



Houston-Galveston Area Council

Fair Housing Equity Assessment

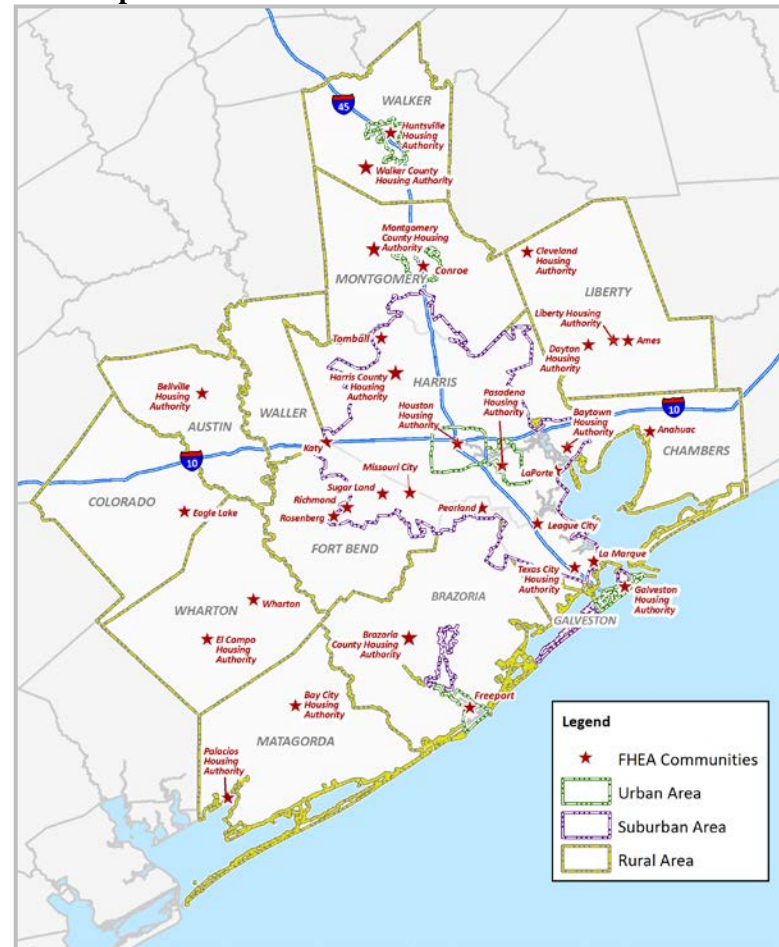
Executive Summary

The Houston-Galveston Area Council is the voluntary association of local governments in the Gulf Coast Planning Region of Texas. Consisting of 13 counties and over 130 cities, the Houston-Galveston region is a dynamic mix of rural, suburban, and urban typologies that range from Houston and its fast-growing suburbs to small rural and coastal communities. The region is home to over 6 million people, and will add an additional three million residents over the next 30 years. The 13-county H-GAC region is growing in population, increasing in diversity, and expanding economically. The changing social, economic, and environmental needs of communities present unique opportunities and challenges with regards to housing, education, and employment choices.

The Fair Housing Equity Assessment (FHEA) identifies baseline conditions for fair housing, equity, and opportunity across the Houston-Galveston region. H-GAC staff led collaboration efforts with the Fair Housing and Equity Workgroup (FHEW), BBC Research and Consulting (BBC), and the Kirwan Institute for the Study of Race and Ethnicity to analyze demographic and economic trends, the existing fair housing landscape, and disparities in access to opportunity across the 13 county Gulf Coast region.

The document is both regional and local in nature, providing analysis of all 13 counties in the region and 29 cities. These combined 42 jurisdictions are known as the FHEA Communities and represent a regional transect of size and typology. Due to the region's size and geographic diversity, these 42 jurisdictions were chosen to represent a cross-section of community size and location.

Figure III-8
Base Map of FHEA Communities



The FHEA is not intended to fulfill the requirements of an AI; however the FHEA can support local and regional fair housing initiatives by:

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- Providing detailed data and analysis that can be directly incorporated into jurisdictional AIs;
- Identifying impediments to affirmatively furthering fair housing that apply at a local level;
- Ensuring that the RPSD links fair housing and equity considerations with transportation, employment, and education;
- Assisting jurisdictions in meeting the goals of their Fair Housing Activity Statement – Texas (FHAAT) Forms;
- Identifying actions to address impediments to fair housing through local recommendations and regional collaboration;
- Providing a census tract-level opportunity analysis that can help jurisdictions focus efforts;
- Informing planning activities that have fair housing and equity implications; and
- Encouraging regional coordination and collaboration.

The FHEA utilizes a collaborative and data driven approach in identifying and examining issues of fair housing, equity, and access to opportunity in the region. The FHEA has a diverse target audience, which includes local officials, local jurisdictions, and fair housing advocacy groups.

H-GAC staff has extensive experience in fair housing projects through work on the State of Texas AI, local AIs, and State of Texas Disaster Recovery housing programs. H-GAC utilized the expertise of three groups throughout the FHEA process: the local FHEW, BBC, and the Kirwan Institute. These groups combined to make-up the FHEA team.

While the work is regional in nature, specific analyses were conducted at the county and municipal level for a subset of

jurisdictions distributed across the urban, suburban, and rural typologies. Responsibilities of FHEA contributors included:

- H-GAC – Coordinating the efforts of the workgroup, HUD technical assistance, and consultants; liaising with local and federal government officials and local housing authorities; collecting and analyzing data; and compiling and writing the final FHEA;
- FHEW – Informing data and analysis with local input and context, and prioritizing the development of best practices and recommendations;
- BBC – Conducting data analysis and developing the opportunity model and best practices; and
- Kirwan Institute – Developing opportunity maps and conducting interviews of the FHEW members.

The FHEW played a major role in shaping the development of the FHEA. Over the course of one year, the FHEW convened seven times to provide feedback on data and mapping, draft sections of the report, and presentation of the material. The workgroup was essential in identifying topics for best practices and recommendations, as well as identifying the nuance in equity and fair housing issues lost in a broader level analysis. Both the feedback from the FHEW and the responsiveness of BBC and H-GAC, allows the FHEA to be a tailored document that addresses the unique challenges of the Houston-Galveston region.

The FHEW includes several local governments with housing programs, non-profits, and fair housing and equity advocacy groups from across all transects.

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Fair Housing and Equity

Workgroup Membership

- Boat People SOS Houston
- Center for Housing and Urban Development at Texas A&M
- Center for the Elimination of Disproportionality and Disparities
- City of Houston
- City of Huntsville
- Coalition for the Homeless Houston/Harris County
- Fort Bend County
- Greater Houston Fair Housing Center
- Gulf Coast Economic Development District
- Gulf Coast Interfaith
- Harris County
- Houston-Galveston Area Council
- League of United Latin American Citizens, Brazosport Council
- Metropolitan Transit Authority of Harris County
- Montgomery County
- NAACP, Missouri City and Vicinity Branch Unit
- Palacios Housing Authority
- Texas Low Income Housing Information Service
- Texas Organizing Project
- United Way of Greater Houston
- University of Texas Medical Branch

The FHEA generated a significant number of findings:

- The vast majority of Census tracts in the Houston-Galveston area gained racial and ethnic diversity in the last 10 years, with the strongest gains occurring within suburban transects.
- While the region increased in racial and ethnic diversity, there is still a moderate to high level of segregation – which can be attributed to a number of factors, including housing preferences, availability, and cost.
- Analysis suggests that the availability of affordable rental properties influences racial and ethnic concentrations, with the locations of affordable multifamily rentals almost entirely contained within areas of racial and ethnic concentration.
- The residents of the region’s highest poverty Census tracts are mostly racial and ethnic minorities and are disproportionately impacted by limited access to job training centers, homeownership opportunities, areas free from environmental hazards, and affordable housing.
- Subsidized and affordable rental housing is lacking in high opportunity areas.
- Not-In-My-Back-Yard Syndrome (NIMBYism) against multifamily rental developments, particularly those with an affordable or low income component, is strong in the region. Opponents to these developments are typically concerned about impacts on property values, school quality, traffic, and crime.
- Disability and race comprise the basis for 65 percent of regional fair housing complaints filed with HUD.
- Up to 40 percent of the region’s residents are unbanked or underbanked – simultaneously impacting residents’ ability to

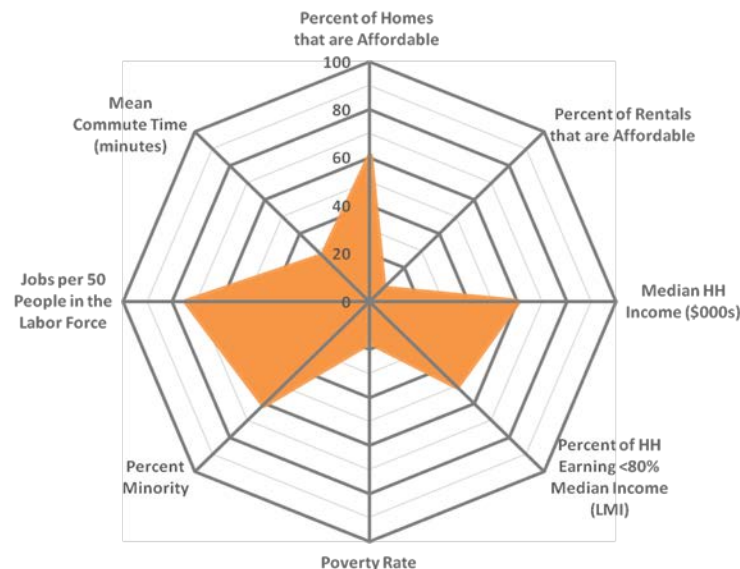
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increase self-sufficiency and costing the region's financial institutions in potential revenue.

Utilizing the findings generated by the FHEA, H-GAC led an effort to create an Opportunity Comparison Radial model that takes into account the following variables in examining opportunity across the FHEA communities:

- Percent of homes that are affordable;
- Percent of rentals that are affordable;
- Median household income;
- Percent of low- to moderate-income (LMI) households;
- Poverty rate;
- Percent minority;
- Jobs per 50 people in the labor force; and
- Mean commute time.

Opportunity Comparison Radial. Houston-Galveston Region



The FHEA analysis and model creation processes generated seven topics for best practices and recommendations. Within each topic, the FHEA describes the problem, contrasts it with regional economic impacts, and provides an examination of successful case studies and/or a collection of proven recommendations. The modeling and analysis conducted for this report suggest that the region should focus on two broad goals to increase access to opportunity:

- 1) Diversifying housing stock, and
- 2) Reducing and improving high poverty areas.

Key to achieving these goals - and ultimately, providing greater access to opportunity - center around the following best practice and recommendation efforts:

- Increasing employment and build self-sufficiency of residents living in poverty-concentrated areas;
- Promoting balanced housing stock where subsidized and affordable housing stock is lacking;
- Revitalizing disadvantaged communities while preserving their cultural heritage and income, racial and ethnic diversity;
- Addressing NIMBYism, which can be a barrier to housing diversification;
- Boosting resident access to capital to purchase and/or improve a home;
- Being a model for regional collaboration to advance opportunity; and
- Improving the regional fair housing infrastructure.

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Section I

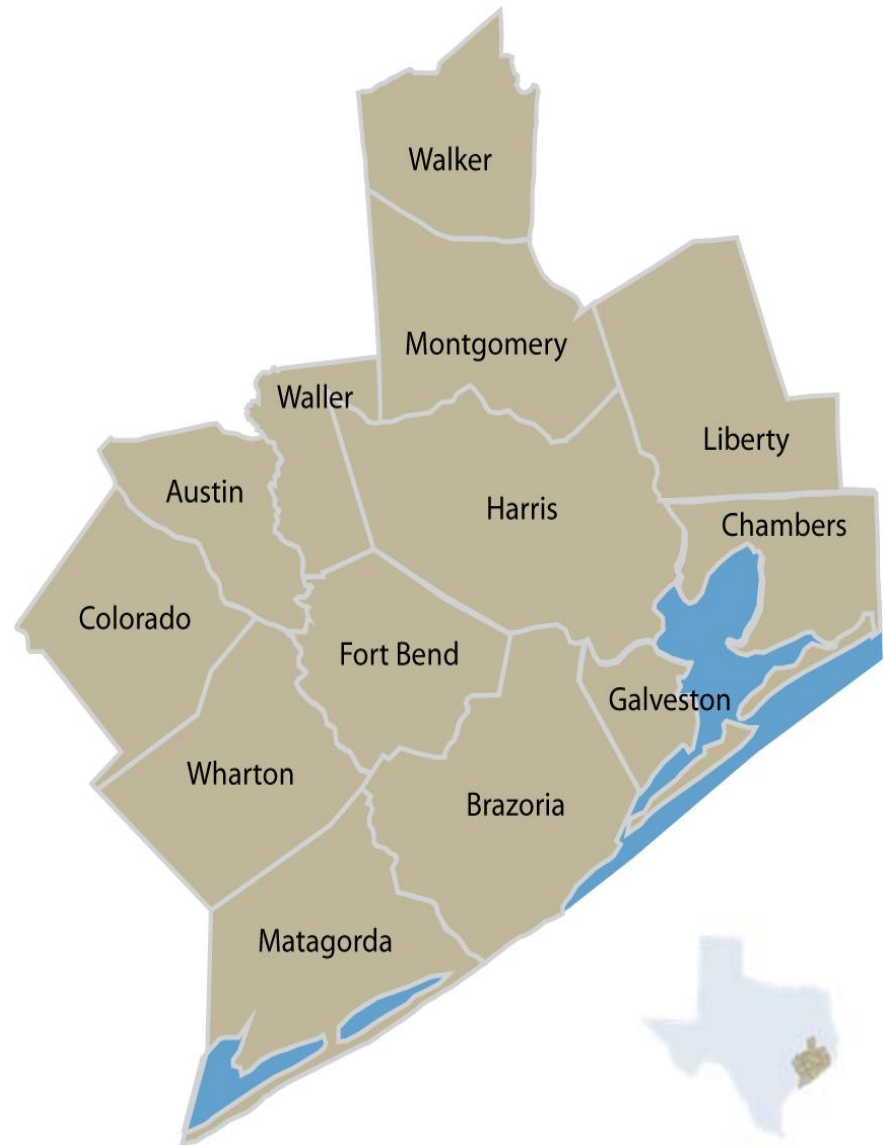
Introduction

Section I – Introduction

Introduction

The Houston-Galveston Area Council is the voluntary association of local governments in the Gulf Coast Planning Region of Texas. H-GAC has a long history of facilitating collaboration among local municipalities, counties, state and federal agencies, and public and private stakeholders on regional initiatives. Consisting of 13 counties and over 130 cities, H-GAC's member governments are a dynamic mix of rural, suburban, and urban typologies that range from Houston and its fast-growing suburbs to small rural and coastal communities.¹ H-GAC's Board of Directors is comprised entirely of local elected officials, and the agency features programs in transportation, workforce development, environmental planning, and economic development.

The Houston-Galveston region is home to more than six million people, and H-GAC's *Regional Forecast* predicts the region will add over three million residents and two million jobs by 2040.² The region's population is city-centered, with over half of the residents living in incorporated cities.³ However, the sheer size and geographic diversity of the region provide opportunities for residents to live in dense urban centers, bucolic rural towns, or suburban communities along the coast. The 13-county H-GAC region is growing in population, increasing in diversity, and expanding economically. The changing social, economic, and environmental needs of



¹ "About H-GAC." *H-GAC*. Houston-Galveston Area Council, n.d. Web. 24 Apr. 2013.

² *H-GAC 2040 Region Forecast*. Rep. Houston: Houston-Galveston Area Council, 2012. Web.

³ *Existing Conditions Report*. Rep. Houston: Houston-Galveston Area Council, 2012. Print.

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communities present unique opportunities and challenges with regards to housing, education, and employment choices.

What is Fair Housing and Equity?

Equity refers to the full inclusion of all people – regardless of demographic, geographic, or other characteristics – in the social, economic, environmental, and political development of the region. In order for residents to attain employment, education, and the many other components that increase quality of life there must be opportunities to access quality housing. The Fair Housing Act of 1968 prohibits discrimination in the sale, rental, and financing of housing based on race, color, religion, sex, national origin, familial status, or disability. In addition to the Fair Housing Act, the U.S. Department of Housing and Urban Development (HUD) passed the Housing and Community Development Act of 1974 which requires jurisdictions receiving HUD funding (CDBG, HOME, ESG) to affirmatively further fair housing through the analysis of impediments and the development of strategies to address identified impediments.

The Fair Housing Equity Assessment (FHEA)

The Fair Housing Equity Assessment (FHEA) was developed as a requirement of the HUD-funded Sustainable Communities Regional Planning grant and identifies baseline conditions for fair housing, equity, and opportunity across the Houston-Galveston region, informs the Regional Plan for Sustainable Development (RPSD), and informs deliberations of the RPSD Coordinating Committee. The document is both regional and local in nature, providing analysis of 29 cities and all 13 counties in the region. These combined 42 jurisdictions are known as the FHEA Communities and represent a regional transect of size and typology.

At the most basic level, HUD requires that the FHEA include an identification and assessment of:

- Segregated areas;
- Areas of increasing diversity and/or racial and ethnic integration;
- Racially/ethnically concentrated areas of poverty;
- Access to existing areas of opportunity;
- Major public investments; and
- Fair housing issues, services, and activities.⁴

In 2010, HUD Secretary Shaun Donovan articulated the rationale for the FHEA:

“Today, too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one’s zip code predicts poor education, employment and even health outcomes. These neighborhoods are not sustainable in their present state.”

Grantees who receive Sustainable Communities funding are expected to do the following as part of their FHEAs:

1. Understand the historical, current and future context for equity and opportunity in the region and the data and evidence that demonstrates those dynamics. This is accomplished in Sections II – Regional Indicators of Opportunity and Section IV – Fair Housing Landscape.

⁴ It is important to note that a FHEA differs from an Analysis of Impediments to Fair Housing Choice (AI) study, required of HUD-block grant recipients, in that a FHEA focuses on race, ethnicity and poverty—and how well residents with these characteristics can access areas of opportunity. Some traditional fair housing analyses are required by FHEAs and are contained in Section IV of this report.

Section I – Introduction

2. Engage regional leaders and stakeholders on findings and implications of analysis. This is accomplished collaboration with the Fair Housing Equity Workgroup (FHEW) and Coordinating Committee.
3. Integrate knowledge developed through the regional FHEA exercise into the strategy development process (e.g., priority setting and decision making). This is addressed in Section V: Best Practices and Recommendations and in the comprehensive Regional Plan for Sustainable Development.

The overall goal for the data, information and research in this report is to give communities in the Houston-Galveston region ideas on how they can 1) work within low opportunity census tracts to capitalize on assets and address challenges to improve conditions, 2) create opportunities with exclusive census tracts for a more diverse resident base; and 3) contribute to the region's goal of creating opportunity for all residents—that is, making all areas in the region areas of high opportunity.

H-GAC staff, the Fair Housing and Equity Workgroup (FHEW), the Kirwan Institute for the Study of Race and Ethnicity, and BBC Research & Consulting (BBC) utilized an interactive approach to analyze the social, political, and economic issues that impact equity and housing in the region. The FHEA examines, in depth, the following components across regional typology – rural, suburban, and urban:

- Primary demographic trends and analysis;
- Fair housing activities and infrastructure;
- Indicators and disparities in access to opportunity;
- Infrastructure and economic investment; and
- Best practices and recommendations.

The FHEA provides data and analysis concerning potential fair housing and equity issues, examines the current fair housing and equity landscape, and presents best practices and recommendations that could be useful to communities within the region, especially those preparing an Analysis of Impediments (AI).

The FHEA is not intended to fulfill the requirements of an AI; however the FHEA can support local and regional fair housing initiatives by:

- Providing detailed data and analysis that can be directly incorporated into jurisdictional AIs;
- Identifying impediments to affirmatively furthering fair housing that apply at a local level;
- Ensuring that the RPSD links fair housing and equity considerations with transportation, employment, and education;
- Assisting jurisdictions in meeting the goals of their Fair Housing Activity Statement – Texas (FHAAT) Forms;
- Identifying actions to address impediments to fair housing through local recommendations and regional collaboration;
- Providing a census tract-level opportunity analysis that can help jurisdictions focus efforts;
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H-GAC's FHEA Approach

The FHEA utilizes a collaborative and data driven approach in identifying and examining issues of fair housing, equity, and access to opportunity in the region. The FHEA has a diverse

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target audience, which includes local officials, local jurisdictions, and fair housing advocacy groups.

H-GAC staff has extensive experience in fair housing projects through work on the State of Texas AI, local AIs, and State of Texas Disaster Recovery housing programs. H-GAC utilized the expertise of three groups throughout the FHEA process: the local FHEW, BBC, and the Kirwan Institute. These groups combined to make-up the FHEA team.

While the work is regional in nature, specific analyses were conducted at the county and municipal level for a subset of jurisdictions distributed across the urban, suburban, and rural typologies. Responsibilities of FHEA contributors included:

- H-GAC – Coordinating the efforts of the workgroup, HUD technical assistance, and consultants; liaising with local and federal government officials and local housing authorities; collecting and analyzing data; and compiling and writing the final FHEA;
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The FHEW played a major role in shaping the development of the FHEA. Over the course of one year, the FHEW convened seven times to provide feedback on data and mapping, draft sections of the report, and presentation of the material. The workgroup was essential in identifying topics for best practices and recommendations, as well as identifying the nuance in equity and fair housing issues lost in a broader level analysis. Both the

feedback from the FHEW and the responsiveness of BBC and H-GAC, allows the FHEA to be a tailored document that addresses the unique challenges of the Houston-Galveston region.

H-GAC utilized an iterative and interactive process to examine the multi-layered relationship between equity, housing, transportation, education, employment, and changing demographics. The FHEA team used national and state data to:

- Create opportunity indices (education, neighborhood quality, health and environment, economy and employment, transportation, and housing) in the development of a region-wide, Census tract level opportunity map;
- Identify Racial/Ethnic Concentrated Areas of Poverty (R/ECAP); and
- Analyze demographic and economic trends in the region.

In addition to data analysis, the Kirwan Institute surveyed members of the FHEW to capture local input on fair housing and equity issues within the region. The FHEW includes several local governments with housing programs, non-profits, and fair housing and equity advocacy groups from across all transects.

Due to their diversity in expertise, the workgroup provided extensive and focused feedback throughout the FHEA process, as well as in review of the final document. Workgroup and coordinating committee members, along with the general public, reviewed the FHEA and provided comments that were incorporated into the document and/or listed in Appendix F.

Section I – Introduction

Fair Housing and Equity

Workgroup Membership

- Boat People SOS Houston
- Center for Housing and Urban Development at Texas A&M
- Center for the Elimination of Disproportionality and Disparities
- City of Houston
- City of Huntsville
- Coalition for the Homeless Houston/Harris County
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- Greater Houston Fair Housing Center
- Gulf Coast Economic Development District
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- Palacios Housing Authority
- Texas Low Income Housing Information Service
- Texas Organizing Project
- United Way of Greater Houston
- University of Texas Medical Branch

FHEA Components

The FHEA includes a detailed look at regional demographics, the fair housing landscape, opportunity analysis, and best practices and recommendations. The contents of the FHEA are in accordance with HUD guidelines and contain the following elements:

- Section I – Introduction: Outlines the purpose of the FHEA, the FHEA geography, and the contents of the assessment.
- Section II – Indicators of Opportunity: Discusses demographic and socioeconomic trends within the region. Analyzes R/ECAPs, patterns of segregation, and potential impacts of major economic and public investments.
- Section III – Access to Opportunity: Describes the opportunity mapping results conducted by the Kirwan Institute, and the results from the FHEW survey process. Outlines the methodology and results of the opportunity model with respect to selected FHEA communities and regional typologies.
- Section IV – Fair Housing Landscape: Examines fair housing complaint data, legal cases, and regional fair housing infrastructure.
- Section V – Best Practices and Recommendations: Discusses best practices for regional collaboration and addressing NIMBYism through an examination of successful case studies and recommendations.
- Appendices: Contains Community Data Sheets, Public Housing Authority (PHA) plans review, AI/FHAST Form analysis, and complete Opportunity Mapping sheets.

Section II

Indicators of Opportunity

Section II – Indicators of Opportunity

Introduction

The Houston-Galveston region is one of the most racially and ethnically diverse and economically vibrant areas in the country spread across distinct rural, suburban, and urban typologies.⁵ A recent analysis of racial and ethnic makeup of major U.S. cities showed Houston meeting or exceeding the racial and ethnic diversity of other major cities including New York and Los Angeles. The relatively low cost of living and strong economy are major factors in significant demographic changes, the increased demand for a variety of housing options, and the demand for increased access to amenities and services for all residents – regardless of race, religion, national origin, age, or socioeconomic status.⁶

The Houston-Galveston region is a majority minority area, with no single racial or ethnic cohort holding a majority of the total population. The region's population is growing and changing at an accelerated pace, and within that growth are diversifying housing needs for new and existing residents. Just as demographics drive housing demand, the availability of housing affects access to opportunity in terms of employment, education and quality of life. Section II of the FHEA focuses on measures of opportunity in the Houston-Galveston region. The maps and narrative in this section depict the variables that are important to

⁵ Throughout the document, increasing diversity is defined as an increase in minority representation and viewed as a positive change. However, increasing diversity can also result in increased segregation and that relationship is not wholly explored within the scope of this assessment.

⁶ *The Changing Racial and Ethnic Makeup of New York City Neighborhoods*. Rep. The Furman Center for Real Estate and Urban Policy, May 2012. Web.

housing choice, fair housing, and access to opportunity. These variables range from existence of assisted housing to availability of public transit to concentrated areas of poverty. The variables discussed in this section include:

- Racial and ethnic composition and concentration;
- Changes in racial and ethnic concentration and diversity between 2000 and 2010;
- Concentration of poverty;
- Racially/ethnically concentrated areas of poverty;
- Location of subsidized housing;
- Areas with low rates of residential capital investment;
- Educational quality and access to job training centers; and
- Areas with potential environmental hazards.

Summary of Findings

The analysis of key factors used to assess opportunity in the Houston-Galveston region found that:

- Between 2000 and 2010, the Houston-Galveston region experienced significant gains in racial and ethnic diversity across almost all Census tracts. The region has experienced dramatic growth and change over the past several decades, with racial and ethnic minorities increasing from 35 percent to 60 percent since 1980.⁷ The strongest gains in diversity occurred within suburban transects. Census tracts that lost diversity were mostly located in northern/east Houston and rural areas.

⁷ PolicyLink, and USC Program for Environmental and Regional Equity. *An Equity Profile for the Houston-Galveston Region*. Rep. N.p.: n.p., 2013. Print

Section II – Indicators of Opportunity

- Despite increasing overall diversity, the region has a moderate to high level of segregation as measured by the HUD-created dissimilarity index. Racial and ethnic segregation is most pronounced in Brazoria and Matagorda Counties with respect to Asian/white populations. Harris, Galveston, Liberty, and Fort Bend County registered a moderate level of segregation with respect to African-American and white populations.
- Within the growing racial and ethnic minority population, the youth cohort is experiencing significant expansion. This is creating an ever increasing racial generation gap between the region's mainly white senior population and the diverse youth population⁸.
- The clustering of certain racial and ethnic groups is likely to due to a number of factors, including housing preference, availability, and cost. Racial and ethnic minorities have higher housing cost burdens on average, especially for renters.⁹ Overlay analysis in this section suggests that the availability of affordable rental properties influences racial and ethnic concentrations, with the locations of affordable multifamily rentals almost entirely contained within areas of racial and ethnic concentrations.
- Income inequality has increased in the region and working poverty rates have exceeded national averages, with poverty

rates for racial and ethnic minorities being among the highest.¹⁰

- Overall, the region's mix of socioeconomic, geographic and employment diversity affords many types of residents access to opportunity. The weak point is for residents living in poverty— especially those in the region's highest poverty Census tracts— whose access to job training centers, homeownership opportunities, areas free from environmental hazards and affordable housing is limited. The residents living in these areas are mostly racial and ethnic minorities, with this holding true across urban, suburban, and rural transects.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

Section II – Indicators of Opportunity

Background and Trending Demographics

Containing 13 counties, the Houston-Galveston region is home to the fourth largest city and the third largest county in the U.S. Texas as a whole – and the Houston-Galveston region in particular – has experienced a significant amount of population growth over the last decade. This growth is projected to continue, and the region’s population is expected to exceed 8 million by 2040, with over three quarters of those residents to be people of color.¹¹

Between 2000 and 2010, the growth of the region was four percentage points higher than the state as a whole. Harris County, the largest county in the region, contains the City of Houston and had a population of 4.1 million in 2010 – an increase of 20 percent over the 2000 population. Fort Bend County had the highest percentage growth (65 percent) of the region, followed by Montgomery (55 percent). Both counties experienced significant growth in racial and ethnic diversity also. Figure II-1 displays the population of all counties in the region.

Figure II-1.
Population Growth by Race and Ethnicity, Houston-Galveston Region, 2000 to 2010

	Total Population 2000	Total Population 2010	Percent Growth	Percent Growth by Race/Ethnicity			
				Non- Hispanic White	African American	Hispanic	Other Minority*
State of Texas	20,851,820	25,145,561	21%	4%	24%	42%	22%
City of Houston	1,953,631	2,099,451	7%	-11%	1%	26%	9%
Region 6 Total	4,854,454	6,087,133	25%	3%	28%	54%	39%
Region 6 Counties:							
Austin	23,590	28,417	20%	10%	6%	75%	56%
Brazoria	241,767	313,166	30%	5%	84%	57%	61%
Chambers	26,031	35,096	35%	23%	13%	136%	114%
Colorado	20,390	20,874	2%	-5%	-9%	35%	-3%
Fort Bend	354,452	585,375	65%	29%	79%	86%	99%
Galveston	250,158	291,309	16%	9%	4%	45%	35%
Harris	3,400,578	4,092,459	20%	-6%	23%	49%	29%
Liberty	70,154	75,643	8%	0%	-9%	78%	56%
Matagorda	37,957	36,702	-3%	-13%	-13%	18%	-14%
Montgomery	293,768	455,746	55%	36%	89%	155%	130%
Walker	61,758	67,861	10%	7%	3%	31%	64%
Waller	32,663	43,205	32%	18%	12%	98%	71%
Wharton	41,188	41,280	0%	-10%	-6%	20%	-14%

Note: * Other Minority includes American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, Some other race and Two or more races.

Source: 2000 and 2010 Census.

¹¹ Ibid.

Section II – Indicators of Opportunity

Age

The Houston-Galveston region has a slightly lower proportion of seniors than the State of Texas as a whole. Fourteen percent of the non-Hispanic white population is age 65 and over and 5 percent is under the age of five. Among Hispanic or Latino residents in the region, 4 percent are 65 or older and 11 percent are under five. Figure II-2 displays age by race and ethnicity for the region.

There is a large and growing racial generation gap between the region's non-Hispanic white elderly population and rapidly increasing minority youth population. Figure II-2 displays age by race and ethnicity for the region, and illustrates the difference between the youth and elderly population dynamics across race and ethnicity. The region's racial generation gap has nearly doubled since 1980, with the median age of the Latino population at 26 and the non-Hispanic white population at 40.¹²

Based on median ages the City of Houston is younger than Texas as a whole; however, the proportion of the population that is seniors is higher in Houston for both non-Hispanic whites and African Americans than in the state or region as whole. Colorado County has the oldest population in the region with 19 percent of residents over the age of 65 and a median age of 44. Across all counties, the generational gap is considerable, with the non-Hispanic white population having a higher proportion of seniors than the Hispanic or Latino population.

¹² Ibid.

Section II – Indicators of Opportunity

Figure II-2.
Age by Race and Ethnicity, Houston-Galveston Region, 2010

	Total Population 2010	Children Under 5	Seniors (65 or older)	Median Age	Non-Hispanic White			African American			Hispanic		
					Under 5	Seniors	Median Age	Under 5	Seniors	Median Age	Under 5	Seniors	Median Age
State of Texas	25,145,561	8%	10%	34	5%	15%	41	8%	7%	32	10%	6%	27
City of Houston	2,099,451	8%	9%	31	4%	17%	41	8%	9%	30	11%	4%	25
Region 6 Total	6,087,133	8%	9%		5%	14%		8%	7%		11%	4%	
Region 6 Counties:													
Austin	28,417	7%	16%	41	5%	20%	48	7%	12%	36	11%	4%	26
Brazoria	313,166	8%	10%	35	6%	13%	40	7%	6%	35	10%	4%	27
Chambers	35,096	7%	9%	36	6%	11%	40	6%	11%	38	11%	2%	24
Colorado	20,874	6%	19%	44	4%	26%	51	7%	14%	38	12%	7%	27
Fort Bend	585,375	7%	7%	35	6%	11%	41	7%	5%	33	10%	4%	28
Galveston	291,309	7%	11%	37	5%	14%	42	8%	11%	34	10%	6%	28
Harris	4,092,459	8%	8%	32	5%	14%	42	8%	7%	31	11%	4%	27
Liberty	75,643	7%	11%	36	6%	14%	40	6%	10%	36	11%	3%	25
Matagorda	36,702	7%	14%	38	4%	21%	48	7%	15%	40	10%	6%	27
Montgomery	455,746	7%	10%	36	6%	13%	40	8%	7%	32	11%	3%	25
Walker	67,861	5%	10%	35	4%	14%	39	5%	6%	34	8%	3%	27
Waller	43,205	7%	10%	32	5%	16%	46	6%	8%	22	12%	3%	24
Wharton	41,280	7%	15%	37	5%	21%	47	7%	14%	36	10%	7%	27

Source: 2010 Census.

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Family characteristics

Forty percent of all households in the Houston-Galveston region are family households with children. Nearly two-thirds of these households are married-couple families with children, and the remainder is single parents. Harris County has the highest proportion of single parents in the region (13percent of all households).

Figure II-3.
Family Characteristics, Houston-Galveston Region, 2010

	Total Households	Nonfamily Households	Living Alone	Married with Children	Single Parent: Female	Single Parent: Male
State of Texas	8,922,933	30%	24%	26%	10%	3%
City of Houston	782,643	38%	31%	20%	11%	3%
Region 6 Total	2,120,706	29%	24%	27%	10%	3%
Region 6 Counties:						
Austin	10,837	27%	23%	24%	7%	3%
Brazoria	106,589	24%	20%	31%	8%	3%
Chambers	11,952	20%	17%	34%	7%	3%
Colorado	8,182	30%	27%	20%	7%	3%
Fort Bend	187,384	18%	15%	37%	9%	3%
Galveston	108,969	30%	25%	24%	9%	3%
Harris	1,435,155	31%	25%	26%	10%	3%
Liberty	25,073	26%	22%	26%	8%	4%
Matagorda	13,894	30%	26%	22%	9%	3%
Montgomery	162,530	25%	21%	29%	7%	3%
Walker	20,969	41%	28%	17%	8%	2%
Waller	14,040	28%	21%	25%	9%	3%
Wharton	15,132	28%	25%	24%	10%	3%

Source: 2010 Census.

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Disability

The incidence of disability for the counties in the Houston-Galveston region ranges from 7 percent in Fort Bend County to 20 percent in Liberty County. Seniors are substantially more likely to have a disability than non-seniors—over half of all seniors in Liberty County have a disability. Seniors are also more likely to have at least two types of disabilities whereas non-seniors typically have only one.

