really was	6.6%	18.8%	41.6%	32.6%
Advertising for a rental home excluded certain types of people	5.7%	14.0%	44.4%	36.7%
A bank or credit union discriminated by denying a housing loan	5.7%	9.3%	44.1%	40.0%
A landlord refused to make reasonable accommodations for disabilities	4.3%	17.3%	40.1%	38.8%
A housing loan was denied because of the location of the home	4.1%	8.8%	44.9%	41.2%
Other	11.8%	10.5%	52.7%	28.4%

Question 17: On what basis do you believe you or someone you know were discriminated against in housing? Select all that apply.

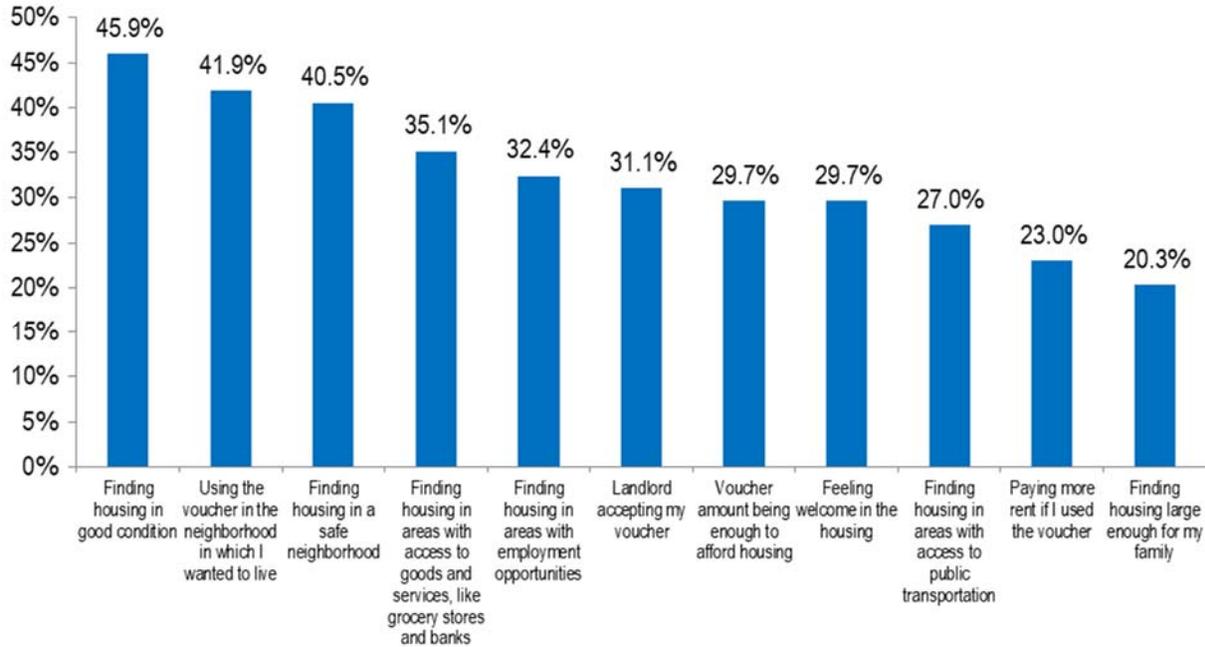
	I experienced this	Someone I know experienced this	I don't know	Neither I or someone I know has experienced this
Race / Ethnicity / Color	14.20%	21.82%	31.99%	31.99%
Age	10.28%	10.12%	38.94%	40.65%
Gender / Sex	6.92%	8.96%	39.62%	44.50%
Disability	5.69%	13.69%	37.85%	42.77%
Pregnant or have children	5.66%	9.43%	40.09%	44.81%
From a country outside of the United States	4.81%	13.49%	39.38%	42.33%
Sexual Orientation	3.93%	11.48%	40.88%	43.71%
Religion	3.41%	8.05%	41.49%	47.06%
Other (Please explain below)	9.36%	11.99%	51.31%	27.34%



Housing Vouchers

Although only 3.5% of respondents reported using a housing voucher in the past five years, about 17.6% of those individuals experienced challenges when using the vouchers.

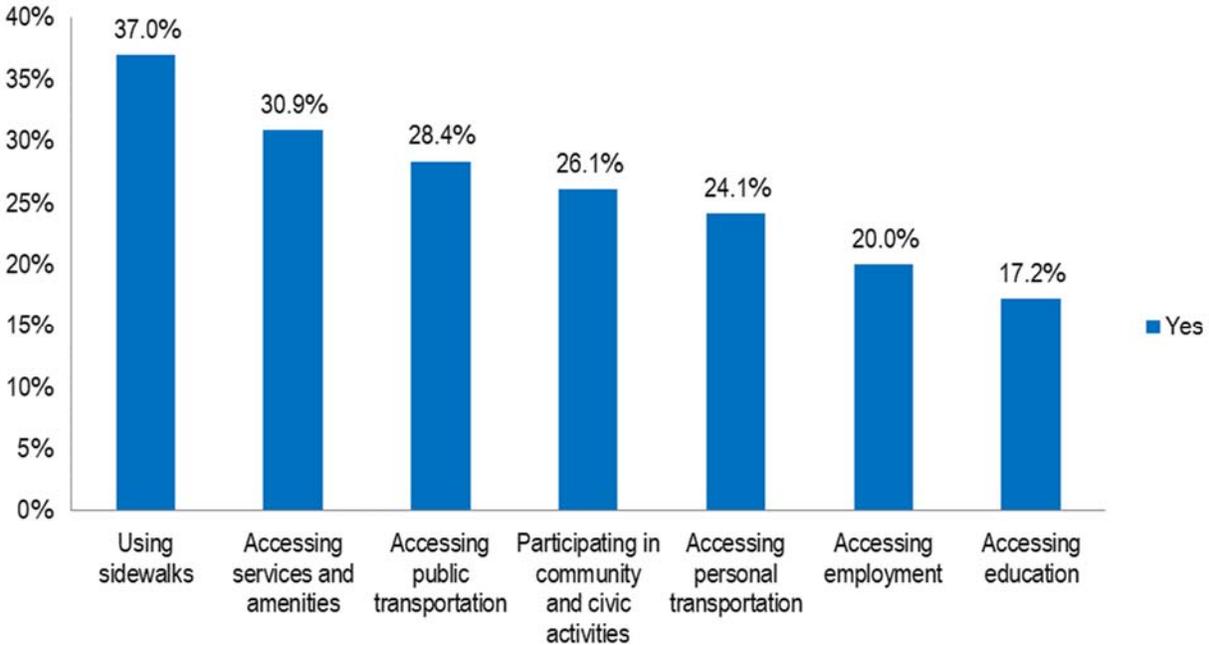
Question 17: Which of the following challenges have you faced when using a voucher? Select all that apply.
(A: 74)



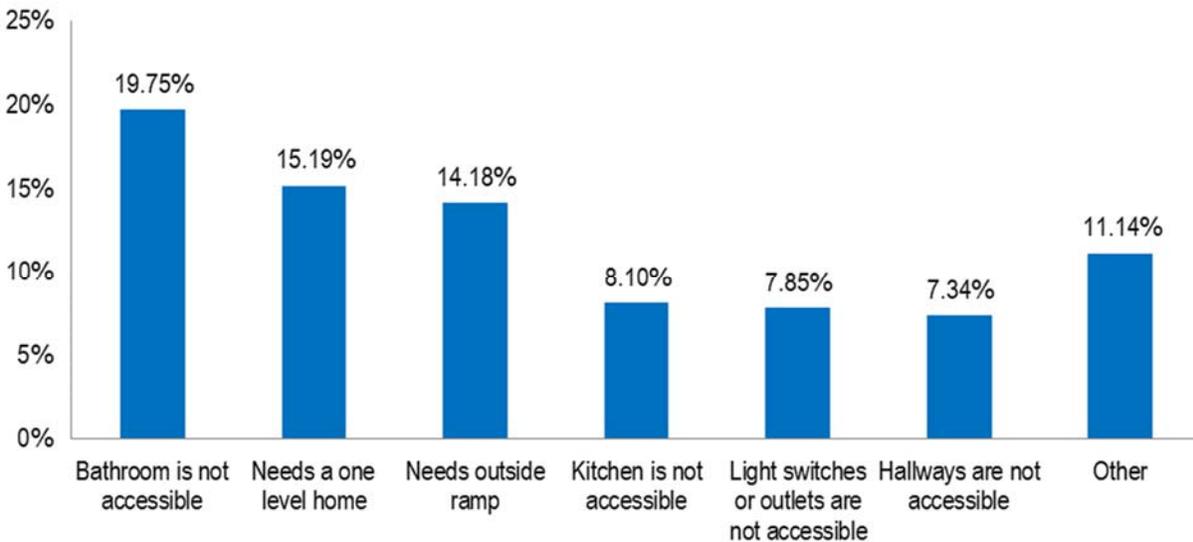
Household Members with Disabilities

Almost one-fourth (24%) of respondents said there is someone in their household with a disability, whether physical, developmental, intellectual, or otherwise (A: 1,732).

Question 22: Does the person in your household with a disability have any difficulty accessing the following services or amenities in your neighborhood?



Question 23: Is your current housing insufficient to meet your household member's accessibility needs in any of the following ways? Select all that apply.

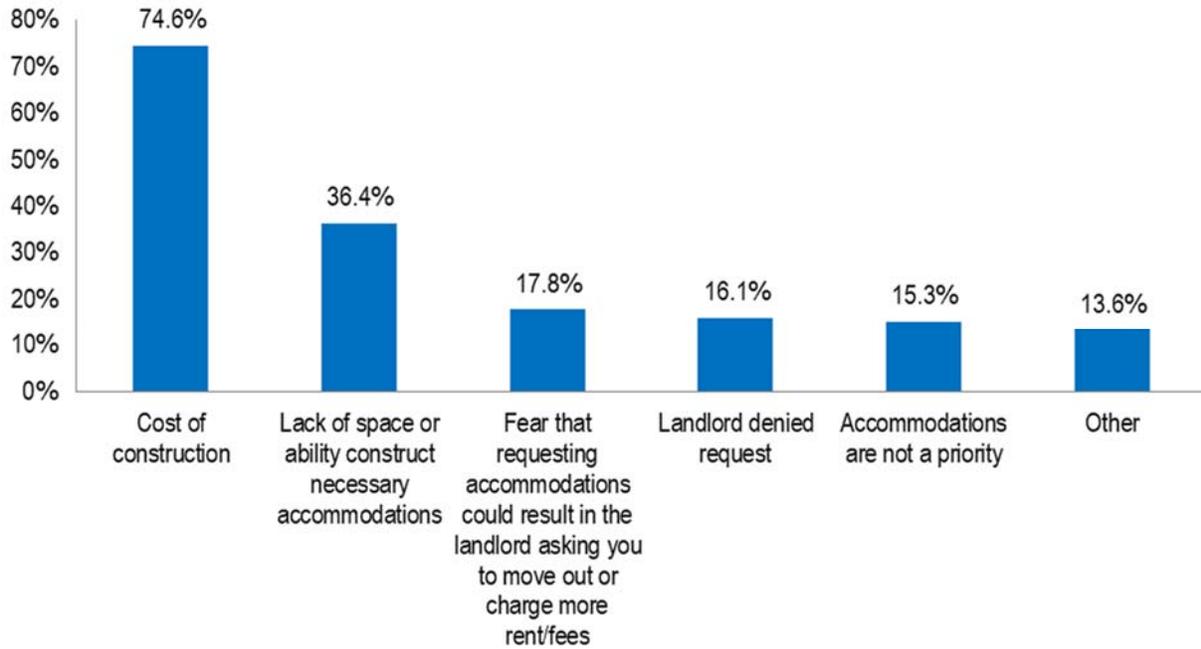


Over one-quarter (28.1%) of respondents with or living with someone with disabilities modified or needed to modify their home to accommodate a household member's disability. Over one-third (37.2%) of those that needed



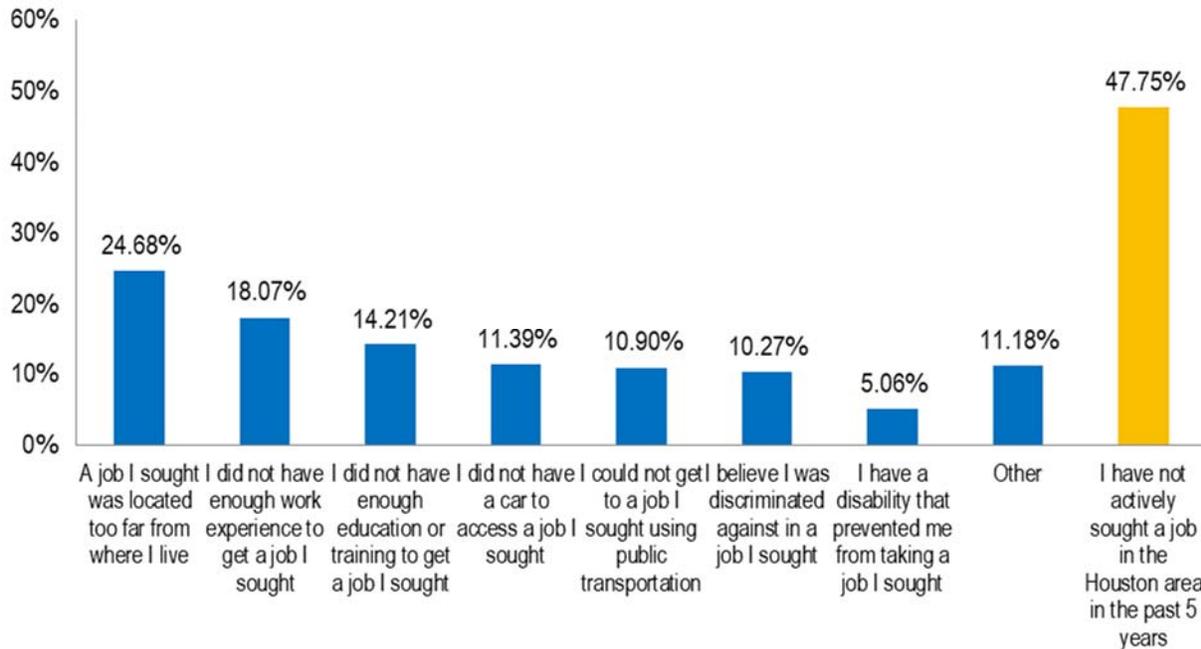
modifications experienced challenges when modifying or attempting to modify their home to accommodate a household member's disability.

Question 26: What barriers have you experienced when modifying or attempting to modify your home to accommodate your household member's disability? Select all that apply.



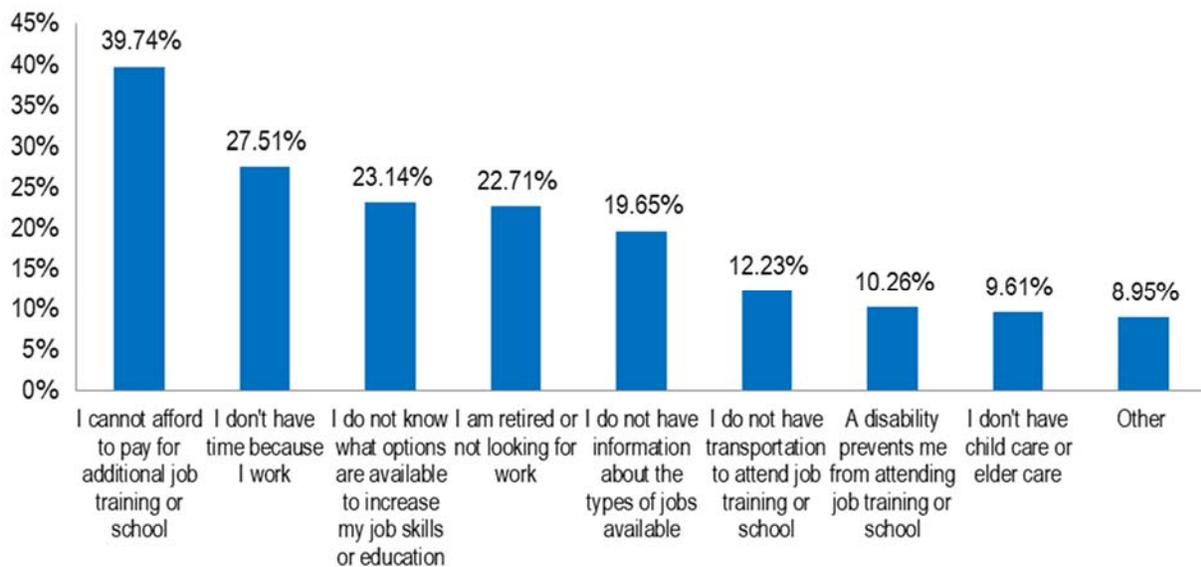
Employment

Question 27: In the past five years, when seeking employment in the Houston area, did you experience any of the following barriers to getting a job you actively sought? Select all that apply.



Approximately one-fifth (20.7%) of respondents believed that they lacked the right job skills and education to obtain a job in the Houston area that pays enough to support themselves and their immediate family (A: 1,640).