Figure II-4.
Disability Status for Seniors and Non-Seniors, Houston-Galveston Region, 2008-2010 ACS

	Percent of the Population with a Disability	Percent of Seniors (65+) with a Disability			Percent of non-Seniors with a Disability		
		Overall	1 Type	2 Types	Overall	1 Type	2 Types
State of Texas	12%	41%	17%	24%	8%	5%	3%
City of Houston	10%	38%	15%	23%	7%	4%	3%
<i>Region 6 Counties:</i>							
Austin	11%	41%	19%	22%	6%	4%	2%
Brazoria	12%	43%	19%	23%	8%	5%	4%
Chambers	13%	45%	23%	22%	10%	6%	4%
Colorado	15%	38%	21%	17%	9%	7%	2%
Fort Bend	7%	34%	15%	19%	5%	3%	2%
Galveston	11%	40%	15%	25%	8%	4%	4%
Harris	9%	38%	15%	22%	6%	4%	3%
Liberty	20%	53%	21%	33%	15%	9%	6%
Matagorda	15%	41%	20%	21%	11%	6%	5%
Montgomery	10%	34%	17%	18%	7%	4%	3%
Walker	10%	35%	19%	15%	7%	4%	3%
Waller	10%	38%	15%	23%	7%	5%	2%
Wharton	14%	45%	23%	22%	9%	6%	3%

Source: 2008-2010 ACS.

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Racial and Ethnic Concentrations

Analysis of racial and ethnic concentrations is important to determine if minorities have the same access to areas of opportunity – e.g., quality schools, employment, and safe neighborhoods – as non-minorities. Racial and ethnic minorities are the focus of this analysis because, historically, they have faced barriers to housing choice more often than non-minorities.⁹

HUD prescribes several methods for analyzing racial and ethnic concentrations, also called “minority impacted areas.”

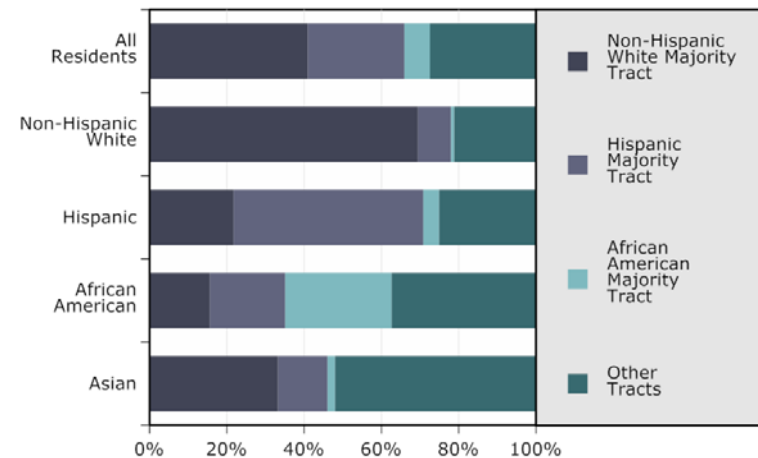
In the Houston-Galveston region as a whole, 40 percent of residents are non-Hispanic white and 60 percent are minorities (35 percent are Hispanic, 17 percent are African American and 6 percent are Asian). Despite this overall diversity, residents are likely to live near neighbors who share their race and ethnicity, especially non-Hispanic whites. Figure II-5 displays where different racial/ethnic groups live by Census tract majority.

According to the data in Figure 11-5, in 2010, Hispanic residents were twice as likely as the average resident to live in a Hispanic majority tract (49 percent of Hispanic residents lived in a Hispanic majority tract, compared to 25 percent of residents overall) and African American residents were four times as likely to live in an African American majority tract (28 percent of African American residents lived in an African American majority tract, compared to 7 percent of residents overall).

⁹ Throughout this document, “minority” refers to any racial/ethnic group other than non-Hispanic white regardless of whether that group represents a majority share of the total population.

Sixty-nine percent of non-Hispanic white residents lived in a census tract that was majority non-Hispanic white, compared to 22 percent of Hispanic residents and 16 percent of African American residents.

Figure II-5.
Population Distribution by Census Tract, 2010



Source: 2010 Census and BBC Research & Consulting.

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Concentration maps

The maps on the following pages show where residents of different races and ethnicities live in the region. These racial and ethnic concentration maps and analysis use HUD’s definition of minority impacted areas:¹⁰

- A “minority area” (also known as a racially or ethnically-impacted area) is any neighborhood or Census tract in which: 1) the percentage of households in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the housing market areas (respective county); 2) the total percentage of minority persons is at least 20 percentage points higher than the total percentage of all minorities in the housing market areas as a whole; or 3) the total percentage of minority persons exceeds 50 percent of its population, if in a metropolitan area.
- A “non-minority area” is a neighborhood or Census tract with a greater than 90 percent non-minority population.
- A “mixed area” is a neighborhood or Census tract that is not a non-minority or minority area.
- The “housing market area” is the region where it is likely that renters and purchasers would be drawn for housing.. Generally the housing market area is the county.

¹⁰ The source of this definition can be found in many of HUD’s Notices of Funding Availability (NOFAs) – i.e., Section 811 Supportive Housing for Persons with Disabilities Program (FR-5415-N-39)

It is necessary to use two definitions of “concentration” for the Houston-Galveston region due to the geographic diversity of the region. The 20 percentage point threshold used to describe “minority area” determines racial and ethnic concentrations in rural and suburban areas, and the 50 percent definition is applied to urban areas. Maps of both definitions are provided.

Figure II-6 displays the racial and ethnic breakdown of each county in the Houston-Galveston region, along with the 20 percentage point threshold used to determine if individual Census tracts are minority impacted.

In general, the maps provided focus on the three most predominant racial and ethnic groups in the region, rather than for minority populations overall, as many census tracts in the region are majority minority.

The information contained in the maps includes the following:

- The first three maps (Figures II-7 through II-9) show minority impacted Census tracts for the racial and ethnic categories of: 1) African American; 2) Asian; and 3) Hispanic or Latino.
- The fourth map (Figure II-10) shows Census tracts that are more than 50 percent minority. This includes non-Hispanic residents of all races except for white plus Hispanic or Latino residents of any race.
- The map in Figure II-11 supplements the map in Figure II-10 by showing racial and ethnic majorities for three racial and ethnic categories: African American, Asian and Hispanic residents.

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- The map in Figure II-12 shows areas defined as “non-minority” by HUD; these are a neighborhood or Census tract with a greater than 90 percent non-minority population. Just a handful of Census tracts in the region meet this definition.
- Figure II-13 supplements II-12. It displays Census tracts with a relatively high proportion of non-Hispanic white residents, defined for this analysis as Census tracts in which the proportion of non-Hispanic white residents is at least 20 percentage points higher than the percentage of that minority group for the county overall.

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Figure II-6.

Race and Ethnicity and Minority Impacted Area Threshold, Houston-Galveston Region, 2010

Name										20 Percentage Point Concentration Threshold for Census Tracts							
	White	African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races	Hispanic	Non-Hispanic White	African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races	Hispanic	Non-Hispanic White
Austin	79%	9%	1%	0%	0%	9%	2%	23%	66%	29%	21%	20%	20%	29%	22%	43%	86%
Brazoria	70%	12%	1%	6%	0%	9%	3%	28%	53%	32%	21%	26%	20%	29%	23%	48%	73%
Chambers	79%	8%	1%	1%	0%	10%	2%	19%	71%	28%	21%	21%	20%	30%	22%	39%	91%
Colorado	75%	13%	1%	0%	0%	9%	2%	26%	60%	33%	21%	20%	20%	29%	22%	46%	80%
Fort Bend	51%	22%	0%	17%	0%	8%	3%	24%	36%	42%	20%	37%	20%	28%	23%	44%	56%
Galveston	73%	14%	1%	3%	0%	7%	3%	22%	59%	34%	21%	23%	20%	27%	23%	42%	79%
Harris	57%	19%	1%	6%	0%	14%	3%	41%	33%	39%	21%	26%	20%	34%	23%	61%	53%
Liberty	77%	11%	1%	1%	0%	9%	2%	18%	69%	31%	21%	21%	20%	29%	22%	38%	89%
Matagorda	74%	22%	1%	1%	0%	1%	2%	3%	47%	42%	21%	21%	20%	21%	22%	23%	67%
Montgomery	84%	4%	1%	2%	0%	7%	2%	21%	71%	24%	21%	22%	20%	27%	22%	41%	91%
Walker	67%	23%	0%	1%	0%	7%	2%	17%	58%	43%	20%	21%	20%	27%	22%	37%	78%
Waller	59%	25%	1%	1%	0%	13%	2%	29%	45%	45%	21%	21%	20%	33%	22%	49%	65%
Wharton	72%	14%	0%	0%	0%	11%	2%	37%	48%	34%	20%	20%	20%	31%	22%	57%	68%

Source: 2010 Census and BBC Research & Consulting.

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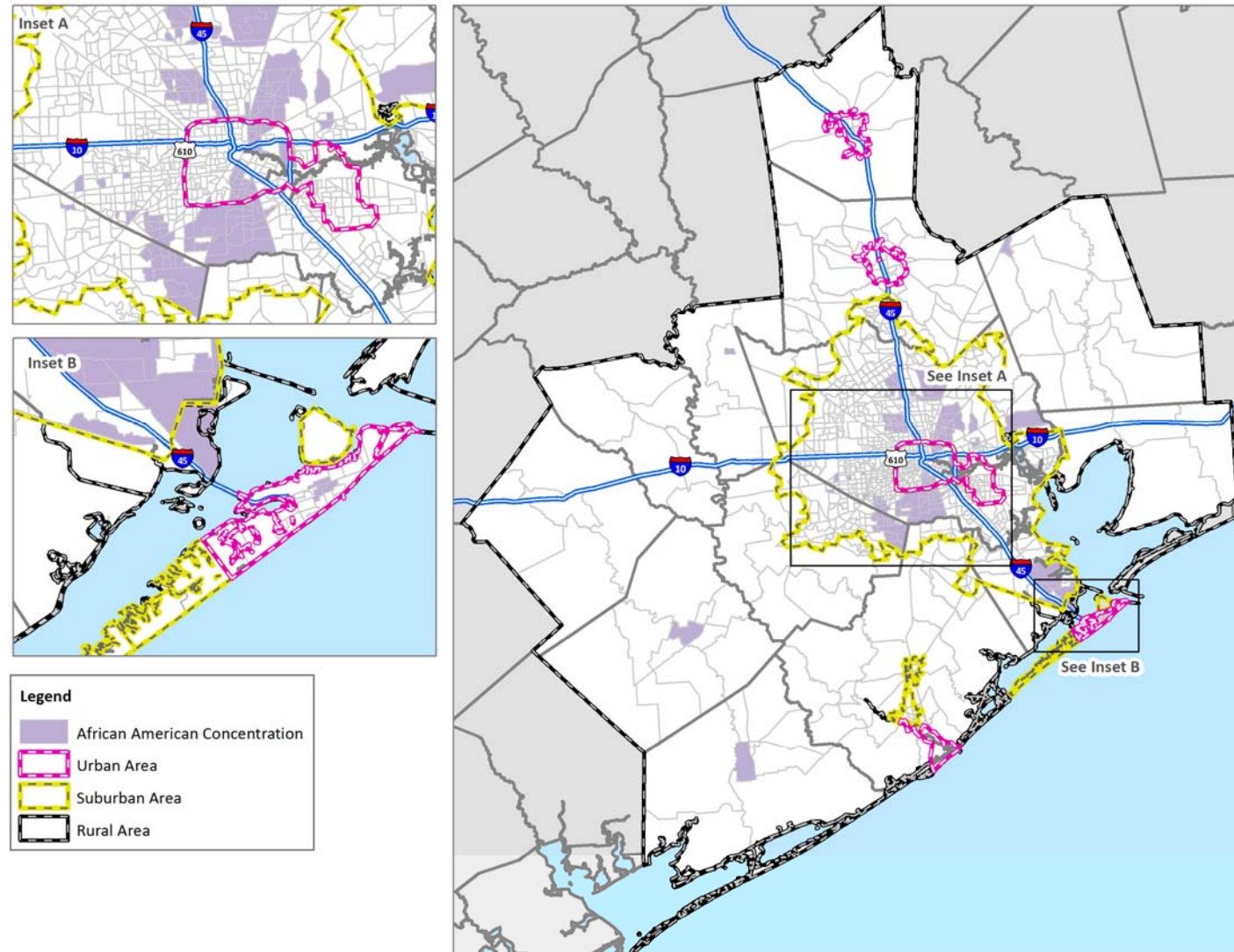
**Figure II-7.
Census Tracts with African
American Impacted Areas,
Houston-Galveston Region,
2010**

Note:

This map uses HUD's definition of "racially/ethnically impacted area." A Census tract is "impacted" when the percentages of residents in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the county overall.

Source:

2010 Census, H-GAC and
BBC Research &
Consulting.

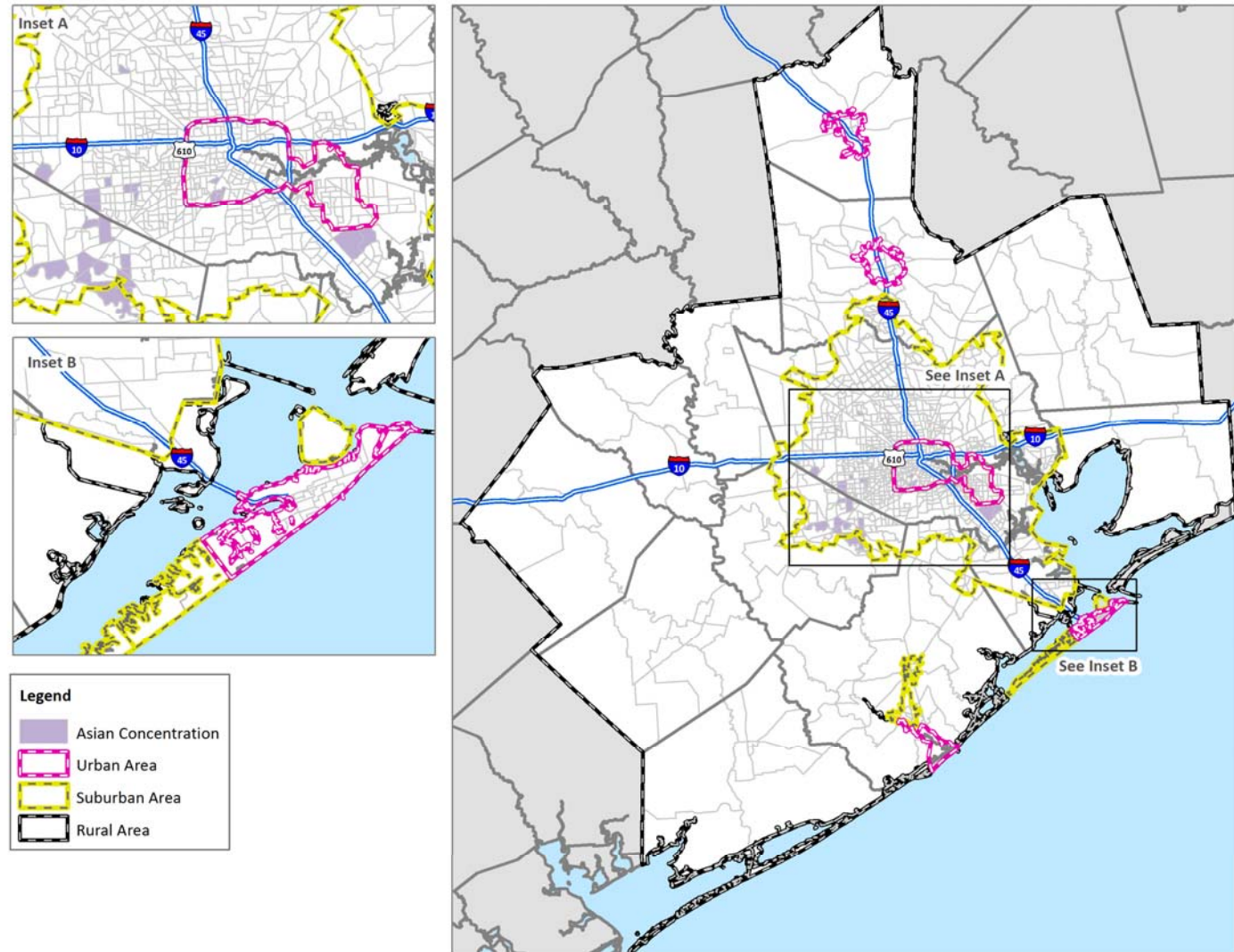


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**Figure II-8.
Census Tracts with Asian
Impacted Areas,
Houston-Galveston Region,
2010**

Note:

This map uses HUD's definition of "racially/ethnically impacted area." A Census tract is "impacted" when the percentages of residents in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the county overall. The "Asian" cohort includes persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent (U.S. Census).



Source:

2010 Census, H-GAC and
BBC Research &
Consulting.

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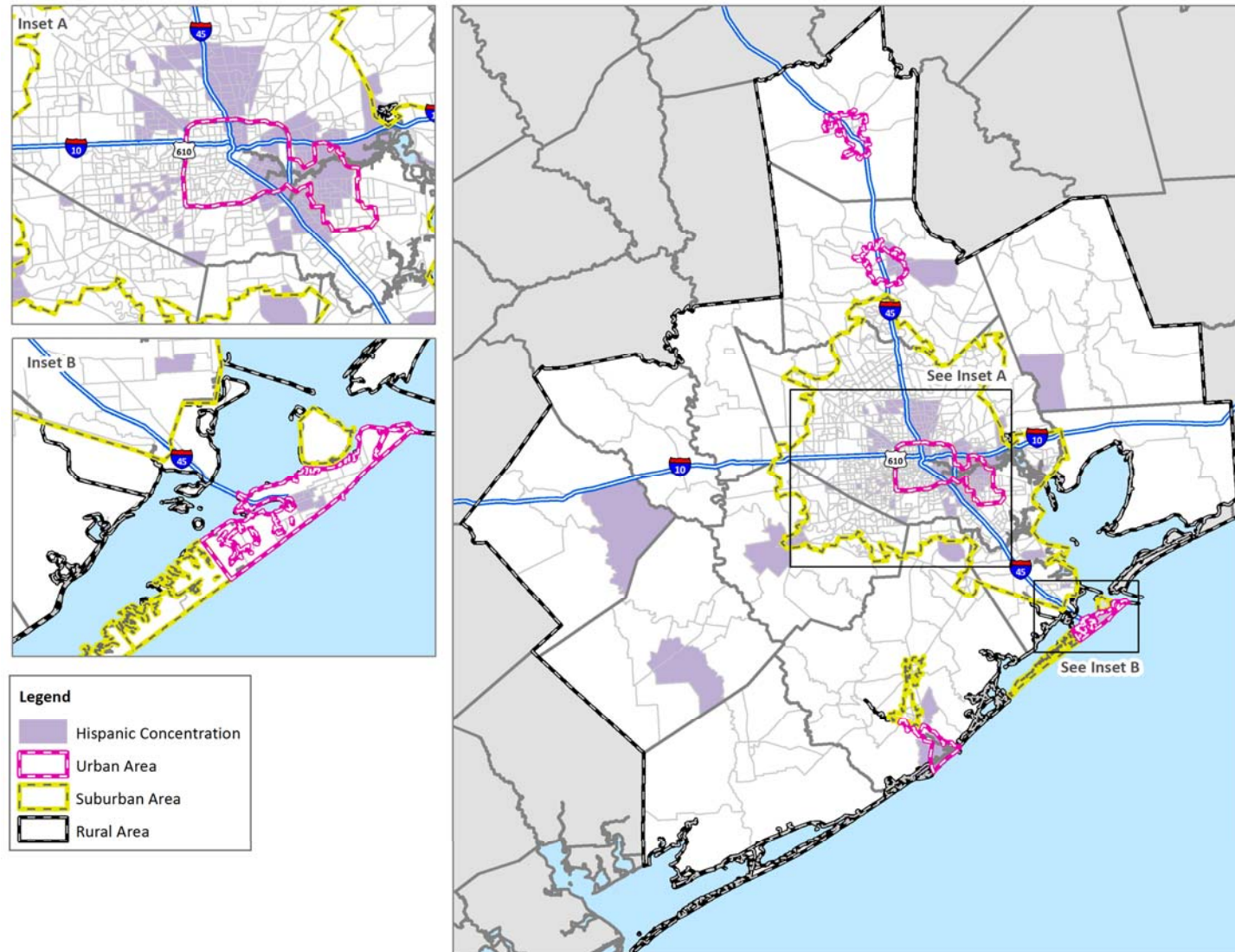
Figure II-9.
Census Tracts with Hispanic Impacted Areas,
Houston-Galveston Region,
2010

Note:

This map uses HUD's definition of "racially/ethnically impacted area." A Census tract is "impacted" when the percentages of residents in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the county overall.

Source:

2010 Census, H-GAC and
BBC Research &
Consulting.



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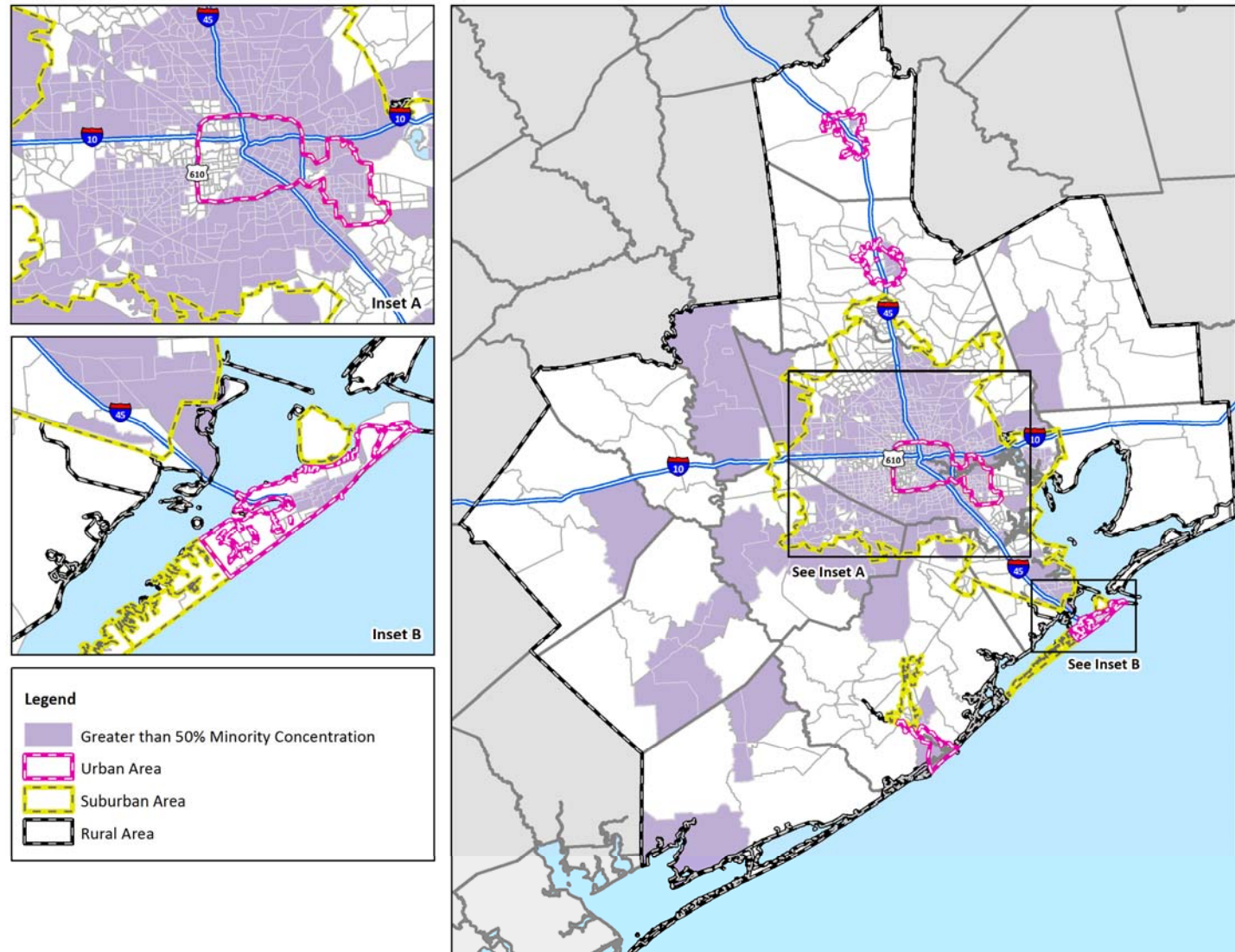
**Figure II-10.
Census Tracts
Greater than 50%
Minority
Concentration,
Houston-
Galveston Region,
2010**

Note:

This map uses HUD's definition of "racially/ethnically impacted area." In an urban area, HUD defines an "impacted" Census tract as one where more than 50 percent of its population is made up of minorities.

Source:

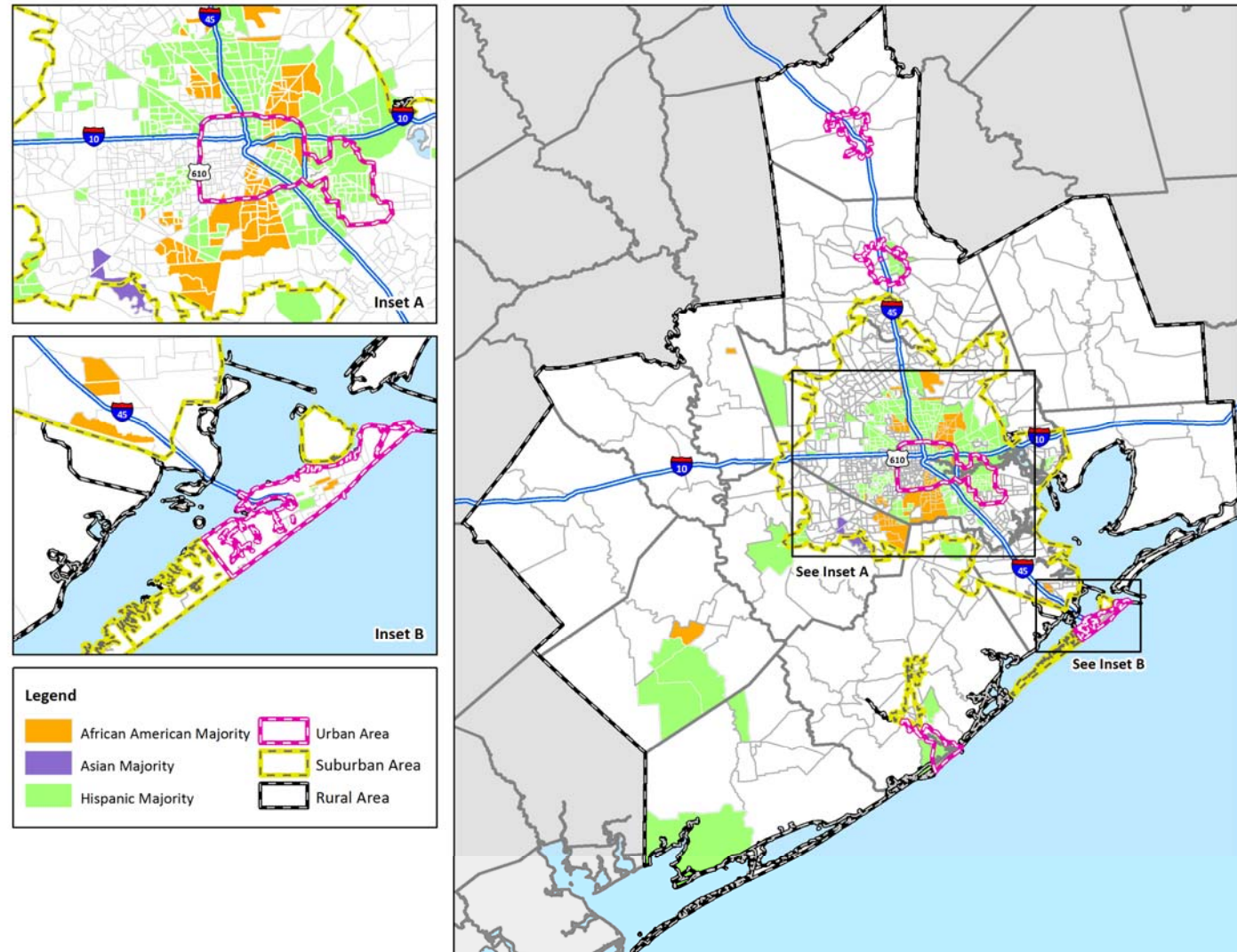
2010 Census, H-GAC and
BBC Research &
Consulting.



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**Figure II-11.
Census Tracts
Greater than 50%
African American,
Asian, or Hispanic
Residents,
Houston-
Galveston Region,
2010**

Source:
2010 Census, H-GAC and
BBC Research &
Consulting.



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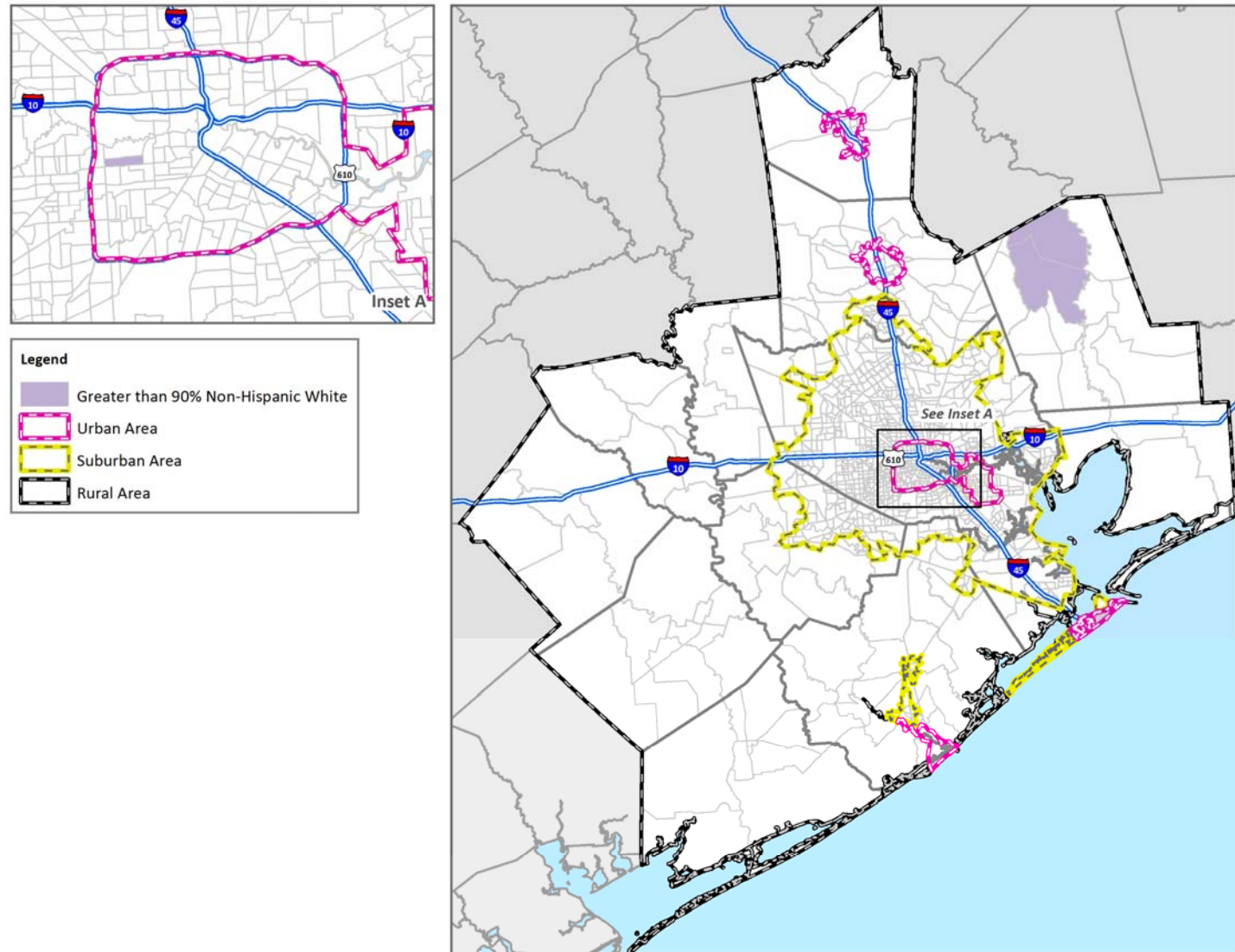
**Figure II-12.
Non-minority
Areas, Houston-
Galveston Region,
2010**

Note:

This map uses HUD's definition of "racially/ethnically impacted area." A "non-minority area" is a neighborhood or Census tract with a greater than 90 percent non-minority population.

Source:

2010 Census, H-GAC and
BBC Research &
Consulting.



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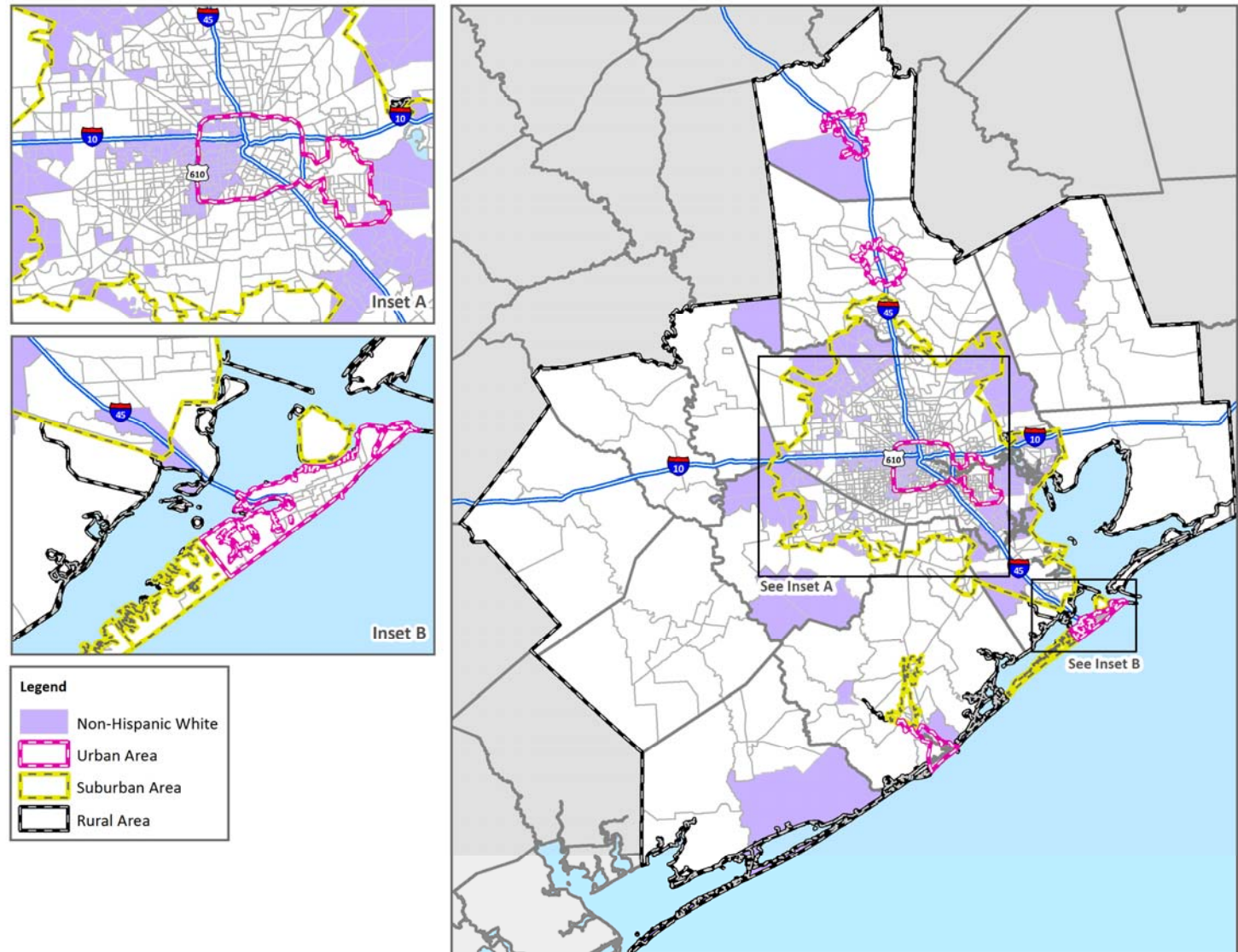
**Figure II-13.
Census Tracts
With Non-
Hispanic White
Impacted Areas,
Houston-
Galveston Region,
2010**

Note:

This does not represent a “non-minority area” as defined by HUD. This map displays Census tracts where the proportion of the population that is non-Hispanic white is greater than 20 percentage points higher than the county as a whole.