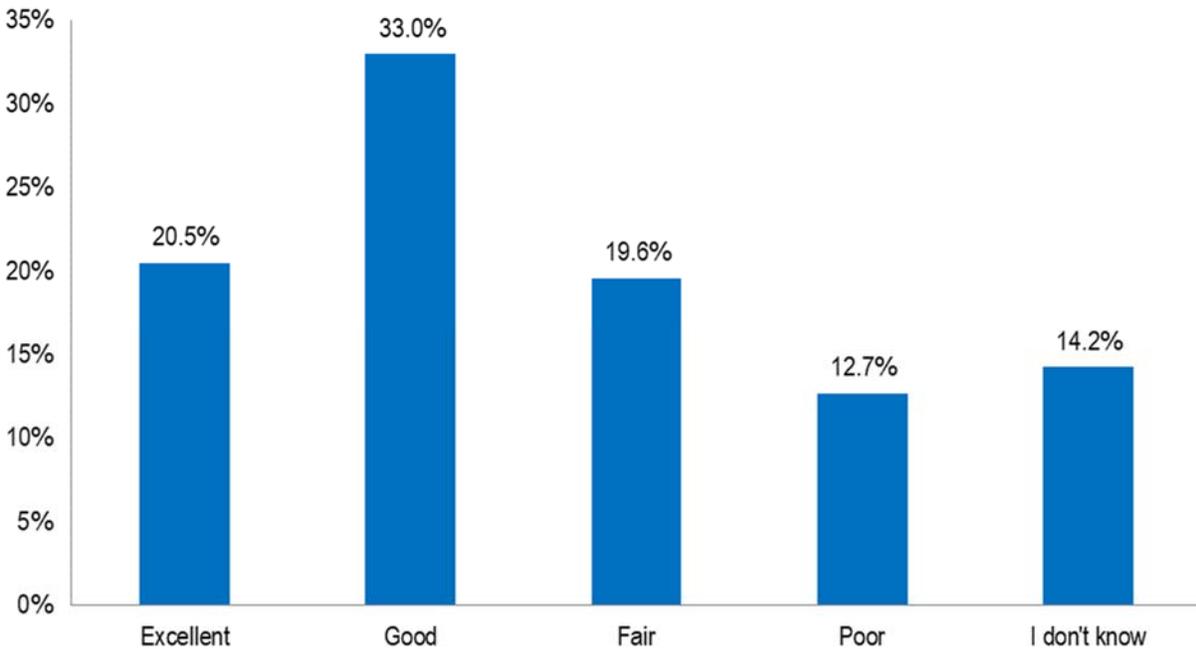
Question 29: Which of the following do you believe are barriers to increasing your job skills or education? Select all that apply. (A:458)



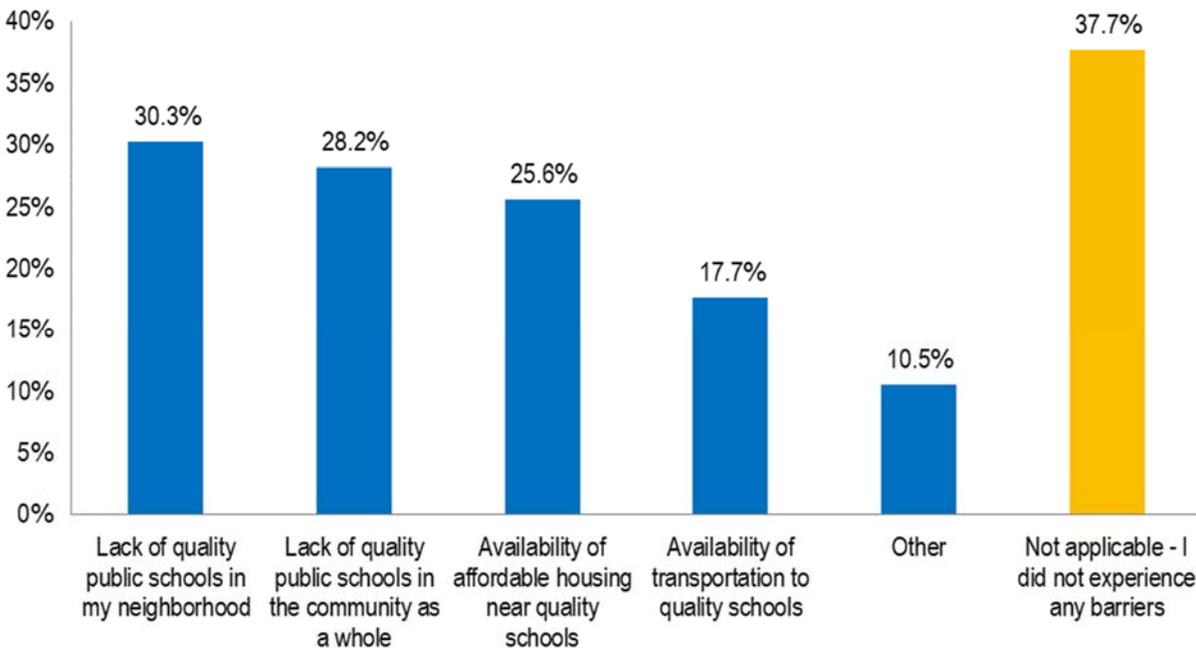
Education

Approximately one-third (33.7%) of respondents have households with a household member under 18 years of age.

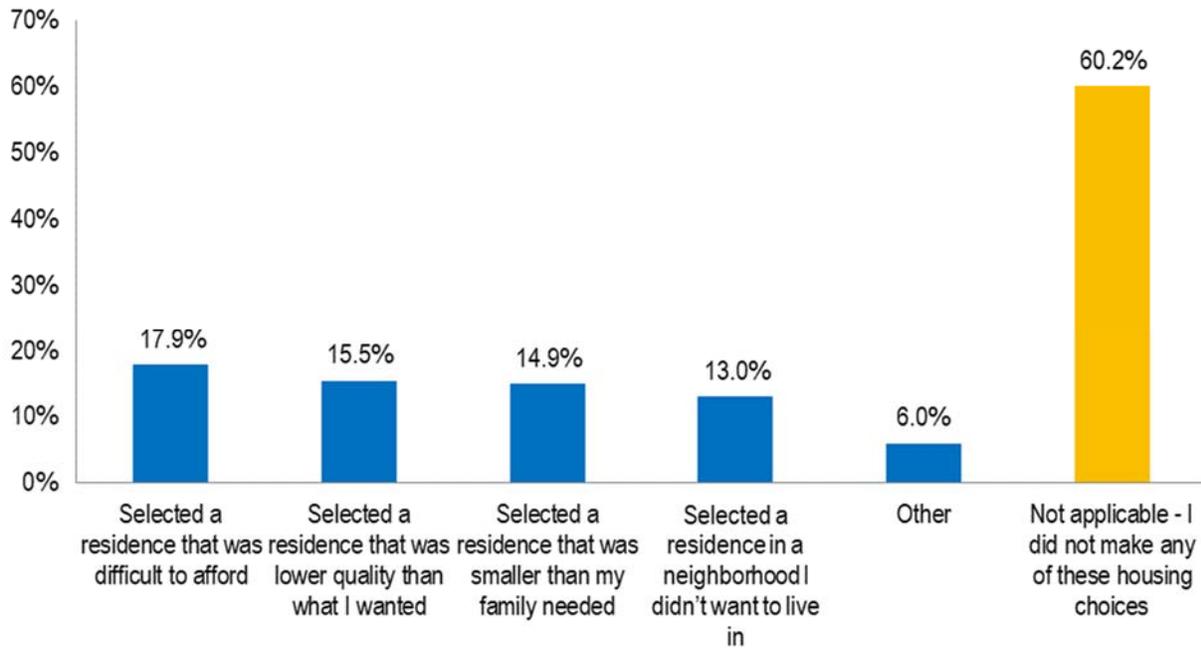
Question 31: How would you rate the quality of schools that your child attended in the past year? (A: 648)



Question 32: What barriers have you experienced in getting a high-quality education for your child? Select all that apply. (A: 628)



Question 33: In the last five years, have you made any of the following choices when seeking housing to ensure that your child could attend a high-quality school? Select all that apply. (A:600)



Express Survey

From June through September 2019, HCDD staff asked the following questions, as feasible, to residents calling HCDD's fair housing hotline and HCDD's general call center. In addition, in partnership with Rice University and METRO, HCDD staff hosted Rice students at three METRORail transit stops to collect fair housing information from commuters one afternoon in July 2019.

1. Do you know that it is illegal for someone to deny you housing based on a protected class, which are race, color, religion, national origin, sex, disability, or familial status?

	METRO		HCDD Fair Housing Hotline		Total	
Yes	294	64.2%	287	93.2%	581	75.8%
No	152	33.2%	3	1.0%	155	20.2%
A Little Bit	12	2.6%	18	5.8%	30	3.9%
Total	458		308		766	

2. In the past five years, have you been discriminated against when you were looking for a new place to live in Houston based on your protected class?

	METRO		HCDD Fair Housing Hotline		Total	
Yes	72	16.1%	24	7.8%	96	12.7%
No	376	83.9%	282	92.2%	658	87.3%
Total	448		306		754	

2.a. What would you do if or what did you do when you were discriminated against in housing?

	METRO	
I don't know	37	29.1%
Nothing	62	48.8%
Report	20	15.7%
Other	8	6.3%
Total	127	

3. Do you know how to report housing discrimination?

	METRO		HCDD Fair Housing Hotline		Total	
Yes	90	20.0%	278	93.0%	368	49.1%
No	360	80.0%	21	7.0%	381	50.9%
Total	450		299		749	



Outcomes that Matter Activity

In September 2019, approximately 80 people participated in a priority exercise during five different meetings, two sponsored by the City and three sponsored by SHAPE Community Center. This exercise was made available to all Fair Housing Ambassadors.

Participants were asked “**What are the most important housing outcomes for you?**” and given 10 outcomes related to housing or neighborhood preferences. Participants were given five votes to prioritize the outcomes.

Residents are most concerned with **safety** in their neighborhood. They would like to feel safe walking alone within their neighborhood. Second behind safety is **neighborhood assets**. The participants would like to live in a neighborhood with cultural and social assets. Behind safety and neighborhood assets are **affordability** and **transportation**. Residents would like to 1) live in their home without fear of it getting too expensive and 2) easily use public transportation to get to places from their home. All other outcomes were 10% or below.

What are the most important housing outcomes for you?		
	Number	Percentage
I feel safe when walking alone in my neighborhood	65	16.4%
I live in a neighborhood with cultural and social assets	54	13.6%
I can live in my home without fear of it getting too expensive	50	12.6%
I can easily use public transportation to get to places from my home	50	12.6%
I live in a neighborhood that is not at risk of flooding	39	9.8%
I earn enough to live in a home of my choice	39	9.8%
I have knowledge about available housing assistance programs	28	7.1%
I can maintain and repair my home easily and affordably	27	6.8%
I can choose to buy/rent from a variety of housing types	23	5.8%
I can move to a new neighborhood of my choice	21	5.3%



Findings from Fair Housing Ambassadors Program

The Fair Housing Ambassadors Program lasted from July through September 30, 2019 and served to facilitate engagement opportunities for hard-to-reach-communities or communities that are normally underrepresented on behalf of the City of Houston. The Fair Housing Ambassadors Program consisted of organizations and individuals gathering input about housing and fair housing needs and strategies for the Consolidated Plan and AI.

The Ambassadors were provided resources like the *2019 Community Meeting Presentation*, four discussion exercises, and guidelines and tips for meeting organizers, facilitators and notetakers. The Fair Housing Ambassadors were also encouraged to execute their own strategy to conduct public engagement, so long as necessary and sufficient feedback is gathered from the community regarding housing and fair housing needs and solutions.

The following organizations and residents were selected to participate in the program.

- 2nd Chances Life
- Advocate Legal Senior Center
- Bellaire Future Problem Solvers / Fresh Hub
- Covenant Community Capital
- East End Unidos
- Fair Housing Neighborhood Rights / Coalition of Community Organizations
- Fifth Ward CRC (GO Neighborhoods)
- Franklyn Odum
- Higher Dimension Church
- Houston Area Urban Community Development Corporation
- Houston Area Urban League
- Korean Journal Houston
- Mangrove Community
- Marcina Gilliam
- NestQuest
- Parental Survival Center
- Revive Community Workshop
- Shape Community Center
- Spice Lane Community Investment Group
- Zain Zaman Shenwari

Ambassadors held 10 community meetings with Ambassador-led discussions about fair housing lasting from 15 minutes to two hours long. Approximately 235 residents participated in these events. In addition, Ambassadors attended other community events and walked door-to-door where they discussed fair housing, promoted their events, and offered the 2019 Community Needs Survey to residents, approximately interacting face-to-face with an additional 300 residents. Fair Housing Ambassadors also used methods of outreach that worked for their community, including canvassing, social media, word-of-mouth, and articles and information in community newspapers.



Korean Journal Houston

The Korean Journal Houston held two events to discuss fair housing issues and laws and to receive qualitative feedback from community members. In addition, the Fair Housing Ambassador encouraged participants to take the 2019 Community Needs Survey. Also, there were several advertisements and articles about fair housing in the Korean Journal Houston, which has a weekly distribution of 6,000-7,000.

- Article about fair housing in Houston – August 16, 2019
- Article about fair housing – August 30, 2019
- Article summarizing the AI engagement process and 2019 Community Needs Survey – September 6, 2019
- Article summarizing the Fall Open Houses – September 13, 2019
- Article summarizing the Fair Housing Seminar – September 27, 2019
- PSA's using Houston's "I am Protected Campaign" in English and Korean appeared in the following issues
 - August 16, 2019 – familial status
 - August 23, 2019 - disability
 - August 30, 2019 – national origin
 - September 6, 2019 – familial status
 - September 13, 2019 – familial status
 - September 20, 2019 – familial status

Fair Housing Seminar for Korean-American Community

Date: September 21, 2019

40 people (3 people in discussion)

This first-time event included 1) a presentation, 2) discussion (1.5 hours), 3) summary of HCDD and its programs, 4) guest speaker, 5) 2019 Community Needs Survey.

Top themes from discussion

- Characteristics of the Korean-American community in Houston, compared to other races and nationalities
- Lack of information due to language barriers as an immigrant society
- Housing assistance program needed for middle- and low-income families
- Proposing ideas for fair housing outreach in the Korean-American community

Question 1: Houston is the most diverse city in the United States. Do you believe that a barrier to fair housing choice in Houston remains today? Why or why not?

- Discrimination does not stem from society as a whole but more so from each individual.
- Sometimes immigrants that experience problems or difficulties think that it is better to ignore and move on rather than confronting the issue/causing a scene.

Question 2: How would you educate the public about housing discrimination against 7 protected class?

- Real estate and lending professionals and bank officials who are in charge of housing transactions should work together with Korean American leaders to promote fair housing in the Korean language and with Korean translated brochures.

Fair Housing Meeting with Disability Parents Association (DPA)

Date: September 27, 2019

5 people (3 people in discussion)

This first-time event included: 1) a presentation, 2) discussion (1 hour), 3) summary of HCDD and its programs, 4) guest speaker, and 5) 2019 Community Needs Survey.



Top themes from discussion

- Discussed the Fair Housing Act and 2019 Community Needs Survey
- Status about the discrimination cases related to a family with a person with a disability
- Lack of information due to language barriers as an immigrant society
- Housing assistance program needed for middle- and low-income families
- Proposing ideas for fair housing outreach in the Korean-American community

Question 1: Have you or anyone you know experienced housing discrimination? If so, what happened and how did you react?

- I've heard that there are people around who have had trouble renting a house, but they didn't share the details. At the time if the person was being discriminated against because of their disabilities, we believed it was only a matter of the owner's personal inclinations and at the time did not realize we could be protected due to against unfair practices. Perhaps most disabled families felt that such discrimination had be tolerated.

Question 2: How would you work with landlord and property management companies to become compliant with design and construction requirement of the Fair Housing Act?

- If law protects persons with disabilities, I will definitely appeal for these facilities for people with disabilities for apartment or house rentals in the future.
- I will actively inform the community living with disabilities and share fair housing information with them.

Question 3: How can the City educate the public about housing discrimination based on disability?

- Inform local community centers more about fair housing, government programs, and new housing development plans.
- The presence of brochures, which are also made available in Korean, will help inform the neighborhood a lot.
- There are only a few networks or community members informing the Korean community or the Korean community center about the government's beneficial programs.



SHAPE Community Center

Fair Housing Community Forum

Date: September 7, 2019

25 People

The event included an informal discussion on what fair housing means and fair housing barriers. It also included Exercise 2: Outcomes that Matter from the City provided Toolkit. The discussion lasted 2 hours.

Top Themes from Discussion

- Fair housing education
- Marketing and publicity
- Opportunity areas
- Abandoned property

The participants developed a list of questions based on their concerns brought up in the discussion.

- Does fair housing apply to shelters with housing? Can they discriminate against you for how you look? What you drive? Your race? How you dress?
- What can be done about discrimination against people with Section 8 (Housing Choice Vouchers) vouchers when the State of Texas allows it?
- How do we educate elected officials and representatives on our issues?
- Does the 5-year plan include stabilization on the housing crisis?
- Are there more plans for senior housing to address the track of people going from home—to hospital – to hospice?
- Doesn't the point system for complete communities affect where housing is built? (Discussion of Ft. Bend Low income housing threat; High opportunity areas; Fountain View Project)
- If you call 3-1-1 for help and information with fair housing issues, do you get stuck going down the rabbit hole of automated assistance?
- Can areas like Third Ward, with high amounts of subsidized housing, raise the median income by quantifying subsidies as income?
- Will there be more Open House meetings?
- Is the land bank and land trust in line with the 5-year plan?
- How much housing will be destroyed with the new 45 project?
- Wants to understand what the land bank is- what about the people who are not abandoning property, but they don't know that it is theirs? Or what if they don't know what to do?
- Is there any law against the unsolicited notices sent to private homes requesting to buy their houses? How are they getting my information from the City of Houston?
- If I had \$5,000 and wanted to do something with it (regarding abandoned property), where would I go?
- How do we get all of this important information into the hands of the people? Can meeting notices be mailed with people's water bills?
- Does this cover tax-credit housing? Can late fees fall under fair housing?

Fair Housing Community Forum Parent Meeting

September 11, 2019

17 People

The event included an informal discussion on what fair housing means and fair housing barriers. It also included Exercise 2: Outcomes that Matter from the City provided Toolkit. The discussion lasted 2 hours. After the Exercise, they discussed some of the differences in priorities from those who anticipated in the first event. This event targeted parents and they were very concerned with having resources in their neighborhoods such as good schools and cultural



activities for their children. Parents did not want to travel to “rich” neighborhoods to provide their children with a variety of programming.

Top Themes from Discussion

- Neighborhood resources
- High cost of homeownership
- Gate-keepers and officials who are not responsive to complaints

Fair Housing Community Forum Elders Meeting

Date: September 12, 2019

20 People

The event included an informal discussion on what fair housing means and fair housing barriers. It also included Exercise 2: Outcomes that Matter from the City provided Toolkit. The discussion lasted 2 hours. After the Exercise, they discussed some of the differences in priorities from the other events. This event targeted seniors and some of their greatest concerns were transportation, flooding, safety/security, and have activities for seniors.

Top Themes from Discussion

- Poverty
- Flooding
- High cost of utilities
- Resource for elders
- Availability of information for people who do not access the Internet



Fifth Ward GO Neighborhoods

Fair and Affordable Housing Business Focus Group

Date: September 26, 2019

8 People

Attendees were asked to provide their thoughts about the future of fair and affordable housing in Fifth Ward, how possible construction might affect them and how to ensure affordable housing is available and accessible to the community. The questions posed to the focus group were:

1. How do you define fair & affordable housing?
2. What's the difference between the words 'Fair' and 'affordable'?
3. How do you feel about the current status of the community & the businesses in this community, specifically?
4. How do you feel about the current state of housing in this community?
5. What in your opinion, can the City of Houston do to make housing more affordable in this community?
6. What are ways you think we can empower local business owners to have more discussion & better advocate for fair housing in this community?

Main Themes & Findings

There were several running themes throughout our conversation with participants.