Source:

2010 Census, H-GAC and BBC Research & Consulting.



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Changes in concentration and diversity

Figures II-14 through II-16 show changes in racial/ethnic concentrations and changes in diversity at the Census tract level for the Houston-Galveston region. The base map for those figures displays Census tracts from the 2000 Census. Some tracts were combined for comparability to 2010 Census tracts.

The “gained a concentration” map (Figure II-14) shows areas that added an African American, Asian or Hispanic concentration between 2000 and 2010. For this analysis, a concentration occurs when the percentage of residents in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the county as a whole. (Figures II-7, II-8 and II-9 show concentrations of African American, Asian and Hispanic residents in 2010 using the same concentration definition).

Conversely, Figure II-15 shows Census tracts that lost a concentrated area between 2000 and 2010.

Figure II-16 shows areas in the region that increased in racial and ethnic diversity between 2000 and 2010, which is the vast majority of tracts. Diversity is measured by the proportion of the population that is a racial or ethnic minority: An increase in diversity reflects an increase in the proportion of the Census tract population that is minority between 2000 and 2010. Conversely, a decrease in diversity reflects a decrease in the proportion of the population that is minority (or an increase in the non-Hispanic white population proportion).

The most prominent trend exhibited in Figure II-16 and Figure II-17 is movement and/or growth of racial and ethnic minorities

in first and second ring suburbs (Figure II-16), coupled with a decline of non-Hispanic whites in the central city (Figure II-17).

This trend is consistent with national growth patterns which show a substantial increase in the share of minorities living in metro-area suburbs throughout the 2000s.¹¹ Some explanations posed for the racial/ethnic diversification of American suburbs include employment decentralization and an increase in the affordability of suburban housing stock.¹²

In Houston, much of the increase in diversity in the suburbs can be attributed to Hispanic movement from the city center to outer ring suburbs as well as growth in the Hispanic population overall. Employment decentralization, specifically of service and working class jobs, also draws minorities, who traditionally have lower levels of educational attainment, into the suburbs.¹³

Changing preferences of white residents may be another contributing factor to the increase in diversity in the first and second ring suburbs and the decrease in diversity in the central

¹¹ Frey, William H. "Melting Pot Cities and Suburbs: Racial and Ethnic Change in Metro America in the 2000s." *The Brookings Institution*. The Brookings Institution, 4 May 2011. Web. 14 May 2013. <<http://www.brookings.edu/research/papers/2011/05/04-census-ethnicity-frey>>.

¹² Berube, Alan. "The State of Metropolitan America: Suburbs and the 2010 Census." *The Brookings Institution*. The Brookings Institution, 14 July 2011. Web. 14 Apr. 2013. <<http://www.brookings.edu/research/speeches/2011/07/14-census-suburbs-berube>>.

¹³ Florida, Richard. "Class-Divided Cities: Houston Edition." *Place Matters-Neighborhoods*. The Atlantic Cities, 12 Mar. 2013. Web. 14 Apr. 2013. <<http://www.theatlanticcities.com/neighborhoods/2013/03/class-divided-cities-houston-edition/4850/>>.

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city. The Houston Survey conducted annually by Rice University's Kinder Institute asks respondents who live in the suburbs how interested they would be in someday moving to the city and it asks respondents who live in the city how interested they would be in someday moving to the suburbs. Although most respondents are content where they currently live, the 2012 results indicate that white residents of Harris County are more likely to prefer the city to the suburbs: 33 percent of white suburbanites expressed an interest in someday moving to the city. This compares to only 28 percent of white city-dwellers who said they would be “very” or “somewhat” interested in moving to the suburbs.

The survey also provides insight on the settlement patterns of Latino immigrants. Results suggest that immigrants typically move into the city center and later migrate to the suburbs. According to the 2012 survey, Latino immigrants who have been in the U.S. for 10 or 20 years are more likely to live in the suburbs than those who have been in the U.S. for fewer than 10 years. In addition, second and third generation Latino immigrants are more likely to live in the suburbs than first generation immigrants.¹⁴

¹⁴ *The Kinder Houston Area Survey - 2012: Perspectives on a City in Transition*. Rep. Rice University Kinder Institute for Urban Research, n.d. Web. 14 Apr. 2013. <http://kinder.rice.edu/uploadedFiles/Center_for_the_Study_of_Houston/Rice%20HAS%20Report%202012%20single%20pages.pdf>.

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**Figure II-14.
Census Tracts that Gained a
Concentration
Between 2000 and
2010, Houston-
Galveston Region**

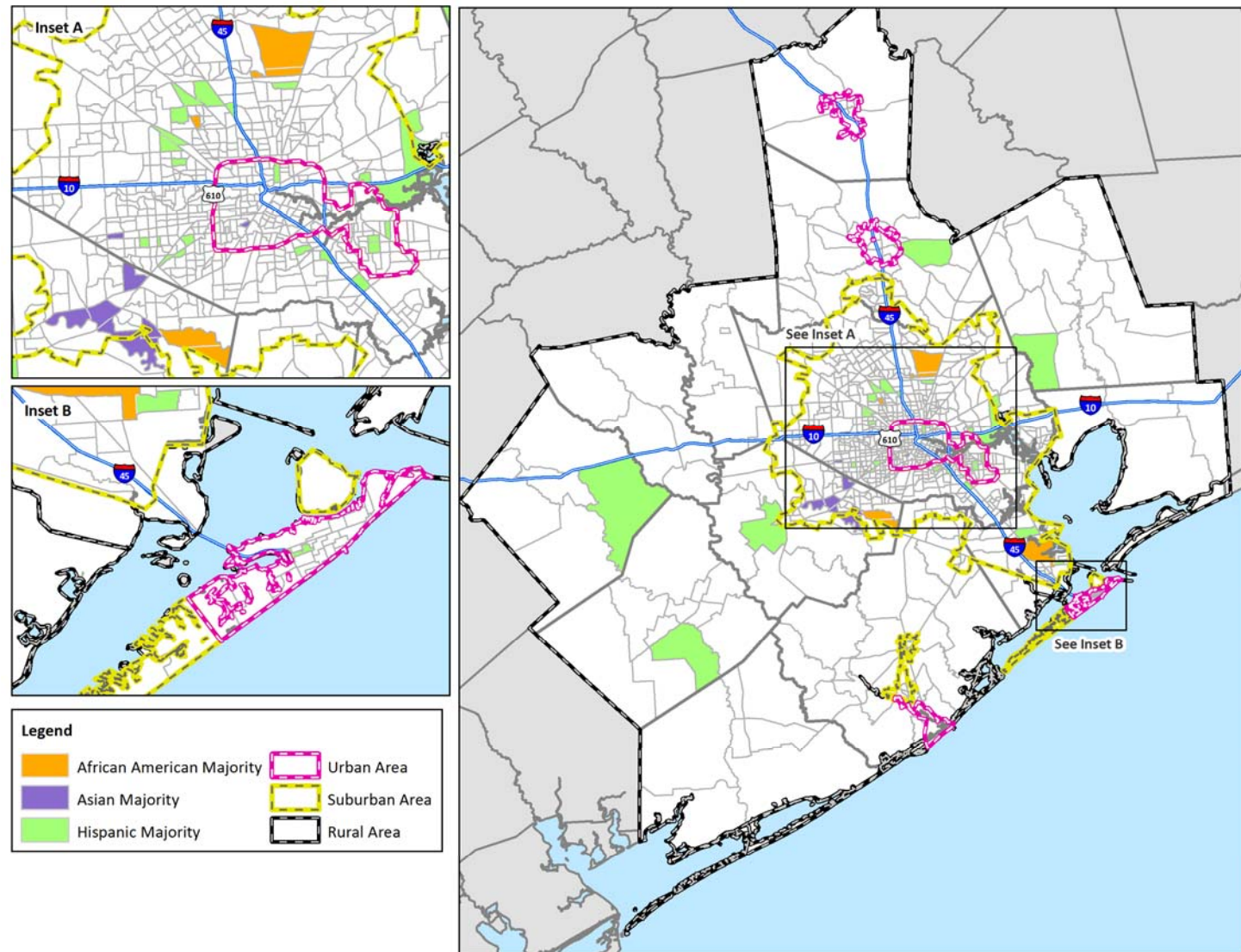
Note:

Base map reflects
Census tracts from the
2000 Census. Some
tracts were combined
for comparability to
2010 Census tracts.

Census tracts gained a
concentration if they
added an African
American, Asian or
Hispanic concentration
between 2000 and 2010.
For this analysis,
concentration occurs
when the percentage of
residents in a particular
racial or ethnic minority
group is at least 20
percentage points
higher than the
percentage of that
minority group for the
county as a whole.

Source:

2000 Census, 2010
Census, H-GAC and BBC
Research & Consulting.



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**Figure II-15.
Census Tracts that
Deconcentrated
Between 2000-
2010, Houston-
Galveston Region**

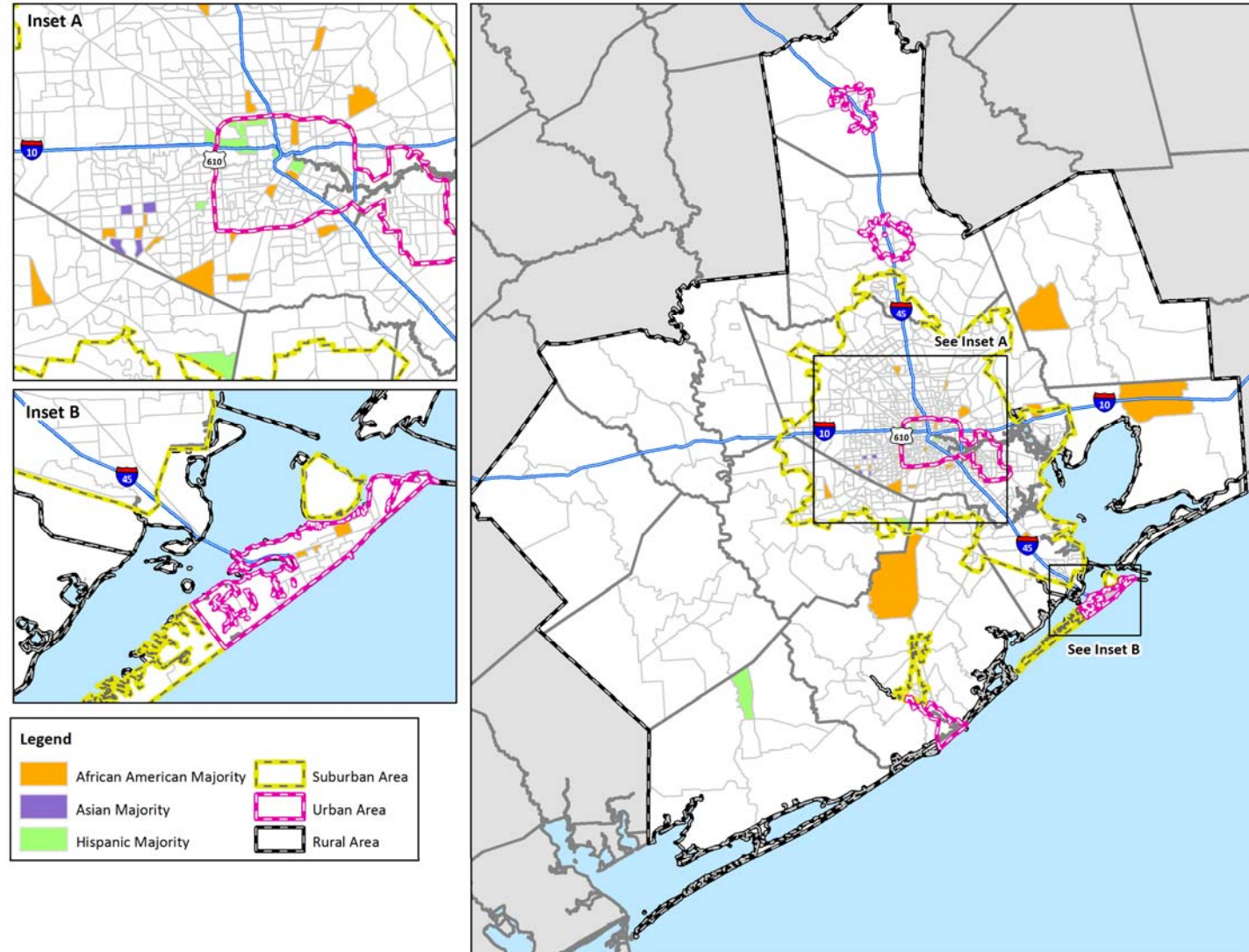
Note:

Base map reflects Census tracts from the 2000 Census. Some tracts were combined for comparability to 2010 Census tracts.

Census tracts deconcentrated if they had an African American, Asian or Hispanic concentration in 2000 but did not have that same concentration in 2010. For this analysis, concentration occurs when the percentage of residents in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the county as a whole.

Source:

2000 Census, 2010 Census, H-GAC and BBC Research & Consulting.



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Figure II-16.
Census Tracts that Increased in Diversity Between 2000 and 2010, Houston-Galveston Region

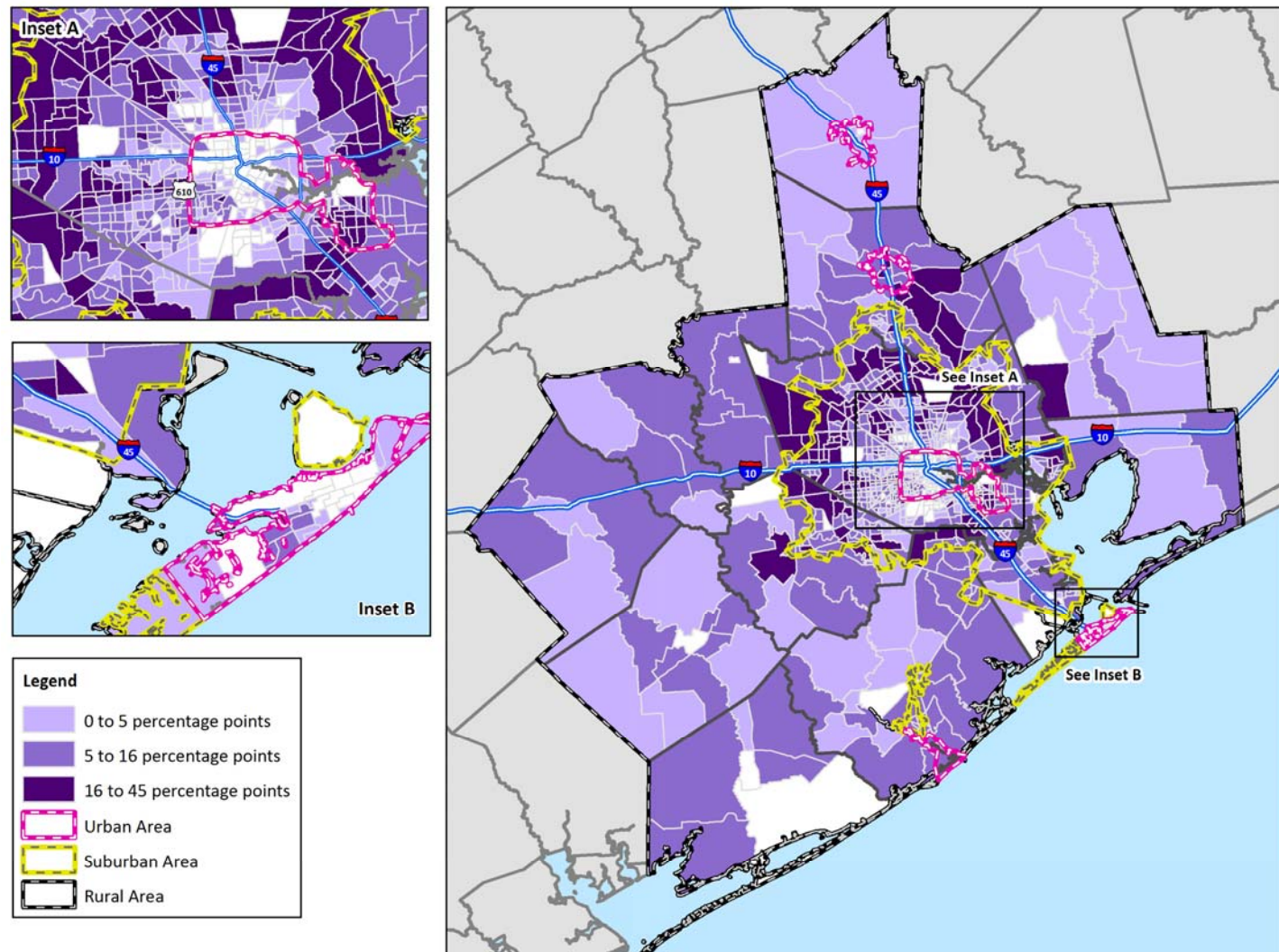
Note:

Increase in diversity is measured as an increase in the proportion of the population that is minority.

Base map reflects Census tracts from the 2000 Census. Some tracts were combined for comparability to 2010 Census tracts.

Source:

2000 Census, 2010 Census, H-GAC and BBC Research & Consulting.



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Figure II-17.
Census Tracts that Decreased in Diversity Between 2000 and 2010, Houston-Galveston Region

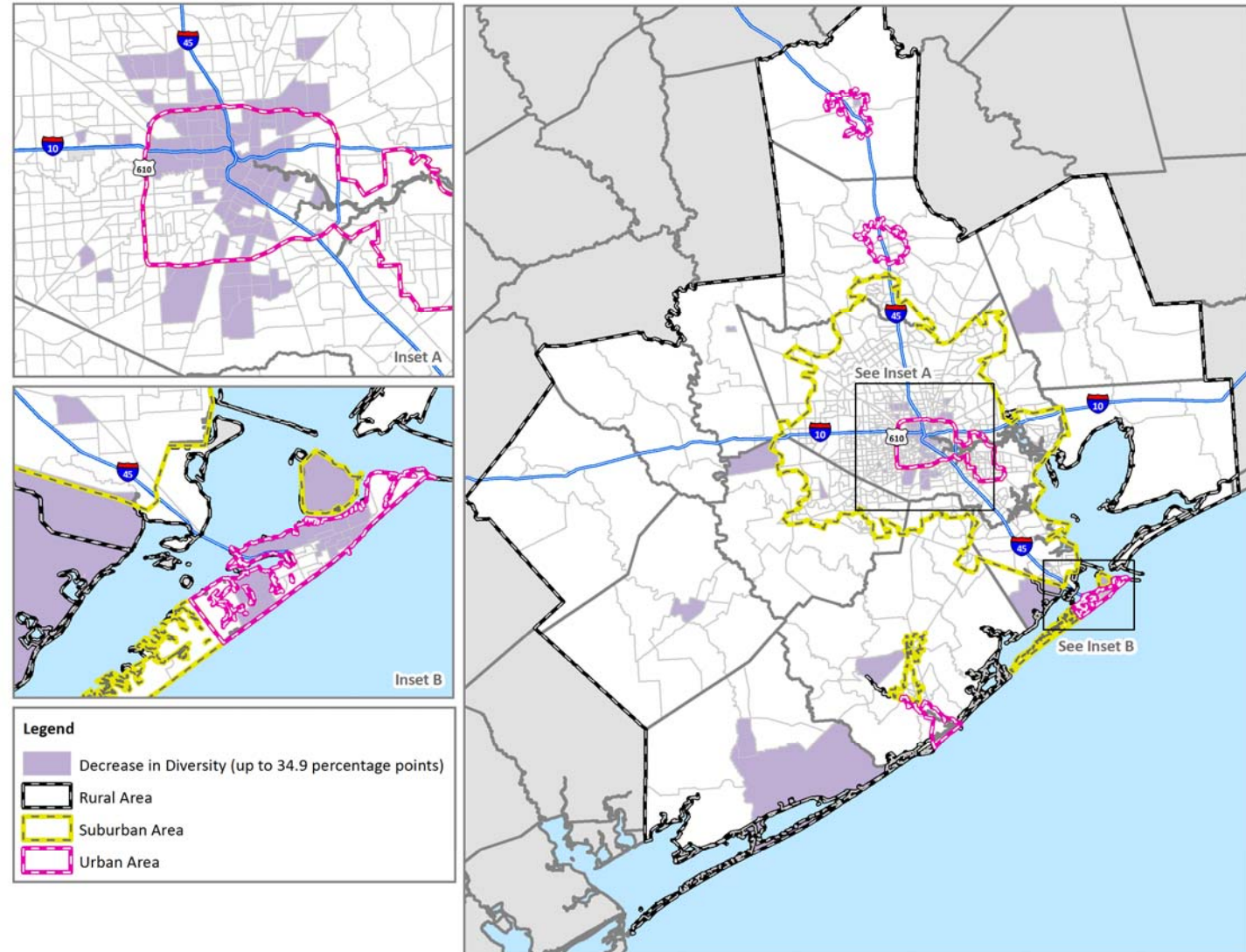
Note:

Decrease in diversity is measured as an increase in the proportion of the population that is non-Hispanic white.

Base map reflects Census tracts from the 2000 Census. Some tracts were combined for comparability to 2010 Census tracts.

Source:

2000 Census, 2010 Census, H-GAC and BBC Research & Consulting.



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Segregation

Segregation is indicative of existing racial, ethnic, and socioeconomic disparities in access to quality housing, education, employment, and wealth within a region. Residential segregation patterns are a result of historic and current land use and economic practices that increase and/or maintain housing and development inequality. Nationwide, policy and lack of enforcement have promoted segregation through housing discrimination and steering in the rental, sales, lending, and insurance markets. Subsidized housing and local government policies affecting the location of housing and limited choices also have a segregating effect.

Despite increasing in overall diversity, the Houston-Galveston region has a moderate to high level of segregation in a significant number of counties, as measured by the HUD dissimilarity index. The maps in Section II display the racial and ethnic population patterns in the region, however, segregation can be measured and quantified in a variety of ways. The following subsections will examine segregation through the use of the HUD Dissimilarity Index, the identification of Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs), and opportunity mapping.

Dissimilarity index

The dissimilarity index is another measure of racial and ethnic concentration prescribed by HUD. The dissimilarity index is a way to measure evenness in which two separate groups are distributed across geographic units—such as Census tracts—that make up a larger geographic area—such as a county.

The index typically compares the proportion of the total population of a minority group in a census tract and the proportion of the total number of the majority population (generally non-Hispanic whites) in that same Census tract.

The dissimilarity index is somewhere between 0 and 1. An index near 0 indicates perfect distribution of racial groups across all Census tracts in a region. An index of 1 indicates perfect segregation of racial groups across the region. As an example, one of the most segregated cities for whites and African Americans in the U.S. is Detroit, which has historically had a dissimilarity index exceeding 0.80.

HUD categorizes the dissimilarity index into three ranges that represent the intensity of segregation:

Figure II-18.
HUD
Categorization of
Dissimilarity
Index

Source:
FHEA Data
Documentation
(Attachment C).

Values	Category
< 0.40	Low Segregation
0.41 – 0.54	Moderate Segregation
>0.55	High Segregation

A census report on segregation using the dissimilarity index ranked the Houston Primary Metropolitan Statistical Area (PMSA) 20th among urban areas in the U.S. for segregation in 2000, with a dissimilarity index of 0.663. The report showed a declining trend of segregation in the Houston PMSA.

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The dissimilarity index was 0.754 in 1980. The change in segregation in the Houston PMSA was average among all cities measured in the report.¹⁵

HUD's calculation of the dissimilarity index by race and ethnicity, which was provided to H-GAC for the FHEA, showed a disparity in segregation by race and ethnicity. The white-black index was among the highest at 0.62. The white-Hispanic index was 0.53. The white-non-white index was the lowest at 0.50.

For this analysis, the dissimilarity index was calculated for all 13 counties within the Houston-Galveston region and for the region overall. The 2010 dissimilarity index for the region is 0.52—a moderate to high level of segregation.

Figure II-19 shows the dissimilarity index for each county in the region for three racial and ethnic groups:

- African Americans and whites,
- Asians and whites, and
- Hispanics and non-Hispanics.

Figures II-20 through II-22 geographically display the dissimilarity index by county by racial and ethnic group.

Figure II-19.
Dissimilarity Index by County, Houston-Galveston Region, 2010

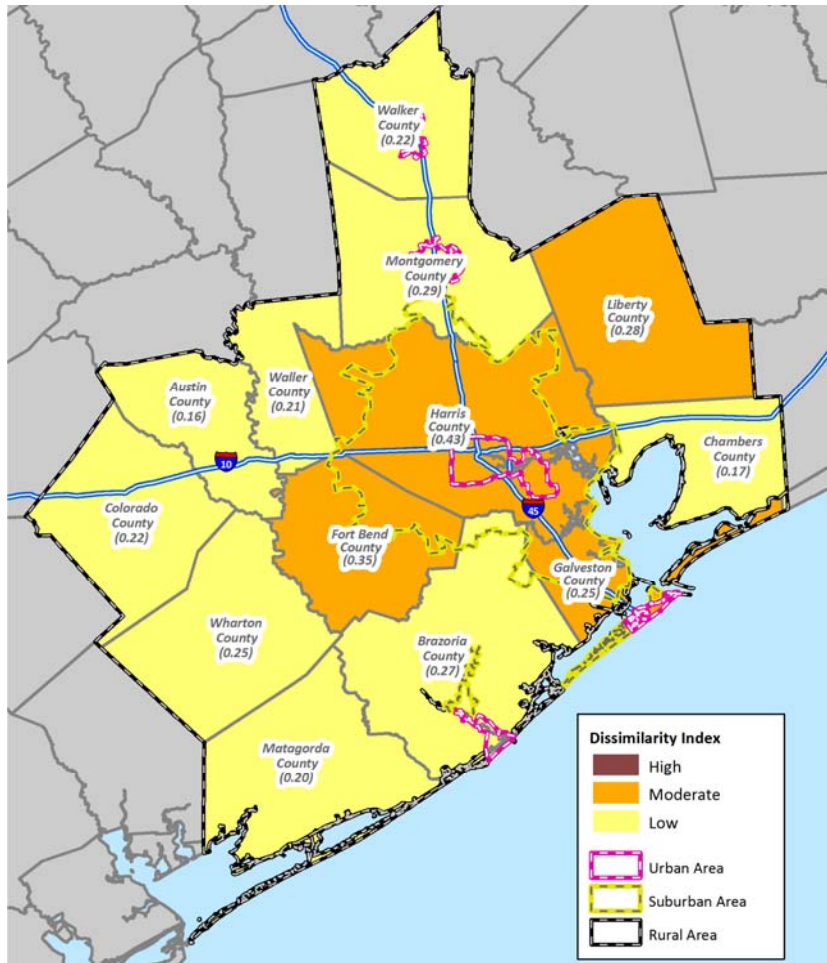
Name of County	African American/White		Asian/White		Hispanic/Non-Hispanic	
	Dissimilarity Index	Level of Segregation	Dissimilarity Index	Level of Segregation	Dissimilarity Index	Level of Segregation
Austin	0.20	Low	0.27	Low	0.16	Low
Brazoria	0.35	Low	0.57	High	0.27	Low
Chambers	0.22	Low	0.24	Low	0.17	Low
Colorado	0.27	Low	0.31	Low	0.22	Low
Fort Bend	0.49	Moderate	0.43	Moderate	0.35	Low
Galveston	0.49	Moderate	0.33	Low	0.25	Low
Harris	0.52	Moderate	0.42	Moderate	0.43	Moderate
Liberty	0.43	Moderate	0.31	Low	0.28	Low
Matagorda	0.39	Low	0.59	High	0.20	Low
Montgomery	0.35	Low	0.36	Low	0.29	Low
Walker	0.20	Low	0.34	Low	0.22	Low
Waller	0.36	Low	0.06	Low	0.21	Low
Wharton	0.33	Low	0.22	Low	0.25	Low

Source: 2010 Census and BBC Research & Consulting.

¹⁵ US Census Bureau. "Housing Patterns." *Housing Patterns - Table 5-4*. U.S. Census Bureau, n.d. Web. 14 Apr. 2013. <http://www.census.gov/hhes/www/housing/housing_patterns/tab5-4.html>.

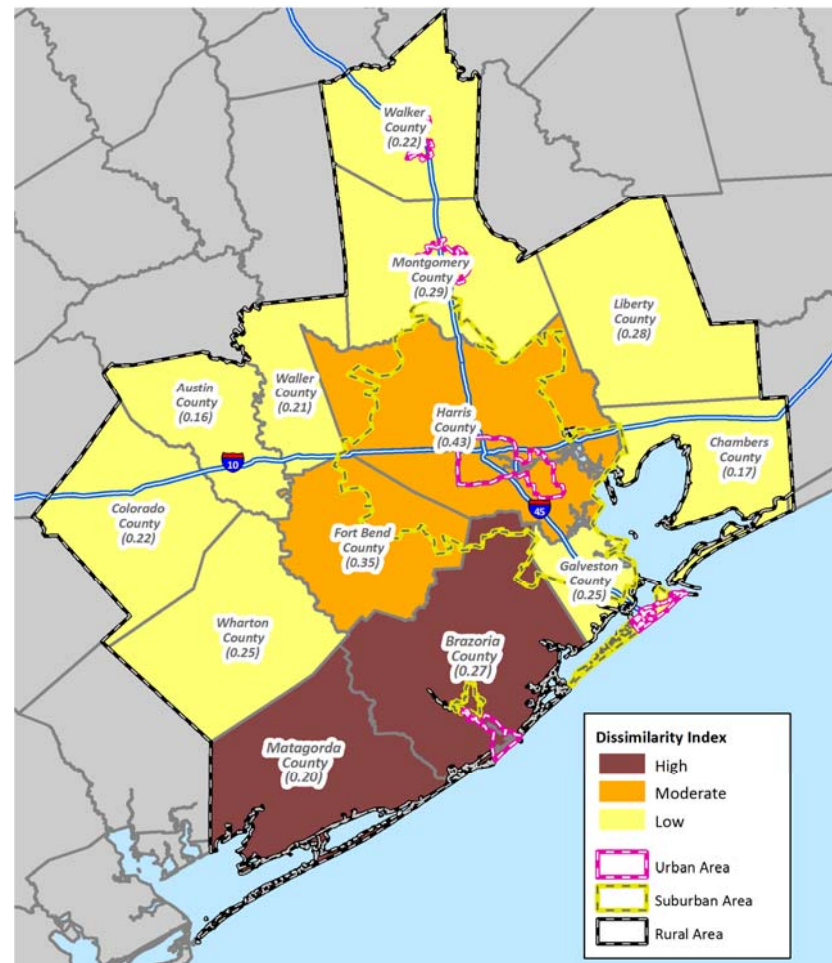
Section II – Indicators of Opportunity

Figure II-20.
Dissimilarity Index African American/White by County,
Houston-Galveston Region, 2010



Source: BBC Research & Consulting.

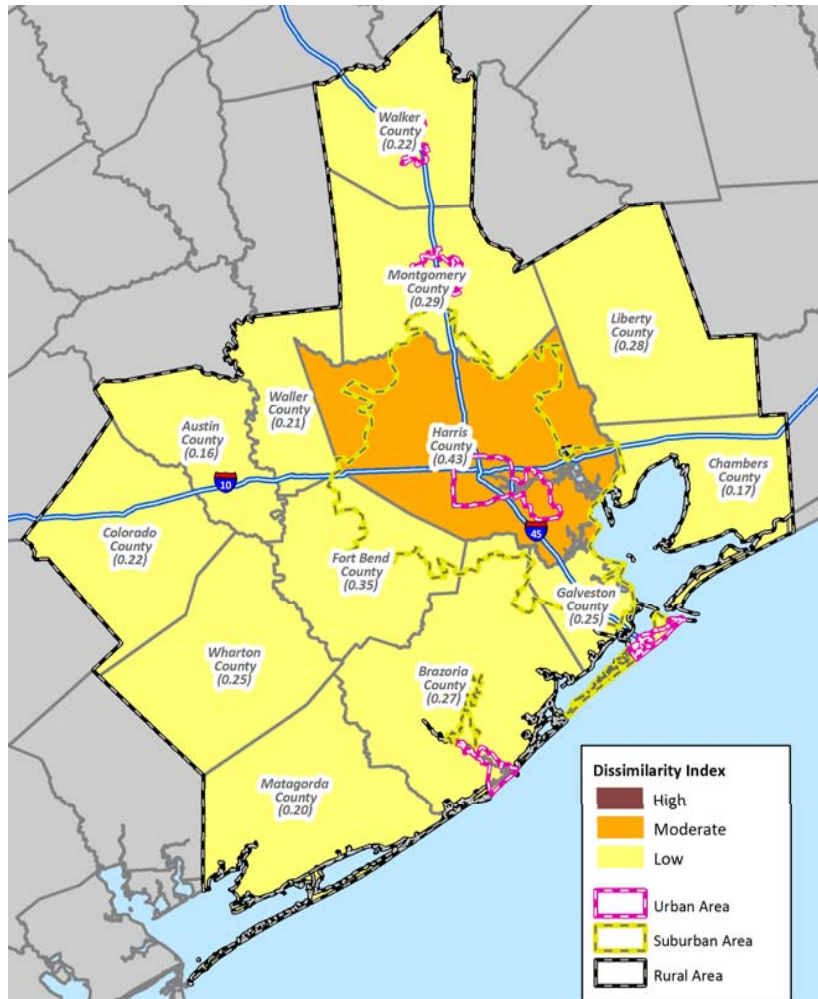
Figure II-21.
Dissimilarity Index Asian/White by County,
Houston-Galveston Region, 2010



Source: BBC Research & Consulting.

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Figure II-22.
Dissimilarity Index Hispanic/Non-Hispanic
by County,
Houston-Galveston Region, 2010



Source: BBC Research & Consulting.

The counties in the region with the highest dissimilarity indices are Brazoria and Matagorda (both high) followed by Fort Bend, Galveston Harris and Liberty (all moderate). In some counties, this is because certain racial or ethnic groups are significantly concentrated in one or more Census tracts. For example, Brazoria County has one Census tract in which one-third of the county's entire Asian population lives. Similarly, 75 percent of the Asian population in Matagorda County resides in one Census tract. Liberty County has three Census tracts which house more than half of the county's African American population.

Many of these concentrated areas contain multifamily assisted housing developments, but this is not always the driving factor behind the concentration. For example, Matagorda's Asian-concentrated Census tract contains the most housing choice vouchers of any Census tract in the county (vouchers can be used wherever affordable rentals can be found) but not the most public housing units.

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Poverty

The poverty rate in the Houston-Galveston region (15 percent) is slightly lower than in Texas as a whole (17 percent). As displayed in Figure II-23, 24 percent of children under five and 11 percent of seniors in the Houston-Galveston region are living in poverty. In the region as a whole, the poverty rate is 22 percent both for African American and Hispanic or Latino residents and only 7 percent for non-Hispanic whites.

Figure II-23.

Percent of Population Living in Poverty, Houston-Galveston Region, 2006-2010 ACS

	Average Population 2006-2010	Population Living in Poverty	Percent of Children (Under 18) in Poverty	Percent in Poverty by Age		Percent in Poverty by Race/Ethnicity		
				Children Under 5	Seniors (65+)	Non- Hispanic White	Black or African American	Hispanic
State of Texas	23,707,679	3,972,054	17%	27%	12%	9%	24%	25%
City of Houston	2,038,184	428,044	21%	35%	14%	7%	28%	27%
Region 6 Total	5,746,564	864,332	15%	24%	11%	7%	22%	22%
Region 6 Counties:								
Austin	27,710	2,439	9%	12%	13%	5%	29%	11%
Brazoria	287,910	30,586	11%	15%	9%	7%	13%	19%
Chambers	32,020	3,351	10%	15%	12%	7%	18%	20%
Colorado	20,271	3,090	15%	42%	15%	7%	34%	26%
Fort Bend	535,467	42,631	8%	11%	9%	4%	10%	14%
Galveston	281,176	36,056	13%	19%	9%	8%	25%	19%
Harris	3,908,129	655,742	17%	27%	12%	6%	24%	23%
Liberty	68,640	10,560	15%	23%	12%	12%	29%	23%
Matagorda	36,106	7,782	22%	32%	11%	8%	34%	34%
Montgomery	423,575	45,961	11%	20%	7%	7%	18%	23%
Walker	45,406	10,799	24%	32%	9%	16%	42%	32%
Waller	39,857	8,395	21%	37%	11%	8%	32%	32%
Wharton	40,297	6,940	17%	34%	17%	7%	29%	25%

Source: 2006-2010 ACS.