- **Accessibility:** Primary outreach strategies must directly touch residents or “meet them where they are.” Accessibility must be considered in activities regarding affordable housing (such as community meetings). We must also ensure the housing itself is accessible. Lastly, community engagement opportunities need to be accessible as well. Heavy emphasis on face-to-face engagement tactics are better ways to keep people informed versus social media.
- **The terms ‘fair’ and ‘affordable’ are defined** by individuals’ economic circumstances. The community is experiencing challenges balancing what fair and affordable looks like for all.
- Participants expressed trepidation about **gentrification’s** negative impact on residents’ ability to continue existing and living in Fifth Ward. While new housing structures can be welcomed, displacement of residents during that process is not.
- Participants expressed how important **education** is for affordable housing in the community. Education for home ownership assists residents in the transition from affordable housing to owning property. Education for job skills and money management are important so residents have options and funds to afford “affordable.” Education about deed clinics would assist residents in being able to apply for and maintain residency in affordable housing.
- Participants expressed a need for a **strong economic base** in the community to purchase homes, fight gentrification and increase neighborhood morale. All participants were in agreement the number of businesses in the community needs to increase.

Comments from the Focus Group

Below are important comments from the focus group.

What’s the difference between the words ‘Fair’ and ‘affordable?’

“I like to get people aware of the economic gap. What is fair to me, may not be fair to another person because they might have been born into a different condition.”

“Fair comes in when we’re living in the same place, but we’re paying different mortgages or different rents. And I don’t know how you balance that.”

“A lot of times [developers] target low-income areas basically that has high crime and pretty much say it’s a solution....to create the more expensive areas and have people move in which we know what it is. I’d say fix the problem. Fix the economic issue.”



“So, yea we don’t wanna see the \$300,000 townhomes move in, but it’s an economical decision for those builders. We can’t squawk about people we couldn’t convince to keep their parents’ property.”

How do you feel about the current status of the community & the businesses in this community, specifically?

“It’s very unfortunate, but a lot of us fell into this bed of goods that it’s better to leave Fifth Ward and go live out in the communities where *and I love what you said* there’s no accessibility.”

“I like the fact that the Fifth Ward [CRC], Chamber, you’re trying to preserve what can be preserved at this state of the game, with the Fifth Ward, but I’m still not exactly pleased with the overall.”

“There is a desire to start businesses here in Fifth Ward. But the fear conquers the desire. Fear that Fifth Ward isn’t ready for certain businesses, fear the residents here can’t afford to patronize it.”

“Until you build an economic floor base, you’ll never be able to have a strong voice on the political level. Where you can put the politics in place to protect your bottom line. Then from there, you can deal with the court systems that effect the community.”

How do you feel about the current state of housing in this community?

“As far as housing, all of this, like I said \$225,000 is not affordable housing. This neighborhood will not support that. I would rather see, instead of these townhomes, let’s go back to the shotgun homes. You put two of those on a lot, you got 2 families taken care of. Instead of 1 lot going up 2 stories: no sidewalks, no yard, no front yard and it just doesn’t work. That’s not this community [in reference to townhomes].”

What in your opinion, can the city of Houston, do to make housing more affordable in this community?

“Find out what’s the low income in fifth ward then create affordable housing based on that statistic. It needs to be based on renters with a desire to own.”

“Work to bring better paying jobs into this community. If you have a better paying job, you can fix up your house. Raising the income of the community to keep in the community, that is what the city can do.”

What are ways you think we can empower local business owners to have more discussion & better advocate for fair housing in this community?

“I think you have to have an interest living here first.”

“There are lots of businesses in this area that don’t kinda venture out and participate in these events. So taking them...giving them an opportunity to say, going door to door, and letting them know that these types of discussions occur.”

Possible Next Steps

The focus group participants alluded to several ideas community groups and organizations can activate to assist with advocating for and bringing affordable housing to the community

1. Facilitate workshops and seminars about home ownership, home deeds and money management
2. Facilitate workshops to educate the community about affordable housing trends & opportunities in Houston and the community
3. Increase the number of job readiness programs & opportunities in the community. Residents needs higher wages to not only maintain residency in affordable housing, but transition to home ownership.
4. Bring more businesses to Fifth Ward to create a strong economic base and increase resident morale.
5. Lastly, all aforementioned ideas are great, but they will not be effective if the community is not aware they exist. Bringing the information to residents of the community in an effective way. Activating the Gladiators & the online community calendar by the Fifth Ward Community Redevelopment Corporation would assist in these efforts.



Fair Housing Neighborhood Rights (FHNR) / Coalition of Community Organizations (COCO)

The FHNR / COCO group held one large community meeting and partnered with other organizations for six community discussions with 182 people in attendance to collect qualitative community input and 2019 Community Needs Surveys. FHNR / COCO representatives also attended four other community events to advertise their community meeting and discussions and to promote and collect 2019 Community Needs Survey. Approximately 240 people attended these other community meetings. The FHNR / COCO groups collected approximately 134 surveys from community members. In addition, members of FHNR / COCO also went door to door and to neighborhood businesses to advertise their meetings and to discuss neighborhood needs with residents. Approximately 1,000 people were contacted about the event hosted by FHNR / COCO.

Resource Meeting at New Hope Housing Date: September 11, 2019 20 People (5 people participated in the discussion)

Top Themes from Discussion

- Low income housing, disabilities, and availability of housing while on Social Security income
- Few low-income housing use 30% of income maximum guidelines (especially for Extremely low income residents)

Wesley Community Center Meeting Date: September 12, 2019 52 People

The Harris County Appraisal District and Harris County Tax Assessor gave an overview of paying property taxes, filing homestead exemptions, transfer on death deeds. The fair housing discussion lasted 15 minutes.

Top Themes from Discussion

- Estate planning is needed
 - Wills are needed
 - Concerns about how to pass along property to heirs
- Transfer on Death Deed – avoiding families needing to pay money for probation of wills
- Property tax increases and cost of rent due to future gentrification

Covenant Community Capital “Where You Live Matters” Meeting Date: September 14, 2019 50 People

A 30-minute discussion on fair housing was initiated during a monthly homebuyer workshop at Covenant Community Capital. The moderator asked: “What keeps you from the housing you want?” and participants identified the barriers they felt kept them from being able to access or afford a home in an area they preferred/desired. Each participant stated their barrier and provided more details regarding their concerns. Then, the entire group was asked if they experienced any other versions of the same barrier and this resulted in some subcategories; the entire group was asked to vote if they also shared/experienced the same barrier or subcategory.

After identifying “research” as a major barrier to finding preferred housing/neighborhoods participants were invited to participate in a follow-up workshop on conducting additional homebuying research. “Choosing a Good School” and “Credit” were the first topics explored. Ten future homebuyers attended.



Stated Barrier	Description of Barrier (including subcategories)	Total
Research	<ul style="list-style-type: none"> Buyers felt they lacked sufficient information on how to identify and research neighborhoods and where to buy a good-fit home 	34
Credit	<ul style="list-style-type: none"> Buyer's credit scores were too low to qualify for a mortgage loan – 21 Buyers had insufficient number of tradelines (not enough credit – 8 	29
Sufficient Space	<ul style="list-style-type: none"> Yard size too small – 13 Home square footage too small – 9 Insufficient parking spaces – 7 	29
Good Schools	<ul style="list-style-type: none"> Buyers are not able to afford neighborhood with good schools / the affordable neighborhoods had poor school ratings 	28
Savings	<ul style="list-style-type: none"> Buyers struggle to save for homebuyer's upfront fees, cash reserves/emergency fund, or debt payoff 	24
Income	<ul style="list-style-type: none"> Current debt-to-income ratios too high to purchase a home the desired 	23
HOA Deed Restrictions	<ul style="list-style-type: none"> General restrictions limiting buyer lifestyle choices (restricted paint color or decor for exterior of house – 6 Too restrictive rules for car parking – 3 	9

Where You Live Matters Event

Date: September 24, 2019

10 People (32 people participated in 30-minute discussions)

Top Themes from Discussion

- Illegal dumping with no resolution after 311 reports
- Abandoned buildings with no response and no resolution to 311 reports
- Disaster Recovery Home Repair Program has a waitlist and applicants are not yet receiving repairs
- Flooding after Imelda: concerns of street flooding – especially along MLK Blvd

Where You Live Matters Follow-Up Workshop

Date: September 28, 2019

10 People

Corretta Fontenot, educator, presented an overview of what to consider when choosing a school and the pros and cons of the different tools/metrics to define a “good” school.

To address concerns regarding credit, Financial Educator, Sharita Humphrey was invited to speak about an opportunity to get help with identifying valid credit disputes and following through with the dispute process. Homebuyers were concerned about the challenges of maneuvering the dispute process, understanding how to apply their rights, fulfill their responsibilities and understand the general rules of why and how creditors and credit bureaus handle delinquent debt.

To address the overall barrier of conducting research on neighborhoods, Covenant purchased a membership to an online platform, Neighborhood Scout, to help potential homebuyers to start critical research on neighborhood options and characteristics. The details of the platform were not able to be explored in the workshop due to time constraints; however, participants were encouraged to schedule one-on-one appointments to explore the online tool.



Illegal Dumping Planning Meeting
Date: October 22, 2019
6 people

A follow up meeting to the September 24th meeting was scheduled to address community concerns heard. Discussion included Catherine Garcia Flower, formerly of the Department of Neighborhoods, and Nile Dixon a researcher on 311 data on illegal dumping. Discussed possible information to prepare for a future event.

Top Themes of Discussion

- Top 10 locations of illegal dumping in South Park / Sunnyside
- Challenges to timely resolution of pick up of illegal dumping
- Strategies to improve pick up of illegal dumping.

Canvassing
Date: Mid-September, 2019

In mid-September two members of FHNR/COCO went door-to-door delivering flyers about the upcoming event. Below is a summary description of the conversations regarding issues in their community from residents of South Park. Top concerns included the need for action to improve the neighborhood, illegal dumping and vacant lots, no major grocery store, and flooding and drainage needs. In addition, according to residents, there are unaddressed drug related crimes in South Park, fearing being robbed while returning from local corner convenience stores.

Community Statement	Approximate Number
Thankful that someone is doing something about the community issues/excited about the event	40
Unaddressed vacant lots and esplanade with illegal dumping and trash	35
Concerned that there were no major grocery stores in South Park	30
Flooding of streets and yards during heavy rains (flash flooding) / Standing water in yards due to heavy rains / Lack of drainage	21
Unaddressed drug related crime in South Park	15
Seniors have no accessible/available social spaces in South Park	10
Members have no trust that the City will actually resolve the community issues	10
Lack of information and communication from the City about resources to help	10
Traffic signal not being synchronized at MLK and Crestridge	6
Junk cars and multiple cars parked in yards	5
Raw sewage spilling onto sidewalks and yards (seems to be from broken City sewer lines)	3
Residents have been robbed while returning from the local corner convenience store	2
Home repair was needed post Harvey	1



Mobile Meetings and Resource Fairs

The Process

Starting in June 2019, HCDD staff attended 47 mobile meetings and resource fairs and engaged with over 3,100 people to inform them about fair housing and housing discrimination while gathering community input for the Consolidated Plan and AI.

HCDD staff members reached over 2,400 people with printed information and face-to-face interaction at 20 resource fairs or community events. HCDD staff members made presentations at 7 community events reaching 382 people. Finally, HCDD staff members made presentations and conducted short or long discussions at 20 community events hearing from 340 people.

During the discussions, attendees were asked to give input about qualities they do and do not like and their top housing concerns in Houston. Generally, HCDD asked four simple questions:

- What are three things you like about your neighborhood?
- What are three things you don't like about your neighborhood?
- What are the top three concerns related to housing in Houston?
- Have you or anyone you know experienced discrimination in housing in Houston?

Generally, community members were concerned with increasing housing and housing maintenance costs, gentrification and displacement, highway and transit access, and infrastructure improvements. Some groups also expressed apprehensions about lack of accessibility and housing accommodations while others expressed concerns about lack of regulations and code enforcement. A summary of the findings is indicated below.

The Findings

HCDD's Community Development Advisory Committee

Date: June 13, 2019

11 people

Organizations represented: Greater Housing Fair Housing Center, METRO, Chinese Community Center, Houston Housing Authority, H-GAC, Fort Bend County, HAUL, Prosperity Bank, Houston Floodplain Management Office, and BBVA Compass

Question: What are the barriers to fair housing choice?

- Lack of banks in low-income areas
 - Including Acres Homes
 - Contributes to families falling prey to predatory lenders
- Lack of knowledge about credit scores
- Lack of financial literacy causes barriers for people trying to access credit
- Fair housing barriers have not changed but been exacerbated since Hurricane Harvey
- Discrimination continues in banking services
- Hard for low-income people to obtain renter's insurance (too expensive and not advertised well)

Question 1: What are the three things the people you serve like about their neighborhood?

- Sharpstown residents like their access to freeways, affordability of large homes, and diversity
- South Acres has a strong sense of place, an older community, is within fifteen minutes of driving to most places
- Sunnyside has a strong sense of community and place where the original homeowners still live and are fully vested in their neighborhood.



- Acres Homes residents like that it is removed from the city's noise and has a niche of its own.
- Sugarland has good schools, affordable homes, and diversity

Question 2: What are the three things people you serve don't like about their neighborhood?

- Alief has safety issues in the high-density area that has a high transient population, which makes it difficult to do community outreach because of language barriers; and it has a lack of transit options.
- Habitability issues of sub-standard rental units that have code issues
- Transportation is a problem for low-income residents
- Apartments are overpriced in the inner-city neighborhoods
- Lack of sidewalks
- Lack of diversity in the type and price of the new housing stock available in low-income areas
- Need to provide better job skills so low-income people can access better jobs
- Lack of safety and quality of schools in Sunnyside and Alief
- Acres Homes lacks affordable, quality housing and banking services
- Small- and medium-sized businesses did not have resources to grow
- Gentrification is an issue for residents in many neighborhoods

Question 3: What are your concerns related to housing in Houston?

- Lack of access to credit and banks
 - The model of having community lending teams as banking service providers was an ineffective strategy and was not incentivizing loan officers to provide loans to low-income persons.
- Lack of code enforcement in apartment complexes
- Lack of community organizations and non-profit landlords who can provide low-cost housing
 - Lack of Community Housing Development Organizations and too much burden on the Houston Housing Authority
- Lack of a 'face' for the low-income residents of Houston that can better fight NIMBY-ism
- One-third of the metro areas population is under-banked and misinformation is leading vulnerable people towards predatory lending

Baker Ripley Elderly Meeting

Date: July 1, 2019

26 People

Question 1: What are the three things you like about your neighborhood?

- Centrally located for resident in zip code 77004
- Easy accessibility because of nearby freeway in zip code 77004
- Close to downtown and medical center in zip code 77004
- Quiet in area close to Hobby Airport
- Close to downtown and medical district in area close to Hobby airport
- Quiet in area by Kuykendahl Road

Question 2: What are the three things you don't like about your neighborhood?

- Very congested in area by Hobby Airport
- Lack of connectivity because of changes to the Dowling Street bus route; community was not consulted when METRO was implementing changes to bus routes
- Lack of accessibility, cracked sidewalks, and dangerous / unwalkable sidewalks in the Third Ward and Fifth Ward areas
- Loose dogs and cats – unresponsive service for stray animals in Harris County



- Uncovered bus stops
- Lack of connectivity and mobility at night because the bus stops running after 9 pm in Third Ward

Question 3: What are the top three concerns related to housing in Houston?

- High rents
- Housing affordability
- People shouldn't have to feel trapped in their housing situation
- Gentrification: New construction is leading to displacement of residents and increased property values
- Lack of regulation and lack of a civic club in Third Ward
- Lack of code enforcement, people get away with lack of code enforcement in their homes and half-fixes

Montrose Center Senior Meeting

Date: July 3, 2019

16 People

Question 1: What are the three things you like about your neighborhood?

- Nice downtown skyline in a neighborhood at the edge of downtown
- Trees, walkability, accessibility of amenities such as grocery stores within the neighborhood in Montrose
- Trees, old neighborhood with historic character and a designated historic district, walkable, has high density in the West Mooreland neighborhood
- Neighborhood is easily accessible because is on the edge of Montrose and River Oaks
- Close to the Menil Collection, safe and well-taken care of in the Montrose area
- Quiet and nice in the First Ward
- Convenient because of proximity to freeways in 77071
- Nice, quiet and safe and conveniently close to downtown in 77008 (resident lives in Heights Tower)
- Art projects and public spaces (in the) park in 77002
- Affordable and has parks in 77082

Question 2: What are the three things you don't like about your neighborhood?

- Drainage is bad because streets are higher than the sidewalks which leads to ponding in the Montrose area
- Cannot qualify for MetroCab. "It is a cheap option but only for those that cannot walk. I can still walk so I am disqualified. I have to take two buses and walk several blocks. I am qualified for MetroLift."
- People with more money and younger people who are rude are buying the new townhomes. They block sidewalks by parking on it and cause problems to residents.
- Dunlavy Street and West Gray Street: Increased new housing in the area by converting old single family homes to townhomes. It has created parking issues on the street. New residents in single family homes have obtained No Parking signs for the street in front of their home.
- Commonwealth & Waugh: Traffic bottles up in the area due to so much parking on the street. Goes from three lanes to two lanes.
- 77002: Constant increase in traffic. The stop signs are insufficient to control the traffic. Need to be replaced with traffic lights. Also, drugs and crime in the area.
- 77002: Richmond Avenue & Synott Road: Needs wider streets, better traffic regulation with lights. Lots of drugs in the area.
- Commonwealth & Nevada: Potholes
- Hazard Street & West Alabama Street: Broken pavement
- West Mooreland: Petty crime
- Richmond street between 610 and BW: Completely broken for many years

Question 3: What are the top three concerns related to housing in Houston?



- Not enough affordable housing inside the loop. Price of 1-bedroom apartment is \$1,000
- Can live affordably but not in an area of one's choice
- Need safe neighborhoods
- Huge swathes of low-income neighborhoods where developers are buying people out
- 5th Ward is not safe
- Access to grocery stores and drug amenities should be close by, within walking distance, because some residents cannot drive or even walk. Makes it hard to live where there is public transportation
- Senior citizen affordable homes developed on islands, such as Shepherd & 34th Street development, which is 4 blocks from the closest transit, no convenience store, no grocery store. Need to be near bus lines and amenities.
- Build grocery stores in areas like the 3rd Ward

Question 4: Have you or anyone you know experienced discrimination in housing in Houston?

- The LGBTQ+ community is generally concerned that they are not afforded additional protections under the Fair Housing Act.

Fair Housing Ambassadors Orientation Meeting
Room 926
Date: July, 5, 2019
28 Ambassadors in Attendance

Barriers to fair housing choice (from Why did you become an Ambassador?)

- Participant said his sister was denied housing was convinced it was housing discrimination but didn't report it
- Lack of affordable housing
- Lack of access to and ability to maintain housing
- Fear
- Slumlords
- Realize that it was discrimination later
- Felony denials for housing limits access
- Affordability

Strategies – that came during Community Meeting Presentation

- People may be denied loans because of credit or income and not because of discrimination
- Need to create job training and get people better paying jobs so that they can afford a home

LISC / GO Neighborhoods Roundtable
Date: July 11, 2019
11:30 am – 1:30 pm
18 People

Question 1: What are the three things you like about your neighborhood?

- Walkability, parks, mixed-use, access to amenities in zip 77459, 77007
- Proximity to park and amenities in 77009



- 77021: Transitioning from a good neighborhood to a neighborhood that has deteriorated because of broken homes, broken social safety nets. But now there is an attempt to fix it through awareness about mental health awareness and improving safety through strategies like police officers playing with the children.
- 77429: Culturally diverse and economic diversity

Question 2: What are the three things you don't like about your neighborhood?

- Spring Branch Central: Gentrification, lack of affordability for renters; Latino owned businesses getting bought out, displacement of locals resulting in cultural change
- Neighborhood gentrification is injecting new people into older communities
- Developers have changed the names of the streets and places in these old neighborhoods when they come in with new development
- Safety nets have vanished because of this gentrification, which is resulting in kids not playing outside, high crime with guns, and police cars on the streets all the time at 77021

Question 3: What are the top three concerns related to housing in Houston?

- Can't live where we work, suburbs have a better mix of residential neighborhoods with amenities than the central city
- Lack of affordability where there are flood zones, where you can't build in the flood zones e.g. Champions area
- Renters deal with rental units in disrepair since lke, not enough mix income housing with different types of housing at different price points

Question 4: Have you or anyone you know experienced discrimination in housing in Houston?

- I get different responses from landlords when I go looking for apartments based on what I am wearing. If I wear professional clothes, I get treated better.
- Hispanic couple was asked for SSN, home construction ended after every other home in the development was completed, there were other issues with communication with the developer
- Respondent expressed issues with realtor who had inappropriate conversations and would not give an appropriate notice period before showing unit to a prospective renter

Barriers to fair housing choice

- NIMBY-ism is worse since the last AI
- More violations of renter's rights

HHA Kennedy Place

Date: July 9, 2019

9 People

Question 1: What do you like about your neighborhood?

- Close to downtown
- Accessible to freeways, convenient location
- The properties are unique, relatively new and has good amenities
- Sense of place
- Close to public transit
- Safe area
- People are grateful, but it could be better

Question 2: What don't you like about your neighborhood?

- Deep concerns with gentrification



- New townhomes are expensive, too tall and impact the visibility
- New neighbors do not look like the long-term residents
- Stray dogs
- Developers were misleading to existing residents and said townhomes would be affordable and they are not
- HHA tenants don't appreciate the property by not disposing of trash properly, hanging clothing on the balconies, and are not otherwise responsible for their residence
- Tenants damage the units after requesting and receiving improvements
- Units do not have finishings that are practical to maintain the unit, i.e. light-colored carpets and light paint for family units cannot be maintained
- Recertifications can be cumbersome due to tight deadlines and the amount of paperwork that is required
- Neighborhood lacks corner stores
- Grocery stores in the neighborhoods sell expensive items that are outdated and unhealthy. Tenants leave the neighborhood to eat, causing leakage of neighborhood dollars
- No health facility in the neighborhood. LBJ is not good Legacy Health clinic does not assist with major and chronic health issues. No urgent care in the neighborhood.

Question 3: What is your top concern related to housing in Houston?

- Affordability: Cannot afford to live in safer areas. Homes are not affordable in this neighborhood. The more money tenants make, HHA increases the rent. Residents feel that they are unable to attain upward mobility. They feel stuck. (tenants did not know about the Family Self-Sufficiency plan and do not know how to transition out of HHA)
- Safety: People speed through the property. Cannot afford to live in safer areas. The police response times are slow. Residents tend not to call the police because they feel the Hispanic officers do not help the black residents and they are quick to arrest when called.

NAACP

Date: July 10, 2019

8 People

Question 1: What are the three things you like about your neighborhood?

- No answer

Question 2: What are the three things you don't like about your neighborhood?

- No answer

Question 3: What are the top three concerns related to housing in Houston?

- Lack of affordable housing units
- Tax credit deals only do the minimum amount of units
- The QAP does not help to build the number of units that are needed

Question 4: Have you or anyone you know experienced discrimination in housing in Houston?

- Non-English speaking households have fair housing barriers



HHA Long Drive
Date: July 12, 2019
5 People

Question 1: What are the three things you like about your neighborhood?

- Highway access is very convenient
- METRO bus stop is right outside, do not have to walk far
- Feels fairly safe
- Good neighbors, everyone knows everyone for the most part

Question 2: What are the three things you don't like about your neighborhood?

- Feel like an outsider outside of the complex due to race and income
- Better schools are needed, the high school isn't friendly to students. Teachers treat the students like criminals
- When the METRORail was implemented, many bus routes were discontinued, makes it hard to travel to other parts of the city
- METRO routes can get you to work, but can't get you home
- Charters schools keep the black children out, you have to get lucky to get into the charter schools
- Flooding in the neighborhood keeps people trapped
- Transportation is a barrier to get into better schools
- The city does not cut the grass in parks and other public spaces
- METRO doesn't always arrive as scheduled

Question 3: What are the top three concerns related to housing in Houston?

- Reasonable accommodations took too long, almost one year
- Unable to successfully transition off of housing, if income increases, so does rent, unable to save money to leave HHA (didn't know about the Self-Sufficiency Plan)
- Unable to work where we live/live where we work
- Lack of housing affordability in this neighborhood, or in neighborhoods with better schools

Question 4: Have you or anyone you know experienced discrimination in housing in Houston?

- No/IDK

Fair Housing and Neighborhood Rights Meeting
Date: July 12, 2019
20 Attendees

Question 1: What are the three things you like about your neighborhood?

- Historical value of 3rd Ward. It is close to downtown and has great social capital.

Question 2: What are the three things you don't like about your neighborhood?

- Open drainage
- Neighborhood aesthetics
- Too many potholes and unrepaired streets
- Illegal dumping



Question 3: What are the top three concerns related to housing in Houston?

- Affordability, better communication about available programs and processes from beginning to completion, would like more public-private partnerships (or create multiple funding sources for people benefiting from a program)
- Less impoverished areas, faster programs (reduced red tape or looser regulations), and information/communications about programs available that may not be funded by the City.

HHA Fulton Village
Date: July 15, 2019
14 Attendees

Question 1: What do you like about your neighborhood?

- Growth. Like the way the new homes that are constructed in the neighborhood look. There are a variety of housing types.
- Walkability. Sidewalks and the convenience to the METRORail
- Mixtures of cultures

Question 2: What don't you like about your neighborhood?

- Stray dogs
- Lots of homeless people
- Lack of affordability of newly constructed homes
- No big box stores
- Schools could be much better
- Pedestrian gate is not user friendly for people using powerchairs and experiencing dexterity issues (can't press the pedestrian gate buttons)

Question 3: What are your top 3 housing concerns?

- Affordability
- People in poverty are unable to make home repairs. Dilapidated homes
- I-45 expansion threatens Clayton Homes
- Hardy Toll Road expansion will impact access to this neighborhood
- Concrete plant may have health impacts to residents (asthma)

Question 4: Have you or anyone you know experienced housing discrimination in Houston?

- Yes, maintenance selects how repairs are made by who they like more
- Fees are waived for the "right" race

HHA Victory
Date: July 18, 2019
5 to 7 p.m.
10 Attendees

Comments during the presentation

- Participants did not understand the difference between HUD and Fair Housing. When asked what fair housing was, they responded 'HUD.'
- 'Housing' seemed to be a word used for where participants lived, the housing authority, the city, or HUD.
- For the income slides:



- Household incomes are on the rise all over the City, especially inside the loop (and in their neighborhood)
- Development is happening inside the loop and so it is becoming unaffordable; suburban residents are moving in to new townhomes
- For the poverty slides
 - When asked who poverty effects the most, the residents answered African Americans (although we didn't have any data to show that during the presentation).
 - The neighborhood is changing (income and race/ethnicity), however the schools in the neighborhood aren't necessarily improving. However, HISD's vanguard program allows students to go to better schools outside their neighborhood/zoned school, which provides children more opportunity; they just have to get up early/ride a bus across town.
- Fair Housing Barriers – speaker asked if these are still barriers
 - Yes! (everyone replied)
 - Teachers in their schools aren't great and are not preparing students well. Therefore, many students have to go to summer school. (some participants didn't mind having kids in summer school).
 - Need to change minimum wage so that people can earn more, even if you don't have an education. It's hard to get a good paying job.

Question 1: What do you like about your neighborhood?

- Good transportation (rail, freeways)
- Close to Medical Center, Central Business District
- Doesn't flood
- Park for the children
- 911 response time (first responders)

Question 2: What don't you like about your neighborhood?

- Speeding traffic; bad drivers
- Stop sign is disregarded
- Not enough street signs in a neighborhood with lots of one-way streets where people go the wrong way
- Potholes
- Overall people really liked living in their neighborhood

Question 3: Top housing concerns in Houston?

- Availability of affordable homes, especially for families with children.
 - Allen Parkway Village has five-bedroom units and there needs to be more
- Housing Authority doesn't lease to sex offenders; it's hard for them to find housing options
- Concern about where to place affordable housing because of NIMBY efforts, especially in neighborhoods with high opportunity.

Question 4: Have you or someone you know experienced housing discrimination?

- One resident had experienced it but didn't know it was discrimination at the time.

Overall residents liked living in the neighborhood and like the programs that the housing authority conducted.



Catholic Charities Meeting
4315 Lyons Avenue
Thursday, July 18, 2019
23 Attendees

Questions asked by Attendees

- Even if we are not from America, does the Fair Housing Act protect us?
- For someone with a job but of low income, can we apply for assistance? Yes, please call us for help.

Comments by Attendees

- Immigrants don't report discrimination because there is a fear of being reported.
- Please come back to the Spanish-speaking portion with a Spanish speaker. We really want more information.

HHA Oxford Place
Date: July 24, 2019
5:30-7:30pm
12 Attendees

Comments before presentation

- Stated that there is an extreme rodent problem and it has caused a financial hardship for her
- Would like to see more onsite job training and skills at the property as well as in the immediate surrounding neighborhood, so that residents could transition from HHA housing
- Youth activities and opportunities
 - Want to see more senior activities onsite as well as youth engagement project and activities. They expressed concern that there isn't enough activities or facilities geared towards youth to keep them out of trouble. One resident suggested having a community center onsite to help offset some of these concerns and provide opportunities for engagement for the young adults in the community.
 - They also would like to see more scholarship opportunities made available for the youth onsite and geared more towards the young adults; preferably graduating seniors.
 - It was also noted that they wanted a park with swings/ see-saws for the adolescents
 - They wanted a chapter of the Boy Scouts to be brought back to their apartment complex
- More sidewalks are needed on each side of the apartment complex and in the surrounding areas to be safer and make the property and neighborhood more attractive.
- Parking close to a residents' unit is often hard to find

Presentation feedback

- Surprised to learn that Hispanics comprise much of the Houston population

Question 1: What do you like about your neighborhood?

- They stated that they liked the stores, public transportation, the rail system and the accessibility to the grocery stores and shopping. It was also noted that they liked the accessibility to medical care and the supportive services facilities in the area. They also like their neighbors.

Question 2: What don't you like about your neighborhood?

- It was also noted that certain public transportation stops at a certain time and it isn't conducive to their environment because that is the only means of transportation for those going to and from work. It was noted they wanted more access to supportive services from churches, food banks, furniture banks and thrift stores. Access to quality daycare centers. To install more speed bumps to slow down the speeding on the main thoroughfares. To have office staff who can relate to the needs of the tenants. There was a concern



that dangerous and hazardous abandon houses sit empty for months without being knocked down. More covered bus stops were needed in the area, as well as replacing the ones that have been torn up.

Question 3: Top housing concerns in Houston?

- They wanted to see more transitioning programs for those who want to transition out of public housing and access to get there. It was also noted that these transition programs should provide more on-site training and programs for those residents unable to travel to the program areas. Onsite training for residents to learn to navigate the different programs, policy and procedures for their complex.

Question 4: Have you or someone you know experienced housing discrimination?

- Some residents expressed concerns about retaliation for making complaints about their tenant rights and fair housing rights. They expressed concerns about being threatened by management.
- It was also expressed that there is a lot of discrimination at Oxford Place and the need to teach residents about discrimination complaints and who to file the complaints

Avenue Leadership Meeting
Date: August 7, 2019
Leonel Castillo Community Center
2101 South Street
15 Attendees

Comments

- Impediments discussed in the AI should include the 45 Expansion and reoccurring flooding.
- Houston Housing Authority discriminates on the basis on of races.
- Race has nothing to do with housing and the ability to own a home.

Discussion Questions

Past barriers like regulations, lack of affordability in housing, discrimination in financial practices in housing, and NIMBY-ism are still current barriers to fair housing.

Question 1: What do you like about your neighborhood?

- Uptown – Nice view
- Near Northside - Great community; very involved Residents' Council
- Park Place (45-S) - Easy access to other areas; affordable housing; minimal traffic

Question 2: What don't you like about your neighborhood?

- Irvington Village - Currently has a negative perception, but the Resident Council is trying to change community per
- Uptown - Sidewalks, traffic, isolation from other residents
- Heights/Near Northside
 - Poor school achievements & ratings
 - Need more policing-community partnerships
 - There are no police storefronts in the neighborhood
 - Need more interactions and access to police

Question 3: Top housing concerns in Houston?

- Heights/Near Northside
 - Decreased affordability



-
- State of housing stock
 - Affordable homes are old and unlivable
 - Visible Access to Employment

Question 4: Have you or someone you know experienced housing discrimination?

- Uptown - Attendee says that she received a call from a Hispanic woman who believed she was discriminated against because the two black women she went with to the HHA office received vouchers and she did not.

Homeless Coalition's Case Manager Resource Exchange Meeting

Date: August 14, 2019

~55 people in attendance

Question 1: What are the three most important housing issues in Houston?

- Criminal background is a barrier to finding housing
- Gentrification – the displacement of long-term residents
- Broken leases – it's hard to find another place if you have past broken leases
- Some rental assistance programs only last five months but the client signs a 12-month lease. This leads to homelessness
- Providers/public don't know of all existing programs that could assist
- Affordability – wages don't cover housing and all other living expenses. (housing is too expensive and wages are too low)
- Women veterans have issues with evictions, having a disability, homelessness, and child care, which are all barriers to housing.



Houston Be Fair Focus Groups

HCDD held a 5-Part Stakeholder Focus Group Series entitled “Houston Be Fair” to gain qualitative information for the Consolidated Plan and AI. The Series was held over a two-week period between October 1-11, 2019 with several professional and community-oriented entities involved in the housing process. The focus of this series was on

- Housing challenges for protected classes
- Reasons for housing discrimination
- Housing discrimination tactics
- Potential private-public partnerships
- Potential policies or regulations
- Community engagement and empowerment strategies

Forty-eight people participated in the focus groups, and over 200 people were invited to participate. The following lists organizations that participated in the one or more of the focus groups.

- ANTHEM
- AFL/CIO
- Avenue 360
- Avenue CDC
- Change Happens
- Chase Bank
- City of Houston Controller
- Covenant Capital
- Disability Rights Texas
- FIEL Houston
- Harris Housing Advisors
- HAUL
- Houston Area Realtors
- Houston Community College-Office of International Services
- Houston Habitat for Humanity
- Houston Housing Authority
- Houston Housing Corporation
- Houston Immigration Legal Services Collaborative
- Korean Journal Houston
- LISC
- Lone Star Legal Aid
- Mayor's Office of Persons with Disabilities
- One World Strong
- Prosperity Bank
- PSC
- SEIUTX
- Senior Legal
- SHAPE Community Center
- SIERRA CLUB
- Texas Housers
- The HOME Coalition
- The Montrose Center
- VOX Culture



Houston Be Fair: Ending Lending Discrimination with Lenders
Date: October 1, 2019
7 Participants

Question 1: What are some primary challenges that result in low homeownership rates among protected classes?

- Lack of education about the process to buy a home due to
 - Socioeconomic status
 - Education level
 - Being sufficiently socialized into understanding banking relationships (home or school)
 - Life-long renter (systemic challenges)
- Lack of knowledge of credit
- Access to credit is hard for certain people/communities
 - Residents with no credit profile, always pay in cash or utilize prepaid card – could be missing out on utilizing debt to buy a home
 - Banks must have products that people have the ability to receive
 - Gig-economy may not provide livable wage
 - Physical access – banks not located in LMI communities
 - People may not have a credit union or bank relationship – have no account
- There may be different banking practices in other countries
- Immigrants may have a different view of banks, as untrustworthy
- No central location of information or resources about all available programs / banking products
- Lack of encouragement and financial planning
- Lack of ADA compliance in existing structures

Question 2: How might the City of Houston go beyond existing city, state, and federal policies and regulations to address these and other fair housing issues?

- Homeownership and generational wealth
 - Messaging about transfer of ownership to prepare for next generation of homeownership
 - More policies about keeping homes affordable after deeding/willing
 - Way to alleviate liens and taxes after transfer of home upon death
- Protect and support renters
 - Potential Landlord Regulations
 - Protect people who rent homes but would like to purchase the land/home
 - First right of refusal if people have been renting the home for 30 years or more
- Partner with banking institutions to reach more residents
 - The city should inform stakeholders about City initiatives.
 - Should have some kind of a clearing house
- Address housing affordability
 - Look at transportation insecurities for those who cannot afford homes in a centralized location.
 - Transit oriented developments
 - Make all TIRZs set aside 15% of their budget to allocate to affordable home developments in those areas. (earmarked TIRZ fund)

Question 3: What opportunities exist for partnerships between the City of Houston, financial institutions, and the real estate community in addressing these and other fair housing issues?

- City should support community and banking efforts with marketing, event space, and funding
 - A similar event had over 1000 people and the City supported the event by giving the GRB Convention Center for the event space and marketing the event



-
- City should provide new programs
 - Program to help pay for residents' homes if property values are increased due to gentrification
 - New homeownership options
 - Work with Houston Endowment to help homes be properly passed onto next familial generations
 - Prioritize affordable homes in prime locations
 - Share success stories to help people rally behind and educate insecure populations
 - Opportunities for narratives (i.e. complete communities, non-ideal homebuyer success, testimonials)
 - Report numbers to show success

Question 4: How can the city and community partners help to increase homeownership levels among the communities we discussed today?

- Educate young people to change behaviors before they start
- Reduce discriminatory practices with more data
 - City Controller should get fair lending data report for Houston from Banking regulators, including FDIC and FOC
 - Have more information than HMDA
 - Banks are more apt to provide information to regulatory agencies rather than other organizations



Houston Be Fair: Ending Rental Housing Discrimination with Housing Providers
Date: October 3, 2019
5 Participants

Question 1: What are some of the primary challenges that rental housing providers/property management companies face when it comes to adhering to fair housing regulations?

- Non-profit providers challenges
 - Financial challenges for accommodations or build-outs
 - Training on-site staff (even down to maintenance workers)
 - Making sure people understand regulations and rules
 - Teach people how to be fair
 - Some use third-party managers
- Challenges for associations
 - Lack of education
 - Newest least trained lessors are more likely to be tagged with housing discrimination; it is not necessarily about bigotry or racism, but rather a lack of knowledge about policies
 - Technical violations
- Challenges for rental management
 - Turnover amongst staff & ancillary lack of training
 - Providing private landlords with the same information at one time
 - Different properties, property managers, landlords
 - Refresher trainings
 - Changes in procedures/social values that change the way that we address issues
 - How to overcome unconscious behaviors?