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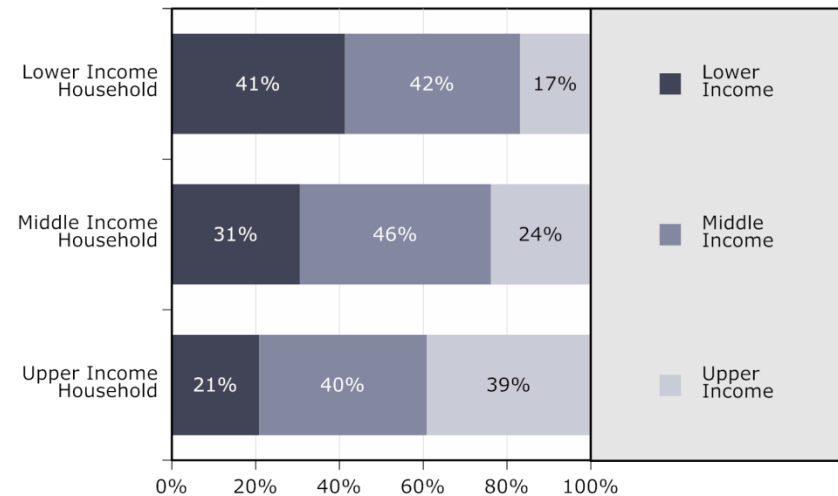
In the Houston-Galveston region, there are 67 Census tracts (6 percent of all Census tracts) with poverty rates exceeding 40 percent.¹⁶

These high poverty Census tracts are mostly located in Houston or within close proximity to the city. Of those 67 Census tracts, 64 (96 percent) contain racial and ethnic concentrations exceeding 50 percent. Twenty-eight tracts are African American concentrations and 29 are Hispanic concentrations. Another seven tracts are minority majority with no specific race or ethnicity as the majority.

Figure II-24 shows where households of different income ranges live by median Census tract income. The typical lower-income household lives in a Census tract in which 41 percent of households are lower-income, 42 percent are middle-income and 17 percent are upper-income. That is, low income households aren't predominantly segregated into low income Census tracts—a very positive finding.

Yet a recent study by Pew Research, *The Rise of Residential Segregation by Income*, which used a methodology similar to that used to produce Figure II-28, showed a large part of the region as having relatively high income segregation.¹⁷ This was also true of the San Antonio and Dallas metropolitan areas.

Figure II-24.
Census Tract Composition by Income for the Typical Lower Middle- and Upper-Income Households, 2007-2011 ACS



Note: Lower-income households are those earning less than \$35,000; middle-income households are those earning \$35,000 to \$100,000; and upper-income households are those earning \$100,000 and more.

Source: 2007-2011 ACS and BBC Research & Consulting.

¹⁶ A 40 percent poverty threshold is widely regarded in the literature as the point at which an area becomes socially and economically dysfunctional.

¹⁷ For the Pew report, incomes below \$34,000 were low income and incomes above \$104,000 were high income.

Section II – Indicators of Opportunity

Income Concentration

Income inequality has grown sharply in the region, highlighted by declining wages for the lowest-paid workers.¹⁸ In the last 30 years in the Houston-Galveston region, the share of households with middle- and upper-incomes decreased, but the share of lower-income households grew.¹⁹

According to the 2006-2010 American Community Survey (ACS), there are 439,390 households (22 percent of all households) in the Houston-Galveston region earning less than \$25,000 per year. Approximately half of these households are in the City of Houston, where 29 percent of all households earn less than \$25,000 per year.

Walker County has the highest percentage of households earning less than \$25,000 (37 percent) and the lowest median income (\$34,259). Figure II-25 displays households earning less than \$25,000 and median income for counties in the Houston-Galveston region.

Figure II-25.
Households Earning Less Than \$25,000 per Year,
Houston-Galveston Region, 2006-2010 ACS

	Household Earning Less Than \$25,000	Percent of Households Earning Less Than \$25,000	Median Household Income
State of Texas	2,118,973	25%	\$ 49,646
City of Houston	220,811	29%	\$ 42,962
Region 6 Total	439,390	22%	
Region 6 Counties:			
Austin	2,426	23%	\$ 53,263
Brazoria	17,680	17%	\$ 65,607
Chambers	1,835	17%	\$ 66,764
Colorado	2,561	31%	\$ 41,145
Fort Bend	19,867	12%	\$ 79,845
Galveston	22,703	21%	\$ 58,317
Harris	320,725	23%	\$ 51,444
Liberty	6,506	27%	\$ 45,929
Matagorda	4,205	31%	\$ 43,205
Montgomery	24,972	17%	\$ 65,620
Walker	7,441	37%	\$ 34,259
Waller	3,656	27%	\$ 47,324
Wharton	4,813	33%	\$ 41,148

Source: 2006-2010 ACS.

¹⁸ PolicyLink, and USC Program for Environmental and Regional Equity. *An Equity Profile for the Houston-Galveston Region*. Rep. N.p.: n.p., 2013. Print

¹⁹ Ibid.

Section II – Indicators of Opportunity

Racially/Ethnically Concentrated Areas of Poverty

Areas of racial and ethnic concentration are not, per se, areas lacking opportunity. Many areas that are racially and ethnically concentrated offer high opportunity amenities. This is especially true for diverse areas like the Houston-Galveston region. It is therefore important to examine racial and ethnic concentrations in the context of other variables: poverty and income diversity, existence of affordable housing, neighborhood safety, and location of community amenities.

The Houston-Galveston region is a majority minority area and this can skew results drawn from HUD's prescribed analyses of race, ethnicity, and poverty. However, HUD's recommended measures help identify segregation patterns and lay a foundation for linking socioeconomic disparities.

"Racially or ethnically concentrated areas of poverty," also known by HUD as RCAPs or ECAPs, are areas in which there are both racial concentrations and high poverty rates (as defined below). RCAPs and ECAPs can be defined using family or individual poverty rates:

- Census tracts that have family poverty rates exceeding 40 percent or three times the average Census tract poverty rate in the region (41percent) and have a minority concentration (more than half of residents are minorities).
- Census tracts that have individual poverty rates exceeding 40 percent or three times the average Census tract poverty rate in the region (51 percent) and have a minority concentration.

Figure II-26 provides background for the RCAP/ECAP analysis and shows the percentage of the population living in poverty across the Houston-Galveston region. Inset A of the map demonstrates a stark split in low and high poverty areas, with poverty more prevalent in the eastern urban core, inner ring suburbs and some outlying rural Census tracts. There is a strong visual correlation between Figure II-26 and Figure II-11, which shows minority concentrations by racial and ethnic group.

Although poverty is prevalent in many Census tracts, there are very few RCAPs and ECAPs in the region.

RCAPs and ECAPs using the family poverty definition are shown in Figure II-27. Altogether, 35 Census tracts in the region are RCAPs/ECAPs; 33 are located in Harris County and the balance located in urban areas of Galveston and Conroe. Altogether, these RCAPs and ECAPs represent 3 percent of Census tracts in the region.

Figure II-28, which defines RCAPs/ECAPs by individual poverty rates, demonstrates a similar pattern and identifies more RCAP/ECAP tracts, including one in Wharton County. Of the 64 RCAPs/ECAPS using the individual poverty rate, 60 are in Harris County. Altogether, these RCAPs and ECAPs represent 6 percent of Census tracts in the region.

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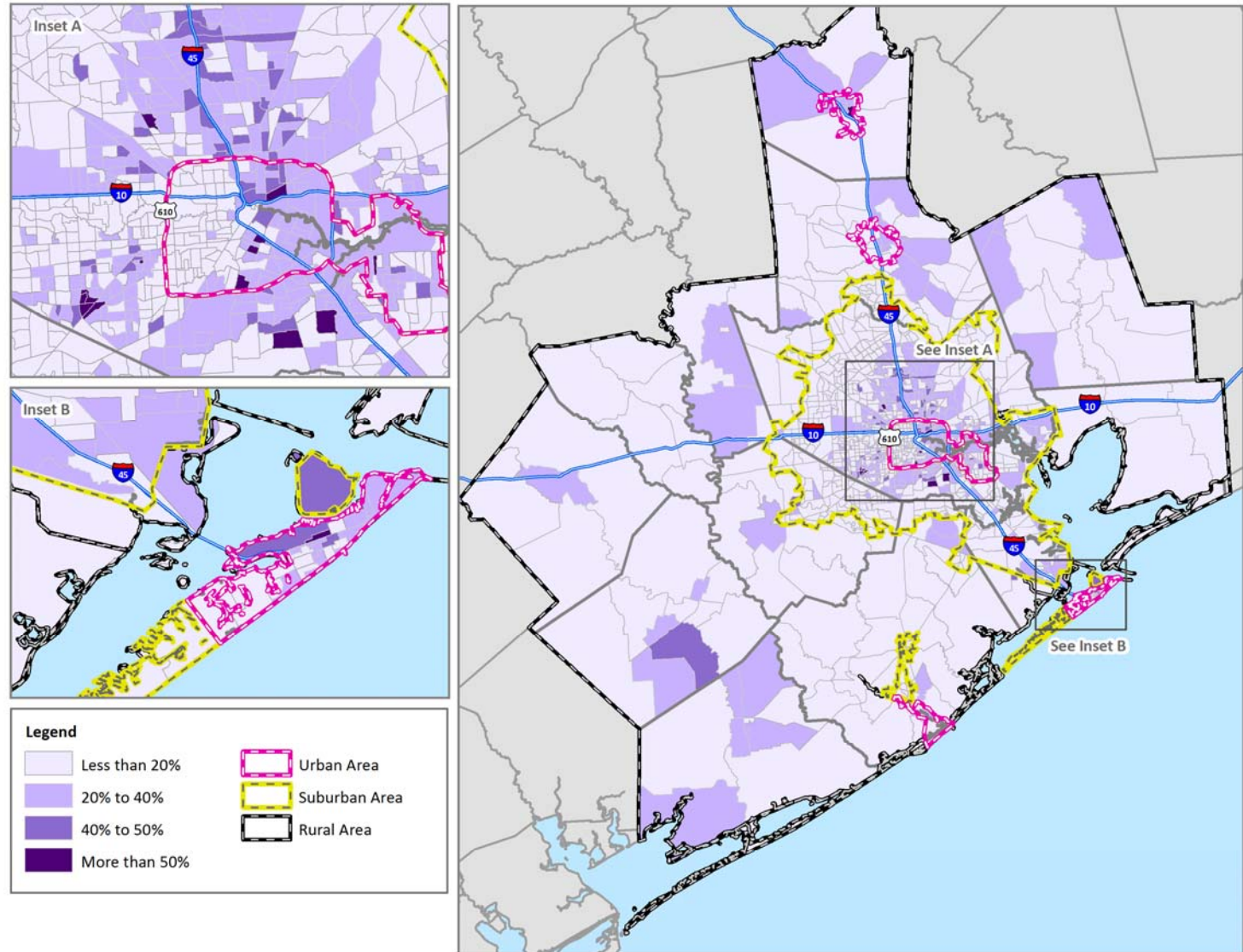
**Figure II-26.
Percent of
Population Living
in Poverty,
Houston-
Galveston Region,
2010**

Note:

Some high poverty areas may be associated with student populations at college/university campuses.

Source:

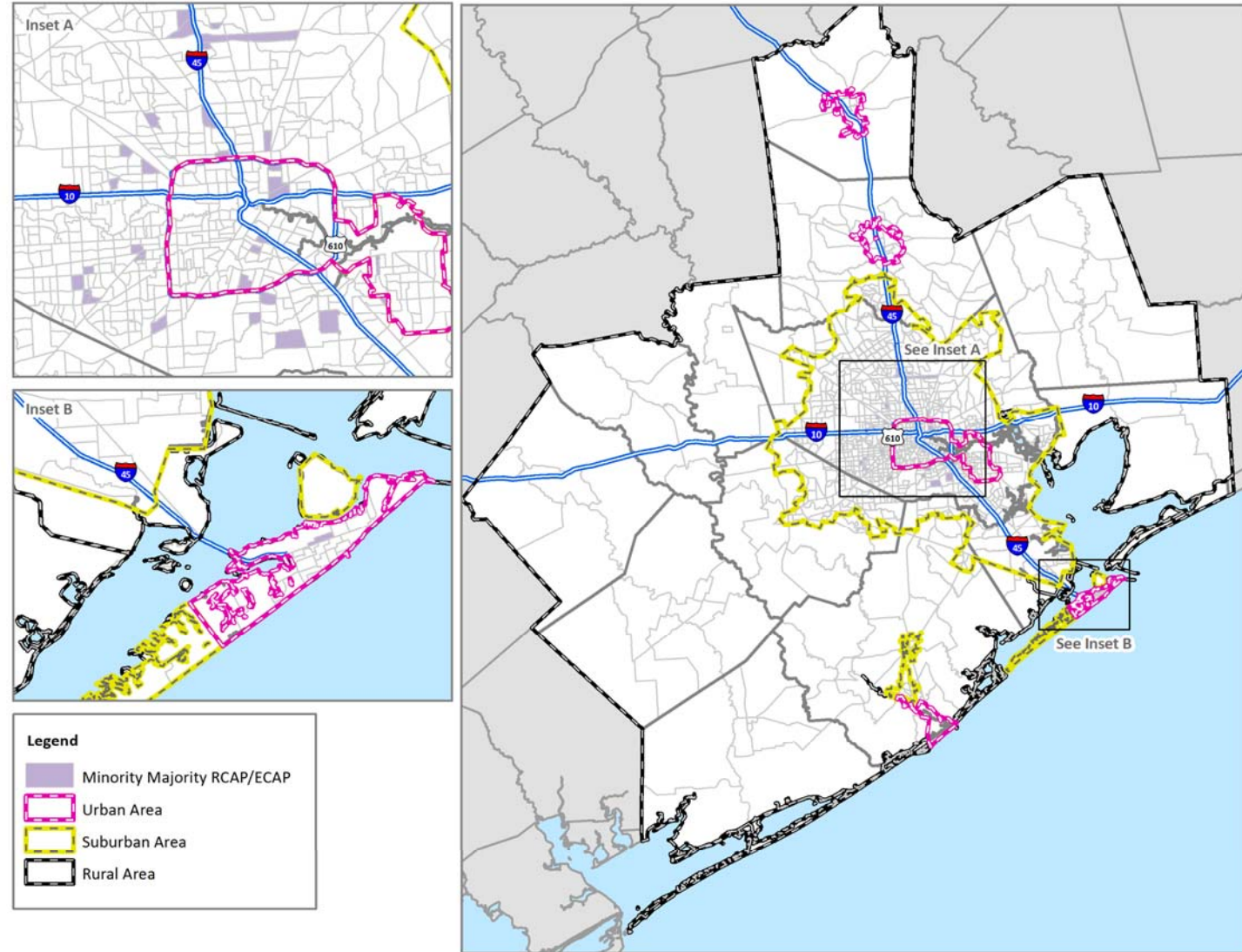
2007-2011 ACS, H-GAC
and BBC Research &
Consulting.



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**Figure II-27.
RCAPs/ECAPs
Based on Family
Poverty, Houston-
Galveston Region,
2010**

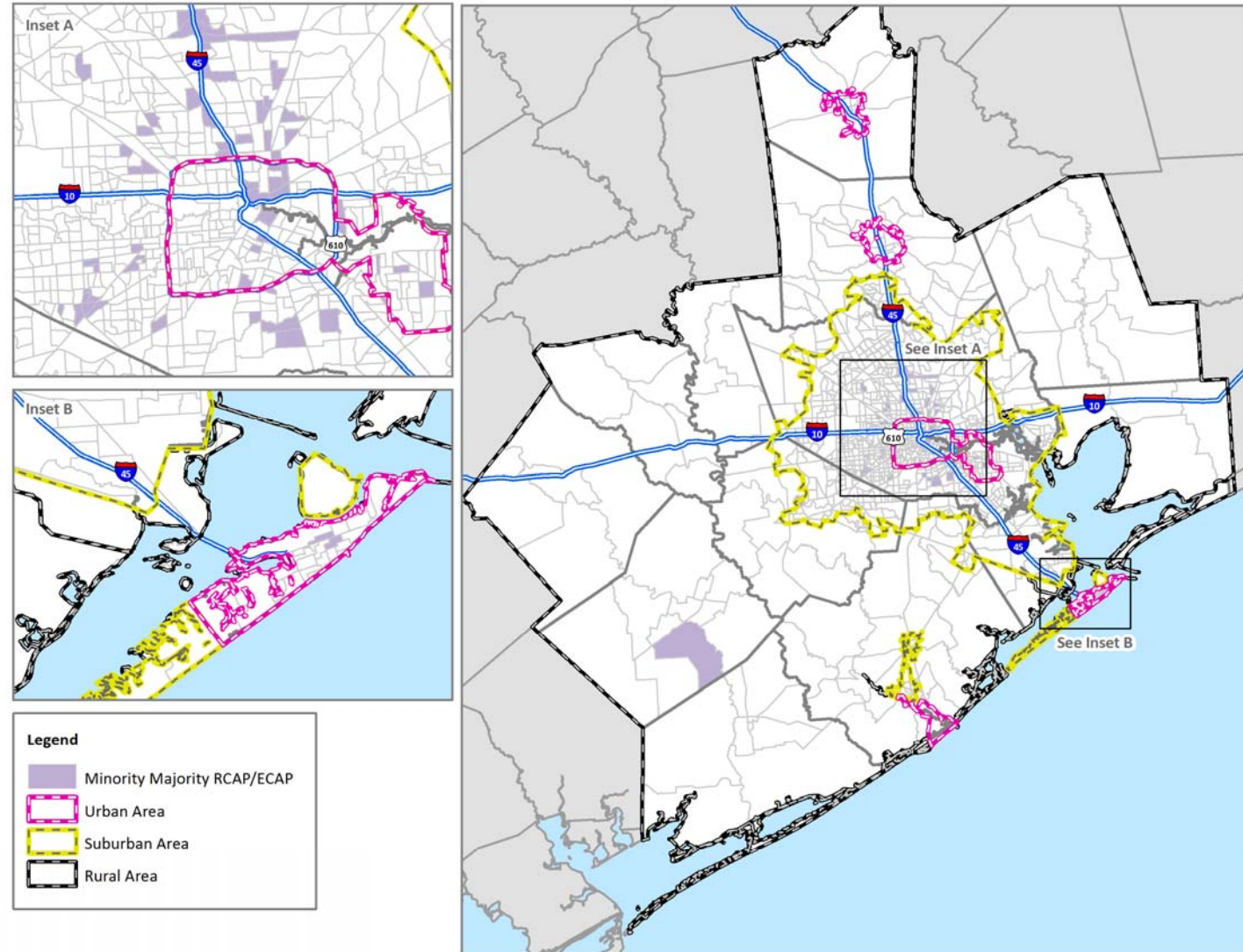
Source:
2006-2010 ACS and 2010
Census.



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**Figure II-28.
RCAPs/ECAPs
Based on
Individual
Poverty, Houston-
Galveston Region,
2010**

Source:
2007-2011 ACS and 2010
Census.



Section II – Indicators of Opportunity

Assisted Housing

In the Houston-Galveston region—as well as in most parts of Texas—assisted rental housing is primarily provided through public housing, housing choice vouchers (also known as Section 8) and Low Income Housing Tax Credit (LIHTC) developments.

Altogether, these programs have contributed more than 90,000 affordable rental units to the region. Yet these units make up a very small portion of the total housing stock in the region—just 4 percent of the more than 2.2 million housing units.

Public housing and housing choice vouchers are funded federally, by HUD, and administered at the local level by public housing authorities. In aggregate, the region's public housing authorities report operating 8,600 public housing units (PHUs) and administering almost 27,000 housing choice vouchers (HCVs).

The LIHTC program directs private capital toward the creation of affordable rental housing by offering developers a tax credit in exchange for the production of affordable rental housing. To qualify for the tax credit, either 20 percent or more of the project's units must be rent-restricted and occupied by individuals whose income is 50 percent or less of the median family income; or 40 percent or more of the units must be rent-restricted and occupied by individuals whose income is 60 percent or less of the median family income. The LIHTC program is governed by the Internal Revenue Service, not HUD, and administered at the state level by the Texas Department of Housing and Community Affairs (TDHCA).

The LIHTC program is the largest single provider of affordable rental units in the region, contributing more than 55,000 units to the supply of affordable rentals.

Fair share provision

Figure II-29 shows the number of PHUs, HCVs and LIHTC units by county. As the table demonstrates, assisted rentals are a very small proportion of total housing units in all counties. Harris County has the highest proportion of all counties, yet the percentage is still relatively low at 5 percent.

The far right columns on the table show each county's share of the region's total assisted rentals. For example, 80 percent of the region's affordable rentals are located in Harris County, which makes sense, because Harris County contains the majority of the region's low- to moderate-income and homeless populations (groups who qualify for subsidized housing). It is typical for most assisted housing and related services to be located in or around the urban core since the residents in urban areas usually have greater needs.

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Figure II-29.

Public Housing, Housing Choice Voucher and Tax Credit Units and County Shares, Houston-Galveston Region, 2013

County	Total Housing Units	Subsidized Housing				Percent of Total Units				County's share of Total Housing Units			
		PHU	HCV	LIHTC	Total Subsidized Units	PHU	HCV	LIHTC	All Subsidized Units	PHU	HCV	LIHTC	All Subsidized Units
Region Overall	2,332,155	8,621	26,635	54,945	90,201	0%	1%	2%	4%	100%	100%	100%	100%
Austin	12,734	34	-	150	184	0%	0%	1%	1%	0%	0%	0%	0%
Brazoria	116,744	-	261	1,952	2,213	0%	0%	2%	2%	0%	1%	4%	2%
Chambers	13,125	-	7	32	39	0%	0%	0%	0%	0%	0%	0%	0%
Colorado	10,450	-	-	174	174	0%	0%	2%	2%	0%	0%	0%	0%
Fort Bend	189,391	260	1,212	1,246	2,718	0%	1%	1%	1%	3%	5%	2%	3%
Galveston	131,558	493	2,462	2,886	5,841	0%	2%	2%	4%	6%	9%	5%	6%
Harris	1,580,658	7,281	21,772	42,695	71,748	0%	1%	3%	5%	84%	82%	78%	80%
Liberty	28,634	170	215	456	841	1%	1%	2%	3%	2%	1%	1%	1%
Matagorda	18,798	132	31	222	385	1%	0%	1%	2%	2%	0%	0%	0%
Montgomery	173,447	-	424	3,893	4,317	0%	0%	2%	2%	0%	2%	7%	5%
Walker	23,857	101	251	507	859	0%	1%	2%	4%	1%	1%	1%	1%
Waller	15,654	-	-	618	618	0%	0%	4%	4%	0%	0%	1%	1%
Wharton	17,105	150	-	114	264	1%	0%	1%	2%	2%	0%	0%	0%

Note: It is important to note that, although the data in this figure represent a large share of assisted housing in the region, the data do not include all types of assisted housing.

Source: 2010 Census, H-GAC and TDHCA.

Section II – Indicators of Opportunity

Manufactured/mobile homes

Affordable housing, particularly in rural areas, is often provided in the form of manufactured/mobile homes. Figure II-30 displays the proportion of housing units that are manufactured/mobile homes as well as median value of manufactured/mobile homes for the Houston-Galveston region

counties. In the region overall, manufactured/mobile homes comprise 5 percent of the total housing stock—about the same as the assisted housing proportion. The median value of manufactured/mobile homes ranges from 19 percent to 64 percent of the median home value of all homes in the Houston-Galveston counties.

Figure II-30.
Manufactured Homes, Houston-Galveston Region, 2010

County	Total Housing Units	Mobile Homes	Percent Mobile homes	Median Value of Mobile Homes	Median Value of All Homes	Median Value of Mobile Homes as a Percentage of Median Value for all Homes
Region Overall	2,332,155	125,584	5%			
Austin	12,734	2,324	18%	\$63,800	\$151,700	42%
Brazoria	116,744	13,571	12%	\$39,000	\$146,100	27%
Chambers	13,125	2,283	17%	\$62,200	\$151,800	41%
Colorado	10,450	1,428	14%	\$38,900	\$101,200	38%
Fort Bend	189,391	7,110	4%	\$50,600	\$178,200	28%
Galveston	131,558	6,311	5%	\$28,600	\$148,100	19%
Harris	1,580,658	41,654	3%	\$25,600	\$131,300	19%
Liberty	28,634	9,377	33%	\$53,700	\$84,100	64%
Matagorda	18,798	3,194	17%	\$51,500	\$89,300	58%
Montgomery	173,447	26,737	15%	\$53,700	\$164,100	33%
Walker	23,857	5,602	23%	\$44,700	\$109,700	41%
Waller	15,654	3,860	25%	\$60,900	\$129,000	47%
Wharton	17,105	2,027	12%	\$33,900	\$89,200	38%

Source: 2010 Census, and 2009-2011 ACS.

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Location of assisted housing

Figure II-31 overlays LIHTC properties with racial and ethnic concentrations in the Houston-Galveston region. The map shows a distribution of tax credit properties throughout the region – with a large number in the Houston area, and a number of properties in more rural areas like Matagorda County. Throughout the region, these properties are mostly located in areas that are majority minority. In the past, developers were encouraged (through national policy) to site assisted housing in high poverty and most-often high minority areas. Framed as a way to serve the immediate housing needs of a specific area, these policies most often resulted in the increased segregation of racial and ethnic minorities and the concentration of poverty.

A recent spatial analysis of LIHTC properties in major U.S. cities found the Houston area to have the “most unique” distribution of LIHTC properties. The analysis found the Houston/Harris County area to have a more “spatially-decentralized pattern of LIHTC placement” than any other large metropolis. The area also had fewer LIHTC properties clustered in high poverty Census tracts and disadvantaged areas.²⁰ These results can be partly attributed to Harris County’s deconcentration policy and increased efforts at the local and state levels to prevent increased clustering of subsidized housing projects.

Figure II-32 shows the areas in which the Fair Market Rate (FMR) two-bedroom rental cost is higher than the allowable, subsidized rent for the Section 8 housing voucher program. The

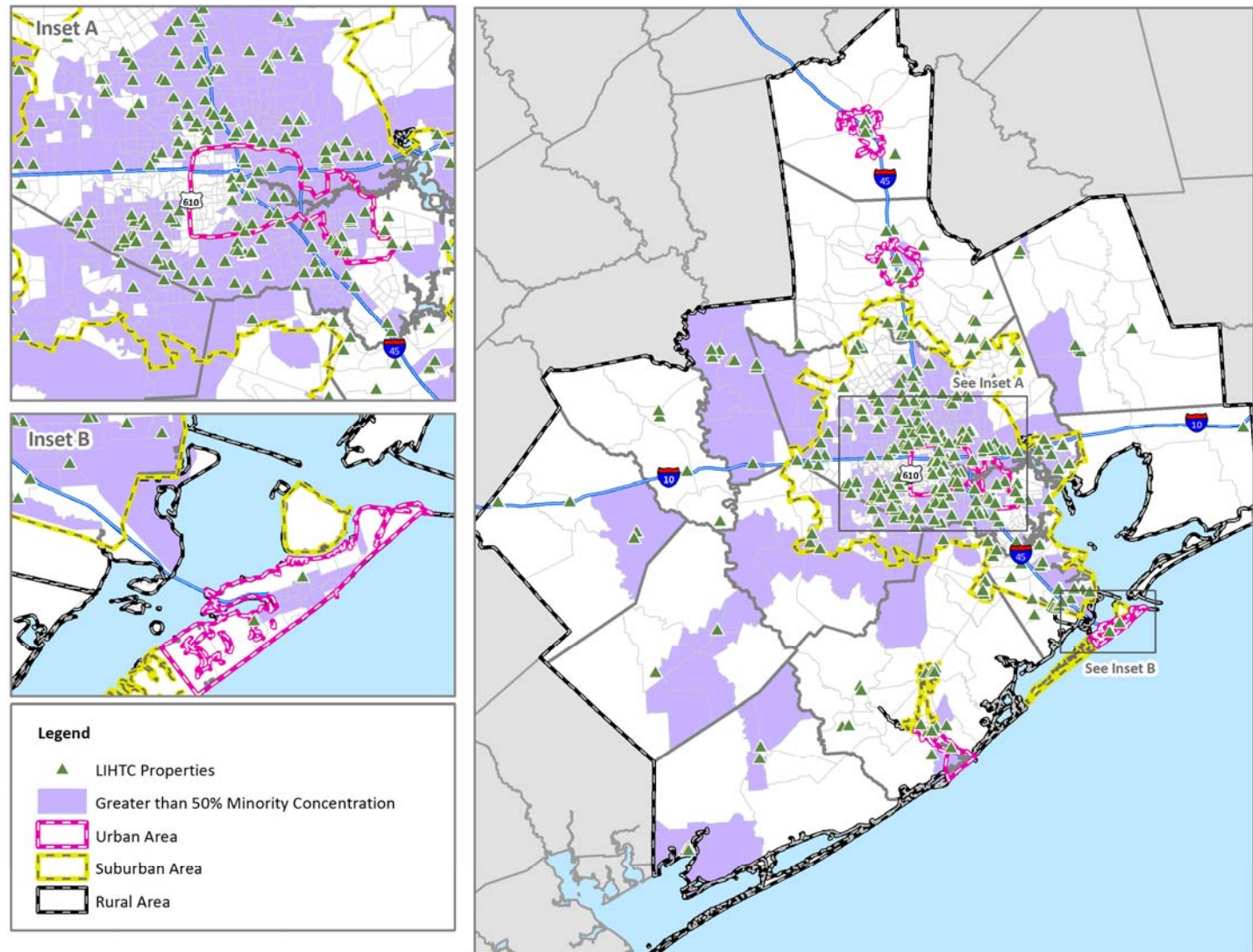
shading indicates submarkets where it would be challenging for voucher holders to find affordable units, mostly southwest Houston and outer suburbs.

²⁰ Dawkins, Casey. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. [S.l.]: Bibliogov, 2013. Print.

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Figure II-31.
LIHTC Properties and Greater Than 50% Minority Concentrations, Houston-Galveston Region, 2013

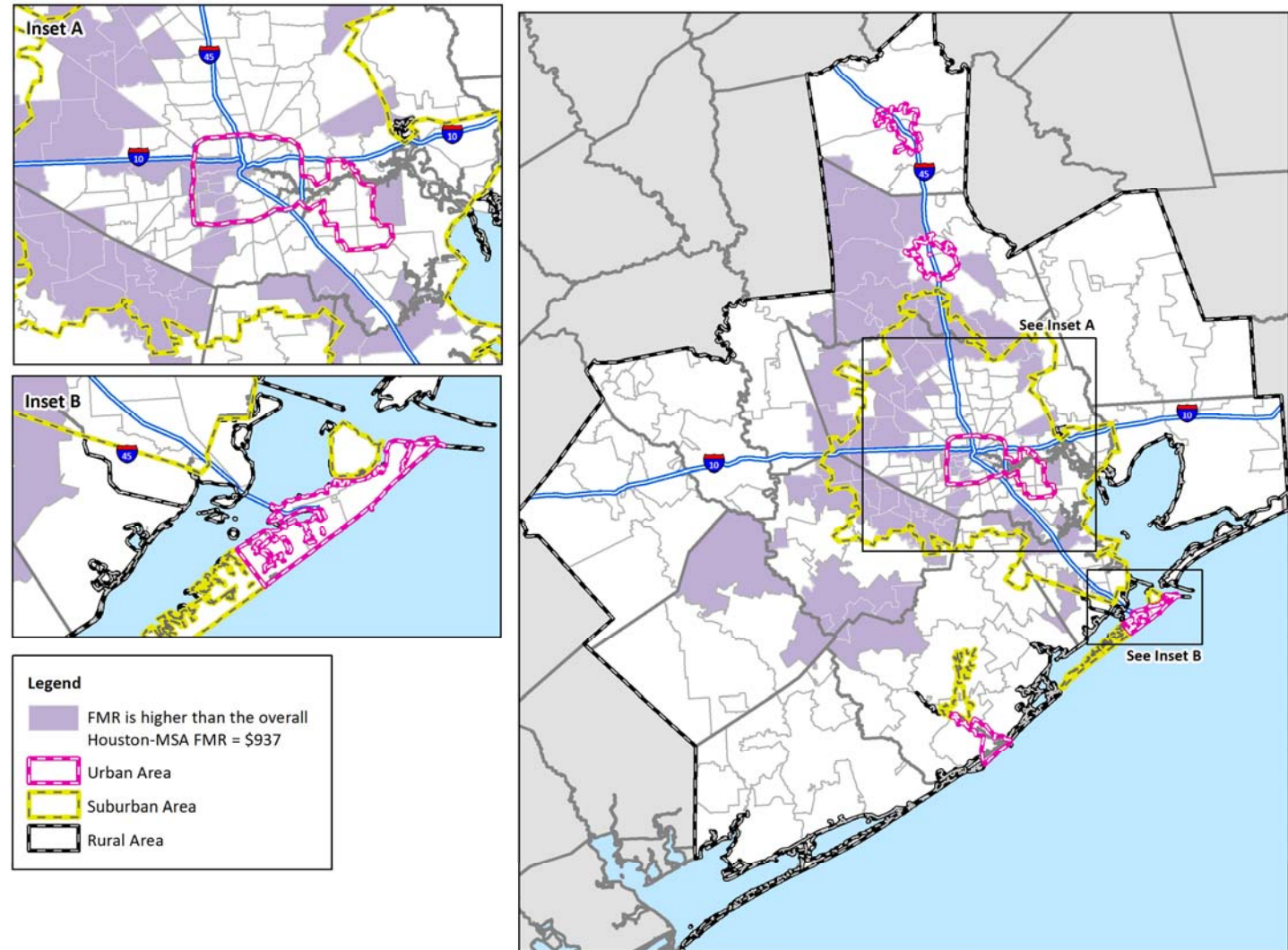
Source:
2010 Census, LIHTC, H-
GAC and BBC Research &
Consulting.



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Figure II-32.
Census Tracts
Where the FMR is
Higher than the
Overall MSA's
FMR, Houston-
Galveston Region,
2010

Source:
2010 Census, LIHTC, H-
GAC and BBC Research &
Consulting.



Section II – Indicators of Opportunity

Community Assets and Challenges

This subsection considers community assets, as well as challenges, that influence housing demand and quality of life. The variables analyzed in this section are not all encompassing, but are meant to highlight some of the more important factors influencing community quality.

Private residential capital investment

Communities with low and declining property values—those with the highest need for investment—are usually those that have the hardest time getting capital. Lenders, especially after the subprime mortgage crisis, are reluctant to make loans in communities where property values have decreased for fear of not recouping their investment.

One way to assess residential capital investment is through Home Mortgage Disclosure Act (HMDA) data. HMDA datasets contain mortgage loan application records with information on the race, ethnicity, gender, and income of the applicant, as well as loan terms. The data are widely used to detect evidence of discrimination in mortgage lending, although analysis of the available data is limited by lack of applicant credit information. In coming years, HMDA data will include information on credit scores, allowing for a more robust analysis of lending practices. The State of Texas Phase 1 AI identified factors that are not taken into account by HMDA data: credit scores, sparse credit history (can be an issue for immigrants), small loans (often associated with less expensive and smaller housing or piggyback loans), loans for manufactured housing, age (i.e., very young or elderly tend to have higher interest loans), high debt to income ratios, high loan to value ratios, small down payment amounts, and refinancing (when cashing out of equity).

Overall in the region, 21 percent of mortgage loan applications were denied in 2010. Denial rates are higher for African Americans and Hispanic applicants than for non-Hispanic white applicants, as shown in Figure II-33. Note that only counties with at least 500 loan applications in 2010 are included.²¹

Figure II-33.
Mortgage Loan Denials by Race and Ethnicity, Houston-Galveston Region, 2010

County	Percent of Loan Applications Denied					Difference	
	All Race and Ethnicity	African American	White	Hispanic	Non-Hispanic	African American / White	Hispanic / Non-Hispanic
State of Texas	22%	30%	20%	31%	19%	10%	13%
Region 6 Total	21%	33%	20%	31%	19%	13%	11%
Austin	26%	34%	25%	43%	23%	10%	20%
Brazoria	19%	27%	18%	27%	17%	9%	10%
Chambers	20%	25%	20%	29%	19%	6%	10%
Fort Bend	19%	30%	17%	27%	17%	13%	9%
Galveston	20%	27%	20%	28%	19%	7%	9%
Harris	22%	34%	20%	31%	19%	14%	12%
Liberty	35%	41%	34%	48%	33%	7%	15%
Matagorda	29%	39%	27%	43%	25%	12%	18%
Montgomery	19%	27%	19%	29%	18%	8%	11%
Walker	26%	49%	21%	27%	24%	28%	3%
Waller	25%	55%	23%	34%	24%	31%	11%
Wharton	31%	49%	29%	39%	28%	20%	11%

Note: Does not include loans for multifamily properties or non-occupants; County-level data displayed for counties with at least 500 loan applications in 2010.

Source: FFIEC HMDA Raw Data, 2010 and BBC Research & Consulting.

²¹ Since the denial and subprime analysis examine subsets of all loan applications by race/ethnicity, BBC only presents county-level results for counties with at least 500 loan applications.

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In all of the counties shown in Figure II-33, denial rates were higher for African Americans than for whites and higher for Hispanics than non-Hispanics. Waller County had the highest African American/white denial disparity (31 percentage points) and Austin County had the highest Hispanic/non-Hispanic denial disparity (20 percentage points).

A similar analysis of subprime loans found that non-Hispanic white borrowers are less likely to get subprime loans than minority borrowers—yet the proportion of loans that are subprime and disparities in subprime lending is relatively low for the region overall. That said, some counties (Liberty and Matagorda; to a lesser extent Walker, Waller, Wharton) have very high subprime lending rates as shown in Figure II-34.

Figure II-34.
Subprime Loans by Race and Ethnicity, Houston-Galveston Region and Select Counties, 2010

County	Percent of Originated Loans That Were Subprime					Difference	
	All Race and Ethnicity	African American	White	Hispanic	Non-Hispanic	African American / White	Hispanic / Non-Hispanic
State of Texas	7%	9%	8%	11%	7%	1%	5%
Region 6 Total	6%	9%	6%	9%	6%	3%	3%
Austin	12%	15%	12%	20%	12%	3%	8%
Brazoria	8%	8%	10%	12%	8%	-2%	4%
Chambers	6%	13%	6%	11%	6%	7%	5%
Fort Bend	4%	6%	5%	5%	4%	2%	1%
Galveston	7%	10%	8%	14%	7%	2%	6%
Harris	6%	10%	6%	8%	5%	4%	3%
Liberty	22%	38%	22%	32%	22%	16%	10%
Matagorda	17%	44%	17%	24%	17%	27%	7%
Montgomery	6%	5%	6%	8%	6%	0%	3%
Walker	16%	26%	16%	33%	15%	10%	18%
Waller	15%	50%	15%	27%	14%	35%	13%
Wharton	14%	27%	15%	27%	12%	12%	16%

Note: Does not include loans for multifamily properties or non-occupants; County-level data displayed for counties with at least 500 loan applications in 2010.

Source: FFIEC HMDA Raw Data, 2010 and BBC Research & Consulting.

Section II – Indicators of Opportunity

Figure II-35 measures the extent of residential investment using HMDA data. High loan rejection areas are shown with racial and ethnic concentrations.

Areas with high loan rejection rates include the eastern portion of Houston’s urban core as well as the suburbs east and north of the city. Many of these areas also have moderate to high poverty rates. Other tracts with high loan denials are scattered throughout the suburbs and rural areas of the Houston-Galveston region.

The areas where mortgage loan rejection rates are the highest, shown in Figure II-35, are those needing stabilization through investments in residential and commercial improvements. Areas with relatively high subprime rates should also be targeted.

Unbanked residents

The Federal Deposit Insurance Corporation (FDIC) routinely conducts a national survey of “unbanked and underbanked” households; the last survey was done in September 2012. Unbanked households are those that lack any kind of deposit account at an insured depository institution. Underbanked households hold a bank account, but also rely on alternative financial providers such as payday lenders or pawn shops.

The latest survey found that in the United States, 28 percent of households are unbanked or underbanked. In the Houston-Baytown-Sugarland Metropolitan Statistical Area (MSA), 12 percent of all households – or about 264,000 – are unbanked. Another 28 percent (630,000 households) are underbanked. Altogether, 40 percent of households in the region are unbanked or underbanked, which is significantly higher than the U.S. overall.

An analysis of the demographic characteristics of the banked, unbanked and underbanked found that:

- The majority of Hispanic households are unbanked or underbanked: 20 percent are unbanked and 41 percent are underbanked. Just 37 percent are fully banked, compared to 73 percent of white non-Hispanic households. The proportions are similar for African American households: 20 percent are unbanked, 31 percent underbanked and 45 percent fully banked.
- Just half of younger households (ages 15 to 34) are fully banked. In contrast, seniors have much higher rates of being fully banked (77 percent).
- Households without a high school diploma (26 percent fully banked) and renters (35 percent) have low rates of being fully banked. Female headed-households have lower rates of being fully banked (56 percent) than other household types.
- The majority of households earning less than \$50,000 is un- or underbanked. Even middle income households—those earning between \$50,000 and \$75,000 per year—have a low rate of being fully banked (60 percent). This compares to 84 percent for households earning \$75,000 and more.

Section II – Indicators of Opportunity

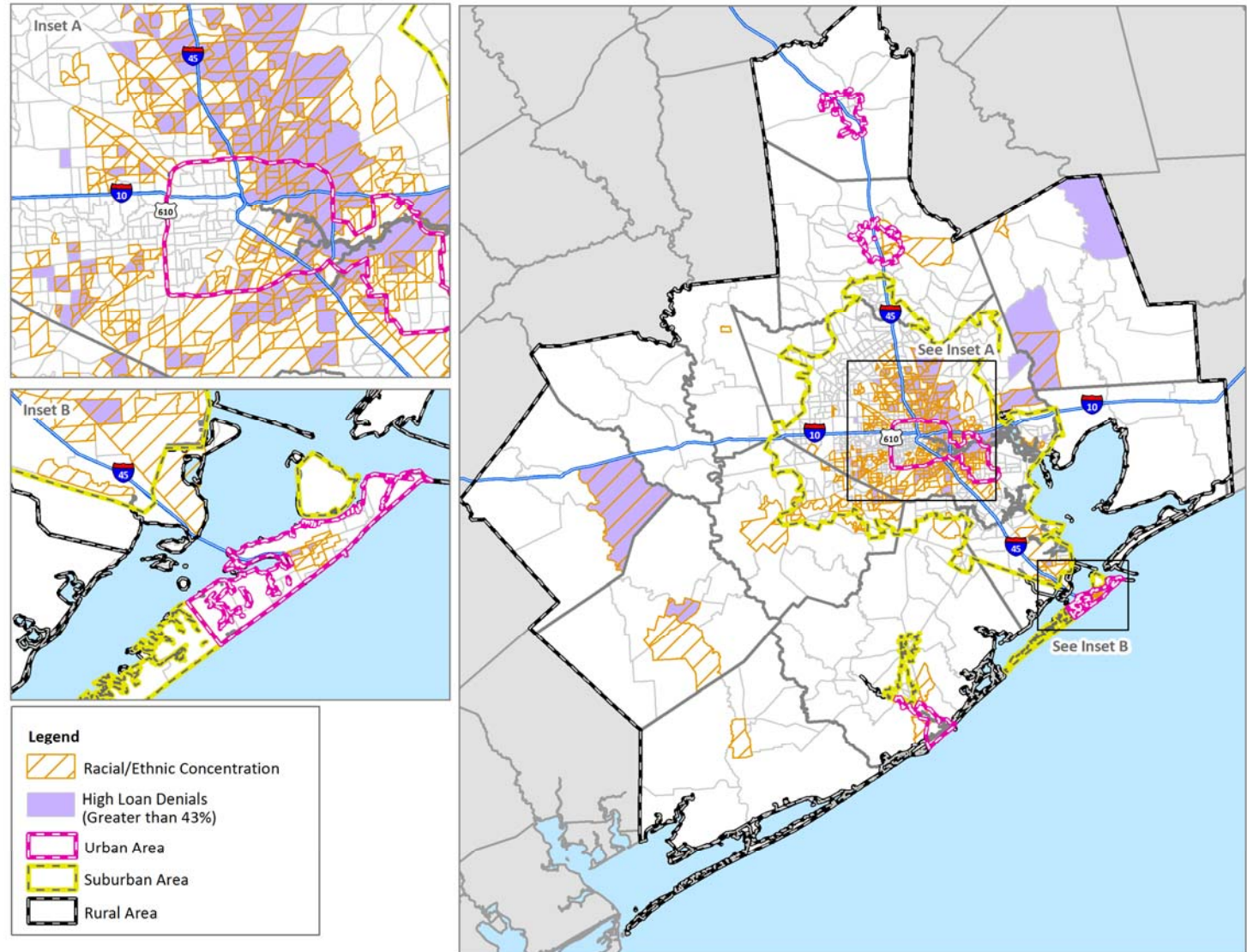
**Figure II-35.
Census Tracts with High Rates of
Mortgage Loan
Denial, Houston-
Galveston Region,
2010**

Note:

Racial and Ethnic concentrations in this map are Census tracts in which the percentage of African American, Asian or Hispanic residents is at least 20 percentage points higher than the percentage of that minority group for the county overall. They are consistent with concentrations shown in Figures II-7 through II-9.

Source:

2010 HMDA and 2010
Census



Section II – Indicators of Opportunity

Education and training opportunities

Improving rates of educational attainment, particularly among low income children and oftentimes, minority populations, is imperative for future economic growth and community stability. Figure II-36 shows the proximity of job training centers and libraries to areas where unemployment rates are the highest.

Unemployment is high in the first ring suburbs to the north, east and south of Houston, but there are less vocational training centers in these areas compared to the southwest side of Houston where unemployment is lower and training centers are more numerous and equally distributed. (Note: The vocational training center data used for Figure II-36 is not exhaustive and additional facilities may be located in these areas).

Figures II-37 and II-38 show elementary school quality and areas of high poverty.²² The Texas Education Agency rated 30 percent of elementary schools in the Houston-Galveston region “Exemplary.” Forty-seven percent were “Recognized,” 21 percent were “Academically Acceptable” and 2 percent received the lowest rating, “Academically Unacceptable.”²³ Figure II-37 displays exemplary rated elementary schools along with areas of poverty. Figure II-38 displays lower-quality elementary schools

(rated academically acceptable or academically unacceptable) along with areas of poverty. Most elementary schools that received a TEA rating of “exemplary” are located in Census tracts with poverty rates below 20 percent. This pattern holds true across all transects.

²² School quality was determined using the Texas Education Agency accountability ratings: Exemplary, Recognized, Academically Acceptable and Academically Unacceptable. Fewer than 5 percent of elementary schools in the Houston-Galveston region did not receive a rating.

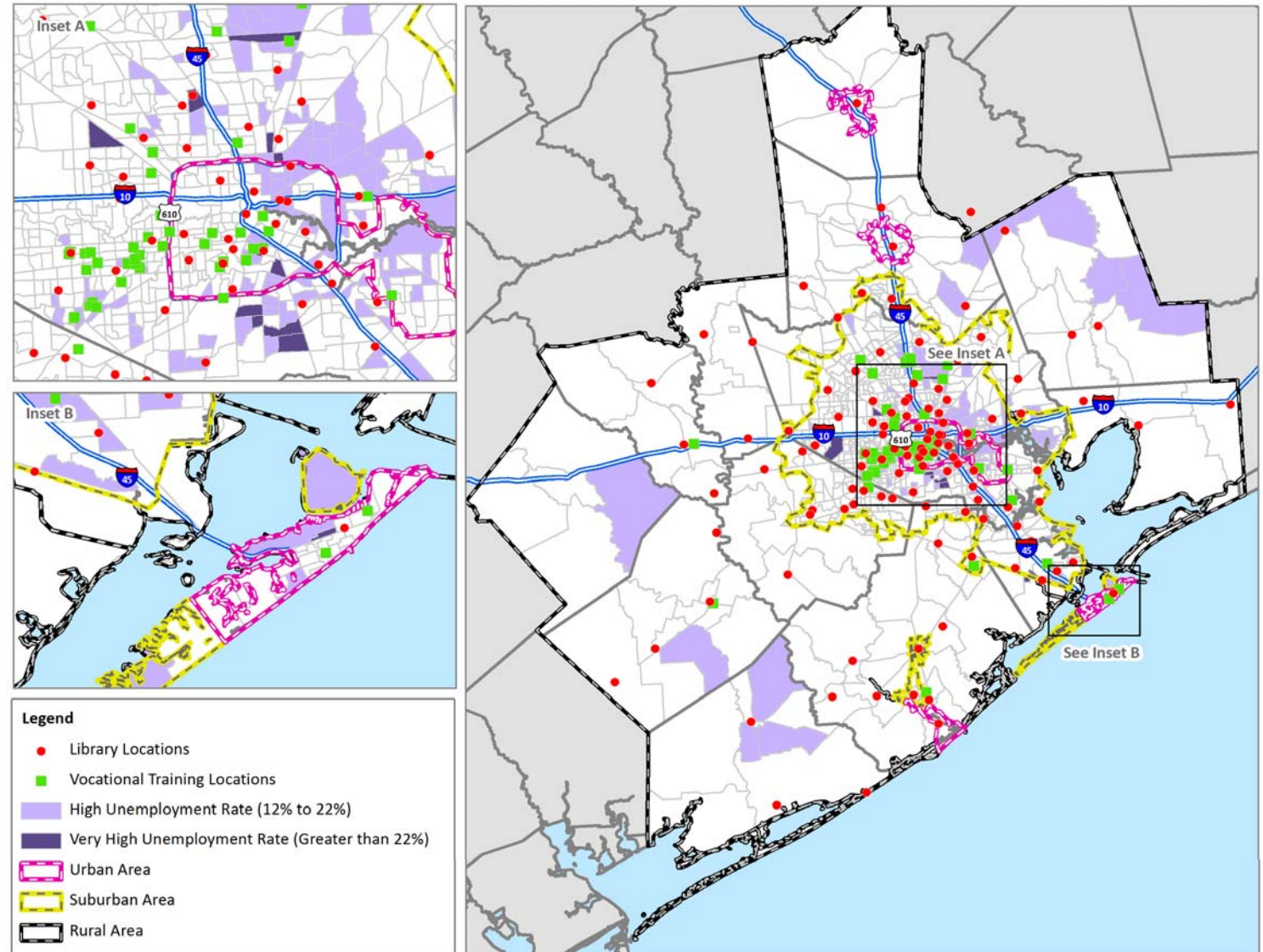
²³ It should be noted that ratings only apply to public schools. According to the Houston Independent School District (HISD), in 2012-2013 only 8 percent of HISD students were non-Hispanic white, suggesting a disproportionate proportion of non-Hispanic white students in Houston attend private school.

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Figure II-36.
Areas of High
Unemployment,
Houston-
Galveston Region,
2010

Note:
“High” (12%-22%)
and “Very High”
(over 22%)
unemployment rate
thresholds were
determined as a
relative measure from
the average
unemployment rate
for the region.
“High” reflects rates
between one and
three standard
deviations above
average, and “Very
High” indicates an
unemployment rate
that is three or more
standard deviations
above average.

Source:
2007-2011 ACS, H-GAC
and BBC Research &
Consulting.

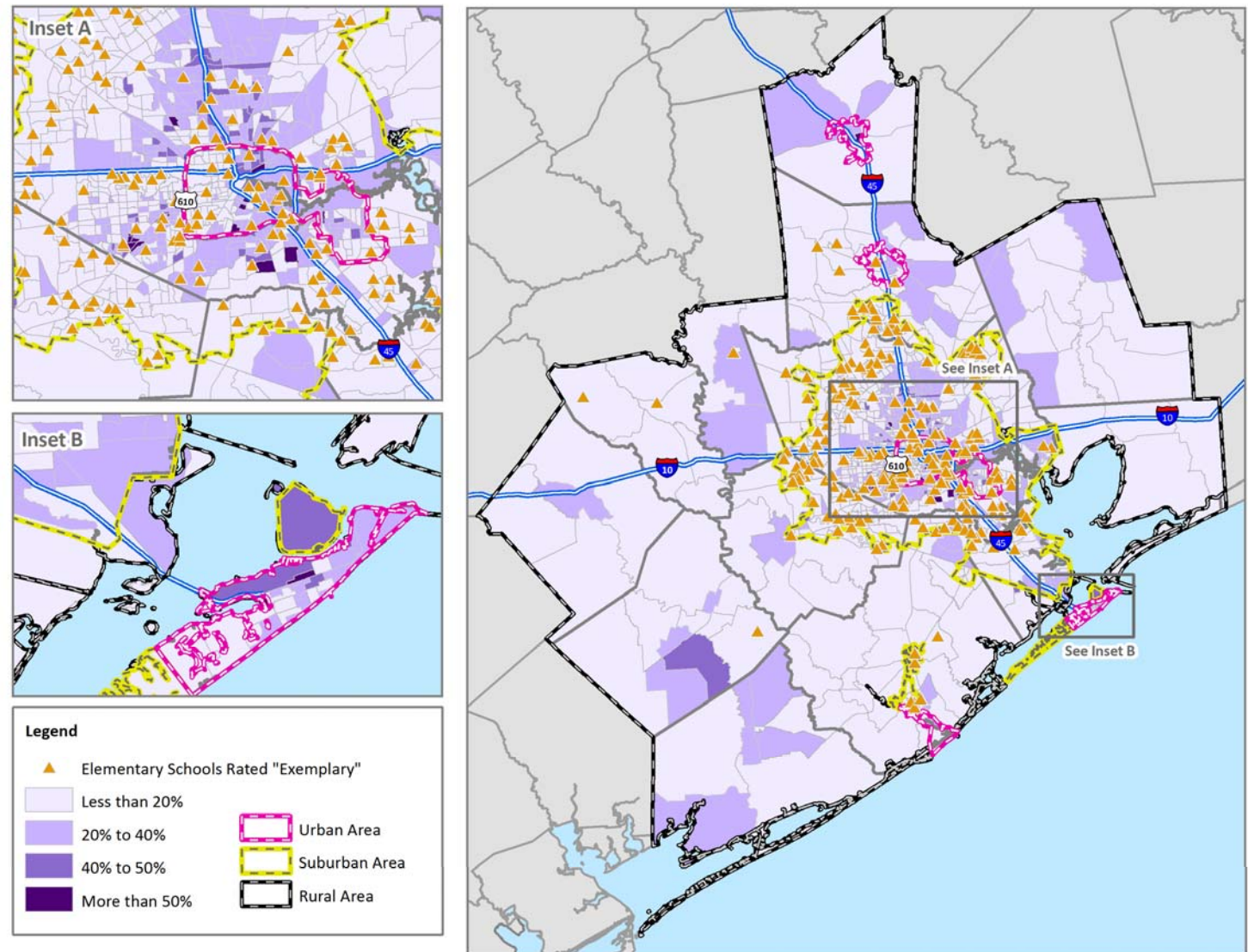


Section II – Indicators of Opportunity

Figure II-37.
“Exemplary”
Elementary
Schools and
Poverty, Houston-
Galveston Region,
2010

Source:

Texas Education Agency,
2007-2011 ACS, H-GAC
and BBC Research &
Consulting.

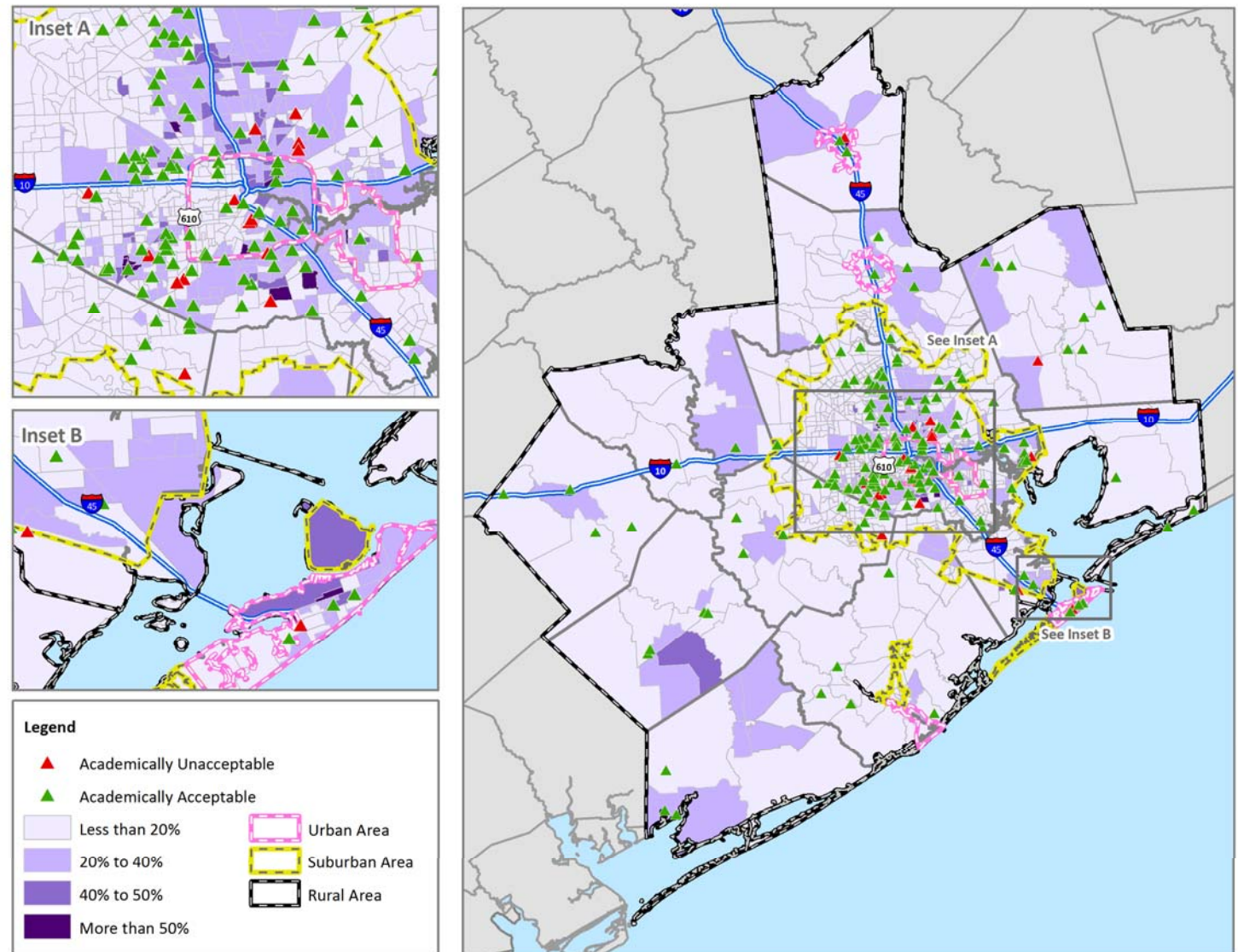


Section II – Indicators of Opportunity

Figure II-38.
“Academically
Acceptable” and
“Academically
Unacceptable”
Elementary
Schools and
Poverty, Houston-
Galveston Region,
2010

Source:

Texas Education Agency,
2007-2011 ACS, H-GAC
and BBC Research &
Consulting.



Section II – Indicators of Opportunity

Environmental factors

Community quality can also be influenced by environmental factors. Parks and recreation centers may add to the value of a neighborhood while proximity to areas of heavy industry, pollution, and contamination devalue properties, in addition to creating health hazards.

The following map (Figure II-39) examines the relationship between land parcels with environmental issues and RCAP/ECAPs. The map displays the locations of municipal waste sites (landfills), abandoned industrial/commercial facilities (brownfields) and hazardous waste sites on the National Priorities List (superfund sites) along with Census tracts that are both 50 percent minority and have a poverty rate of at least 40 percent.

Only 11 percent of the 96 waste sites in the Houston-Galveston region are located in minority poverty Census tracts. That indicates, the superfund sites, landfills and brownfields are not disproportionately concentrated in areas of minority poverty across the region as a whole. However, in Galveston, there is a cluster of brownfields in proximity to the city's RCAP/ECAPs.

In regards to the relationship between the 100-year floodplain and RCAP/ECAPs within the region, there is not a strong correlation between the floodplain and areas of minority poverty. While there does not appear to be a disproportionate floodplain impact among low income or minority groups, many residents in the Houston-Galveston area experience the impact of living in a floodplain.

While the region's air quality has improved over the last decade, the more urban areas are still below EPA standards. Driven by natural gas, the petrochemical industry is continuing to be a major economic driver in the Houston-Galveston region – providing high-skill and low-skill employment opportunities. The ship channel is home to major petrochemical complexes, as well as both wealthy and disadvantaged communities.

According to a 2008 study by the University of Texas utilizing EPA NATA-1999²⁴ data, air toxics in the Houston area disproportionately impact the socially and economically disadvantaged²⁵. The study finds that risk increases with the proportion of residents who are Hispanic and with other key socioeconomic indicators. While these risks do not solely impact R/ECAP communities, many of those census tracts are located along the ship channel. However, air quality is not simply a function of industry, as a growing population and increased automobile usage have drastically contributed to some of the region's poor air quality.

²⁴ The National Air Toxics Assessment (NATA) is a prioritization tool that the EPA uses to identify geographic areas, pollutants, and emission sources for further evaluation.

²⁵ Linder SH, D Marko, and K Sexton. "Cumulative cancer risk from air pollution in Houston: disparities in risk burden and social disadvantage." *Environmental Science & Technology*. 15 June 2008. 42(12):4312-22. Print.

Section II – Indicators of Opportunity

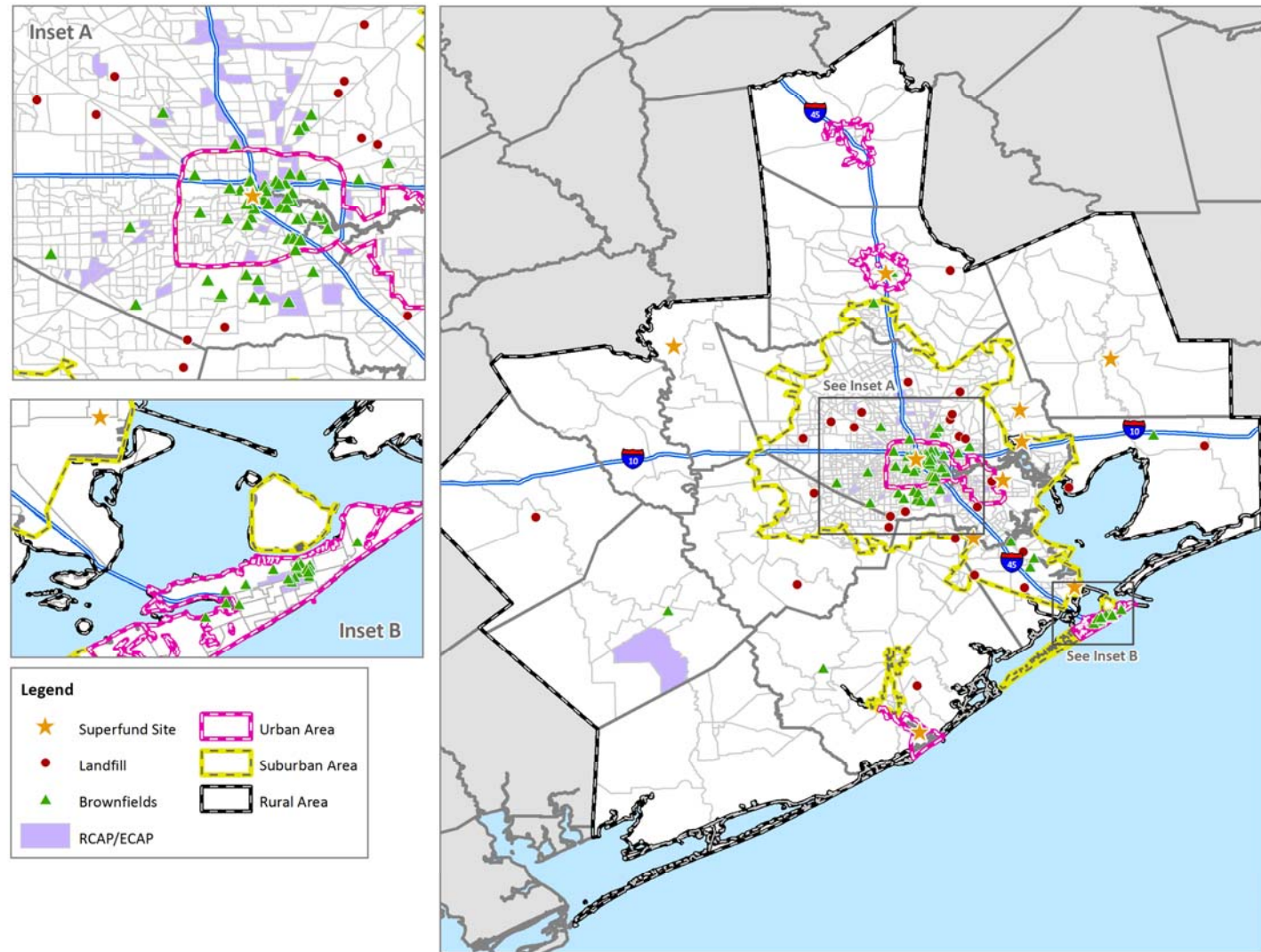
Figure II-39.
Environmental
Concerns and
RCAP/ECAPs,
Houston-
Galveston Region,
2010

Note:

RCAP/ECAPs shown on this map are defined as Census tracts with a minority majority and individual poverty rates greater than 40 percent, consistent with RCAP/ECAPs shown in Figure II-25.

Source:

2010 Census, H-GAC and BBC Research & Consulting.



Section II – Indicators of Opportunity

Major Economic and Public Investment

The Houston-Galveston region contains 13 counties and over 130 municipalities, each with different infrastructure and economic priorities. Because the FHEA takes a regional approach to fair housing and equity, the assessment examines major, large-scale projects valued at over \$10 million.

The region has several large scale economic development projects that will significantly impact and add to economic opportunity in many of the region’s communities. This section begins with national and Houston-Galveston area examples of how large development efforts have transformed sputtering regional economies into more modern competitive economic engines. It concludes with a discussion of the potential impacts of such investments on low income communities.

Background on economic effects

Economic base theory essentially applies international trade theory to smaller domestic regions. Economic base theory classifies businesses in a regional economy into two categories: (1) enterprises serving markets outside a defined region (“basic industries”); and (2) enterprises serving markets inside a defined region (“non-basic industries”). Basic industries export goods and services outside a regional economy, and by exporting goods and services out of the region, money flows into the region. Rising regional corporate income in base industries leads to corporate expansion, increased demand on intermediary suppliers, increased employment and increased labor earnings. Increases in basic employment and labor earnings also increase demand for locally produced goods and services, such as retail goods and personal services. The group of exporting industries, when considered together, is the economic base of a region.

Intermediary suppliers and local service providers are considered non-basic industries that primarily serve the local market and generally expand and contract with basic industry expansion and contraction. A central principle of economic base theory is that over the long run the proportion of basic and non-basic jobs will remain about the same. Hence, an increase in the number of basic jobs will eventually produce a proportionate increase in non-basic jobs.

For example, a new automobile manufacturing plant opens in a region. The manufacturing operation will build and supply vehicles to the entire country. The plant will have a large direct employment force that will draw from the current labor market and will also draw outside labor to move near the new manufacturing facility. Plant workers will patronize local retailers and service providers, increasing economic demand in non-basic sectors. New regional residents will require housing and will bring their families, which will require education and medical services. Suppliers for the manufacturing processes could potentially be drawn to locate in the area, further increasing economic activity and expanding local employment.

These ripple effects, known as induced and indirect economic effects or multiplier effects, provide additional economic benefit to the region. Growth in base industries is crucial to regional economic development because base industries form the foundation of a regional economy. Income and employment in non-basic sectors—including retail, housing, medical services, legal services and many other industries—is often dependent on the strength of base industries. For this reason, growth in the economic base can create opportunity across income brackets, education levels and occupations.

Section II – Indicators of Opportunity

Houston-Galveston opportunities

The Houston-Galveston region is perennially a leader in economic growth and base industry expansion. Houston is traditionally the home of the oil and gas industry and related refining and petrochemical manufacturing facilities. The oil and gas industry is the historical base industry of the Houston region. In addition, Houston's Gulf Coast location and expanding port facility allow for another opportunity to leverage economic development for regional benefit.

Refining and petrochemicals

Houston is a leader in manufacturing petrochemicals. The area is home to more than 125 refining and petrochemical manufacturing companies, which comprise the region's largest petrochemical plants including; Bayport Industrial District, Battleground Industrial Complex, Bayport Shipping Terminal, and the Houston Ship Channel. The petrochemical industry currently employs over 70,000 people in Texas (direct employment), according to Texas Labor Department figures. About half of those jobs are in the Houston region, spread across more than 430 chemical plants and refineries. Texas often leads the nation in crude oil refining, with 26 petroleum refineries processing over 4.7 million barrels of crude oil per day, 27 percent of total U.S. refining capacity.

The discovery of shale rock formations in Texas, North Dakota, Colorado and Pennsylvania, rich with oil, natural gas and natural gas liquids, has had a significant impact on the region's economy as major energy companies headquartered in Houston have expanded domestic exploration. Refineries are seeing increased volume and private investment for capacity expansion. Petrochemical companies are also expanding

capacity and there is domestic and foreign investment in new facilities. There are about 10 new or expansion projects planned for the Houston region beginning construction in the next several years. Shale natural gas (liquefied natural gas) has become economically feasible for export and there are a number of proposals for processing and specialized facilities to liquefy and load natural gas onto cargo ships near Houston.

Port of Houston

The port of Houston's market strength and strategic location represents an ongoing opportunity for industrial development. The economic impact of the port of Houston is significant, accounting for \$178.5 billion of total economic activity in Texas, including \$56.5 billion of total personal income, and \$4.5 billion in state and local taxes. Among the largest facilities is the Bayport Container and Terminal Project, which generates an estimated \$1.6 billion of annual business and tax revenue, as well as 32,000 jobs.

The port of Houston is expected to experience significant increases in cargo traffic due to the expansion of the Panama Canal. In anticipation the Port of Houston has completed several recent projects to increase capacity and has several more projects planned. A Port of Houston Authority 2012 economic impact study showed that more than 1.1 million jobs in Texas and nearly \$179 billion of annual statewide economic activity were in some way related to the port. These economic benefits are expected to grow significantly due to the combined effects of the resurgence of the domestic oil and gas industry and the Panama Canal expansion. Distribution centers near the port and other centers are already growing around the Houston metro area in response to the port's global trade and commerce.

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Growth in nearby warehousing and distribution operations represents an indirect effect of the growth in port-related commerce.

Potential impact

The resurgence in domestic oil and gas and the port expansion are major reasons that Houston is currently leading the nation in job recovery since the recent national economic recession. Houston area communities are already seeing the benefits of the base industry recovery and expansion. There has been housing market response to the economic expansion—including many of the nation’s fastest growing master-planned residential communities. The Houston area is also seeing a rise in commercial development, including retail, services, and office. As a result the construction sector of the economy is also booming.