Sub-question: What about marketing to all protected classes?

- Marketing is typically for vacancies, and bigotry does not behoove you to exude when marketing
- Go out of their way to market in Spanish and Hispanic communities
- Marketing to the most commonly spoken languages in Houston (English & Spanish)
- Be inclusive of other races/ethnicities in marketing documents
- Immigrants tend to cluster because of cultural and linguistic connections

Sub-question: What about diversity of staff?

- It may be a challenge to find more qualified bilingual staff.
- Want staff to reflect the community, and it is difficult to find people who have the knowledge base to be a leasing agent or manager and speaking the language of the community
- Sometimes provide translation services or use someone within the office.
- May have to schedule meetings but have the capabilities of providing linguistic accommodations
- Consumer action will provide things in different languages
- Having leasing documents in different common languages

Question 2: How might the City of Houston go beyond existing local, state, and federal policies and regulations to address these challenges?

- Contracting or offering fair housing training to single-family residential landlords and possibly tenants.
- Sponsor HUD public fair housing training.
- Explore hosting a large one-day symposium for training, showcasing, and resourcing for all landlords.
 - With smaller breakout sessions
 - Have representatives talk about inspections, locks, and fire safety code compliance.
 - Example: Chicago has symposium a well-attended by thousands of people with topics of Financing, Management, Suppliers, Fair housing; Chicago Authorities requires all voucher holders to attend orientation



- Another example is in Atlanta
- Targeted ad for people who are searching for apartments or homes

Sub-question: What about housing inspections? Fair housing testing?

- Work with the Greater Houston Fair Housing Center
- New Inspection Process with Habitability and Fire Marshalls but do not work well

Sub-question: What about renovating units for accessibility?

- Grant money available specifically for accessibility modification for units built before grandfathering
- Building Code should address this (overlap with TAS)
 - Consider parking based on transit capabilities of residences
 - Make an adjustment in the number of the parking spaces required for affordable housing providers
- Streamlining policies at all levels with respect to ADA compliance.
 - Clearer guidelines and memos as a resource for developers and managers
 - ADA and Fair Housing Accessibility (UFAS – Uniform Federal Accessibility Standards)

Question 3: What opportunities exist for partnerships between the City of Houston and rental housing providers/property management companies in addressing fair housing issues?

- Focus groups are good, just more people, but City should host symposium as well
- Have a table and workshop at the Houston Apartment Association Conference

Question 4: How can we support landlords in increasing their efforts to promote fair housing?

- Education opportunities
- Supplying materials at the property level
- On-site interactions with staff and fair housing team
- Make the fair housing section easily accessible

Sub-question: What about educating residents? What might that look like?

- Provide resources to residents annually
- Some municipalities require pamphlets during leasing process
- Have PSAs on the payment systems and social media ads or imagery
- Billboard, TV, and radio PSAs would help promote the message better.
- Partner with strong community centers who have liaisons who educate the community; make information more available

Sub-question: What about improvements to rental housing conditions: In low-and-moderate income areas; For low-and-moderate income people; For housing for persons with disabilities/elderly; For housing for families?

- Tax discount or exemptions if a property maintains a particular percentage of LMI residents.
 - Full property taxes and increases of these taxes may make affordable units unsustainable.
 - This may increase quality and the stock of affordable (workforce) housing because property owners may reinvest in their properties rather than paying taxes.



Fair Housing Ambassadors Houston Be Fair Focus Group
Date: October 7, 2019
9 Participants

Question 1: What are some of the primary fair housings challenges that protected classes face?

- People did not know exactly what discrimination idea of what it was
- People need more access to information
- Realtors make assumptions based on race about whether people are qualified for a price point or area before they have any valuable information about the person.
 - This happens at a point where discrimination is hard to capture because there is no documentation of the refusal to assist.
 - Some realtors require a pre-approval letter before they assist certain people. This again does not capture any discrimination, if any.
- There is a lack of opportunity/awareness to purchase homes because
 - People have not heard about their options
 - There is a lack of knowledge about federal protections. This is hard to explain effectively to people
- People are afraid to report discrimination because they are afraid of retaliation through actual eviction or effective eviction.
- Most discrimination is on the basis of race and disability
- Poverty impacts whether people will be discriminated against

Question 2: What are some of the primary challenges that result in low homeownership rates with certain populations/in certain areas?

- Credit Score is the most common determinant for homeownership.
 - Even the City requires a 640, which is too high.
 - Most people who need assistance have a score of 580-590.
 - Hispanics do not typically have established credit and do not have an understanding of what credit is.
 - Asians typically have a better understand of credit.
- We should consider tying-in financial education with public education
 - Home economics should be re-explored because it teaches about finances and budget, which prepare young people for credit.
 - Setting a Financial Goal Curriculum would help young people budget for wants and needs and what kind of income would satisfy those wants and needs.
- The cost of living is too high, and wages are not comparable to housing costs
 - Because of this, low-income people do not focus on obtaining home, life, and car insurance

Sub-question: How can populations with lower homeownership rates be empowered to apply for home loans?

- People do not believe they have job security. People are earning low wages. Even if people work, they are less apt to stay at that job in order to earn higher wages
- Costs of homeowner upkeep are too expensive. Examples: Plumbing issues or Lawn maintenance
 - People don't know about purchasing Home Warranties
- People are a product of their environment. If parents are not concerned about the purchasing a home, children are not concerned about it either.
- Parents previously gave assistance to their children to purchase homes, but times have changed
- People are losing their home because of the cost of taxes
 - People do not understand that there is equity in a home and do not know that they can
 - People do not understand the transference of wealth & proper preparation (this is dealt with the Urban League)
 - Wealth Stripping because of lack of knowledge
- City-wide workshops that are strategically placed



- A series of workshops that are easy to duplicate and educate the community
- A lot of people are self-employed and loan requirements are more stringent for those that are self-employed
- Mixed status households; they need loans that accommodate people who need assistance, income, and a loan
- Even debt free, people do not have the income to purchase homes and the cost of the homes
- City should partner with affordable developers like LGI and NACCA
 - Need to join forces with other affordable developers
 - Help sell homes and educate people with buying these homes
- Need a different type of homeownership
 - Consider HOA fees during lending process

Question 3: How might the City of Houston go beyond existing city, state, and federal policies or regulations to address these challenges?

- Get a letter in the mail about foreclosure
 - Ask if people have lost a job or need Job training, etc.
 - People don't know that they can recoup money that exceeds the value of the home and amount of foreclosure price
 - Tax Collector's office should notify people about the amount exceeding
 - Money stays in the coffers of the County
- Get developers and providers to collaborate and develop assistance programs

Question 4: What opportunities exist for partnerships between the City of Houston and existing fair housing advocate groups or initiatives engaging in fair housing issues?

- Provide more educational information to more organizations
- Need a platform to talk about fair housing
- Need to overcome language barriers and information asymmetry in immigrant communities.
 - Need to provide information in more languages
 - Partner with more immigrant communities
- Promote 3-1-1 more
- Have a number just for housing to access information about
- Have fun interactive videos
- Partner with justice of the peace Jeremy Brown, who has a program to help people whose homes are near foreclosures
- Partner with universities
 - Target college students who are coming out of school soon
 - Help them understand to credit, homebuying process, budgeting and financing
- Notify people of eviction
- Pull apartment locators in the fold because they have information about all kinds of demographics
- Engage the Chambers of Commerce because they have books published that have insightful information for particular areas
- Engage school system by Saturate every student backpack and teacher inbox

Question 5: What are some of the primary fair housings challenges that protected classes face?

- Education & training sessions throughout the year
 - Know your rights & responsibilities AND rights & responsibilities of their landlord
 - Require Section 8 voucher holders to do certain training
 - Apartment association members must be required to go fair housing training
 - Stress a more workable relationship with tenant
- Landlords do not what tenants to know their rights
 - Based on experience of callers



- Tenants of projects are afraid of reporting because of retaliation
- Victims of domestic violence who hold vouchers
- Approach places that are engaged in promoting Investments in Flipping Houses
- Ads on social media and other websites
- Require an owner or landlord to take a class and hand out information about fair housing

Question 6: How can people be empowered to advocate for themselves when it comes to fair housing issues?

- Show the benefits of education
 - Long-term renters if they do certain things
 - Maintaining a premise
 - Reduce turnover
- Develop official landlord rating/grading system
 - City of Houston Certificate of Excellence
 - Maybe have an award (SN: banquet for developers, providers, lenders, financial institutions, regulatory agencies/businesses)
 - Provide grants/incentives to help housing providers maintain properties
- Although realtors are educated about fair housing before they gain their license, but realtors do not practice fair housing in daily work
- More outreach from realtors to work with low-income tenants
 - Need more counselors
 - Need more training that is specific to the Houston market
- Training of what to do and not what to do + education

Question 7: How did you like the fair housing ambassador program?

- Learned a lot about housing challenges
- Survey was too long & irrelevant
 - The questions on the survey were not going to make a difference in terms in homeownership
- Distrust with the City, local government, or other agencies
- Need to build trust & relationships
- Hear about the study with no follow-up
- Some people appreciated people asking the questions on the survey
- Survey required focus time so its hard to attach yourself to an event
- The “Where you Lives Matters” Brochure was great! It spawned additional conversations
- Have an option of the shorter and longer survey (maybe break up the survey)
- The Speak up Brochure was too busy
- Concerns about the reimbursement program
 - Maybe pay invoices upfront
 - Need an outside source for refreshments
- Events
 - Ra-ra event with Ambassadors to get them on board
 - Big event with all ambassadors at night with full dinner, keynote speaker, survey, then breakout sessions into groups
 - Like having the option of having smaller meeting to have organic matters
- Need more time and more food
- Several months advance notice, about 6 months.
- Provide funding in stages
- Loved the idea of the program!!! Would do it again!

Sub-question: Was the toolkit helpful?

- Yes, the graphs were helpful.



Sub-question: What should the target be for the next round? How many people? Gaining qualitative information? Providing more information?

- Provide information, Specific information about programs by council district
- Provide specific information/outcomes about all of the questions in the survey
- Get qualitative information
- More videos or apps to target young folks
- May be do a chat bot for
- Do short polls through text and Facebook



Houston Be Fair: Ending Rental Housing Discrimination with Housing Advocates
Date: October 10, 2019
24 Participants

Question 1: What are some of the primary fair housing challenges that protected classes face?

- Economics - the cost
 - As people desire to work closer to home, people are forced to move away from the areas they prefer because the costs are too expensive.
 - Transportation is also difficult
 - Housing situation affects the resources around you (e.g. Lack of health food.)
- People make housing more expensive to exclude minorities or low-income homes.
 - Socioeconomic classes can be a proxy for the protected classes in order to exclude certain people.
- Nuisance: even if vouchers are accepted, they are pushed to the back of the apartment complex or put in a corner.
 - This is highly applicable those with criminal backgrounds, with disabilities, and of minority groups.
 - These people are more likely to accept subpar services
- Smaller property owners lack education on how to deal with people who have disabilities or otherwise, and they make decisions based on stereotypes.
- The protected classes are intersecting, and the definitions of the protected classes are too restrictive.
 - Income and socio-economic status are not protected classes
- Differences within protected classes
 - People with different lower income levels live in unsafe units and unhealthy
 - Stronger civic groups
 - Restrictive covenants
 - i.e. if you don't see beautify, how do you know what it is.
 - Not physically safe, psychologically safe, aesthetically safe, etc.
 - Because of the impact of disparate housing opportunities, there are additional affects.
 - Children will not see
 - E.g. woman moves from urban to affluent areas. Late on rent once. New management said that because of the late payment, they would not renew their rent or others with late payments. Wanted to fight, but did not know how.
 - Effects may be changing schools for people with children
 - No recourse for unsafe units
 - To complain, 311 is an option, but it is hard for people with linguistic and literacy barriers. There is also a fear of documentation and too much paperwork. (SN: slow timelines.) This is a barrier to maintaining the fair housing and expressing the need.
 - Housing units do not have the repair forms readily available for people.
 - The forms are all on paper and must ask for them so there is a fear of being evicted. This must be done while the leasing office is open; this is hard for people are already socioeconomically distressed particularly because they will not have time to go to the leasing office during operation hours.
 - People who are immigrants cannot get their homes repaired because they were afraid of being reported.
 - These people may have been displaced because they could not afford the repairs; OR
 - They stayed in areas that were unsafe.
 - Rents were also increased because there was a shortage of livable apartments in the area.



- Difference between renters and homeowners
 - There is a problem with lending and financing. People will find increases in credit score because they may be a “riskier” homeowner. Can be penalized by electricity companies and other utilities, but the consumers are not told this.
 - Lending documents are not available in Spanish and in other languages.
 - The banks are not transparent on their lending rules, and people accept bank decisions at face value without questioning the lending rules.
 - There is a lack of knowledge of navigating the housing market.
 - Form of payment can be a form of discrimination. Most owners are required to use a credit/debit card to pay. This is an avenue of discrimination.
 - Potential solution: city enforce allowing people to pay with other forms of traceable payments (e.g. money orders, cashier’s check, etc.)
 - What can the city do to remediate housing stock that is already built?

Question 2: Think about public or private policies that may limit fair housing choice in Houston. Are there changes to existing city, state, or federal policies or regulations that could address fair housing challenges or promote fair housing choice?

- It is policies that do not exist that do not protect people.
 - Inclusivity
 - Sidewalks and proper wheelchair accessibility
 - Provide transportation in all areas for people who need better accessibility and opportunity.
 - Need additional support services that help people with disabilities.
 - Structure issue that continues to allow discrimination.
- Homeownership & Education
 - People may purchase a home, but they cannot maintain. Ensure the purchase and maintain the property. Consider: escrows for maintenance.
 - Lack of education for homeownership
 - The way that property taxes support education system.
 - The funding for schools is not congruent with property tax revenues
- Placement of tenants with disabilities far away from the handicap accessible parking spots.
 - Tie this to funding
- Provide Homebuyer Assistance in other languages and in different ways
 - A translator makes the experience
 - Integrate linguistic differences; this is a problem across the board.
 - This is an investment that we have to make in manpower and funds
- Sometimes, the homeowner association is a large barrier to homeownership
 - HOA fees and unrestricted rules
 - Lack of understanding what the rules are
 - Develop templates and messaging particularly in areas that are being gentrified because the HOA quickly shifts and people do not know how to push change within the HOA
 - Make them more flexible and democratic
 - Make policies about the what the HOAs can and cannot do
 - Push for change in STATE law regarding HOAs
 - Incentive HOAs through positive reinforcement
 - Habitat is a working on building an HOA that is set by the community
 - Push for HOA fees to be presented before closing or during financing process
- Lack of education on how to change property tax amount
 - Guidelines are not accessible



Question 3: What are some recent activities or actions that have helped promote fair housing or decrease discrimination in Houston? These could be actions taken by non-profit organizations, governmental organizations or businesses, etc.

- No answers

Question 4: We have found that people may not be aware of their fair housing rights, and of those that do know, many may not know how to report discrimination. How can residents (renters, homeowners, homebuyers) be empowered to advocate for themselves when it comes to fair housing issues?

How to help advocate for my own right, and how to help others?

How help accelerator in advocacy?

- Alternate forms for people to participate
 - More participation locations
 - More ways to communicate
 - More open forums
 - Bring the government to people
 - For the information gleaned in these different forms, how do we get this information properly into the public record.
 - Speaking before council is difficult
- Education to homeowners
 - Mandatory class for all homeowners
 - Home economics should be reintroduced into the school system (including financial literacy, budgeting, homeownership)
 - Need a fundamental understanding of reading and money
 - Need to fundamentally equip people because it undergirds fair housing and how to combat it.
 - Where is this education coming from? Where is the funding coming from?
 - Guidance of the navigating the property code & equip people with self-help
 - Housing is only a component. There are social determinants to consider. We should educate people on the basics of living costs.
 - Because of stigmas and social pressures, people believe that do not have social mobility. They are also afraid to ask questions that will help them to be socially mobile because they do not want to look silly.
- Objection to too much government interference.
 - Help people long-term



Houston Be Fair: Ending Rental Housing Discrimination with Disability Advocates
Date: October 11, 2019
2 Participants

Question 1: How does housing affect those with disabilities? What are the challenges?

- Flooding
 - Additional efforts for evacuation for people with disabilities
 - Additional support for people with disabilities who choose to stay in their homes
- Neighborhood accessibility
 - Streets and sidewalks should be available for those using wheelchairs
 - Sidewalk should be an integral part of all neighborhoods in Houston
- Homes should
 - Be affordable
 - Have a range of prices
 - Have reasonable accommodations for those that need it
 - People on disability often stay in homes no one else will stay because that is all they can afford
 - Income is not keeping up with prices
- Many people with disabilities live in the south/southwest area of Houston
- Apartments that are low-income, often do not offer easy access for those with disabilities
- Accommodations
 - When people with disabilities make requests for suitable accommodation, they sometimes go ignored
 - It is expensive to build (and remove) the “reasonable accommodations” tenants need
 - Landlords may ask tenants to move to another apartment rather than make the accommodations (tenant becomes disabled living in second floor apartment; landlord asks them to move to a first floor unit)
 - Poverty compounds the problem
- Housing for people with disabilities
 - Affordable housing does not have a range of options in Houston
 - Affordable housing is needed near bus stations
- Housing Choice Vouchers
 - Most voucher-holders are African Americans
 - Landlords will not accept vouchers - easier to decline vouchers than learn about them
 - The voucher waiting list is closed and most people who need them won't get them

Question 2: How do different disabilities result in different fair housing needs?

- Typically, people live inside the loop because it is close to town has access to transportation
- More transportation is needed throughout the city.
- Better walkability is needed (sidewalks; crosswalks with lights)

Question 3: Do people with disabilities have problems with access our programs?

- Yes, most do
- Some people don't have email or don't know how to operate it
- Some lack knowledge of the Internet: cannot get an Uber, order food for delivering, call MetroLift
- There should be more braille on items throughout the city, even in the items that the city hand out.



Question 4: How might the City of Houston go beyond City, State and Federal policies?

- More rehab of housing in Houston that is affordable to those that need it
 - Example program could include an inspector identifying homes that need to rehabilitate and perhaps these homes could be made available to those with limited income or with housing vouchers. Offer Incentives to landlord for their cooperation in this process. Offer useful classes for landlords to attend.

Questions 5: How can we improve access to federal housing for those with disabilities?

- The landlord must have security in knowing that his property will be taken care of by others.
- We must break the barriers down where required.

Question 6: What opportunities are available for those with disabilities?