Base industry expansion is sometimes referred to as the cause of the rising tide that floats all ships, but economic development can also bring an influx of new residents. For current residents to stay competitive in the labor market, education and workforce development programs are crucial to ensuring that the benefits of large scale infrastructure and economic development reach currently under-educated and under-skilled members of the Houston region.

To that end, the impact of these large economic development investments on low income communities in the Houston-Galveston region will depend on the training low income workers receive. Job training and educational investments should 1) focus on the skills and education needed for workers to be employed in these growing, dominant industries; and 2) be available in and marketed to low income communities. Figure

II-36 shows a disconnect between areas of high unemployment (which are also mostly communities of color) and location of job training facilities. However, H-GAC Workforce Solutions have many career offices located in high unemployment areas – which work to connect job seekers with quality employment. Availability of job training centers in low income communities and affirmative marketing efforts should be examined and potentially expanded to ensure that low income residents have access to the jobs created by these large public investments.

Transportation Investment

The FHEA team compared major transportation projects within the region to the location of R/ECAPs and found no conclusive relationship between the two. Through a regional lens, the equity impacts of transit and road projects can be lost, and there is a greater need for equity evaluations at the local level.

According to the 2035 Regional Transportation Plan (RTP) Update, revenue projections for the region total \$86 billion over a 25-year period. The RTP dictates major transit, ped-bike, and construction investment in the eight county Metropolitan Planning Organization (MPO) region, with a focus on linking land use and transportation planning and policy to afford residents more choices in the way they travel.²⁶ The RTP Update recommends \$9.5 billion in capital investments across the region, including a downtown intermodal terminal, 81 miles of light rail, 84 miles of commuter rail transit, and 10 new transit facilities outside Metro’s service area. These projects will increase access to transportation options for low- and moderate-

²⁶ The MPO area includes Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery and Waller counties.

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income populations and racial and ethnic minorities in the region; however, these investments open up areas to increased private investment, which can result in increased property values that price people out of their neighborhoods. Low-income minority populations are less likely to have consistent access to automotive transportation options, so regional investments in infrastructure that serve vehicular travel do not equitably serve households of color or people with disabilities. In that regard, the RTP Update is marking 45 percent of the funding for transit projects (2035 RTP).

Conclusions

- The strongest gains in diversity occurred within suburban transects, with Census tracts that lost diversity mostly located in rural areas. Employment decentralization, specifically of service and working class jobs, also draws minorities, who traditionally have lower levels of educational attainment, into the suburbs.
- While diversity has increased across the region, segregation is still very much alive. Many factors impact the level at which similar groups cluster, such as historical housing patterns, land use practices, the siting of subsidized housing, housing preference, and affordable housing availability.
- Income inequality promotes the concentration of poverty and the growing socioeconomic disparity in the region creates obstacles to integration.
- A recent spatial analysis of LIHTC properties in major U.S. cities found the Houston area to have a more “spatially-decentralized pattern of LIHTC placement” than any other large city, and the study found the Houston area had fewer

LIHTC properties clustered in high poverty Census tracts and disadvantaged areas. However, overlay analysis found the majority of LIHTC properties are located in minority concentrated areas.

- Subsidized housing options are very limited in high opportunity areas, which are characterized by better access to quality schools and employment opportunities, and have lower racial and ethnic minority populations.
- A large number of regional households were unbanked or underbanked. These households are disproportionately represented by Hispanic, younger, and low-income households.

Section III

Access to Opportunity

Section III – Access to Opportunity

Introduction

This section builds upon the regional analysis in Section II. It provides a greater level of geographic detail about areas of opportunity—and areas with challenges—within the Houston-Galveston region. It also discusses disparities in access to opportunity in the region.

A major component of this section is the Community Opportunity Reports that appear in Appendix A. These reports show the types of opportunity provided by each community and transect (urban, suburban, and rural).

For the purpose of this analysis, “opportunity” means that residents live in areas that are safe, have good schools, are near suppliers of healthy food (in this case, grocery stores) and are free from significant disinvestment or decline. But these areas cannot be exclusive. They must contain a mix of housing prices and types to enable residents employed in many different industries, of different income levels and of different races, ethnicities and cultures to reside within their boundaries.

Therefore, “opportunity communities” include those that have:

- Availability of affordable housing; both rental and ownership;
- Households with a mix of incomes (mixed-income or predominantly middle income);

- Low to moderate rates of poverty;
- A limited number of high crime areas;
- Access to capital for residential investment (home improvement; home purchase);
- High quality schools;
- Employed and educated residents;
- Access to fresh food; and
- Limited environmental hazards.

Opportunity, Distress, and Exclusivity

In addition, but separate from the Kirwan approach, the FHEA team used nine core criteria representing housing, community, and economic indicators to identify High Opportunity, Distressed and Exclusive Census tracts in the region. High Opportunity Census tracts are characterized by positive community amenities and are inclusive in terms of housing stock and income diversity. Exclusive Census tracts offer many opportunity amenities but are less accessible (e.g. limited income diversity and housing stock variety).

Distressed Census tracts are those in which few community amenities exist and residents do not have access to good educational environments, safe neighborhoods, capital to buy a home, and diverse housing types. Of the region’s 64 RCAP/ECAPs, eight (13%) are located in Distressed Census tracts.

Section III – Access to Opportunity

Figure III-1 outlines the criteria used to define High Opportunity, Distressed and Exclusive areas and Figure III-2 shows the number and percent of Census tracts that fall into each category.

The variable ranges displayed in Figure III-4 were determined using statistical measures such as the standard deviation—that is, the ratings were not assigned qualitatively or subjectively.

Figure III-3 maps High Opportunity, Distressed and Exclusive tracts.

Figure III-1. Characteristics of High Opportunity, Distressed and Exclusive Areas

	High Opportunity Areas	Distressed Areas	Exclusive Areas
Housing opportunity variables			
Subsidized Units (% of all units)	2% to 16%	15% or higher	0%
Rental Units (% of all units)	23% to 43%	53% or higher	0% to 13%
Income and Poverty			
Poverty	0% to 29%	30% or higher	less than 17%
Mixed Income	balanced mix of all income groups	disproportionate share of low income households	disproportionate share of high income households
Employment and education			
Less Than High School Degree	0% to 32%	38% or higher	less than 6%
Unemployment	0% to 13%	13% or higher	less than 3%
Community and Schools			
Crime Index (0 to 600)	0 to 159	273 or higher	less than 45
Residential Capital Constraints	0% to 39%	33% or higher	less than 15%
Race/Ethnicity			
Percent Minority	41% to 81%	88% or higher	less than 33%

Source: BBC Research & Consulting.

Figure III-2. Number and Percent of Census Tracts meeting High Opportunity, Distressed and Criteria

	High Opportunity Census Tracts		Distressed Census Tracts		Exclusive Census Tracts	
Housing opportunity variables	Num.	Pct.	Num.	Pct.	Num.	Pct.
Subsidized Units (% of all units)	245	22%	88	8%	231	21%
Rental Units (% of all units)	367	33%	189	17%	184	17%
Income and Poverty						
Poverty	918	83%	184	17%	631	57%
Mixed Income	484	44%	233	21%	243	22%
Employment and education						
Less Than High School Degree	820	74%	192	17%	197	18%
Unemployment	944	86%	158	14%	139	13%
Community and Schools						
Crime Index (0 to 600)	654	59%	199	18%	137	12%
Residential Capital Constraints	857	78%	181	16%	91	8%
Race/Ethnicity						
Percent Minority	399	36%	273	25%	238	22%
CTs that meet all criteria	12	1.1%	1	0.1%	1	0.1%
CTs that meet 8 out of 9 criteria	70	6.4%	8	0.7%	10	0.9%

Source: BBC Research & Consulting.

Section III – Access to Opportunity

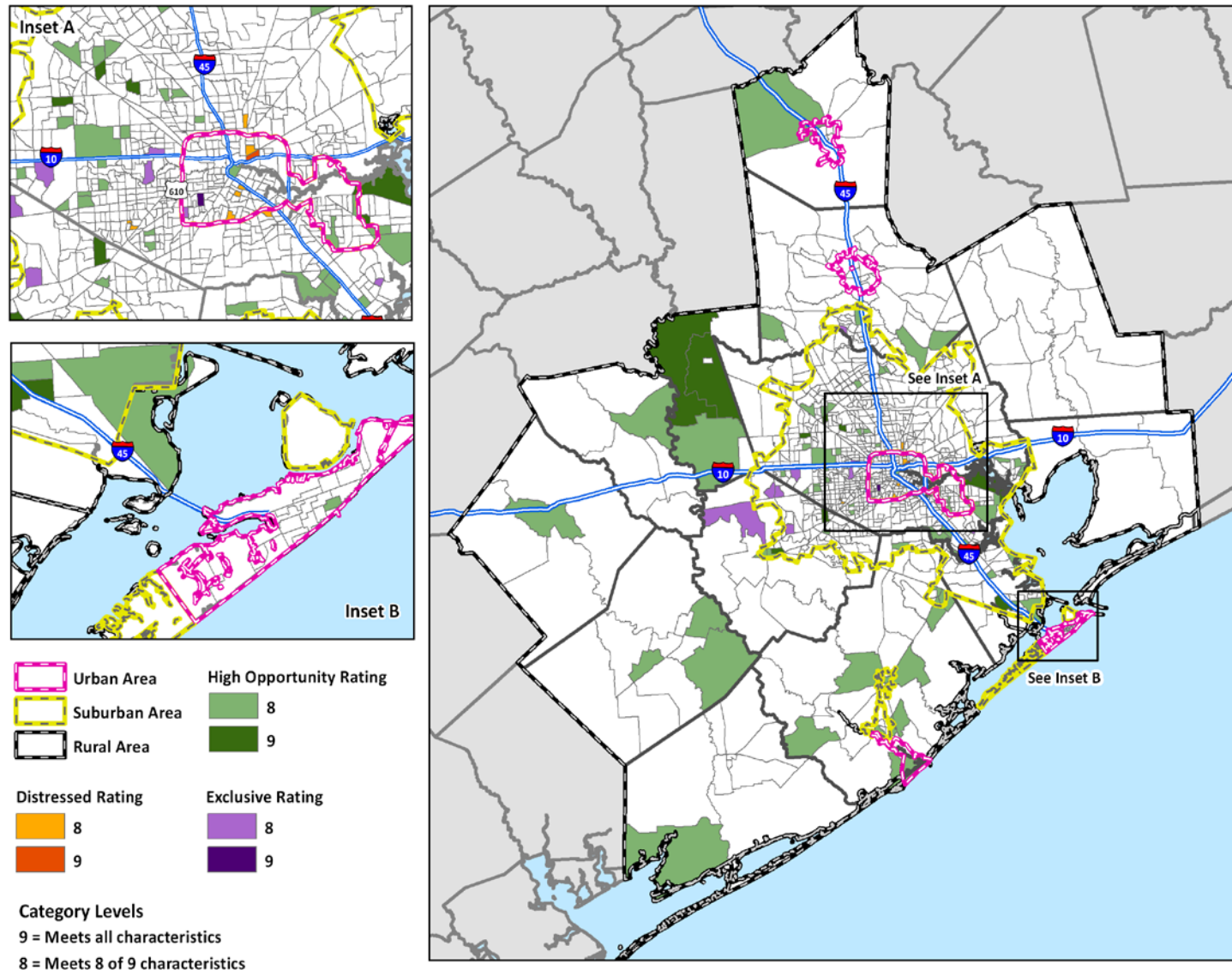
**Figure III-3.
High
Opportunity,
Distressed and
Exclusive
Census Tracts
in the
Houston-
Galveston
Region**

Note:

The criteria used to identify high opportunity, distressed and exclusive ratings are displayed in Figure III-2.

Source:

BBC Research & Consulting.



Section III – Access to Opportunity

As the map demonstrates, Census tracts that are distressed are largely located within the urban core.

Census tracts with the highest levels of opportunity are most prominent in rural areas. These areas are often less accessible to lower income residents because of their lengthy commute times and limited transit.

Exclusive Census tracts are mostly just within and west of the western suburbs. These areas are also less diverse racially and ethnically than other areas.

HUD-provided data on Disparity in Access to Opportunity show that disparity to opportunity is statistically significant for African Americans and Hispanics for almost all measures of opportunity (school, poverty, labor engagement, housing stability, and overall opportunity). Although the differences in opportunity among racial and ethnic groups were relatively small overall, the housing stability measure showed the most variation. This means that African Americans and Hispanics have lower opportunities finding stable housing than other racial groups.

HUD's Disparity in Access to Opportunity data are shown in Figure III-4.

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Figure III-4.
Disparity in Access to Opportunity

Disparity in Access to Opportunity												
Grantee	Houston-Galveston Area Council											
Dimension	All Persons	Poor Families	Persons in Voucher households	Persons in PH	White Persons	Black Persons	Hispanic Persons	Asian Persons	Native American	Pacific Islander		
School Index	6.25	5.23	4.75	4.27	7.11	5.03	5.57	7.11	N/A	N/A		
Poverty Index	5.20	3.36	3.60	1.86	6.29	4.11	4.17	5.98	N/A	N/A		
Labor Engagement Index	5.88	4.42	4.37	2.67	6.84	4.83	4.87	7.42	N/A	N/A		
Housing Neighborhood Stability Index	5.74	4.02	3.87	3.52	7.15	4.51	4.32	6.70	N/A	N/A		
Job Accessibility Index	5.30	5.71	5.38	6.04	4.97	5.01	5.82	5.69	N/A	N/A		
Opportunity Index	5.64	3.91	3.68	2.65	6.89	4.16	4.49	7.01	N/A	N/A		
Demographic Shares of Total Population					43.27%	16.62%	32.99%	5.62%	0.22%	0.06%		
	Poor Families	Poor White	Poor Black	Poor Hispanic	Poor Asian	Poor Native Americans	Poor Pacific Islanders	Disparity Black-White	Disparity Hispanic-White	Disparity Asian-White	Disparity Native Am - White	Disparity Pacific Islander White
School Index	5.23	6.26	4.45	5.13	6.24	N/A	N/A	1.81	1.13	0.02	N/A	N/A
Poverty Index	3.36	4.97	2.87	3.18	4.37	N/A	N/A	2.11	1.80	0.60	N/A	N/A
Labor Engagement Index	4.42	5.66	3.76	4.24	6.30	N/A	N/A	1.90	1.42	-0.65	N/A	N/A
Housing Stability Index	4.02	5.81	3.65	3.51	5.20	N/A	N/A	2.17	2.30	0.61	N/A	N/A
Job Accessibility Index	5.71	5.33	5.28	6.19	6.15	N/A	N/A	0.05	-0.86	-0.81	N/A	N/A
Opportunity Index	3.91	5.55	3.14	3.72	5.59	N/A	N/A	2.41	1.83	-0.04	N/A	N/A

Note: Racial/Ethnic group making up less than 1% of the grantee area jurisdiction will appear as "N/A." Each opportunity dimension ranges from 1 to 10, with 10 representing the most opportunity-rich census tracts, and 1 representing the most opportunity-scarce census tracts. Data represent the average neighborhood characteristics for each group. Highlighted disparity cells represent statistically significant differences across groups at the 0.1 significance level. For more information on the variables in each dimension, please read the PDR Fair Housing Data Documentation Guide. Values can be loosely interpreted as the percentile ranking of the average neighborhood for the particular group.

Source: HUD.

Section III – Access to Opportunity

Community Opportunity Model and Reports

HUD provides Partnership for Sustainable Communities grantees with many types of data to analyze opportunity at the regional level. An example is the dissimilarity index for the region that is discussed in Section II and the Disparity in Access to Opportunity in Figure III-4.

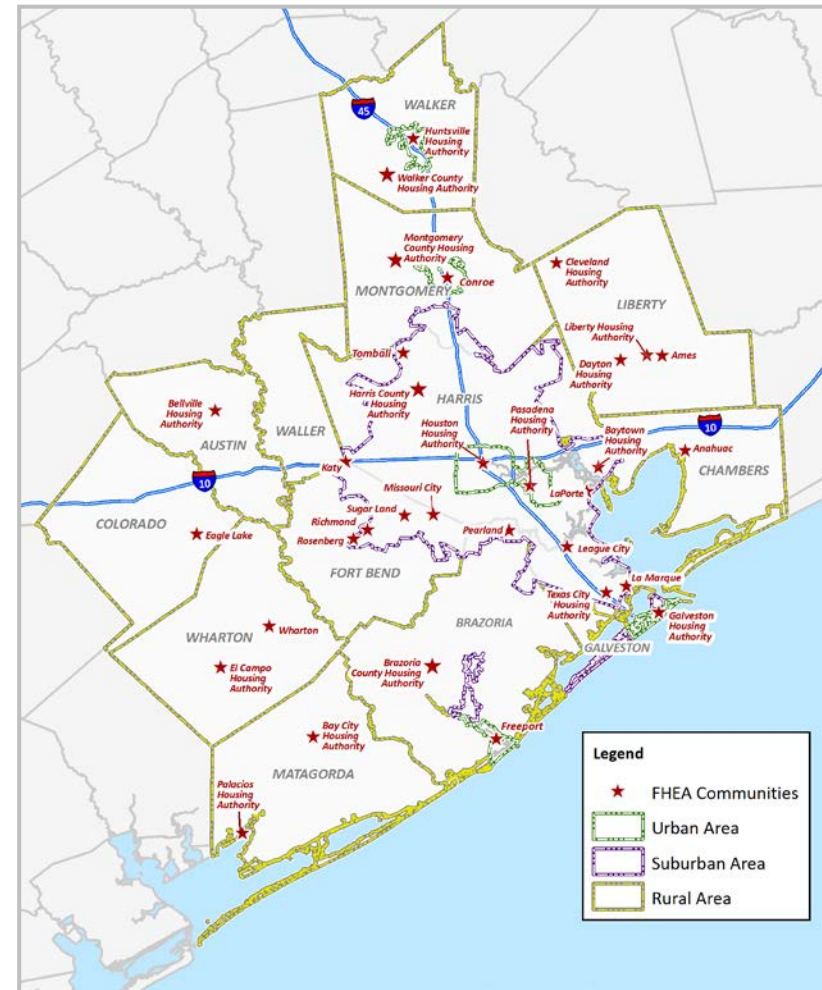
The Houston-Galveston region spans 13 counties and over 130 cities across urban, suburban, and rural transects. Due to the sheer size and geographic diversity of the region, H-GAC selected a cross-section of 29 cities to represent the unique transect and size characteristics of regional communities. To evaluate and measure opportunity at the community level, a proprietary model was created that scores variables important for housing choice, fair housing, and access to opportunity against regional averages. This model is called the Community Opportunity Model.

The Community Opportunity Model was used to analyze opportunity throughout the region. It contains demographic, housing, and community opportunity data for every Census tract in the region.

Appendix A contains Community Opportunity Reports for each FHEA community, county, transect, and the overall region. Figure III-5 shows a base map of the area. The FHEA communities are identified with red stars.¹

¹ For the Community Opportunity Reports, very small FHEA communities were excluded since the number of Census tracts was too small to produce a meaningful analysis.

Figure III-5.
Base Map of FHEA Communities



Source: H-GAC and BBC Research & Consulting

Section III – Access to Opportunity

The Community Opportunity Reports use some of the opportunity variables collected for the Model to show important characteristics of community. These reports contain the following:

1. The Opportunity Comparison Radial graphic displays what the typical Census tract in a given county, community or transect looks like in terms of opportunity.² In addition to select Model variables, the radial graphic displays Census tract averages for median household income, percent of households earning less than 80 percent of median income, jobs per person in the labor force, and mean commute time. Figure III-9 shows the Opportunity Comparison Radial and Primary Findings for the Houston-Galveston Region. Appendix A contains the Community Opportunity Sheets for the region, the three typologies, 13 counties, and 29 cities.
2. The second component outlines primary findings for the select FHEA communities as well as all counties and transects. These recommendations can also be used by FHEA Communities of similar size to improve access to opportunity.

Model Variables Defined

This section defines the variables – as well as the measures used to rate the variables – in the Community Opportunity Model. Not all of these variables are displayed in the

² Note that graphic displays the Census tract average, not the measure for the community as a whole. Said another way, the graphic is weighted by Census tract not by population or household.

Community Opportunity Reports. Instead, the reports summarize the variables that are perceived by the FHEA team to be of the most interest to local policymakers.

Housing affordability variables

Four variables are used to assess affordability with the table and graphics³:

- Percent of housing in the community that is rental stock (measures housing type diversity);
- Percent of rental units that are subsidized (measures rental affordability);
- Percent of rental units affordable to the lowest income households (measures deep affordability);
- Percent of homes valued at less than \$150,000 (measures ability to buy affordable homes).

Three of the four housing affordability variable focus on rentals. This is intentional, since much of the NIMBYism in the region—and many areas within Texas—concerns resistance to rental housing.

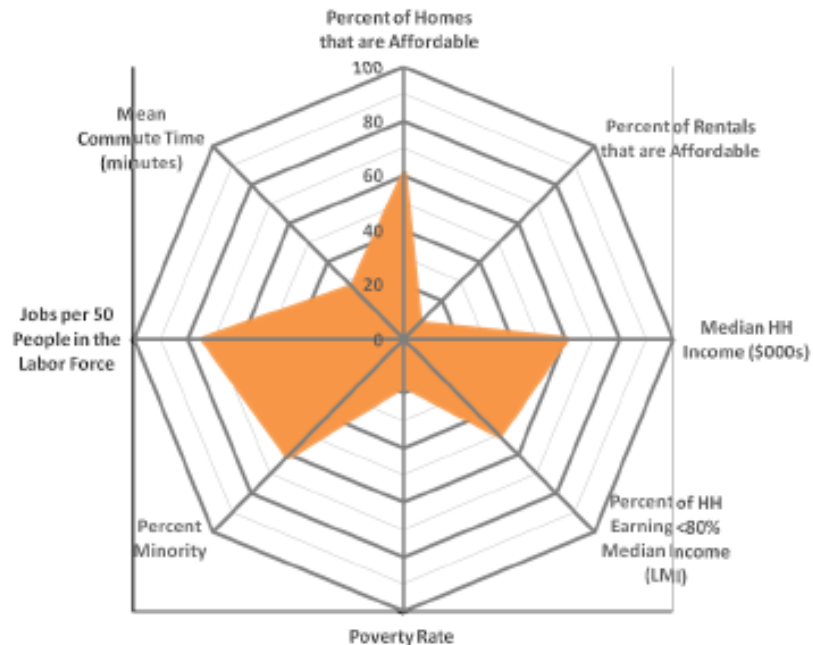
³ Due to lack of data, quality of housing is not considered in the affordable housing variables. In many communities across the region, the quantity of affordable housing is not an issue, but rather the deficit in the quantity of quality, affordable units decreases access to opportunity.

Section III – Access to Opportunity

Houston-Galveston Region

Opportunity Comparison Radial

What does the average Census tract in the Houston-Galveston Region look like?



The radial graphic plots the Census tract average for the community, county or transect.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Primary Findings

- **Affordable rentals.** One-third of housing units in the region overall are rentals. Of these rentals, 8% are affordable to households earning less than \$20,000 per year. 12% of rental units are subsidized.
- **Affordable homes to buy.** A little more than half of homes in the region (55%) are valued at less than \$150,000, an affordable level for a household earning about \$50,000 per year.
- **Racial and ethnic diversity.** The region is one of the most diverse areas in the country. In the average Census tract in the region, 61% of residents are non-white, non-Hispanic.
- **Income diversity.** On average, 43% of Census tracts in the region contain a mix of household incomes. Fifteen percent of residents in the region live below the poverty line (roughly \$23,000 for a family of four). This is about the same as in the U.S. overall.
- **Education.** 20% of residents in the region lack a high school degree.
- **Unemployment and commute.** The region boasts one of the lowest unemployment rates in the country. In 2011, unemployment in the average Census tract was 8%; more recent data put unemployment for the regional overall at around 6%. The vast majority of residents in the region own a car, with an average commute of 27 minutes.

Source: BBC Research and Consulting

Section III – Access to Opportunity

Poverty

Research has shown that a 40 percent poverty threshold is the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with less than 14 percent of poverty have no noticeable effect on community opportunity.

Disproportionate income group

Census tracts were evaluated for both 1) a dominant proportion of low income or high income households and 2) a presence of middle income households.⁴ Census tracts with an income mix representative of the region's households or dominant moderate income households were defined as Moderate, which means having a good mix of incomes. Census tracts with a disproportionate representation of low income households were given a Low rating, and Census tracts with a disproportionate representation of high income households were given a High rating. Census tracts with predominantly higher income households were classified differently from those with predominantly moderate income households because the barriers to entry for mixed-income housing in these areas are larger due to land costs (and potentially NIMBYism).

⁴ For the purposes of this analysis, low income households are those earning less than \$35,000 per year, middle income households are those earning between \$35,000 and \$100,000 per year and high income households are those earning \$100,000 or more per year.

Community assets and challenges variables

Five variables are used to assess community assets and challenges with the table and graphics:

- **School Quality.** This variable reflects the average TEA Accountability Rating for elementary schools located in a given tract. Tracts with no elementary school were excluded from the School Quality ratings and z-score averages. The model focuses on elementary schools (as opposed to middle and/or high schools) because the prevailing literature has shown elementary schools to have the most substantial impact on housing choices.
- **Crime.** The Crime variable is an index measuring the risk of total crime in a given tract. Data are based on FBI Uniform Crime Report databases and include all types of crime ranging from rape and murder to petty theft and vandalism.
- **Residential Capital Constraints.** Constraints are measured as the proportion of home mortgage loan applications in a given tract that were denied. Denial rates were calculated using Home Mortgage Disclosure Act data from 2010; loans for multifamily properties or non-occupants were excluded.
- **Access to Grocery Stores.** This variable measures access to fresh food by indicating whether or not a given Census tract contains a grocery store.

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- **Environmental Hazards.** This variable indicates the presence of a municipal waste site (landfill), abandoned industrial/ commercial facility (brownfield), and/or a National Priorities List hazardous waste site (superfund site) in a given tract.

Unemployment and education variables

Unemployment, access to jobs, and the educational attainment of residents was measured by the following variables included in the tables and opportunity graphics:

- Unemployment rate;
- Percent change in the number of jobs between 2002 and 2010 (measures access to employment); and
- Percent of residents (aged 25 or older) with less than a high school degree or equivalent.

Racial and ethnic diversity

The Opportunity Model also considered whether Census tracts increased or decreased in racial and ethnic diversity between 2000 and 2010. Diversity is measured by the proportion of the population that is a racial or ethnic minority: An increase in diversity reflects an increase in the proportion of the Census tract population that is minority between 2000 and 2010. Conversely, a decrease in diversity reflects a decrease in the proportion of the population that is minority (or an increase in the non-Hispanic white population proportion).

Opportunities and Challenges by Transect

Readers are encouraged to examine the Community Opportunity Reports, contained in Appendix A, for a representative community and county. These reports provide detailed measures of the opportunity and challenge variables analyzed. Many of the region’s urban, suburban, and rural communities replicate the opportunities and challenges found in the transect analysis.

Urban transects

Crime is the most significant challenge or urban transects, followed by high rates of poverty, low levels of educational attainment, and some limitations on residential capital investment. The focus of increasing access to opportunity in urban areas must be on crime and poverty reduction, as well as increasing resident self-sufficiency and economic opportunity through job training and education.

Suburban transects

Suburban areas score poorly on the availability of affordable rentals. These areas are also weak in creating and retaining jobs. The suburban-transect communities should recognize that affordable housing for workforce is an important component of growing jobs and housing workers.

Rural transects

The region’s rural transects score well for most variables in the Community Opportunity Rating analysis. Residents have a good mix of incomes; poverty and crime are low; school quality is mostly “academically acceptable”; many Census tracts show job growth. The weakest areas are associated with housing diversity. Although many Census tracts in rural areas

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offer affordable rentals, there are few rentals in rural communities and very few publicly subsidized rentals.

Findings from Access to Opportunity

Analyses in previous sections and output from the Community Opportunity Model demonstrate that, within the Houston-Galveston region, the greatest challenges to choice and opportunity center around the relationship of the location of subsidized and affordable housing to high opportunity and racially and ethnically concentrated areas.

Subsidized and affordable rental housing is lacking in high opportunity areas. Subsidized rental housing is housing affordable to the lowest income residents and residents with special needs. There is unmet demand in the region for subsidized rentals, evidenced by very long public housing authority wait lists – some exceeding 20,000 applicants. Affordable rentals—those that rent for less than \$500/month—are also short in supply in some areas.

On average, subsidized housing makes up a very small proportion of housing units in a given Census tract, just 4 percent of units. Yet no subsidized rentals exist in 21 percent of Census tracts (231 tracts) and 8 percent of Census tracts have high to very high concentrations of subsidized units.

On average in the region, 32 percent of rental units in a Census tract rent for less than \$500/month (“affordable rentals”). Similar to subsidized rentals, these units are not distributed equally. There are many Census tracts that have a higher proportion of affordable rental units (189 tracts) and many with a lower proportion (185 tracts).

Concentrated poverty is very high in many Census tracts. More than 900,000 people in the Houston-Galveston region live below the poverty level. Many Census tracts have very high concentrations of persons living in poverty. The region has 68 Census tracts (6% of all tracts) where poverty exceeds 40 percent. In the highest-poverty tract, 72 percent of residents are poor. The high-poverty Census tracts alone make up 13 percent of the region’s poor. Conversely, 183 Census tracts have poverty rates of less than 5 percent. These tracts house just 3 percent of the region’s poor.

Minority-concentrated neighborhoods have high concentrations of subsidized housing, high rates of poverty, and lower-performing schools. Specifically,

- 53 percent of the region’s subsidized rental units are located in minority concentrated areas, compared to 30 percent of all housing units and 38 percent of rental units.
- Similarly, 54 percent of the region’s poor live in racially and ethnically concentrated areas, compared to 32 percent of the region’s population overall living in concentrated areas.
- Concentrated areas have disproportionately high rates of rental units (42% of all units, compared to 32% for the region overall) and subsidized rental units (17% of all rental units compared with 12% for the region overall).
- 86 percent of the housing in concentrated areas is affordable to purchase (priced at less than \$150,000). This compares to 55 percent of units in the region overall.

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- Of the 2 percent of the region’s elementary schools receiving the lowest rating by the state (“Academically Unacceptable”), 58 percent were located in minority concentrated areas.

In sum, the region’s minority concentrated areas provide more than their fair share of housing for the region’s lowest income households and workers who need affordable housing.

These findings are supported by HUD’s “Disparity in Access to Opportunity Index” that compares access to five variables, in addition to overall opportunity, for the Houston-Galveston region by household type. HUD’s analysis found statistically significant differences in access to opportunity between African Americans and whites and Hispanics and whites for school quality, poverty, labor engagement and housing stability.⁵ Hispanics and whites for school quality, poverty, labor engagement, and housing stability.⁶

⁵ The difference in measures of job accessibility were significantly different for whites and Hispanics and Asians and whites, but not for African Americans and whites.

⁶ The difference in measures of job accessibility were significantly different for whites and Hispanics and Asians and whites, but not for African Americans and whites.

Section IV

Fair Housing Landscape

Section IV – Fair Housing Landscape

Introduction

This section describes the fair housing landscape in the Houston-Galveston area, beginning with an overview of Houston-Galveston area residents' housing preferences based on telephone survey data from the State of Texas Plan for Fair Housing Choice: Analysis of Impediments (Phase 2 AI).¹ Legal cases and an analysis of fair housing complaints are followed by a discussion of hate crimes and NIMBYism.

Summary of Findings

An analysis of the fair housing landscape in the Houston-Galveston area found that:

- School quality and cost are the two most important factors for choosing housing;
- Desire to avoid living near rental housing is a strong preference;
- The self-reported incidence of housing discrimination (5 percent) is much lower than the rates found in similar statistically significant surveys;
- Disability and race comprise the basis for 35 and 30 percent of fair housing complaints filed with HUD;

¹ Texas Department of Housing and Community Affairs (TDHCA). "State of Texas Analysis of Impediments – (Phase 2 in Development)." TDHCA, n.d. Web. 14 Apr. 2013. <http://www.tdhca.state.tx.us/housing-center/fair-housing/analysis-impediments-2010-2.htm>.

- Compared to the national and state rates, the Houston-Galveston area has a much lower incidence of hate crimes; and
- NIMBYism against multifamily rental developments, particularly those with an affordable or low income component, is strong in the region. Opponents to these developments are typically concerned about impacts on property values, school quality, traffic and crime.

Resident Housing Preferences

As part of the Phase 2 AI, BBC conducted a statistically valid and representative telephone survey of Texas residents.² This section presents survey results for residents living in the Houston-Galveston region. The sampling method was not designed to be statistically significant at the regional level; therefore the responses shown should be considered representative only of those who responded to the survey. The data reflect the opinions of a randomly selected set of Houston-Galveston residents.

The Phase 2 AI survey included a series of questions about respondents' satisfaction with their current housing situation, the primary factor that influenced their housing choice and the characteristics they like most and least about their neighborhood.

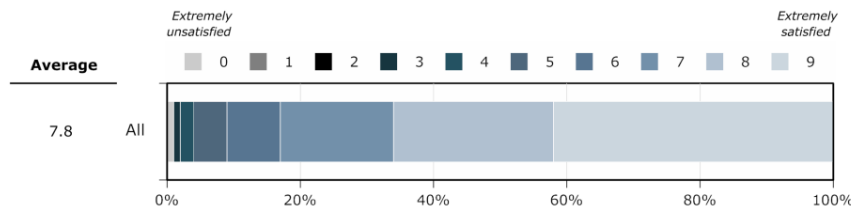
² The survey was offered in both English and Spanish. For more details on the survey methodology, see the Phase 2 AI.

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Satisfaction

Houston-Galveston area residents who participated in the Phase 2 AI telephone survey are generally very satisfied with their current housing situation as shown in Figure IV-1. Satisfaction ratings were not measurably different between whites, Hispanics and non-Hispanic non-whites and were similar to those of Texas residents overall.

Figure IV-1.
Housing Situation Satisfaction, Houston-Galveston Region, 2012



Note: n=129.

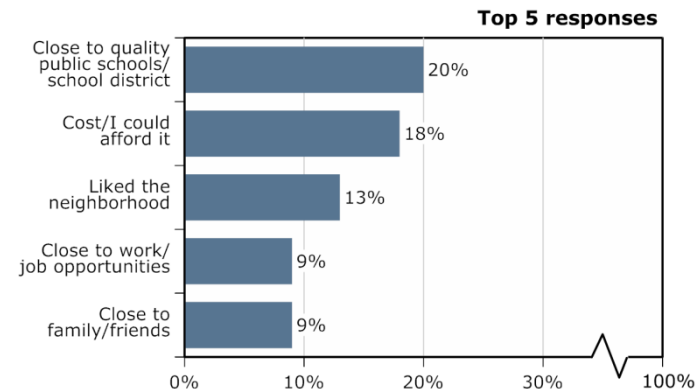
Source: BBC Research & Consulting from the State of Texas Phase 2 AI Resident Telephone Survey.

Most important factor for choosing current housing

Figure IV-2 presents the top five most important/primary factors respondents named for choosing their current housing. Schools, affordability, the neighborhood itself, proximity to employment opportunities, and proximity to family and friends comprise the top five factors. As with housing satisfaction, the primary factor for choosing their current home did not measurably vary by race or ethnicity. The five factors selected by the greatest proportion of Houston-Galveston residents mirrored those of residents statewide.

Figure IV-2.

Most Important Factor for Choosing Current Housing



Note: n=128.

Source: BBC Research & Consulting from the State of Texas Phase 2 AI Resident Telephone Survey.