- There is a lot of positive information being shared, including what is happening in our community and how to improve the situation
- Improve the PSA's and audio that are targeted for persons with disabilities
- Start a fair housing planning committee that includes the Mayor's Office of Disabilities, so they can have a say in what is being shared
- Information should be included in bills that go out
- Continuously ask about people's living arrangements and how they can be improved



Fall 2019 Open Houses

Summary

On September 4, 2019 and September 10, 2019, HCDD held Fall Open Houses that were structured to gain input from the community about what should be included in the Consolidated Plan and AI. The first Open House was held at Emancipation Community Center and the second at Southwest Multi-Service Center.

After a short presentation, participants were separated into groups at several tables. Two HCDD staff members were assigned to each group: one moderator and one notetaker. Each group was asked a series of five questions about two maps based on recent data from the American Community Survey. Map Set 1 showed the race/ethnicity group distribution amongst the City of Houston using dot density. Map Set 2 included two maps: (1) 2017 Home Median Income in Houston and (2) Race/Ethnicity Distribution and School Performance. Questions 1 and 2 were corresponding to Map Set 1, and Questions 3-5 related to Map Set 2.

Summary of Findings

Many meeting participants expressed that Houstonians cannot live in neighborhoods of their choice, mentioning race, ethnicity, language access, and income as determining factors. Participants thought that the City should promote programs that expand affordable housing options and opportunities in Houston as the main way to promote inclusive communities. Other participants thought that the City should expand or start new programs that assist rental owners to maintain their properties and reinvest in the community and others that promote historic preservation and small business opportunity. The majority of participants thought that where Houstonians live determines their opportunities. Some of the reasons cited were historical segregation, decisions made without community support and NIMBYism. Many ways that neighborhoods differ is access and options for services, including grocery stores and youth enrichment, transportation, and schools. Generally, participants thought that job training/economic development, housing, education, and transportation were ways the City could expand opportunity in areas with high poverty.

Summary of Public Comments (Wednesday, September 4, 2019)

Commenter #1

Commenter 1 represents Catholic Charities, which provides help to nearly 100,000 people a year through housing and basic needs assistance, counseling and other services. His organization works with many undocumented individuals or with friends or relatives of undocumented individuals who do not want to seek assistance because there is a fear of the being taken away by ICE. He has seen progress with the City in handling affordable housing. HCDD is more customer-centric, collaborative, and more productive.

The commenter applauded the City in terms of funding disaster recovery and funding new affordable housing projects. He also iterated the equal importance of keeping people housed and housing the homeless. He would like to see an affordable housing plan, not only the Consolidated Plan.

Response: HCDD appreciates the comment. HCDD will continue to address housing issues with disaster recovery funding and continue to work with community partners to address community needs. HCDD plans to work with Harris County to create a comprehensive housing study.

Commenter #2

Commenter 2 addressed family legacy and her need to downsize her home. She intends to live in her home for another 20 years, hoping that her children aspire to be in an even better home in the future.

Response: HCDD appreciates the comment.

Commenter #3

Commenter 3 is concerned with community and individuals' needs and business opportunities. Because community members know the community needs, business owners benefiting from opportunity zones should be someone living



in the community, should have family members in that community, or should be sponsored by another community member or business owner. Otherwise, community members are excluded from the opportunity of owning a business in the areas where they live. This will create a direct path to the community client base.

The race/ethnicity of business owners do not match the people of the community because people in the community have difficulties securing funds to start a business, yet the same funds are given to someone from outside of the community to start a business in the same area. People in the Third Ward also have needs. Some do not have adequate transportation to get to the grocery store.

Response: HCDD appreciates the comment. HCDD will continue to prioritize investments in Complete Communities like the Third Ward to provide additional amenities and assistance for residents. HCDD will be utilizing CDBG-DR17 funding to support small businesses in Houston.

Commenter #4

Commenter 4 spoke about an affordable housing opportunity called ADU or Auxiliary Dwelling Units, with respect to parking restrictions. ADUs are secondary houses on a single family lot, generally a garage apartment. He thought these are important opportunities in communities but parking restrictions present challenges. He thought that the requirement of one parking space, separate from garages and driveways, restricts the use of space and impedes development of affordable and middle income housing. He also thought that it inhibits wealth generation within neighborhoods. He thought that developing ADUs create affordable housing, passive income for homeowners, and maintaining home affordability, even if a large apartment complex is built or if taxes are raised.

Response: HCDD appreciates the commenters passion for creating affordable communities. The Planning Department is currently reviewing these parking restrictions.

Summary of Public Comments (Tuesday, September 10, 2019)

Commenter #1

Commenter 1 said that the open house was a fantastic opportunity for all of us to come together, and he thanked the City and HCDD for hosting the event and making the data available. He thought the event was a great use of time and resources.

Response: HCDD appreciates the comment.

Commenter #2

Commenter 2 thought that many schools have difficulties with student performance. Instead of investing in building charters schools or additional schools, the commenter recommended that more should be invested in schools for improvement. Families may be absent in their children's education because they are working full-time jobs. The commenter also recommended supporting services to help families, like Big Brother, creating better after school programs, and establishing better teacher training.

Response: HCDD appreciates the comment. HCDD will continue to invest funding in child care and youth such as afterschool programs to support education and families.

Commenter #3

Commenter 3 commended HCDD on doing some great things. Although the City is still trying to come up with something new, the commenter thought that HCDD just needs to tune it up. He thought that additional information could be provided to the community.



Response: HCDD appreciates the comment. HCDD is always looking for new ways to connect with Houstonians and make information available.

NOTE: The transcript used to summarize these comments was written for Communication Access Realtime Translation (C.A.R.T.) purposes and is not intended to be a verbatim, certified transcript of these proceedings.

Discussion Group Findings

Question 1: Do you think Houstonians can live in any neighborhood of their choice, which they can afford?

- Everyone has a right to live in all neighborhoods
 - Every Houstonian has the right to live where they want albeit money.
 - Northside is a very diverse area.
- Not everyone can live in every neighborhood (race and income mentioned)
 - There was no formal policies preventing people from living where they choose but does feel there is unspoken assumptions about living in minority concentrated areas.
 - There is a shortage of affordable housing for renters especially those renters with vouchers.
 - Everyone feels there is always resistance to mixed income affordable housing. Essentially NIMBYism and residents with Section 8 vouchers
 - City Council has big impact on passing laws and ordinances within the jurisdiction as it relates to housing
 - These neighbors don't want me living next to them because I am black women. Therefore, they are putting these \$300,000.00 condos' in our neighborhoods. They are raising our taxes so that we can't afford to stay here. No, we can't live anywhere, they want people who are doctors and attorneys.
 - There are places that we can't go to without conforming to their dress code. i.e. no gold jewelry, no saggy pants, no shirts that are not what they deem permissible, like the Midtown area
 - They seem to zero in on our income. There's nowhere in this neighborhood that you can even walk from this location (Emancipation Park) to find a job that will pay you at least \$12.00 an hour. In this neighborhood, you have to ride the bus if you don't have a car.
 - As a white person, I did not have trouble with financing and purchasing but black neighbors did. Difficult financing causes racial clustering; however, her neighbors has a difficult time getting financing.
 - Black female feels unwelcome in a predominantly Hispanic Area.
 - Houston is no better than other notoriously racist states like Mississippi.
 - In most places, if a person walking it's not seen as low income, like in New York or Chicago, however, here it is. The only place you can walk is downtown or the Heights area and to do that you have to live in the area. Prices continue to go up and it impossible for someone who a teacher even to afford to stay downtown or in the Heights area.
 - Housing is not affordable.
 - There are income barriers. Roads could have been designed to segregate races. No, people cannot live wherever they want where they can afford. The biggest barrier to me is how much it costs to buy the land. There are areas of town where you cannot live. The Housing Corp. tries to rehab units, but we cannot afford the land.
 - There is a lack of information in the Korean community. No one knows how to get help. We have no access due to limited information. I do think Houstonians can live anywhere they can afford to.
 - Affordability is a huge challenge. Magnet programs helps to get access to good schools, even if you can live in a neighborhood of your choice.
 - It's harder and harder to live in a neighborhood of your choice. I live on Westheimer and Hillcroft. Rents go up every year. We have tried to buy a house, but taxes are high. In my neighborhood, I



can rent but I cannot buy. It's possible that I won't be able to rent due to rising rents. I like the place where I live, but the places where there is high crime are more affordable.

- Everyone can live where they choose
 - There are not restrictions if you have the money to live where you want.
 - Yes, to a certain extent. It depends on your relationship and involvement.
 - Yes, I have lived in several areas, but family is nearby.
 - Depends on the person.
 - Yes, but where you live limits your access
- Other comments
 - The community isn't brought in soon enough to sway public opinion about affordable housing.
 - Houston was originally diverse.
 - Personal space and family is important.
 - Transportation costs will eat up what you saved in rent. It may even cost you more than what you saved in rent or mortgage.
 - Better transportation is needed

Question 2: What can the City do to promote and build inclusive neighborhoods that have a diversity of people, especially in areas that are historically populated by a majority of one race?

- City programs that expand housing choice
 - Provide Incentives
 - Variety of housing for public and private sector for more ethnicity and economically inclusive neighborhoods.
 - We need to build more affordable homes for everyone.
 - Why do we need \$300,000.00 home anyway? We can't afford that! We need some homes that are for low income persons.
 - Yes, put a cap on the price of homes in this area.
 - If you are a senior, they should build homes/condos for person over the age of 62 that are beautiful to live in within Houston. Typically, we don't like to put our parents in senior homes, but this may help those that are having tax issues.
 - We need more affordable homes right now!
 - Work where you live/live where you work. Mix businesses with commercial and residential properties. Livable areas with retail businesses that they can use, like daycares rather than a Whole Foods, doctor's offices, etc.
- Other City programs needed
 - Supportive services to promote real growth and to invest for developers.
 - Incentive small businesses in "revitalized" areas
 - Historic preservation is an option for preserving historically minority areas
 - HPD is not checking up on apartments. Residents are retaliated against if they complain.
 - City needs to enforce quality of apartments. Reinvest in and beautify the area. Then, go for complete communities.
 - Have an ombudsman for apartments that are part of the city.
 - Only the city can enforce codes and rules. Owners will respond to tickets, not complaints to "hold them accountable."
 - Encourage people to maintain lower income properties
 - Provide education and services for immigrants
 - Deed restrictions have segregated races. We need to invest more into minority areas and give them the same opportunities as you would in other parts of town. Where there is capital investment, people will follow. Create requirements for businesses, if they get tax breaks to build in a nice part of town, they should be required to build another store/business in a low-income area in the same way.
 - Get small businesses to invest in high opportunity areas.



- Have more services, like parks and playgrounds in lower income areas.
- Additional regulations needed
 - Pay attention to the “good ole boy system,” of developers and break down that system.
 - They build buildings but don’t invest anymore into the declining and/ or minority concentrated neighborhoods
 - Managers have to be engaged and rent is not reinvested in apartments.
 - Make developers minimize the impact of the construction.
- Schools
 - Increase resource equity amongst neighboring school districts/school within Houston
 - Would consider moving outside of the city to get access to better education
- Remove regulations
 - Zoning ordinances create barriers in terms of value in a neighborhood
- Other issues to be addressed
 - Property tax issues is the problem. Anytime you have homes that are over \$3K taxes go up and for those persons who have lived in this area a long time they can’t afford to pay the higher taxes. That’s why I’m moving to the suburbs. You can get a home for half as much out there.
 - A woman who owned her home but not her land had her home sold at auction. Shameful!
 - Keeping the community as a neighborhood is important.
 - Transportation is a problem.
 - Some people are okay with racially clustered areas.
 - Southwest Houston apartments are way too dense.
 - Racial profiling in some neighborhoods based on the way someone looks/the type of care they drive is a problem
 - Owners don’t care about residents.

Question 3: Generally, does where someone live in Houston determine their access to opportunities?

- It doesn’t matter where you live
 - No. There are opportunities everywhere.
- Where you live determines your access to opportunity
 - The majority believed that where one lives does impact access to opportunity.
 - Yes, Yes, Yes
 - Opportunity is limited if you don’t have a car.
 - Yes, where you live determines your access to opportunity. Encourage more affordable housing in high opportunity areas for both rental units and homes for sale.
- Reasons for differences in access to opportunity
 - The group believed a lot of the issues when dealing with access to opportunities within in a neighborhood is more to do with historical patterns of segregation when it comes to access to municipal services.
 - The group believed the federal government had a lot to do with impact on access to opportunity in low-income and minority concentrated areas.
 - No community center in my area. A gym was recently demolished without talking to the community. These are the things that are being done to hurt us!
 - Opposition to opportunities need to be reduced.
- Additional opportunities in some areas are needed
 - Parents are working two jobs and the children don’t have anything to do. I think we need more programs to help the children stay out of the streets and give them an opportunity.
 - We need to have opportunities that the under privilege can take advantage from churches in the area to the two colleges in our area. You should be able to go from high school to perhaps a job that suits your interest.



- They move teacher within the inner-city schools that are doing well and put them in the white schools. I think that is awful. We need incentives to keep good teachers here. Like a home that they can afford to purchase here in this neighborhood.
- We don't have health care in our neighborhoods. You have to drive some distance to a doctor.
- Transportation is a need for the inner-city. For instance, if you had a program at TSU for children coming out of high school to go into a job or even U of H, that would be wonderful to see. You could even offer transportation to and from the school to the university.
- Co-Op Grocery Stores, doctors, teachers, police and fire fighters they should offer down payment assistance to these persons and pull them into the community.
- The church has a campus and could have a career path program in place.
- Education exposure and resources must become equitable in all schools
- Transportation barriers hampers business and entrepreneurship
- Lack of "fresh food" opportunities and farmers markets
- Need transportation from East Houston to jobs and good schools
- METRO was supposed to come to high opportunity areas but got stopped by high income neighbors.
- Chimney Rock needs to be expanded. Gulfton needs to be more than a throughway.
- Richmond was an original siting for METRO which would have been ideal. Residents stopped it 10 years ago.
- Other issues
 - Most responded by saying they don't believe school ratings should exist and doesn't see the value in utilizing school rating systems.
 - Opportunities add value to where you live
 - Parents should be more vocal about what they want to see in their schools and neighborhoods.
 - Assist communities to be more expansive and see the bigger picture.
 - Reach out to younger folks who can vote.
 - Get people to complete the census because numbers are under counted.
 - My girls go to a charter school. I would never change to HISD because there is a difference in the way that they learn.

Question 4: How do opportunities near where you live compare to other neighborhoods in the city?

- Lack of services and amenities
 - Differences in grocery stores aesthetics
 - HEB in Gulfgate has regularly empty shelves
 - HEBs in low-income areas sell less products (no flowers or birthday cards) and less quality
 - A full service grocery store is necessary.
 - Near Calhoun, MacGregor has a lot of parks but not a lot of accommodations or nice restrooms. The area needs a full grocery store.
 - North MacGregor has a small HEB.
 - Have to drive to museums. It's a 30-minute drive.
 - Gulfton lost big grocery stores and retailers. Gulfton is very dense; there is little green space and few Starbucks.
 - Need to entice more major businesses to come into the neighborhood.
 - Need more anchor retailers. There was land to be developed, including the hotel (off 59) that burned down (where firefighters died) and a large car dealer's lot along 59 that closed down and is now just vacant. Put some economic development on this land, and other businesses / job opportunities / etc. will follow and attract even more viable businesses.
 - Access to services, food desserts, and supportive services contribute to deterioration
- Lack of transportation access and options
 - No Bike trails, park & rides



- The buses do not come frequent enough
- It is impossible to have a job without a car in Houston, and there is a lack of transportation alternatives
- Bike trails bring both gentrification and improvement
- People who are low-income do not care about bike trails
- Some areas do not want public transportation because they perceive that public transportation is associated with low-income people and crime.
- Other issues/general thoughts
 - Zoning laws and ordinances
 - Crime and poverty in areas of high minority concentration when compared with other neighborhoods in the community with more access to services
 - More community input and get the community's buy-in before large undertakings
 - I have reasonably good access where I live to jobs and transportation, but there are still disparities. People can do better about making and keeping their areas cleaner and more livable.
 - Improve charter schools

Question 5: What are some ways to expand access to opportunity in neighborhoods that may have a high poverty rate and lack opportunity?

- Job training
 - Job training
 - Vocational training
 - Job placement and municipal services within the community
 - Economic Development
 - Vocational Programs
 - Educate about non-college opportunities
 - Service stations are not economic opportunity. They may even lessen retail incentives.
 - Need for a community college
- Education
 - Access to quality schools
 - Invest money in existing schools rather than building a new school. Improve after school programs and provide better training for teachers.
 - Education (good Schools)
 - Teach languages earlier in schools so they can understand the different cultures around the city
- Housing
 - Truly Supportive Housing
 - Housing
 - Mixed use buildings (single and multi-family)
 - More Affordable Housing in the area
 - Mix neighborhoods and economic communities
- Transportation
 - Change perception of public transportation
 - Expand ACCESS to public Transportation
- General
 - Expand Access to Lower Income Areas
 - Full Childcare
 - Transportation, communication, businesses
 - Full-service grocery store
 - What does Complete Communities mean and where is the money to advance enhancement?
 - Less regulated zoning
 - Support for more family/small businesses



-
- Protect spaces for social services (if the services move than families have to move too)
 - Keep historic neighborhoods while encouraging growth and diversity by improving
 - Sense of belonging (Pride about your community)
 - Connectivity around the loop
 - Education- not to ashamed of where you come from



Spring 2020 Open Houses

Originally, two spring public hearings were scheduled for Tuesday, March 24, 2020 at the Hiram Clarke Multi-Service Center and for Tuesday, March 31, 2020 at Northeast Multi-Service Center. Both public hearing venues were easily accessible using METRO, the City's public transportation system. These events were publicized in Spanish and English. HCDD advertised the public hearing through public notices in Spanish through the *La Voz* and in English through the *Houston Chronicle*. It was also advertised on community calendars and websites for local news stations/outlets like Channels 2, 11, 13, 26, 39, *Houston Press* and *Visit Houston*. The events were also advertised over 20 times through email blasts and through social media between March 16th and April 16th. While HCDD maintained the March 24th date, the March 31st hearing was rescheduled for April 7th to make adjustments for accessibility and inclusion.

However, because of social distancing and the Mayor cancelling all City events with more than 10 people due to the COVID-19 crisis, HCDD converted the hearings to virtual meetings that were held on Tuesday, March 24, 2020 and Tuesday, April 7, 2020. The virtual public hearings were available on several visual and audio platforms. Both events were broadcasted live on HoustonTV (HTV), HCDD's Facebook Live, and HTV's Facebook Live from HCDD's Office while executing CART services remotely and having a language interpreter available. Each hearing was also audibly available in English through a listen-live number.

Based on feedback from community members and advocates following the March 24th hearing, additional services were added. This included two sign language interpreters, a dedicated listen-live number in Spanish, Spanish announcements throughout the presentation, and additional presentation information about fair housing. In all advertising materials for the public hearings, HCDD publicized that accommodations (i.e. interpreter, sign language, or other accommodations) were available with prior notice. Also, the advertising materials listed HCDD's Fair Housing Hotline as a resource for landlord/tenant or fair housing questions.