Housing Preferences

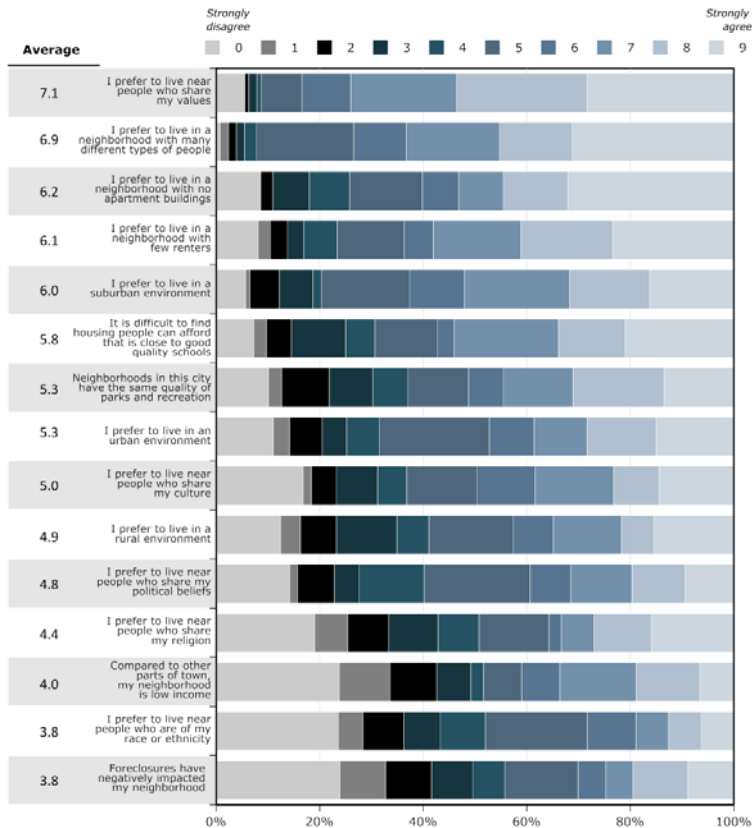
Houston-Galveston residents rated a series of housing and community preferences on a scale from 0 (strongly disagree) to 9 (strongly agree). As shown, among all the preferences rated, residents most strongly agree (average rating of 6 or higher) with the statements:

- “I prefer to live near people who share my values.”
- “I prefer to live in a neighborhood with many different types of people.”
- “I prefer to live in a neighborhood with no apartment buildings.”
- “I prefer to live in a neighborhood with few renters.”

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It is important to note that two of the top four statements Houston-Galveston residents most strongly agreed with show a clear anti-renter attitude—a finding in the statewide survey as well. Figure IV-3 presents respondents’ ratings for all housing and community preferences included in the survey.

Figure IV-3.
Housing and Community Preference Ratings



Note: n=129.

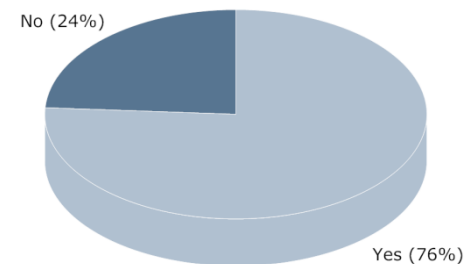
Source: BBC Research & Consulting from the State of Texas Phase 2 AI Resident Telephone Survey.

Equitable Treatment and Housing Discrimination

The Phase 2 AI survey asked respondents about their perception of how equitably people in their neighborhood are treated compared to other neighborhoods in the community and their personal experience with housing discrimination.

Most respondents from the Houston-Galveston region agree that all residents of their neighborhood are treated the same as residents of other neighborhoods in their town or city. However, one in four disagreed with this statement. This is slightly higher than found for the state overall (17 percent), but the difference is not statistically significant. There were also no meaningful differences by race or ethnicity.

Figure IV-4.
Do you feel that all residents of your neighborhood are treated equally or the same as residents of other neighborhoods in your town/city?



Note:

n=128.

Source:

BBC Research & Consulting from the State of Texas Phase 2 AI Resident Telephone Survey.

Statewide, 3 percent of survey respondents report that they have experienced housing discrimination in the past. As shown in Figure IV-5, 5 percent of Houston-Galveston residents participating in the Phase 2 AI survey believe they experienced

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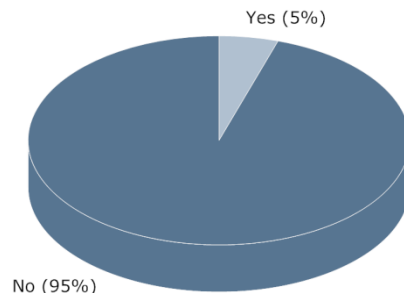
discrimination when seeking housing in the area. Both the statewide and regional figures are much lower than typically found in similar statistically valid surveys at the state, regional, and municipal levels.

Figure IV-5.
Experience with Housing Discrimination

Note:
n=128.

Source:

BBC Research & Consulting from
the State of Texas Phase 2 AI
Resident Telephone Survey.



Houston-Galveston residents who felt they were discriminated against provided the following reasons for the discrimination:

- “My ethnicity.”
- “My race.”
- “Income or race.”
- “All over Houston you have housing for rent/sale; the real estate Century 21 agent brought my husband and I to the most Hispanic areas in Houston; we told him we didn’t want to live with all the Hispanic people.”
- “Because I am young they assumed that I did not have the money to buy the home I was looking for.”

Fair Housing Issues, Services, Activities

This section explores Fair Housing Act compliance in the region, beginning with an overview of fair housing enforcement and fair housing resources. An analysis of complaints and legal cases filed in the region as well as hate crime data provide localized context about housing and other forms of discrimination.

Fair Housing Law and enforcement

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

HUD’s Office of Fair Housing and Equal Opportunity in Fort Worth (FHEO), the Texas Workforce Commission (TWC) or one of many local fair housing organizations are a resource for residents who feel that they might have experienced a violation of the FFHA. The Greater Houston Fair Housing Center (GHFHC) is the local organization serving the Houston-Galveston area.

Complaints filed with the State of Texas

TWC is responsible for overseeing and providing workforce development services to employers and citizens. The Civil Rights Division (TWCCRD) provides programs for housing discrimination and complaint resolution. The TWCCRD provides a webpage with information on how to file a complaint.³ As described on the webpage, residents can file a

³ http://www.twc.state.tx.us/crd/file_hsg.html.

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complaint in person at the Division office in Austin, by phone or by writing the Division a letter. So that residents can better identify whether or not their issue involves housing discrimination, TWCCRD's website has a fair housing fact sheet. It also describes the steps that follow the initial complaint filing.⁴

Once a complaint is received, TWCCRD notifies the alleged violator that a complaint has been filed and provides the alleged violator with an opportunity to respond to the complaint. TWCCRD assigns an investigator to determine if there is reasonable cause to believe the complaint is indeed a violation of the FFHA. If reasonable cause of a violation is found, TWCCRD will try to reach a conciliation agreement. If such an agreement is signed between the complainant and the respondent, no further action is taken unless the conciliation agreement is breached. In the event of a breach of the agreement, TWCCRD may request the Texas Attorney General to file suit.

Complaints filed with HUD

Housing discrimination complaints filed with HUD may be done online at <http://www.hud.gov/complaints/housediscrim.cfm>, toll free at (800) 669-9777, or by contacting HUD's FHEO headquarters in Washington, D.C. or HUD's Fair Housing Regional Office in Fort Worth, which serves Texas residents at (817) 978-5900 or 5595 TDD.

⁴ Residents may also write a letter to or call TWCCRD directly at (888) 452-4778, (512)463-2642 or (800) 735-2989 (TDD) and 711 (voice).

According to HUD, when a complaint is received, HUD will notify the person who filed the complaint along with the alleged violator and allow that person to submit a response. The complaint will then be investigated to determine whether there has been a violation of the FFHA.

A complaint may be resolved in a number of ways. First, HUD is required to try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and the public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached.

If HUD has determined that a state or local agency has the same powers ("substantial equivalency") as HUD, they may refer the complaint to that agency and will notify the complainant of the referral. The agency, called a Fair Housing Assistance Program Partner (FHAP), must begin work on the complaint within 30 days or HUD may take it back. TWC is the state agency FHAP in Texas, in addition to the local agencies including the Austin Human Rights Commission, the City of Corpus Christi Department of Human Relations, City of Dallas Fair Housing Office, Fort Worth Human Relations Commission and Garland Housing and Neighborhood Services. Note that the GHFHC is not a FHAP.

If during the investigative review and legal process HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in federal district court.

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Fair housing activities in the Houston-Galveston area

Across the region, individual communities support fair housing activities in a variety of ways. Many cities, counties, and organizations recognize April as Fair Housing Month and participate in fairs, meetings, and other activities to support fair housing education and outreach. Over 60 communities in the region directly considered fair housing and equity implications in their applications for over \$1 billion in Disaster Recovery Ike funding with the completion and submittal of FFAST forms.

The GHFHC is a community based organization originally founded in 1999 to educate housing providers and residents about fair housing law. Through investigation and enforcement, the Center works to prevent and resolve discriminatory acts in housing. GHFHC provides information about the FFHA, disability rights, and how to file a complaint. Individuals who believe they have experienced housing discrimination can file a complaint with GHFHC by calling (713)641-3247 or emailing houstonfairhousing@swbell.net.

The Houston Area Urban League (HAUL) is a HUD fair housing funding recipient, and has partnered with the Houston Volunteer Lawyers program to provide direct assistance to victims of housing discrimination, as well as provide training and education to community and government organizations.⁵

Other organizations in the region also provide services related to fair housing, including tenants' rights, legal services and housing counseling. The Tenant's Council of Houston provides

⁵ "Housing Programs." *Houston Area Urban League - Housing*. Houston Area Urban League, 2012. Web. 24 Apr. 2013.

a Tenants' Rights pamphlet that includes a chapter on fair housing, including how to file a complaint with HUD and information on a landlord's duty to accommodate tenants with disabilities.⁶ The Houston Apartment Association's website provides information about housing discrimination and links to local organizations for residents to contact.⁷ The Harris County Housing Resource Center (HRC) accepts fair housing complaints and provides links to information and additional reporting services.

Texas complaint trends

To provide context for the analysis of complaints filed in the Houston-Galveston area, BBC examined complaints for the state of Texas. HUD's Fair Housing and Equal Opportunities (FHEO) office in Fort Worth provided data for all fair housing complaints filed or closed with HUD and/or TWC between January 2007 and March 2012; a total of 5,232 complaint records.

Statewide, disability was the basis for slightly more than one in three complaints, followed closely by race. The incidence of housing discrimination based on religion was one in 50 complaints and color, one in 100. Figure IV-7 presents the number and basis of complaints for Texas.

⁶ Texas Young Lawyers Association and State Bar of Texas. *Tenants' Rights Handbook*. Texas Young Lawyers Association and State Bar of Texas, 2009. Print.

⁷ <http://www.haaonline.org/fairhousing/>

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**Figure IV-7.
Basis of
Complaints, State
of Texas, January
2007 through
March 2012**

Note:

One-fourth of all complaints had more than one basis; as such, the total number of bases does not match the total number of complaints.

Source:

HUD—Fort Worth FHEO.

Basis	Number	Percent
Disability	2,186	36%
Race	2,005	33%
Familial Status	699	12%
Sex	540	9%
Retaliation	325	5%
National Origin	184	3%
Religion	100	2%
Color	31	1%

**Figure IV-8.
Basis of Complaints,
Houston-Galveston
Region, August 1,
2007 through July 11,
2012**

Note:

Nearly one-fourth of all complaints had more than one basis; as such, the total number of bases does not match the total number of complaints.

Source:

H-GAC.

Basis	Number	Percent
Disability	305	35%
Race	259	30%
National Origin	128	15%
Familial Status	88	10%
Sex	41	5%
Retaliation	26	3%
Religion	15	2%
Color	3	0%
Grand Total	865	100%

Houston-Galveston area complaint trends

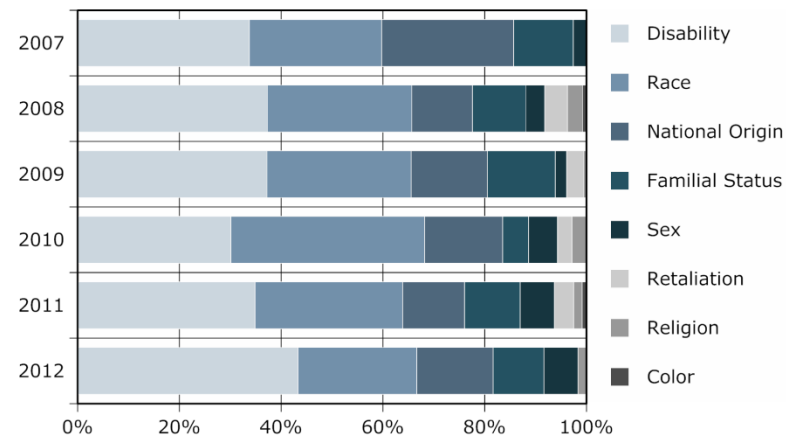
Upon request, HUD supplied fair housing complaint data for the period from August 1, 2007, through July 11, 2012, for the region. In the Houston-Galveston area, 672 complaints were filed. The basis of complaints in the Houston-Galveston area were similar to the state overall, except complaints based on national origin accounted for a larger share of the total in the Houston-Galveston area, as shown in Figure IV-8. According to the 2012 U.S. Census, the Houston metro area has nearly one million people who speak English less than “very well.” Limited English proficiency (LEP) impacts residents’ access to many government services, including access to fair housing education and the complaint reporting process.

Figure IV-9 shows the complaint basis share by year for the Houston-Galveston area. Each year, complaints based on disability, race, and national origin account for the greatest share of complaints—combined they accounted for over three quarters of all complaints each year. The share of complaints based on familial status ranged from 5 percent to 15 percent between 2007 and 2012.

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Figure IV-9.

Basis of Complaints by Year, Houston-Galveston Area, August 1, 2007 through July 11, 2012



Note: 2012 data only represent January through July 11, 2012 complaints.

Source: H-GAC.

Complaints in FHEA Communities

Figure IV-10 shows the number of complaints and the complaint count per 10,000 people for each FHEA Community. Katy had the highest number of complaints per capita with 22 complaints for every 10,000 people. Dayton was the community with the second highest complaints per capita with fewer than 10 complaints per 10,000 people. Richmond and Tomball also had relatively high complaints per capita (approximately 7 complaints per 10,000 people).

Figure IV-10.

Complaints by FHEA Community, Houston-Galveston Region, August 2007 through July 2012

City	Number of Complaints	Population	Complaints per 10,000 people
Ames	-	1,003	-
Anahuac	-	2,243	-
Bellville	-	4,097	-
Eagle Lake	-	3,639	-
Katy	31	14,102	21.98
Dayton	7	7,242	9.67
Richmond	8	11,679	6.85
Tomball	7	10,753	6.51
Conroe	21	56,207	3.736
Galveston	14	47,743	2.932
Wharton	2	8,832	2.26
Palacios	1	4,718	2.12
Houston	410	2,099,451	1.953
Huntsville	7	38,548	1.816
Baytown	13	71,802	1.81
Freeport	2	12,049	1.66
Rosenberg	4	30,618	1.306
Cleveland	1	7,675	1.303
Liberty	1	8,397	1.19
LaPorte	4	33,800	1.18
Bay City	2	17,614	1.135
Pasadena	15	149,043	1.006
Pearland	9	91,252	0.99
El Campo	1	11,602	0.86
Missouri City	5	67,358	0.742
Sugar Land	5	78,817	0.634
League City	4	83,560	0.48
Texas City	2	45,099	0.44

Note: No complaints were filed in Ames, Anahuac, Bellville or Eagle Lake.

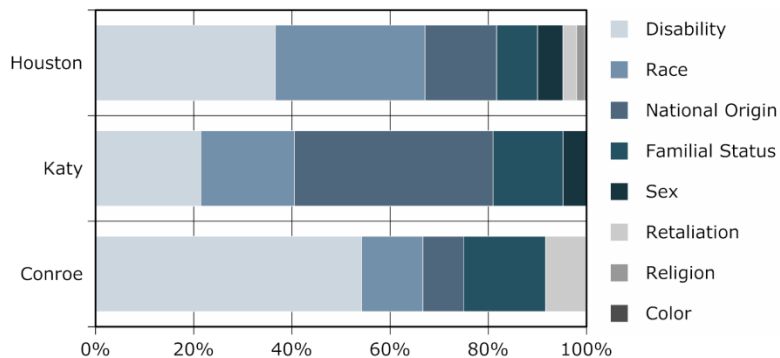
Source: H-GAC, 2010 Census.

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Basis of complaints—Houston, Katy, Conroe

Figure IV-11 examines the basis of complaints in Houston, Katy and Conroe, the FHEA Communities with the highest number of complaints. Disability was the most common basis for complaints in both Houston (37 percent) and Conroe (54 percent). However, in Katy, national origin accounted for the greatest share of complaints (40 percent).

Figure IV-11.
Basis of Complaints for Houston, Katy and Conroe,
August 1, 2007 through July 11, 2012



Source: H-GAC

Disposition of complaints

Of the 672 complaints filed in the Houston-Galveston area between August 2007 and July 2012, 297 (44 percent) complaints ended in conciliation or settlement. Thirty-six percent of all complaints resulted in a no cause determination, which occurs when HUD determines that there was no evidence of violation of the FFHA. Nineteen percent of complaints were closed for administrative reasons. Administrative closures occur when an investigation cannot be completed, the

complainant withdraws the complaint, or a trial has commenced.

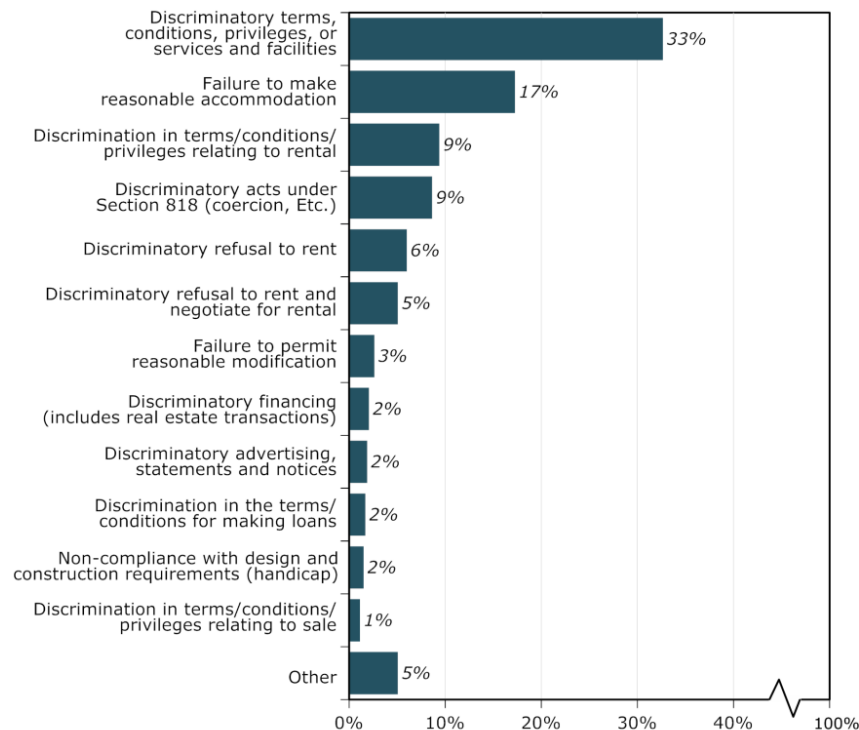
Among complaints with findings or cause or conciliation, there were few repeat offenders. Over the course of the period examined, the Houston Housing Authority was found in violation in 12 cases, the largest number against a single organization. No other housing authorities in the region were found in violation for more than one incident.

Basis for settled complaints

Figure IV-12 shows the reasons the settled complaints were filed. Most of these complaints had multiple reasons for why they were filed (e.g., discriminatory terms and conditions and refusal to rent). The most common reason for filing a complaint was “discriminatory terms, conditions, privileges, or services and facilities,” accounting for 33 percent of the settled complaints. The next largest issue found was “failure to make reasonable accommodations,” representing 17 percent of the settled complaints.

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Figure IV-12.
Settled Complaints by Reason Filed, August 1, 2007
through
July 11, 2012



Note: Most complaints have more than one reason for filing.

Source: H-GAC.

Fair Housing Testing in Houston-Galveston Area

This section summarizes the results of two studies conducted by the National Fair Housing Alliance (NFHA) that included testing in the Houston-Galveston area. It is important to note that these tests and audits may not include all recent fair housing testing that has occurred in the Houston-Galveston area.

In 2005, NFHA conducted undercover tests of rental discrimination based on race in Houston.⁸ NHFA found that African American testers were substantially less likely to be told about available units, called back or shown properties than their white test group counterparts.⁹

NFHA also reports that “in the twelve metropolitan areas investigated to date, NHFA’s testing revealed discriminatory steering practices and illegal behaviors that are both striking and pervasive.”¹⁰ This report includes the counties affected by Hurricane Katrina as one of the metropolitan areas examined.

Legal Cases

The FHEA team researched fair housing legal actions that were brought and/or resolved during the past five years and represent major fair housing legal actions in the Houston-Galveston area. The primary sources for the cases include: 1) the National Fair

⁸ *No Home for the Holidays: Report on Housing Discrimination Against Hurricane Katrina Survivors*. Rep. National Fair Housing Alliance, 20 Dec. 2005. Web. 24 Apr. 2013.

⁹ Ibid.

¹⁰ *Dr. King’s Dream Denied: Forty Years of Failed Federal Enforcement*. Rep. National Fair Housing Alliance, 8 Apr. 2008. Web. 14 Apr. 2013.

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Housing Advocate case database;¹¹ 2) the U.S. Department of Justice, Civil Rights Division;¹² and 3) legal documents.

HUD v. Pinnacle Homestead Management INC (2009)

This case involved a single African American female and her four children who were given an eviction notice from their apartment complex in Columbus, Texas because of exceeding occupancy limits. In response, the mother required her son, not listed on the lease, to live with his aunt outside of the complex. The child's mother would travel to take her child to and from the apartment complex so he could ride the bus to school and then return back to his aunt's home. Apartment management noticed that the child was still taking the bus to school and staying in his mother's apartment after school and began to block the child's ability to ride the bus by giving a list to the bus driver. At the same time, a white family with four children who lived in the same complex was not subjected to any of the management's occupancy limit requirements. The African American family moved from the property because of the restrictions. The management company was found to have violated the FFHA and was required to compensate the family for the damages caused by the discriminatory practices.

¹¹ <http://www.fairhousing.com>

¹² <http://www.justice.gov/crt/about/hce/caselist.php>

Texas Low Income Housing Information Service, Texas Appleseed v. State of Texas (2010)

A Federal Fair Housing Act (FFHA) complaint filed by Texas Low Income Housing Information Service and Texas Appleseed against the State of Texas alleged that the state violated the FFHA in administration of its federal housing and community development funds by 1) making housing unavailable on the basis of race, color, and national origin; 2) discriminated in the terms, conditions, or privileges of sale or rental and in provision of services or facilities because of race, color, and national origin; and 3) failed in its obligation to affirmatively further fair housing. The complaint resulted in a conciliation agreement which requires, among other things, an updating of the Texas AI, in two phases, training to recipients of federal housing and community development funds, and specific methods for distributing disaster recovery funds.

This case spurred the creation of the Fair Housing Activity Statement—Texas form (FHAAT form). The FHAAT form that was developed as part of the Phase 1 AI is a tool that jurisdictions receiving state and federal housing and community development funding must use to communicate their role in affirmatively furthering fair housing choice to the state and HUD. Responding to the requirements of the FHAAT form encouraged many communities in the Houston-Galveston region to address fair housing and the requirement to affirmatively further fair housing as part of their local disaster recovery efforts.

The FHEA team examined jurisdictional AI and FHAAT Forms from the region, noting major common impediments, such as

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restrictive zoning codes, discriminatory lending practices, and NIMBYism. Appendix B contains more in-depth analysis.

Hate crimes

The incidence of hate crimes and the prevalence of hate crime groups can be an indicator of discrimination concerns even though they do not directly link to housing discrimination. Enacted in 1990, the Hate Crime Statistics Act requires the Department of Justice to collect data on crimes which “manifest prejudice based on race, religion, sexual orientation, gender or gender identity, disability or ethnicity” from law enforcement agencies. By law, findings from the data collection are publicly available through the Department of Justice.

Designating a crime to be a hate crime is the responsibility of local agencies. If a local agency determines that a crime is based on race, religion, sexual orientation, ethnicity or national origin, or disability, the crime is included in the data. Note that the crimes included in the data represent only the crime, not convictions.

In 2010, Texas had the most law enforcement agencies participating in hate crimes reporting of any state. These agencies reported 174 hate crime incidents or 0.69 per 100,000 residents.¹³ This is significantly lower than the national average of 2.33 incidents reported per 100,000 residents and 3.62 (the high) reported incidents for residents in New York State.

¹³ The FBI uses a basis of 100,000 persons to compare hate crime data between states.

Hate crime in the Houston-Galveston area

There were 30 reported hate crimes in the Houston-Galveston area in 2010, or 0.49 incidents per 100,000 residents, lower than the state rate (.69 per 100,000). Just over half were race-based hate crimes with another 13 percent (4 hate crimes) based on ethnicity and national origin.

Basis for hate crime

Nationally, in 2010, 47 percent of all hate crime incidents were race related. Religion and sexual orientation was the subject of 20 and 19 percent of hate incidents, respectively. Ethnicity and national origin based hate crime incidents accounted for 13 percent. Disability and multiple-bias incidents accounted for less than 1 percent combined. Compared to national figures, Texas hate crimes have a similar distribution across bias categories, except religious hate crimes are less common in Texas than in the nation as a whole. Compared to the state, the Houston-Galveston region has a higher share of hate crimes based on sexual orientation and a much lower share of crimes based on religion. Figure IV-13 shows hate crime statistics by bias motivation.

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Figure IV-13.

Hate Crimes in the United States, Texas and the Houston-Galveston Region, 2010

	United States		State of Texas		Houston-Galveston Region	
	Number	Percent	Number	Percent	Number	Percent
Race	3,135	47%	85	49%	16	53%
Religion	1,322	20%	19	11%	1	3%
Sexual Orientation	1,277	19%	39	22%	9	30%
Ethnicity and National Origin	847	13%	30	17%	4	13%
Disability	43	1%	1	1%	—	0%
Total Reported Crimes	6,628	100%	174	100%	30	100%

Source: US Federal Bureau of Investigation—Hate Crime Statistics.

Hate groups

The Southern Poverty Law Center is a nonprofit organization dedicated to civil rights, fighting hate and seeking justice for the most vulnerable. As part of this mission, the law center monitors hate crime incidents and hate-based organizations. The count and characterization of hate crime groups by the Southern Poverty Law Center was compiled using hate group publications and websites, citizen and law enforcement reports, field sources and news reports. Nationally there are about 1,000 known active hate groups; 45 are located in Texas.

There are nine active hate crime groups in the Houston-Galveston region: five are pro-white, two are pro-black, one is anti-immigrant and one is pro-Christian.

NIMBYism

This section summarizes recent incidents of NIMBYism in the Houston-Galveston area related to the development of affordable housing. Analysis of NIMBYism in the context of fair housing is complicated because it is difficult to determine if opposition to affordable housing is related to protected classes. Resistance to or denial of affordable housing in general does not violate fair housing laws. However, if denial or affordable housing disparately impacts protected classes, this may be a fair housing violation.

At its most basic level, NIMBYism is citizen opposition to development, whether the development is residential, commercial or for public uses (e.g., landfills). Citizens voice their opposition through public processes, public hearings or meetings, and the media. NIMBY opposition to development can, but may not always, reflect the opinion of a majority of residents. Houston-Galveston area residents' strong preference to live in a neighborhood with no apartment buildings and few renters—similar to preferences expressed by residents statewide—may underlie organized resistance to multifamily developments, particularly resistance to LIHTC or other affordable housing developments.

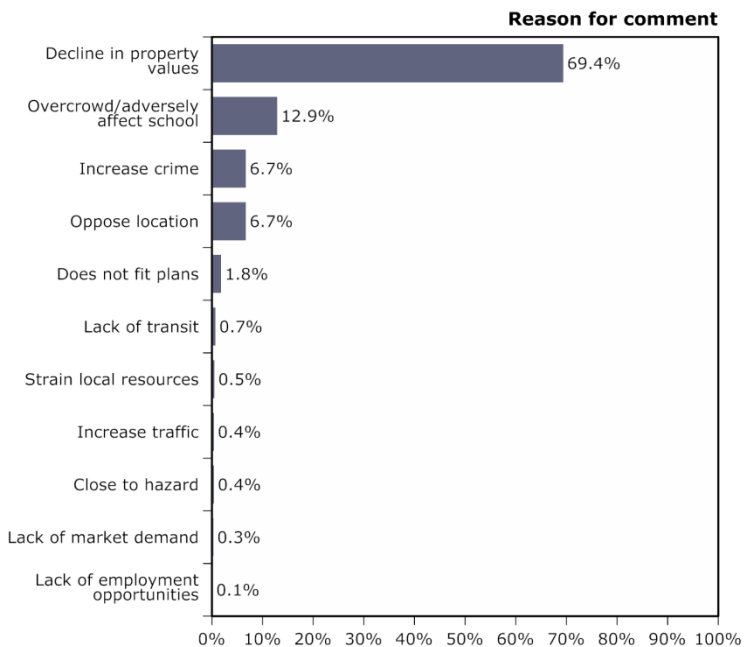
The TDHCA manages the state's LIHTC program. As part of the process, TDHCA tracks informal support and opposition of LIHTC development proposals sent to TDHCA in the form of letters, emails, and petitions.

Figure IV-14 summarizes the public comments received by TDHCA for the 2012 LIHTC process based on the reasons for opposition. These comments are attributed to 131 projects seeking LIHTC financing. As shown, the concerns raised by the

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greatest number of opponents focus on the impact of affordable housing on area property values, local schools, crime and the location of the proposed development. Out of the 980 comments summarized, 69 percent concerned the perceived negative impact of affordable housing development on property values.

Figure IV-14.
Summary of 2012 LIHTC Application Opposition Comments - Texas



Note: n=980 comments for 131 projects statewide in 2012.

Source: BBC Research & Consulting from TDHCA's 2011-2012 Public Comment Summary – LIHTC.

Residents express NIMBYism for many reasons, as shown in the Figure IV-14 and the examples that follow. In addition to

the analysis of opposition comments gathered by TDHCA, the study team tracked news articles from the Houston-Galveston area to identify the type and prevalence of community resistance to affordable housing, rental housing and housing likely to be occupied by protected classes. This is not meant to be an exhaustive examination of reports of NIMBYism; rather, the aim is to identify examples of NIMBYism in the Houston-Galveston area.

Examples of NIMBYism

Based on news reports, common concerns Houston-Galveston area residents express as their reason for opposing multifamily development, senior housing, and affordable or low income housing (LIHTC developments) include the impact of the development on:

- Residential property values;
- Local school crowding and quality;
- Traffic and congestion; and
- Crime.

These reasons for opposition expressed by Houston-Galveston area residents in public meetings and the media are very similar to those submitted in writing to TDHCA. We explore each of these primary factors using recent examples reported in the media. As noted by the examples, NIMBYism opposition does not solely apply to low- to moderate-income developments, but can impact higher end, multi-unit projects.

Recent examples of NIMBYism in the Houston-Galveston area unrelated to LIHTC applications include:

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- Sugar Land residents proposed an ordinance to make it difficult to build multifamily rental units in the city after City Council approved more than 1,600 apartments in three locations. The residents' proposed ordinance would have been so restrictive that it would have the effect of blocking future multifamily rental development. City officials argued that a diverse housing stock was important to having a vibrant community.
- Residents of Meyerland unsuccessfully protested the development of housing and supportive services for single mothers because they feared the project would negatively affect property values. St. John's Presbyterian Church, in partnership with Presbyterian Children's Homes and Services (PCHAS), proposed the construction of a seven-unit multifamily development to house single mothers and their children on property owned by the Church. In fall 2012, neighbors in Meyerland formed the "Stop PCHAS" and encouraged the Meyerland HOA to use association dues to pursue legal action to stop the development. In early 2013, PCHAS signed a lease agreement on the land and construction on the units is underway.
- One of the most recent, high-profile NIMBY efforts in the region resulted from the planned replacement of 569 public housing units destroyed by Hurricane Ike in Galveston. An initial legal settlement required the city to rebuild the lost housing. This changed in summer 2012, when there was a local proposal to use Section 8 vouchers to provide replacement housing instead of rebuilding the units. In fall 2012, HUD intervened, requiring the city to rebuild the public housing units or risk losing more than \$500 million in federal aid available to restore some of the island's public infrastructure.

The public housing controversy raised many issues about the appropriate siting of public housing and fair housing choice, as well as HUD's and the judicial system's role in requiring affordable housing. In an interview with the Wall Street Journal, Galveston Housing Authority's Board Chair expressed his preference to have the number of homes to be rebuilt decided by the judicial system, adding "Galveston does not want to be the dumping ground for every city's waiting list of people needing low income housing."¹⁴

On September 29, 2012, the Galveston City Council approved a plan to rebuild, which calls for 1) 141 public housing units or 113 public housing units and 28 project-based vouchers at the sites of the demolished Magnolia Homes and Cedar Terrace projects; and 2) 388 single and multifamily units on scattered sites, of which up to 50 units can be built outside of the city but within county limits.

- Residents of the Rice University area have actively protested the development of the Ashby high-rise (officially 1717 Bissonett), a 21-story higher-end apartment complex. The reasons for opposition include increased traffic and noise in the residential area. In May 2013, a group of residents sued the high-rise developer, citing concerns about physical damage and safety issues associated with construction.¹⁵ Demolition of the existing structure began in May 2013 to make room for the high-rise project.

¹⁴ Whelan, Robbie. "Galveston Still Holding Out in Public Housing Fight." Weblog post. *The Wall Street Journal*. The Wall Street Journal, 20 Aug. 2012. Web. 14 April 2013.

¹⁵ Sarnoff, Nancy. "Ashby High-rise Developer Gets Sued." *Houston Chronicle* [Houston] 2 May 2013: n. pag. Print.

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NIMBYism and LIHTC

The LIHTC program is the most sought after and well funded program to produce affordable housing units in Texas (and other states). Although the subsidy for tax credits is federal, states allocate credits and, as part of this process, develop a Qualified Allocation Plan (QAP) that outlines development preferences and scoring. In Texas, “community support” is a factor in scoring of LIHTC applications. Elected official approval of a proposed LIHTC housing project is also part of the scoring and award process.

Since community support is a factor in scoring for the highly competitive LIHTC application process, developers seeking the credit are often at the mercy of organized citizens. NIMBY opposition often results in the developer reducing a proposed project’s density, altering the proposed design, building materials or project layout, or, in the most extreme case, withdrawing their application altogether. As shown in the following examples, the most common reasons for opposition focus on property values, negative impacts on school capacity and quality, fear of crime, and increased traffic.

- In March 2013, a developer sought a resolution of support from the Houston City Council for a senior living community that would feature affordable service-enriched senior residences in Kingwood.¹⁶ The letter of support was for the developer’s LIHTC application. In response to neighborhood concerns, the developer had already reduced

¹⁶Summer, Jennifer. “Kingwood Residents Express Concern over Senior Living Community, MainStreet Kingwood.” *YourHumbleNews.com*. Humble Observer, 21 Mar. 2013. Web. 28 Apr. 2013.

the total number of residents from 121 to 96 and had increased green spaces. In a town hall meeting with the developer, residents expressed concerns about the impact of the development on their property values as well as the “affordable” nature of the development. The resolution supporting the development failed to pass.¹⁷

- Two developers intended to secure LIHTC financing for low income apartments in the Copperfield area. Upon learning of the proposed projects, the Copperfield Coalition, an association of active neighbors, met with developers. After these meetings, one developer withdrew his application.¹⁸ In a community meeting attended by 200 outraged neighbors, the remaining developer withdrew his request for community support. Community members expressed concern about crime and the impact of the development on property values. One resident was quoted as saying, “We believe that such housing should be kept in like areas, such as I-45N at West Little York, 290 at W. 34th, Hempstead Highway between 610 and Gessner, the Hobby Airport area, etc., not in a community with homes ranging from \$175,000 to \$1,000,000 plus.” According to the coalition. “These [sic] low income housing should be restricted to areas ranging in home values of \$50,000 or

¹⁷ “Proposed Housing Project Fails to Pass City Council - Thursday, March 28, 2013 - Copyright 2007 Ourtribune.com.” *OurTribune.com*. The Tribune Newspapers, 28 Mar. 2013. Web. 28 Apr. 2013.

¹⁸ Simmons, Crystal. “Proposed Low-income Development Raises Concerns in the Community.” *CypressCreekMirror.com*. The Cypress Creek Mirror, 14 Mar. 2013. Web. 28 Apr. 2013.

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less.”¹⁹ After this April 2013 meeting, the remaining developer withdrew his application for LIHTC financing.

- In December 2012, the Deer Park ISD Board signed a contract with a developer to build 100 affordable units on surplus land in Pasadena for low income apartments. Once word of the proposed development reached nearby residents, they banded together in opposition. More than 400 residents petitioned the Board and the Board received more than 1,000 emails opposing the project. As a result of citizen opposition, in March 2013, the Board cancelled the contract.²⁰
- Residents of Spring are expressing their opposition to two proposed low income developments by writing letters to their state representative in the hopes that they can stop the development due to their concerns about reduced property values and increased crime. ABC Local News in February 2013, this project has not yet been awarded LIHTC funds.²¹

Anti-NIMBY policies

As part of the FFAST form process, many communities in the region have committed to develop anti-NIMBY policies. It is

¹⁹ Simmons, Crystal. "Copperfield Residents Stall Developer's Plans for Low-income Apartments." *CypressCreekMirror.com*. The Cypress Creek Mirror, 18 Apr. 2012. Web. 28 Apr. 2013.

²⁰ Nix, Kristi. "DPIISD Trustees Cancel Housing Project Contract." *www.yourdeerparknews.com*. Deer Park Broadcaster, 19 Mar. 2013. Web. 19 Apr. 2013.

²¹ Lodhia, Pooja. "Spring Neighborhood Concerned about Proposed Low-income Housing Project." *ABC Local News*. N.p., 5 Feb. 2013. Web. 19 Apr. 2013.

too soon to judge the effectiveness of these efforts. The City of Friendswood has developed an Anti-NIMBYism Action Plan that includes the following steps:

- Informing developers of potential NIMBY pitfalls at regularly scheduled Development Review Committee (DRC) meetings. Developers will be encouraged to work with the community and city staff involved with the DRC will participate in fair housing training.
- Friendswood has a notification policy that informs residents within 200 feet of the boundaries of proposed rezoning applications and replat application. This policy, in addition to regularly posted agendas and meeting notes from the Planning and Zoning Commission, the Zoning Board of Adjustment and City Council properly inform residents about development issues.
- The final component of the Anti-NIMBYism Action Plan consists of the city holding public hearings and town hall meetings on proposed developments that may spark NIMBY opposition.

Conclusions

The Houston-Galveston region fair housing landscape is filled with major challenges and opportunities centered around public outreach and education efforts; regional coordination; and testing, reporting, and enforcement infrastructure.

The Phase 2 AI Survey results indicate that housing discrimination is much lower in the Houston-Galveston region than in other areas. However, it is important to note that these positive notes are not necessarily indicative of the region as a whole. There are major deficits in fair housing knowledge amongst the general public and local governments. This

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combination contributes to the underreporting of housing discrimination for many reasons:

- Victims do not realize they have been discriminated against;
- Victims do not know where to report the incident; and
- Victims do not have the means or time to follow through with complaints.

Many jurisdictions and organizations provide fair housing literature and incorporate fair housing information into official documents. However, because of lack of funding and prioritization, there exists no regional coordination efforts that focus on outreach and education, let alone testing and reporting.

FHAST Forms and AIs require jurisdictions to identify major impediments to affirmatively furthering fair housing. While this section focuses on the regional challenges of the fair housing landscape, Appendix B analyzes these obstacles in more detail. The following points are common to both sections:

- Fair Housing complaint and reporting procedures are not easily accessible by the public;
- Land use and zoning codes impact the development and placement of affordable housing options, yet they are rarely scrutinized;
- NIMBYism has the most impact in affordable housing development and is often framed around complaints of lower property values and increased traffic; and
- There is a hesitance to address fair housing at a local level through resolutions and policies, but there is a willingness to participate in regionally driven fair housing initiatives.

Section V

Best Practices and Recommendations

Section V – Best Practices and Recommendations

Introduction

This section provides a framework for the FHEA goals and strategies, and it begins with a recap of the findings from Sections II and III. The bulk of this section is dedicated to a discussion of the activities that are most important to increase opportunity in the Houston-Galveston region. The best practices, recommendations, and case studies referenced are in no way an exhaustive list of potential approaches. They are intended to direct interested parties to the more comprehensive and diverse strategies in the Regional plan for Sustainable Development (RPSD).

Findings – Indicators and Access to Opportunity

Analyses in previous sections and output from the Community Opportunity Model demonstrate that, within the Houston-Galveston region, the greatest challenges to choice and opportunity are:

Subsidized and affordable rental housing is lacking in high opportunity areas. Subsidized rental housing is housing affordable to the lowest income residents and residents with special needs. There is unmet demand in the region for subsidized rentals, evidenced by very long public housing authority wait lists. Affordable rentals—those that rent for less than \$500/month—are also short in supply in some areas.

On average, subsidized housing makes up 4 percent of housing units in a given Census tract. Yet no subsidized rentals exist in 21 percent of Census tracts, and 8 percent of Census tracts have high concentrations of subsidized units.

On average in the region, 32 percent of rental units in a Census tract rent for less than \$500/month (“affordable rentals”). Similar to subsidized rentals, these units are not distributed equally. There are many Census tracts that have a much higher proportion of affordable rental units (17 percent of Census tracts) and an equal number of tracts with a much lower proportion (17 percent).

Concentrated poverty is high in many Census tracts. More than 900,000 people in the Houston-Galveston region live below the poverty level. Many Census tracts have very high concentrations of persons living in poverty.

- The region has 68 Census tracts (6 percent of all tracts) where the poverty rate exceeds 40 percent.
- In the highest-poverty tract, 72 percent of residents are poor (below the poverty level). The high-poverty Census tracts alone make up 13 percent of the region’s poor.
- Conversely, 17 percent of Census tracts have poverty rates of less than 5 percent. These tracts house just 3 percent of the region’s poor.

Minority-concentrated neighborhoods have high concentrations of subsidized housing, high rates of poverty and lower-performing schools.

- Specifically, 53 percent of the region’s subsidized rental units are located in minority concentrated areas, compared to 30 percent of all housing units and 38 percent of rental units.

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- Similarly, 54 percent of the region’s poor live in racially and ethnically concentrated areas, compared to 32 percent of the region’s population overall living in these concentrated areas.
- Minority impacted areas have disproportionately high rates of rental units (42% of all units, compared to 32% for the region overall) and subsidized rental units (17% of all rental units compared with 12% for the region overall).
- 86 percent of the housing in minority concentrated areas is affordable to purchase (priced at less than \$150,000). This compares to 55 percent of units in the region overall.
- Of the 2 percent of the region’s elementary schools receiving the lowest rating by the state (“Academically Unacceptable”), 58 percent were located in minority concentrated areas.

In sum, the region’s minority concentrated areas provide a disproportionately high share of housing for the region’s lowest income households and workers who need affordable housing.

These findings are supported by HUD’s “Disparity in Access to Opportunity Index” that compares access to five variables, in addition to overall opportunity, for the Houston-Galveston region by household type. HUD’s analysis found statistically significant differences between Hispanic and white households for school quality, poverty, labor engagement, job accessibility, and housing stability. The index found statistically significant differences between African American and white households for

school quality, poverty, labor engagement, and housing stability.¹

Goals for Increasing Access to Opportunity

The modeling and analysis conducted for this report suggest that the region should focus on two broad goals to increase access to opportunity:

- 1) Diversifying housing stock, and
- 2) Reducing and improving high poverty areas.

Key to achieving these goals—and ultimately, providing a greater access to opportunity—center around the following efforts, which are discussed in more detail in this section:

- Increasing employment and build self-sufficiency of residents living in poverty-concentrated areas;
- Promoting balanced housing stock where subsidized and affordable housing stock is lacking;
- Revitalizing disadvantaged communities while preserving their cultural heritage and income, racial and ethnic diversity;
- Addressing NIMBYism, which can be a barrier to housing diversification;

¹ The index also found a significant difference in measures of job accessibility for Asians and whites.

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- Boosting resident access to capital to purchase and/or improve a home;
- Being a model for regional collaboration to advance opportunity; and
- Improving the regional fair housing infrastructure.

Case studies and best practices are provided as available to demonstrate how cities and counties in the Houston-Galveston region can improve the environment for their residents. These should be considered by FHEA-designated communities, as well as those that are not.

In addition to case studies and best practices, the economic benefits of addressing the challenges are provided, where available. Where data are not available, the section discusses the rationale for the effort.

The FHEA's Potential Impact

The FHEA's power to affect change is limited by a number of factors, the most significant being limited authority over jurisdiction governance or regional decision-making. Yet the FHEA can play a valuable role in guiding and leading jurisdictions to adopt policies and practices that increase access to opportunity region-wide through the following:

- Directing planning and public investment toward activities that help achieve greater housing diversification, resident self-sufficiency and poverty reduction;

- Leading efforts to provide education and outreach to communities and residents resistant to housing stock diversification, as well as fair housing information;
- Making poverty and crime reduction and investments in education and job training a priority in the region; and
- Supporting organizations to affect change in the region's most challenging Census tracts.

Increasing Employment and Self Sufficiency

This effort supports the RPSD goals of:

RPSD Goal: Our region's residents have access to education and training opportunities to allow them to realize their full potential.

RPSD Goal: Our region has a diverse economy and skilled workforces that support businesses, innovation, and entrepreneurship.

Economic benefit

Having a well-educated, well-trained workforce has always been a strong community benefit, but this has become increasingly important as industries in the U.S. have become more specialized and segmented. California's Silicon Valley is perhaps the best evidence of how businesses in the technology industry have clustered around centers of highly-educated workers and leading research institutions.

The Houston-Galveston region has been fortunate to have weathered the recent economic downturn better than many cities in the country. The region's diverse economy, high-demand

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industries, and well-educated workforce have contributed to its economic success and low unemployment.

Not all residents in the region have experienced this good fortune, however. Unemployment is high—in some cases exceeding 22 percent—in many Census tracts within first ring suburbs to the north, east and south of Houston. These areas would benefit from focused job training and education improvement initiatives.

Some of these areas are also those of concentrated poverty, for which the solution is more complicated. To equalize poverty among all Census tracts, more than 250,000 persons in poverty would need to move to a lower-poverty Census tract—an improbable solution. A more viable solution to poverty deconcentration is one that combines housing diversification with neighborhood improvement, crime reduction and resident programs that focus on building individual self-sufficiency—a combination of the efforts addressed throughout this section.

Case studies/best practices

The Aspen Institute has recently released several research reports that focus on addressing unemployment and raising self sufficiency, particularly in the wake of the current recession. The Institute’s research has found that collaboration across multiple institutions is imperative to build the academic, supportive-service and employment needs of low income workers. Successful strategies include:

- Combining the strengths of community colleges and local workforce nonprofits. Students are served more effectively by a joint effort than by the organizations alone.

- Targeting a specific industry or cluster of occupations.
- Supporting students’ efforts to improve workforce skills by providing counseling, social services (e.g. child care) and in some cases, basic skills development.
- Connecting with area businesses and providing labor market navigation services to students to help find jobs and improve their job hunting and communication skills.

Many recent research papers have emphasized that the residents for whom programs are intended should also be the agents of change. Top town government programs have been found to be less effective than resident-involved programs. Examples are found in the following case study, in addition to the Midtown Global Market, Minneapolis case study.

Case study-Carbondale volunteer and mentor program

Carbondale, Colorado is a “down valley” community, meaning a town that provides workers and affordable housing to expensive resort areas—in this case, Aspen. The relationship between down valley communities and resort areas is similar to that between lower income, minority concentrated neighborhoods and affluent neighborhoods in urban areas.

This relationship can isolate lower income workers who spend many hours commuting and don’t identify with the communities in which they work and/or stay-at-home parents supporting working spouses with long commutes. Language barriers and poverty can exacerbate this isolation.

Carbondale’s new Valley Settlement Project’s goal is to bring “disenfranchised residents” into the community by providing

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them with volunteer opportunities ranging from tutoring at local schools to building community playgrounds. The primary goal of the program is to “empower marginalized families, interrupting the conditions and disconnection that perpetuates poverty and poor student achievement.”²

The project was initiated with a \$1.2 million grant from the Kellogg Foundation. It is sponsored by the local Manaus Fund, which invests in programs to “strengthen, diversify and empower communities.” Before launching the program, the Manaus Fund interviewed families, service providers and school administrators to identify the reasons for gaps in self-sufficiency of low income families.

Early returns on the program are positive. Those involved with the program report that not only are adults enrolled in the program investing more in their children, they are also investing in themselves (e.g., by taking GED courses). An added benefit is that the community is brought closer together by the program: “This is making a huge difference,” the school district superintendent told the Denver Post. “It is sending an important message to the community of acceptance and inclusion.”³

Recommended action steps for the Houston-Galveston region

To increase the self-sufficiency of low income residents, there is a need for regional collaboration to promote local empowerment programs. Recommended action steps include:

² <http://www.manausfund.org/partners/valley-settlement-project/>

³ Denver Post Editorial Board. “A Message of Inclusion for Immigrants in Carbondale.” *DenverPost.com*. The Denver Post, 14 May 2013. Web. 14 June 2013

Explore partnerships with small business lenders

A focus should be placed on encouraging collaboration with small business lenders, such as the community development financial institutions (CDFIs) that serve the Houston-Galveston region, to discuss potential partnership opportunities. The San Antonio-based ACCION, which provides lending to small businesses, has been very successful in obtaining large institutional support from the U.S. Treasury (New Markets Tax Credits or NMTC) and Goldman Sachs to leverage small business lending activities. Houston is one of six cities where the Goldman Sachs fund (through ACCION) offers small business loans to growing businesses in economically disadvantaged areas. The Dallas-based Texas Mezzanine Fund has been successful in obtaining NMTC statewide. The Austin-based PeopleFund, which has an office in Houston and also provides small business lending, is another potential partner.

Successful partnership models are found in the history of Hope Credit Union, with branches in Mississippi and Arkansas. The credit union was borne out of a desire to empower low income residents in Jackson, Mississippi.

The credit union empowers low income residents and communities in many ways. The credit union maintains branches in distressed neighborhoods, so residents have access to traditional banking products. Hope also makes loans to organizations and nonprofits that serve low income and special needs residents. Finally, Hope provides loans and banking services to businesses that make a positive contribution to distressed areas.

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Capitalize on large scale economic development efforts

The Houston-Galveston region is expected to experience significant increases in cargo traffic due to the expansion of the Panama Canal. In anticipation, the area has completed several large-scale infrastructure projects with more planned. Regional coordination among businesses, community colleges and job training centers is needed to share information about the workforce skills required in the future and how to best prepare residents to fill some of the new jobs.

Continue to support workforce development

With the federal government placing a premium on economic development projects that reshore American jobs and increase capacity within the local-regional supply chain, there are many additional opportunities to increase the links between new and growing industry and the local workforce. Economic development entities in the region should continue to support efforts by groups like H-GAC Workforce Solutions, which partner with the region's businesses, educational institutions, and community organizations to train and connect job seekers with the current and future labor needs of the region.

Promoting Balanced Housing Stock

One of the top level goals of the RPSD is: *Our region provides choices for individuals and for local communities to fulfill their needs.* This section contains recommendations for how the region can work to fulfill that goal in terms of housing choice.

One of the more challenging aspects of promoting balanced housing is providing housing to the region's very lowest income households. The review of the PHA 5-year plans found more

than 22,000 low income households on the wait list for Section 8 vouchers or public housing units.⁴ These very low income households typically need government-subsidized housing for which funding has declined.

Economic benefit

There are many costs to affordable housing concentration, from increased traffic congestion to social isolation to poor educational outcomes. These costs are addressed elsewhere in this report. This section discusses the positive effects of affordable housing development, which exist and have been well-documented, counter to many widely-held beliefs. These benefits take the form of:

- diversified property tax base,
- job creation, and
- improved school quality.

It is important to note that the location of the affordable developments, scale/size of developments, and management of the units are all key to the realization of these benefits. The lack of affordable housing options negatively impacts the entire region, and thus, regionally-based solutions can be most effective when addressing the challenges.

⁴ This accounts for duplication among households on individual PHA wait lists, but not for households on more than one PHA wait list. It is an upper bound estimate of need.

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Diversified tax base

Many recent studies of consumer housing preferences document a shift in preferences toward lower-maintenance homes in walkable environments with community amenities. This type of housing is a departure from much of the development in the last housing boom, which focused on larger, suburban homes in auto-oriented environments.

A recent, large-scale housing preference survey of households by generational cohort found high demand for smaller, denser housing requiring shorter commutes, especially for Baby Boomers (born between 1947 and 1965 and numbering 75 million) and Generation Y (born between 1979 and 1995, nearing 80 million people).⁵ It is likely that as Baby Boomers age, there will be increased demand for housing that is low maintenance, not expensive and is in a supportive environment, near relatives and friends.

In Texas, city revenues are largely generated from local sources, such as property taxes. A recent survey conducted by the Texas Municipal League (TML) indicates that over half of all municipal general fund revenue (61.4 percent) comes from combined property and sales taxes.⁶

⁵ Riggs, Trisha. "The Future of Housing Demand Is Compact, Urban, and Transit-friendly." *Urban Land Institute Spring Meeting*. Urban Land Institute, 15 May 2013. Web. 10 June 2013.

⁶ The general fund is used to account for all general municipal revenue and expenditure. General fund services most often include police, fire protection, parks and recreation, transportation, finance and municipal administration.

Cities, therefore, have an incentive to maintain strong residential property values. Providing a range of housing choices helps hedge against shifts in consumer preferences.

Master-planned developments that incorporate housing types that accommodate a diversity of housing preferences and lifestyles—including affordable housing—have already shown to have stronger economic demand in the market. This is likely to continue as Generation Yers and their parents influence future housing demand.

Job creation

A number of recent studies have quantified the economic effects of affordable housing development and/or housing rehabilitation. These studies are aggregated in a January 2011 literature review conducted by the Center for Housing Policy and funded by the Macarthur Foundation.⁷ The paper profiles a 2010 research study conducted by the National Association of Homebuilders (NAHB), which found that building 100 units in a Low Income Housing Tax Credit (LIHTC) development for families created 80 construction (direct) jobs, 42 indirect jobs and 30 new jobs to support ongoing resident activities—in addition to more than \$2 million of earnings for local businesses. The economic effect was on par with the effect produced by a market rate rental property development.

⁷ "Center for Housing Policy Highlights the Role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development." *Housing Trust Fund Project*. The Center for Community Change, Nov.-Dec. 2011. Web. 28 April 2013.

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Educational improvement

A recent study by the Federal Reserve Bank of Dallas examined the impact of the LIHTC program on local school performance (both school accountability ratings and standardized tests), using time-series data.⁸ The authors found “little evidence for adverse effects from LIHTC units on neighborhood schools.” In fact, some analyses found that the addition of LIHTC units had a positive influence on school accountability in higher-income Census block groups. The authors concluded that “children living in LIHTC properties may perform better in their new schools than the existing students.”

It is important to note that the effect of the LIHTC developments differed depending on the income level of the block group. Units that were added to high-poverty block groups did not positively affect school performance, yet units developed in higher income block groups did.

Case studies/best practices

A recent study by the American Planning Association (APA) Research Department, funded by HUD, reviewed a host of regional and statewide affordable housing programs including fair share programs, affordable housing trust fund programs and public-private sector partnerships to determine the most

successful approaches to retaining and developing affordable housing on a multi-jurisdictional level⁹.

The authors identified a set of best practices and “lessons learned” for a regional approach to affordable housing. Those lessons that could be considered as the region moves toward a more integrated housing strategy include the following:

- The most important element in ensuring the provision of affordable housing on a regional basis is political will and leadership.
- The need for affordable housing must be reframed as a market inefficiency to be corrected rather than as charity or welfare for the poor or less deserving.
- A regional institution must be charged with identifying and understanding the scope of the affordability problem on a regional basis and creating a forum for action.
- Advocates for affordable housing production must understand the role of the market in housing provision. The private sector plays a critical role in the solution.
- The state’s role is critical, especially in high-cost, high-growth regions of the United States. States need to be aggressive in persuading local governments to remove regulatory barriers to affordable housing.

⁸ Di, Wenhua, and James C. Murchoch. *The Impact of LIHTC Programs on Local Schools*. Working paper no. 1006. Dallas: Federal Reserve Bank, 2010. Print.

⁹ Meck, Stuart, Rebecca Coleen. Retzlaff, and James Schwab. *Regional Approaches to Affordable Housing*. Chicago, IL: American Planning Association, 2003. Print.

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- Reliable sources of funding for subsidies and for supporting infrastructure for affordable housing are essential.
- Local governments must have a full toolbox of techniques to provide affordable housing opportunities. Often this toolbox requires state authorizing legislation or hands-on assistance.

Case study – Lowry Air Force Redevelopment

Lowry Air Force Base was a former training facility that became part of the Base Realignment and Closure (BRAC) list in 1991 and closed in 1994. The closure was estimated to cost the Denver area 7,000 jobs and \$295 million in annual spending. The Lowry site consisted of more than 1,800 acres, stretching from east Denver into the large suburban city, Aurora.

Soon after the closure, the Cities of Denver and Aurora adopted a joint Reuse Plan and formed the Lowry Redevelopment Authority (LRA), which is still in operation. LRA acquired approximately 850 acres of the site from the Air Force through a \$32.5 million economic development conveyance. LRA also received a \$6 million grant from the U.S. Economic Development Administration to make infrastructure improvements on the site.

Besides being the fastest former base to redevelop into new use, Lowry adopted a very progressive land use plan which allowed for a wide variety of housing types and prices, repurposed or reused many existing structures and preserved open space. This “inner suburban” neighborhood has approximately 4,500 homes, 85 acres of commercial uses, two community colleges,

several K-12 campuses and 800 acres of open space and recreational use.

The mix of housing types that can be found in the Lowry neighborhood include:

- Single-family detached, custom built executive homes,
- Temporary, transitional housing for the homeless,
- Land trust townhomes for purchase by very low income households,
- Traditional single family homes,
- Many attached housing products—condominiums, duplexes, rowhomes and urban lofts, and
- Assisted living and senior housing facilities.

Home sales in Lowry have traditionally been very strong and weathered the housing recession very well. More information on the Lowry redevelopment and neighborhood amenities can be found at: <http://www.lowry.org/>

Recommended action steps

Diversifying housing opportunities in the region will require 1) Alleviating the concentration of affordable units in certain Census tracts, 2) Adding affordable and subsidized rentals to areas lacking affordability, and 3) Encouraging the development of mixed-income developments and communities in the future. Recommended action steps for these strategies include the following.

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Regional action steps

- A regional entity or collaboration of entities could provide guidance and leadership on how the jurisdictions can increase housing diversity, both by type (multifamily, single family) and price point. A centerpiece of this effort might be hosting workshops about the economic benefits of planned, mixed-income developments communities.
- A regional entity could take the lead on educating jurisdictions about model regulations and practices to promote a continuum of housing types (also see the Action Steps for counties/communities below). This could include promoting practices of permitting by right group homes in residential settings and encouraging visitability in development. The Real Estate Center at Texas A&M has developed a brochure called “Me, You and Grandpa, too” (<http://recenter.tamu.edu/pdf/1807.pdf>) that nicely describes the benefits of universal design and could be included in such educational efforts.
- A regional entity could sponsor information sessions for PHAs about how to increase mobility using best practices from literature (e.g., PPRAC’s “Practical Strategies for Building a Successful Housing Mobility Program”¹⁰) and from the field (local housing authorities’ innovative practices, Texas Apartment Association’s recommendations for working with landlords).

¹⁰Scott, Molly M., Mary Cunningham, Jennifer Biess, Philip Tegeler, Ebony Gayles, and Barbara Saard. *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program*. Rep. no. 13718. Poverty and Race Research Action Council, Feb. 2013. Web. 14 Apr. 2013.

Action steps for counties/communities

As mentioned previously, the APA best practices research determined that local governments must have a full “toolbox of techniques” to promote the creation of affordable housing. To that end, the region could encourage adoption of best practices by their jurisdictions, such as:

- **Adoption of a visitability ordinance to encourage or require universal design in new construction.** Pima County, Arizona, for example, requires that all new single housing incorporate visitability standards. Arvada, Colorado, a suburb of Denver, requires that 15 percent of all new housing developments meet universal design standards or payment of a fee-in-lieu. In addition, at least one model home within each qualifying residential development shall be built with a step-free building entrance and all interior visitability features. Some communities require universal design in all construction that has public funding.
- **Consideration of deconcentration policies where needed.** In communities where affordable housing and poverty is concentrated—particularly those with RCAPs and ECAPs—policies to avoid further concentration of affordable housing should be considered. Harris County has utilized such a policy – the Affordable Multi-unit Family and Senior Housing Concentration Policy - for

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LIHTC properties and the county has been highlighted in HUD studies for the policy’s impacts.¹¹

- **Reviews of zoning/land use regulations and similar materials to ensure they do not create barriers to fair housing choice.** In suburban and rural communities, land use and zoning regulations are often very basic and sometimes do not include language that is important for Fair Housing Act compliance. Most common are barriers created by special permit requirements for group homes housing persons with disabilities and/or failure to permit group homes by right in at least one residential district. Counties and communities should review their regulations for such barriers, in addition to how well they allow and promote diverse housing types.

This review should include an examination of materials including Comprehensive Plans, government websites, promotional and branding items. For example, community goals of “supporting existing character and community charm,” imply homogeneity and exclusiveness and should be avoided.

- **Innovation to accommodate changing needs.** As communities age, their incentive to find ways to accommodate a growing senior and disabled population increases. Las Cruces, New Mexico, for example, recently began including wheelchair ramps as an eligible

improvement in the city’s HUD-funded home modification program.

Revitalizing Distressed Communities

Included in the RPSD prosperity goals is: *Our region embraces its rich multicultural, historical, and natural assets to ensure its communities retain their unique character.* This section addresses the challenge of revitalizing distressed communities in the region—with a focus on high poverty areas—while preserving their heritage and character.

As discussed in Section III, research shows that a 40 percent poverty threshold is the point at which an area becomes socially and economically dysfunctional. Six percent of all Census tracts (67 tracts) in the Houston-Galveston region have poverty rates over 40 percent. Those high-poverty tracts are also characterized by high unemployment, limited access to job training centers, out-of-balance housing stock (disproportionately high share of rentals and subsidized housing) and limited access to residential capital. Many of the residents living in these areas are racial/ethnic minorities—64 of the 67 tracts are RCAPs/ECAPs.

These high poverty areas have traditionally been located in the urban core, but this has changed recently, as cities have grown in demand and affordable housing has been easier to find in suburban areas. Since the 1990s, poverty in the suburbs has been increasing at a faster rate than in cities and non-metropolitan areas. A recent study by the Brookings Institution reports that more of the nation’s poor people live in the suburbs

¹¹The Harris County deconcentration policy can be found at http://www.harriscountytexas.gov/CmpDocuments/103/Housing_Policies/D_Turkel_CSD_Approval_of_Affordable_Multi_Unit_Family_&_Senior_Housing_Concentration_Policy.pdf

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than in urban cities.¹² In the Houston-Galveston region, nearly three-fourths of the high poverty Census tracts are located in suburban communities.

The Community Opportunity Model (discussed in detail in Section III) identified nine Census tracts in the Houston-Galveston region as extremely distressed, based on negative indicators for housing opportunity, income and poverty, employment and education, community and schools and racial/ethnic variables. All of those tracts are in Harris County—four in the inner ring suburbs and five in the urban core.

Economic benefit

The economic costs associated with poverty in general and distressed communities in particular are well-documented and numerous. These generally include:

- Poor educational outcomes;
- High crime;
- Vacant and underutilized property;
- Depressed commercial activity;
- Low residential investment; and
- Limited homeownership opportunities.

In addition, a substantial body of literature on neighborhood effects shows that negative outcomes for those in poverty are

exacerbated when living in distressed or high poverty neighborhoods.

Revitalizing distressed communities creates direct economic benefit through an increase residential investment, property values, employment and resident income. It also generates a secondary economic benefit by mitigating the negative “neighborhood effects” of high poverty areas. Finally, revitalization can help to break the cycle of generational poverty, which is key to overall poverty reduction.

Case studies/best practices

Many of the case studies and best practices presented in the Increasing Employment and Self-Sufficiency, Promoting Balanced Housing Stock and Boosting Access to Residential Capital are also applicable to community revitalization. These activities play an important role in revitalization, but significant improvement in impoverished areas generally requires an “all hands on deck” approach. The most effective revitalization strategies, according to a 2006 paper on community development in areas of poverty, take a market approach: “Where community development has worked, it has done so by increasing market demand in poor neighborhoods.”

Case study—Midtown Global Market, Minneapolis

An empty Sears store on Lake Street, a major corridor in the city that had experienced significant decline, was transformed into one of the city’s largest indoor public markets through partnerships with neighborhood groups, community leaders and private businesses. The mission of the market is to give “new and emerging entrepreneurs,” many low income and recent immigrants, a place to support a business. The market has also

¹² Kneebone, Elizabeth, and Alan Berube. *Confronting Suburban Poverty in America*. N.p.: Brookings Institution, 2013. Print.

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helped stabilize and transform the surrounding neighborhood—part of the market’s “social mission that will provide a return many times greater than the initial investment.”

Development of the market began when the City of Minneapolis began exploring reuse potential of a former Sears retail building. Neighborhood organizations and the Latino Economic Development Center took an interest in the potential reuse of the site. They worked with the Neighborhood Development Center (NDC)—a nonprofit redevelopment corporation started as a community development bank subsidiary—to develop the global marketplace concept. The African Development Center became part of the team (called MGM) and together, the team created a development proposal for the city.

The Market opened for business in May 2006. Redevelopment of the site was accomplished through broad support and financing from local businesses, the city and the nonprofit development team. The MGM Business Owners Association and business owners within the Market continue to participate in operating decisions; the market is managed by NDC. For more information about the market see <http://www.midtownglobalmarket.org/>.

Recommended action steps

Community revitalization encompasses a range of issues and cannot be addressed by focusing on a single element of distress. Success is best achieved through a holistic community approach. That said, even small steps toward revitalization can be a catalyst for broader change. Recommendations for counties and communities are presented below.

Action steps for counties/communities

- **Improve local ability to deal with vacant/blighted properties and educate local governments on effective strategies, such as land banking.** Land banking can be an effective tool for acquiring vacant/blighted properties. Land banking, which is commonly used to preserve land for affordable housing, has been increasingly used in communities to address revitalization needs.

A regional entity could investigate the feasibility of community approaches like the City of Dallas’ Urban Land Bank Demonstration Program. Dallas’ program is used to acquire unproductive and vacant, developable lots and abandoned, vacant, and uninhabitable houses to be “banked” for affordable housing development. These lots are then sold through an RFP to nonprofit community development corporations for rehabilitation and new development to house low and moderate-income homeowners and stabilize distressed communities.

- **Take a leadership role in promoting community-oriented revitalization models.** A regional entity could convene and sponsor community dialogues about regional revitalization efforts, as well as promote successful case studies like the Midtown Global Marketplace. Major themes could include: how redevelopment efforts should be tailored to individual neighborhoods as the factors contributing to neighborhood distress are different in different areas; how neighbors, community leaders, Community Development Corporations (CDCs) should play a significant role in revitalization efforts; and how collaboration promotes the efficient use of resources while

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mitigating risk for individual organizations. It is also important to invest in building the capacity of CDCs and other community groups to empower those entities to tackle complex projects and sustain the redevelopment momentum.

- **Improve access from distressed areas to job training centers and/or employment centers.** The analysis of the location of job training centers and areas of high unemployment in the region showed a significant disconnect between locations. A regional entity could take the lead on exploring solutions, which could include coordinated transportation planning that utilized FHEA data and focused on increasing access to existing training/employment opportunities.

Addressing Not-in-My-Backyard Syndrome

This effort supports the RPSD Goals of:

RPSD Goal: Our region provides choices for individuals and for local communities to fulfill their needs.

RPSD Goal: Our region's communities have a range of quality housing choices that meet the diverse needs and preferences of all residents.

As discussed in Section IV, in its broadest version, NIMBYism is citizen opposition to development. In the context of fair housing, NIMBYism is often associated with opposition to the development of affordable housing for low income households, homeless persons, seniors, or persons with disabilities.

In Texas, the LIHTC program provides a substantial share of the state's affordable housing, and this is also true in the Houston-Galveston area. As part of the evaluation process for the award of LIHTC financing, points are awarded to applications that demonstrate support for a project from elected officials and the community. Section IV included an analysis of public comments received by TDHCA on the 2012 LIHTC applications; the 131 applications generated nearly 1,000 comments in opposition with the majority related to concerns about an application's potential negative impact on property values. Similarly, an analysis of media coverage in the Houston-Galveston area in 2012 and 2013 revealed evidence of successful NIMBY opposition to affordable housing developments, including LIHTC applications. If communities in the region are committed to providing a balanced mix of housing for residents of all ages, incomes and abilities, NIMBYism must be addressed proactively, while respecting and valuing neighbors' legitimate concerns.

Economic benefit

There are many economic benefits of development processes that allow for open, transparent dialogue. Neighbors have a vested interest in development that shapes their neighborhood and home values, particularly since the investment in the home is the largest asset of most households. Neighborhood input can result in developments that are better designed, have lower negative impacts and are more likely to be patronized by surrounding residents.

Yet public input has economic costs, generally in the form of higher development costs, delayed realization of tax revenues generated by the development and time spent addressing

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neighbors' concerns. Strong opposition to development can result in developers cancelling the project, as demonstrated by several of the examples from the Houston-Galveston area presented in Section IV.

Affordable housing developments can face some of the strongest opposition of any development type. The economic costs—and benefits—of affordable housing are complex and not readily understood by neighbors. Few believe that affordable housing offers any economic gains. Review of the literature on NIMBY opposition to affordable housing reveals that opposition is often rooted in fear of how affordable housing, and its tenants, will impact neighborhood quality, crime, traffic, safety, local schools and most importantly, property values.

NIMBY opposition to affordable housing may disparately impact protected classes. If this is the case, actions to deny such housing may violate the Fair Housing Act. It is important for developers, local elected officials and staff to understand the potential fair housing implications of local practices. The Housing Alliance of Pennsylvania produced a comprehensive toolkit for affordable housing developers about the potential fair housing implications of NIMBY opposition to affordable housing, such a toolkit can also be informative to elected officials.¹³

Economic benefits from affordable housing availability

Several researchers note that when new industries evaluate prospective locations for their business, they examine the extent

¹³ <http://www.fhcsp.com/Links/toolkit.pdf>

of workforce housing available in the community.¹⁴ Communities with balanced housing options available to workers across the income spectrum appeal to industry. With new business comes new jobs and expands the ad valorem tax base. It is not surprising that some communities with very expensive housing and an inadequate supply of affordable housing are at risk of losing basic services provided by lower wage workers. In *Creating Inclusive Communities in Florida: A Guidebook for Local Elected Officials and Staff on Avoiding and Overcoming the Not in My Backyard Syndrome*, the author cites the Florida Keys and Naples, Florida as examples of this phenomenon.

Impact of affordable housing on property values

As detailed previously, one of the most common arguments against affordable housing developments by NIMBY opposition is the perception that proximity to affordable housing has a negative impact on property values. Numerous studies have examined the affect of proximity to affordable housing on residential property values. Arizona State University's Stardust Center synthesized the results of more than 20 recent (post-1995) studies that examined these impacts.¹⁵ These researchers found there is not a single simple answer. Rather, the affect—positive, negative or no affect—of proximity to affordable

¹⁴ Ross, Jaimie. *Creating Inclusive