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Response: HCDD appreciates the comment. HCDD will continue to prioritize investments in Complete Communities like the Third Ward to provide additional amenities and assistance for residents. HCDD will be utilizing CDBG-DR17 funding to support small businesses in Houston.

Commenter #4

Commenter 4 spoke about an affordable housing opportunity called ADU or Auxiliary Dwelling Units, with respect to parking restrictions. ADUs are secondary houses on a single family lot, generally a garage apartment. He thought these are important opportunities in communities but parking restrictions present challenges. He thought that the requirement of one parking space, separate from garages and driveways, restricts the use of space and impedes development of affordable and middle income housing. He also thought that it inhibits wealth generation within neighborhoods. He thought that developing ADUs create affordable housing, passive income for homeowners, and maintaining home affordability, even if a large apartment complex is built or if taxes are raised.

Response: HCDD appreciates the commenters passion for creating affordable communities. The Planning Department is currently reviewing these parking restrictions.

Summary of Public Comments (Tuesday, September 10, 2019)

Commenter #1

Commenter 1 said that the open house was a fantastic opportunity for all of us to come together, and he thanked the City and HCDD for hosting the event and making the data available. He thought the event was a great use of time and resources.

Response: HCDD appreciates the comment.

Commenter #2

Commenter 2 thought that many schools have difficulties with student performance. Instead of investing in building charters schools or additional schools, the commenter recommended that more should be invested in schools for improvement. Families may be absent in their children's education because they are working full-time jobs. The commenter also recommended supporting services to help families, like Big Brother, creating better after school programs, and establishing better teacher training.

Response: HCDD appreciates the comment. HCDD will continue to invest funding in child care and youth such as afterschool programs to support education and families.



Commenter #3

Commenter 3 commended HCDD on doing some great things. Although the City is still trying to come up with something new, the commenter thought that HCDD just needs to tune it up. He thought that additional information could be provided to the community.

Response: HCDD appreciates the comment. HCDD is always looking for new ways to connect with Houstonians and make information available.

NOTE: The transcript used to summarize these comments was written for Communication Access Realtime Translation (C.A.R.T.) purposes and is not intended to be a verbatim, certified transcript of these proceedings.



Summary of Written Comments

A notice of the spring public hearings, the 30-day public comment period, and the availability of the Drafts Consolidated Plan (Con Plan), Annual Action Plan, and Analysis of Impediments to Fair Housing Choice (AI) was published on HCDD’s website and in the *Houston Chronicle* on March 16, 2020

The comment period was advertised on March 10th and March 30th in Spanish through the *La Voz* and in English through the *Houston Chronicle*. It was also advertised on community calendars and websites for local news stations/outlets like Channels 2, 11, 13, 26, 39, *Houston Press* and *Visit Houston*. The community meetings and comment period were also advertised over 20 times through email blasts and through social media between March 16th and April 16th. While HCDD maintained the March 24th date, the March 31st hearing was rescheduled for April 7th to make adjustments for accessibility and inclusion.

Comments were accepted through several channels by postal mail and electronically, by email and through an online survey. A total of five written comments were received with comments about the Draft AI.

Commenter/Commenters	Organization/Affiliation
Kimberly Brown Myles, Velimir Rasic, Asheia Jones, Amanda Powell, Aimee VonBokel, and Jennifer Mohawk	Lone Star Legal Aid
Daniel Bustamante	Greater Houston Fair Housing Center
William Lyons	Houston Resident
Zoe Middleton, Adam Pirtle, and Madison Sloan	Texas Housers and Texas Appleseed
Debra Walker	Fair Housing and Neighborhood Rights

The following summarizes the comments received and the City staff response.

Comment: Support enforcement and education by Affirmatively Further Fair Housing in all departments and by addressing NIMBY resistance.

Response: All city departments work to carry out a variety actions to further fair housing. HCDD will continue to work with other city departments to expand outreach and education about fair housing and combat NIMBY resistance. HCDD will continue to research ways to support enforcement activities in Houston.

Comment: Provide resources to existing fair housing efforts and partner with organizations, like the Greater Housing Fair Housing Center, to expand provision of services.

Response: HCDD will continue to provide resources, partner with, and assist community organizations and advocates to expand fair housing efforts.



Comment: Expand ongoing educational efforts related to fair housing, affordable housing, and the way that decisions are made; use grassroots leaders; the Fair Housing Ambassador Program was a good step and should be improved.

Response: The City seeks to expand ongoing educational efforts by partnering with community leaders. HCDD anticipates improving the Fair Housing Ambassador Program by providing additional training and funding to community organizations and advocates.

Comment: The AI should specify the neighborhoods it intends to share information with and when and where the City will host events about housing programs. The City should explain what actions will come out of assisting callers through the Fair Housing Hotline. The City should include specific objectives to help residents understand tenant's rights and partner with other organizations. The City should gather data on eviction and displacement and loss of subsidized housing. The City should partner with housing authorities to educate Houstonians about fair housing.

Response: HCDD will work throughout the year to provide educational information about fair housing and its programs. There are scheduled and continuous ways that residents can receive information about HCDD's programs, including Community Office Hours and the Housing Advocates Meetings. The City looks forward to continue to partner with the Houston Housing Authority on fair housing education. The Fair Housing Hotline provides free information to residents, which will help them find appropriate resources to address their situation or question.

Comment: Support the enforcement of civil rights regulations especially the Federal Fair Housing Act. Pursue legal action and whatever is necessary to ensure people's fair housing rights are protected.

Response: The City will continue to look for the most effective ways to support fair housing enforcement and ensure people's fair housing rights are protected.

Comment: Increase the number of accessible units in supportive housing.

Response: HCDD will work with its housing partners to increase the number of accessible homes available in the next five years.

Comment: Develop low- and moderate-income housing in high opportunity areas and in neighborhoods that are gentrifying.

Response: HCDD will continue to work with developers and implement procedures to ensure that affordable homes are available in high opportunity areas and in areas close to amenities and safe from environmental hazards.

Comment: Work with METRO and other jurisdictions to develop a comprehensive regional transportation plan involving the community. Support rapid transit in north Houston and the construction of light rails.

Response: The City will continue to work with METRO to improve transportation options for Houstonians.

Comment: Work with community groups to protect Houstonians from and clean up environmental hazards.

Response: The Houston Health Department works to inform residents about environmental hazards in neighborhoods.

Comment: The City and all recipients of federal funds must comply with Limited English Proficiency requirements.

Response: The City has policies and procedures in place and complies with the federal LEP requirements.



Comment: The City should appoint grassroots people to boards and decision-making bodies, including METRO.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Create a community development board to monitor, provide oversight, and approve or disapprove of community development spending, including the Consolidated Plan budget.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Ensure that standards of affordability allow for affordability of very low-income people.

Response: HCDD follows the definitions for affordability in the corresponding grant regulations to ensure compliance. HCDD will continue to look for ways to expand housing options for very low-income people, like rental assistance or the HCLT.

Comment: Address discrimination and disparities in hiring as residents should be hired in their own neighborhoods and paid at a living wage.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Invest in retail amenities so that residents do not have to go to other neighborhoods. Recommendations for new amenities include the development of a grocery store or healthcare facility in South Park and a full-service washateria in Fifth Ward

Response: HCDD recognizes there is a need for improved amenities in neighborhoods throughout the City and will continue to fund new or improved facilities in Houston's low- and moderate-income neighborhoods.

Comment: Advocate for equitable investment in schools

Response: HCDD recognizes the feedback provided in this comment.

Comment: Provide assistance to local businesses.

Response: HCDD will fund grants and loans to small businesses through the Harvey Economic Development Program.

Comment: Develop vacant and fix streets.

Response: HCDD continues to fund infill development on vacant lots throughout the city by working with the Houston Land Bank. Houston Public Works continues to maintain the city's street infrastructure.

Comment: METRO should operate regularly and have improved service.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Use COVID-19 funding to invest in long-term improvements in public transit.

Response: HCDD recognizes the feedback provided in this comment.



Comment: There should be a notification system to let people know when toxic chemicals are released; educate people on how to report toxic air releases; put more air monitors in Sunnyside.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Consult with community members in public meetings before approving permits for chemical and industrial facilities.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Proposed additional actions for impediment 5 include: increase the cultural competency of staff serving persons with disabilities and increase knowledge of the impact of increase housing prices and provide an alternative guide to increasing rent and incentives for lease renewals.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment. As HCDD provides training for City staff members, ways to improve communications with persons with disabilities will be considered. HCDD will also consider ways to communicate the need for affordable housing to Houstonians.

Comment: Proposed actions for impediment 6 include: address misinformation about people of color, partner with HAA affiliated properties with low occupancy to adjust rental rates or criteria to increase affordability, and determine if Public Vacancy ClearingHouse is up to date and applicants are being prioritized.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment.

Comment: Revise impediment 7 to acknowledge discriminatory practices of banks.

Response: HCDD has revised impediment 7 with this recommendation.

Comment: Proposed actions for impediment 7 include: collaborate with school districts to create curriculum, target youth for financial education, commit that any child benefiting from HCDD funds graduates from high school or obtains GED and fund scholarships, and provide leasing institutions alternative approval criteria.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment. HCDD will continue to seek ways to reach youth with financial education information.

Comment: Proposed actions for impediment 8 include: prioritize energy home efficiency, prioritize food resources over greenspace, encourage to all-bills paid options or paying utilities to property for flexible leasing and energy efficiency.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment.

Comment: Proposed actions for impediment 9: Publicly rate communities regarding their racial and ethnic desegregation and provide technical assistance to further desegregation.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment.

Comment: Proposed actions for impediment 10: METRO discount cards for those benefitting from HCDD funds and collaborate with One the Road Lending.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment.



Comment: Proposed actions for impediment 11 include: address cancer clusters, ensure people are aware of Federally Qualified Health Centers near them, and ensure neighborhoods have access to safety equipment for health hazard exposures.

Response: HCDD recognizes these specific proposed actions would support addressing this impediment.

Actions for impediment 12: Conduct caucus style engagement.

Response: HCDD recognizes this specific proposed action that would support addressing this impediment.

Comment: Create and preserve affordable homes by showing where affordable housing will be located, having target areas, taking actions to monitor and enforce housing codes citywide, expanding fair housing enforcement, locating affordable homes in high rent areas, and publishing demographic statistics of HCV holders periodically.

Response: HCDD recognizes these actions to create and preserve affordable housing. Information about target areas and location of affordable housing is located in HCDD's consolidated planning document. HCDD funds code enforcement activities and will research ways of how to expand fair housing enforcement. HCDD publishes demographic information from HHA about voucher holders in the AI updates.

Comment: The Houston Community Land Trust should involve more properties distributed across the City in high-opportunity areas and additional specificity should be included in the action to support the HLB and HCLT.

Response: HCDD will continue to work with the HCLT to increase the number of properties in the land trust. Additional specificity of annual goals or reports about support for the HLB and HCLT will be included in HCDD's consolidated planning documents.

Comment: To construct affordable single family homes and preserve Section 504 units, the City should establish deadlines and expectations of the 504 accessible rental units, additional tracking mechanisms should be put in place for the intended new single family homes constructed over the next five years, more information should be provided about eligibility of the Homebuyer Assistance Program, and actions should be clearly explained regarding the updates to Chapter 42.

Response: HCDD provides information about yearly goals for the creation of accessible units in its Annual Action Plan. Information about the new single family homes constructed or to be constructed through the Harvey New Home Development Program and homebuyers receiving assistance through the Harvey Homebuyer Assistance Program is available: <https://recovery.houstontx.gov>. More information about the Chapter 42 goals for revisions will be developed throughout the public participation process that the Planning and Development Department is undertaking.

Comment: To enhance the communication between the City and the public, the City should do more to address impediment 14, which could include increasing resident's knowledge about tenant's rights or maintaining housing.

Response: HCDD will work with community partners to provide information about fair housing and tenant rights to underserved or underrepresented Houstonians over the next five years. We recognize the need for additional tenant education.

Comment: Increase resident's knowledge about their rights and responsibilities under the Fair Housing Act and housing programs to prevent evictions and fight poverty.



Response: HCDD will work with community partners to provide information about fair housing and tenant rights to underserved or underrepresented Houstonians over the next five years. We recognize the need for additional education to avoid eviction.

Comment: Get accurate census tract-level data to better assist persons with disabilities.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Conduct a more thorough analysis of disaster recovery related impediments, including considering social vulnerability. The City should consider the disaster recovery impediments to fair housing impacting renter households in Houston. The City should assist households with heir property title, property tax, and other ownership issues that prevent impacted hosueholds from receiving assistance from disaster recovery programs.

Response: HCDD recognizes the feedback provided in this comment. The City will conduct several planning studies to further analyze the impacts of disasters like Hurricane Harvey and provide more informed recommendations for future disaster events.

Comment: Analyze and set goals to address inequitable disaster recovery, which could include improving infrastructure in segregated, improvised neighborhoods to combat open ditch drainage, creating renter disaster assistance program, and allocated funding to assist low-income disaster victims overcome title and property tax issues.

Response: HCDD recognizes the feedback provided in this comment. HCDD is working with HPW to improve the City's infrastructure to alleviate flooding in low- and moderate-income areas. HCDD will continue to research ways to best assist renters after a disaster and fund services like rental assistance and public services. HCDD will continue to work with community based organizations to address ownership issues for potential disaster recovery applicants.

Comment: Build 1,000 affordable rental and owner-occupied units for low-income families in high opportunity areas, with 40% for families below 60% AMI and all rental units are available for those with HCVs.

Response: HCDD recognizes the feedback provided in this comment. The number of affordable homes that can be produced is limited to funding restraints, but the City is committed to provide a variety of options for homes.

Comment: HHA should adopt Small Area Fair Market Rent payment standards.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Fund fair housing testing and enforcement and partner with the Harris County District Attorney.

Response: HCDD recognizes the feedback provided in this comment and will look for ways to support fair housing and enforcement.

Comment: The City of Houston and Houston METRO should adopt LINK Houston's Transit Equity Demand Index for creating more equitable transit.

Response: HCDD recognizes the feedback provided in this comment.



Comment: The City must stop acceding to NIMBY pressures.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Expand the Houston Community Land Trust to high-opportunity areas and change actions to place 250 homes in the HCLT by 2020 and deliver 250 homes in high-opportunity areas by 2020.

Response: HCDD will continue to fund the HCLT. The number of homes that will be added to the HCLT will be dependent on available funding.

Comment: Ensure that criminal history or a history of eviction filings are not an absolute bar to housing.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Prioritize preservation of properties that have access to amenities in areas where values are rising and free of environmental issues and high crime and consider implementing a city and tenant right-to-purchase program for subsidized properties.

Response: HCDD recognizes the feedback provided in this comment. HCDD looks for ways to prioritize and implemented polices to create affordable homes that are close to amenities and in areas free from hazards.

Comment: Consider adopting strategies outlined in the “Texas Anti-Displacement Toolkit” by Professor Heather Way to protect vulnerable renters from gentrification.

Response: HCDD recognizes the feedback provided in this comment and will consider these strategies.

Comment: Assist homeowners secure clear title to their homes and homestead exemptions to support homeownership.

Response: HCDD will partner with community organizations to ensure low- and moderate-income residents can address ownership and title issues.

Comment: Commit \$1 billion to Complete Community Initiative to address neighborhood inequality.

Response: HCDD recognizes the feedback provided in this comment. The City’s Complete Community Office manages the goals and tracks investment in the Complete Communities.

Comment: Mitigate existing hazards and prohibit expansion of new hazards near neighborhoods.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Create a renters’ commission at the city level to protect renter’s rights.

Response: HCDD recognizes the feedback provided in this comment.

Comment: Address severe disparities in access to non-predatory financial services and change the name of Impediment 7 to “Lending Disparities”.

Response: The name of impediment 7 has been revised. HCDD will continue to build knowledge of homeownership and research ways to address predatory lending.



Comment: Proposed additional recommendations for disaster recovery include: continue community outreach for disaster recovery, help LMI families comply with Chapter 19, put additional homes into the HCLT, give updated information about recovery programs, prioritize LMI families for reimbursement program, simplify and create accessible disaster application process, keep disaster recovery resource centers open throughout recovery period, maintain single casework for applicants through life of the program and should leverage funding to allow for the full rebuilding of homes to the previous number of bedrooms.

Response: HCDD will continue to seek community feedback about the City's disaster recovery programs. HCDD will also continue to find ways to prioritize assistance to the most vulnerable populations impacted by a disaster through its recovery programs.



Table of Progress Since 2015 AI

The following table reviews the 2015 anticipated actions with progress and accomplishments over the past five years. This serves as a summary of highlights of actions taken to affirmatively further fair housing in Houston, and additional information about accomplishments are a part of each CAPER from 2015 to 2019.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	High	1. Discrimination in Housing	2015	2018	<ul style="list-style-type: none"> · Contract with qualified fair housing organizations · Conduct testing · Produce study or studies 	Staff researched similar RFPs from other jurisdictions and drafted a scope of work. Staff also reviewed comparable cities with substantial equivalency. This action will be carried forward to the 2020 AI.
<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>	High	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing 14. Lack of Communication Between Government and Residents	2015	Ongoing	<ul style="list-style-type: none"> · Assist 7,500 callers 	Assisted 6,512 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>	High	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	2016	2018	<ul style="list-style-type: none"> · Reach 200 housing industry professionals 	HCDD reached 469 housing industry professionals with in-person fair housing training. HCDD also provided fair housing information to over 30,000 housing industry professionals in an interview with HCDD staff about fair housing in the April 2019 edition of the Houston Apartment Association's publication, ADOBE.
<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>	High	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	2015	Ongoing	<ul style="list-style-type: none"> · Reach 200 HCDD stakeholders with information about fair housing 	Reached 785 stakeholders with fair housing training.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<p>5. Increase the fair housing information to City staff members 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>	High	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing			<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 	HCDD staff members attended in-person and virtual trainings that increase their knowledge of fair housing. In addition, HCDD worked with other City Departments to provide fair housing training to City employees. Approximately 507 City staff received fair housing training. Training topics have included assisting LEP residents, HUD requirements, Community Land Trust, accessibility, and general fair housing issues. Highlights included HCDD staff providing SAYYES! training to Councilmembers and their staff and providing a half day fair housing training to 54 City staff members about implementing fair housing into city programs. In addition, Abt Associates assisted HCDD staff in creating the Local Action Plan, Needs Assessment, and program guidelines for CDBG-DR assisting with Hurricane Harvey.
<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>	High	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	2015	2015	<ul style="list-style-type: none"> · All HHA staff will have fair housing training 	On September 17, 2015, HHA, HCV, PHO, Legal, & Procurement staff received 4 hours of 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>	High	2. Lack of Knowledge about Fair Housing 8. Lack of Financial Education 14. Lack of Communication between government and residents	2015	Ongoing	<ul style="list-style-type: none"> · Reach 500,000 citizens with information about fair housing 	HCDD has reached more than 4 million people with fair housing information.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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.</p>	High	3. Lack of Affordable Housing Options	2015	Ongoing	· Preserve 390 affordable housing rental units	HCDD preserved 529 affordable rental units through repair and rehabilitation activities, using formula grants.
<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.</p>	High	3. Lack of Affordable Housing Options	2015	Ongoing	· Create 404 affordable housing rental units	HCDD created 499 new affordable rental homes, using formula grants.
<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.</p>	High	4. Lack of Accessible Housing for Persons with Disabilities	2015	Ongoing	· Fund creation or preservation of 50 Section 504 accessible rental units	HCDD created or preserved 103 affordable, accessible rental homes, using formula grants.
<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.</p>	High	7. Affordability	2015	Ongoing	· Fund 30 loans through the Workforce Development Program	HCDD streamlined the Homebuyer Assistance Program and discontinued the separate Workforce Development Program. Currently, HCDD operates one program assisting households up to 120% AMI with purchasing homes.
<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.</p>	High	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Ongoing	· Fund 20 public infrastructure and public facility improvements in low- and moderate-income neighborhoods	HCDD constructed or rehabilitated 32 infrastructure or public facility improvements in low- and moderate-income neighborhoods.
<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>	High	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Ongoing	· Fund economic development activities creating 3 new or improved services	HCDD funded a new HEB grocery store in the Greater OST/South Union neighborhood, Avenue Center in the Near Northside, and East End Innovation Maker Hub in the East End neighborhood. HCDD has allocated almost \$30 million of Section 108 loans and additional CDBG funds to these economic development projects. HCDD also received feedback in the fall of 2019 about economic development needs from an EDI workshop for economic development stakeholders to help shape future programming.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	High	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	2016	· Complete repair or reconstruct 275 homes	HCDD completed the repair or reconstruction of 321 homes in designated areas impacted by Hurricane Ike using CDBG-DR funds.
<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>	High	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	2018	· Fund economic incentives	Target areas for funding has been changed from CRAs to Complete Communities. HCDD has allocated almost \$30 million in target areas designated by the City's Mayor.
<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>	High	5. Lack of Income/Funding	2015	Ongoing	· Provide downpayment assistance loans to 500 households	In four years, HCDD provided 362 LMI families with downpayment assistance to assist them in purchasing a home.
<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>	High	5. Lack of Income/Funding 9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Ongoing	· Provide housing repair assistance to 250 households	HCDD partnered with Rebuild Together Houston to provide home repair assistance to over 500 LMI families through the Blue Tarp Program beginning in 2016. Many blue tarps existed years after Hurricane Ike impacted the area. In addition, HCDD assisted 60 homeowners with home repair assistance through the Home Repair Program.
<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>	High	5. Lack of Income/Funding	2015	Ongoing	· Create or retain 50 jobs	HCDD funding created or retained 107 jobs at the Houston Furniture Bank. HCDD also funded the new HEB store, which also created jobs in an LMI neighborhood.
<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>	High	11. Lack of transportation options	2015	2019	· 100% of RFPs will have priority for proximity to transit	HCDD has published 4 multifamily RFPs in the last four program years. These have had prioritization for location of new or repaired multifamily units, including near transit options and in high opportunity areas. Beginning in 2017, HCDD published a set of priorities for multifamily funding to assist in developer's efforts, which is periodically updated.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	High	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	2019	<ul style="list-style-type: none"> · 100% of RFPs will have priority for location 	HCDD has published 4 multifamily RFPs in the last four program years. These have had prioritization for location of new or repaired multifamily units, including near transit options and in high opportunity areas. Beginning in 2017, HCDD published a set of priorities for multifamily funding to assist in developer's efforts, which is periodically updated.
<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>	High	5. Lack of Income/Funding	2015	Ongoing	<ul style="list-style-type: none"> · Apply for 5 grants · Increase in funding available 	HCDD submitted an application for 2016 Fair Housing Initiative Program funding but was not selected. HCDD continued to work with private funders to assist in funding fair housing related activities. HCDD worked with Capital One, which funded \$130,000 for a series of trainings for community development corporations in Houston. In April of 2018, Texas Capital Bank funded the SAYYES! Affordable Homes Tour in the amount of \$8,000.
<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>	High	2. Lack of Knowledge about Fair Housing 14. Lack of Communication Between Government and Residents	2015	Ongoing	<ul style="list-style-type: none"> · 10 materials created · 10 materials updated 	HCDD staff created three fair housing outreach campaigns and updated the Fair Housing/Landlord tenant presentation to reflect new employees and streamline for clarity. HCDD also created a new flyer advertising the Fair Housing and Landlord/Tenant Hotline.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	High	2. Lack of Knowledge about Fair Housing 14. Lack of Communication Between Government and Residents	2015	Ongoing	· 10 of documents translated per language	HCDD continued to translate documents, when feasible. HCDD translated many public notices, including those about planning for entitlement and disaster recovery funding, into several languages including Spanish, Chinese, and Vietnamese. Hurricane Harvey program information was translated into other languages. HCDD translated the "We are all protected" and "SayYes!" fair housing campaign materials into Spanish, Vietnamese, Chinese, Arabic, and Urdu.
<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>	High	14. Lack of Communication Between Government and Residents	2015	Ongoing	· Update CAPER annually	Each year, HCDD reviews information about fair housing impediment and report on the progress of the proposed fair housing actions in the CAPER.
<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>	High	14. Lack of Communication Between Government and Residents	2015	2015	· Create a Spanish webpage through HHA's website	HHA translated portions of its website into Spanish in program year 2015. In program year 2016 the application for Public Housing became available in four different languages.
<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>	High	14. Lack of Communication Between Government and Residents	2015	Ongoing	· 10 documents translated per language	HHA has translated documents into other languages, including the public housing application and supplement, portions of the website, the web portal, and other HUD documents. HHA will continue to translate documents as needed and by request.
<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>	High	14. Lack of Communication Between Government and Residents	2015	Annually	· Update Language Assistance Plan annually	HHA reviews its Language Assistance Plan annually and updates as needed.
<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>	High	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	2016	· 50 ACC units	In program year 2016 26 ACC units were added to Sweetwater Pointe Apartments.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	High	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	Ongoing	· Additional resources secured	In program years 2015 and 2016 the Opportunity Center reached 5,690 people. In 2017, HHA opened a new expanded Opportunity Center. In program years 2017 and 2018, HHA continued to promote community resources and provided over 16,000 books to low- and moderate-income families. In 2019, 227 residents were employed through Workforce Solutions and 505 Job Plus participants at Cuney Homes received career counseling.
<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>	High	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	Ongoing	· Change in waiting list demographics	HHA provided Spanish, Vietnamese and Mandarin translations for the HHA website before the waitlist was opened in 2016. HHA's public housing and voucher waitlists were established through a web-based portal. In PY 2019, established 18 site-based waiting lists for public housing developments.
<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>	Medium	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	2015	Annually	· Update and maintain database of longitudinal lending data	Lending data was updated, analyzed, and included in outreach and public engagement in support of the development of the Consolidated Plan and Analysis of Impediments to Fair Housing Choice.
<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>	Medium	1. Discrimination in Housing 2. Lack of Knowledge about Fair Housing	2015	Annually	· Update and maintain database of longitudinal complaint data	HCDD updated and analyzed HUD fair housing complaints. Information was included in outreach and public engagement in support of the development of the Consolidated Plan and Analysis of Impediments to Fair Housing Choice.



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<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>	Medium	4. Lack of Accessible Housing for Persons with Disabilities	2015	2016	<ul style="list-style-type: none"> · Update or collect 5 local datasets · Partner with 3 organizations 	HCDD continues to research best practices to acquire information on accessible housing for person with disabilities.
<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>	Medium	3. Lack of Affordable Housing Options 5. Affordability 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	2017	<ul style="list-style-type: none"> · Perform market value analytics · Produce the second Market Value Analysis for Houston 	HCDD completed its second Market Value Analysis for Houston in April of 2017. Comparing the market value over time in Houston will help HCDD identify areas that are increasing and decreasing in value and apply targeted strategies in certain areas. After Hurricane Harvey, HCDD partnered with NALCAB to create a study about the impacts of Hurricane Harvey on real estate values in 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>	Medium	1. Discrimination in Housing 9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Annually updated	<ul style="list-style-type: none"> · Update analysis annually · Meet with DON if any concerns found 	In the past five years, HCDD has created a team of staff members to manage relationships with other City Departments and the Letters of Agreement (LOAs) process, which includes managing and monitoring the Department of Neighborhood's code enforcement activities.
<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>	Medium	5. Affordability 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status 9. Imbalanced distribution of amenities, services, and infrastructure between neighborhoods	2016	2018	<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 	HCDD staff continued relationships with bankers and banking institutions, including presenting information about fair housing to bank representatives at several meetings, collaborating with Capital One on a series of classes for CHDO training in 2018, and collaborating with Texas Capital Bank for the SAYYES! Affordable Homes Tour. Held a focus group about discrimination in lending to support the 2020 AI development.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	Medium	8. Lack of Financial Education 9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	2017	<ul style="list-style-type: none"> · Meet with banking institutions · Increase number of branches and financial services available in minority areas 	HCDD continued to update and present information about the locations of banks in relation to neighborhood demographics to bank representatives.
<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>	Medium	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Ongoing	<ul style="list-style-type: none"> · Increase private development in minority areas 	HCDD funds new development in minority areas of the City through the Multifamily Development Program, the New Home Development Program, and economic development activities. In addition, HCDD has held technical assistance opportunities over the past five years to strengthen the capacity of home builders and developers. Used millions of dollars of EDI and Section 108 loan funds to support a community hub in Near Northside and a makers hub in the East End.
<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>	Medium	2. Lack of Knowledge about Fair Housing	2015	Ongoing	<ul style="list-style-type: none"> · Hold three meetings annually 	In program year 2015, HCDD held three FHIT meetings. Over the past four years the Mayor's Office has hosted meetings and trainings regarding language assistance for residents. In January 2019, HCDD hosted a training for senior staff from various City Departments to discuss affirmatively furthering fair housing in City programs.
<p>40. Provide outreach 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>	Medium	5. Lack of Income/Funding	2015	Ongoing	<ul style="list-style-type: none"> · Conduct 50 outreach activities · Reach 10,000 individuals 	HCDD conducted 215 outreach activities reaching over 25,000 people. In addition, HCDD started hosting Section 3 Café, which are events where residents can meet in an informal setting with Section 3 businesses searching for employees. This has helped to create a direct link between residents and available jobs.



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<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>	Medium	5. Lack of Income/Funding 8. Lack of Financial Education	2018	2018	· Reach 5,000 persons	HCDD continues to provide outreach about the Homebuyer Assistance Program through in person events and through radio spots. Over the last four years, HCDD has reached over 100,000 people with information about the Homebuyer Assistance Program.
<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>	Medium	10. NIMBY Resistance 14. Lack of Communication Between Government and Residents	2015	Ongoing	· Attend 50 events	HCDD continues to host and attend a variety of community events to educate residents about HCDD programs and resources and attended over 380 community events. In 2019, HCDD began to offer Community Office Hours, where anyone can come to the HCDD office, speak with a staff member, and have any questions about HCDD answered.
<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, charrettes, 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>	Medium	10. NIMBY Resistance 14. Lack of Communication Between Government and Residents	2015	Ongoing	· Create 100% of RFPs with community engagement notification	HCDD's RFPs include documentation that the proposer sought, received, and implemented, if needed, views and recommendation from members of the community about the proposed development.
<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>	Medium	10. NIMBY Resistance	2016	2016	· Create a policy or action statement	HCDD did not develop an internal action statement but instead focused on promoting anti-NIMBYism in the community through the SAYYES! campaign.
<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>	Medium	10. NIMBY Resistance	2015	Ongoing	· Continue to be involved in national education campaign · Hold meetings	In April 2016, HCDD launched the "SAYYES!" or "Can I Be Your Neighbor" fair housing campaign. To develop this campaign, HCDD worked with an Advisory Committee, which consisted of housing advocates, marketing professionals, and other housing stakeholders. HCDD staff made presentations to over 1,000 people and more than 50,000 people were reached with campaign materials. Materials are available in multiple languages.



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<p>46. Establish goal that addresses reducing existing economic and racial/ethnic stratification and fostering socio-economic diversity in the general plan</p> <p>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>	Medium	<p>1. Discrimination in Housing</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p> <p>7. Affordability</p>	2015	2015	<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>In September 2015, City Council approved Houston's General Plan, called Plan Houston, which included goals: "Equal access to opportunity and property," "Supportive services for disadvantaged and at-risk groups," "An inclusive community that reflects our international heritage," "A diverse, welcoming culture that is celebrated and respected," and "Job opportunities that support a good standard of living and financial stability."</p>
<p>47. Seek clarification about whether state law prohibits affordable housing density bonus requirements</p> <p>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>	Medium	<p>1. Discrimination in Housing</p> <p>6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status</p>	2015	2016	<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>The City of Houston supported proposed State laws that assisted affordable home preservation. The City did not specifically seek clarification about this law.</p>
<p>48. Fund youth enrichment and afterschool programs to children in low- and moderate-income areas</p> <p>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>	Medium	<p>9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods</p> <p>12. Low educational Attainment Among Minorities</p>	2015	Ongoing	<ul style="list-style-type: none"> Fund youth enrichment and education programs for 34,750 children 	<p>HCDD assisted to over 29,000 youth through the Juvenile Delinquency Program, Mayor's Afterschool Achievement Program, and Youth Enrichment Program</p>
<p>49. Fund programs that provide job training to low- and moderate-income individuals and individuals from protected classes</p> <p>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.</p>	Medium	<p>5. Lack of Income/Funding</p> <p>12. Low educational Attainment Among Minorities</p>	2015	Ongoing	<ul style="list-style-type: none"> Support job training for 1,335 persons 	<p>HCDD supported job training for 2,504 people. These training programs helped residents find and retain jobs with living wages.</p>



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<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.</p>	Medium	13. Increased Health Hazard Exposure in Certain Neighborhoods	2015	Ongoing	· Reach 500 people	HHD provided lead-based paint and hazards outreach to over 3,000 people per year
<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.</p>	Medium	13. Increased Health Hazard Exposure in Certain Neighborhoods	2015	Ongoing	· Reach 500 people	HHD provided lead-based paint and hazards outreach to over 3,000 people per year. In addition, HCDD's home repair programs also provide information about residential lead-based paint hazards to low- and moderate-income families.
<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.</p>	Medium	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2017	Ongoing	· Reach 2,000 people	HCDD did not carry out a publicity campaign as described in the last four years.
<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.</p>	Medium	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	Annually	· Review assessment annually	HHA continued to review its physical needs, finding that the need is much greater than funding available. HHA continued to install new appliances throughout the portfolio and completed portfolio wide energy efficiency improvements that will decrease resident energy and utility bills resulting in decreased amounts monthly payments for residents. HHA initiated the process of converting all Public Housing properties to Rental Assistance Demonstration (RAD) to answer and meet deferred capital needs.



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<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>	Medium	6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2015	Annually	· Review analysis annually	HHA has received HUD approval for exceeding some FMRs. HHA conducted a market analysis of fair market rents by zip code and area of the community several times. HHA evaluated the distribution of vouchers to determine if payment standards should be modified. HHA maintained the amount of its four payment standard tiers throughout its service area. This action will ensure that HCV holders can access communities that are not traditionally leased by HCV holders.
<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>	Low	11. Lack of Transportation Options	2015	2015	· Complete a revised bike plan	Bike Plan utilized extensive community input to complete the plan, which was adopted by City Council on March 22, 2017. The City continues to build new bikelanes and paths and expand the Bicycle program.
<p>55. Develop a bike plan for the City 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>	Low	11. Lack of Transportation Options	2015	Ongoing	· Submit 2 comments	HCDD continued to monitor METRO changes and did not submit any formal comments. HCDD staff participated in several of METRO's campaigns soliciting community input, including METRO Next.
<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>	Low	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	Ongoing	· Better understand infrastructure deficiencies in minority areas	Houston Public Works continues to gather information about Houston's infrastructure for analysis.
<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>	Low	9. Imbalanced Distribution of Amenities, Services, and Infrastructure Between Neighborhoods	2015	2015	· Recommend updates to New Bus Network if concerns are found	HCDD staff did not provide formal comments regarding METRO's new bus network in 2015.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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>	Low	5. Lack of Income/Funding 8. Lack of Financial Education	2015	Ongoing	<ul style="list-style-type: none"> Partner with 20 organizations 	The City partnered with organizations over the last five years to promote financial literacy including Harris County Housing Authority, United Way Thrive, BankOn Houston, Neighbor Works, and Earl Carl Institute of Legal and Social Policy. HCDD partnered with Harris County Appraisal District to hold five free Homestead Exemption Workshops in March and April 2017. The Mayor's Summer Jobs Program employed youth from the age of 16 to 21 years of age and made no-cost or low-cost bank accounts and financial education information available to participants. HCDD's Homebuyer Assistance Program promotes an 8-hour homebuying class which has a financial literacy component to potential participants.
<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.</p>	Low	2. Lack of Knowledge about Fair Housing 6. Segregated Housing Patterns Based on Race, Ethnicity, and Economic Status	2016	2018	<ul style="list-style-type: none"> Recommend updates to subdivision process Update subdivision process 	The Planning Department seeks to begin the process to update Chapter 42 in 2020 and 2021.
<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.</p>	Low	3. Lack of Affordable Housing Options 7. Affordability	2017	2019	<ul style="list-style-type: none"> Recommend amending Chapter 42 Meet with Planning and Development staff 	The Planning Department seeks to begin the process to update Chapter 42 in 2020 and 2021.



2015 AI Recommended Actions and Description	Priority	Related Impediments	Start	End	Measure for Success/Milestone	Progress since 2015 AI
<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.</p>	Low	4. Lack of Accessible Housing for Persons with Disabilities	2016	2016	<ul style="list-style-type: none"> · Research ways to implement through the plan submittal process · Meet with Planning and Development staff 	HCDD did not directly work on this action.
<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>	Low	1. Discrimination in Housing 10. NIMBY Resistance	2015	2016	<ul style="list-style-type: none"> · Update Section 10-551 of the City's Code of Ordinances 	HCDD did not directly work on this action.
<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>	Low	1. Discrimination in Housing 4. Lack of Accessible Housing for Persons with Disabilities 10. NIMBY Resistance	2017	2019	<ul style="list-style-type: none"> · Research, write, fund, and implement a new policy 	HCDD did not directly work on this action.
<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>	Low	6. Segregated housing Patterns Based on Race, Ethnicity, and Economic Status	2016	2016	<ul style="list-style-type: none"> · Implement 3 agreements 	HHA is developed a voucher mobility program with the City (HCDD).



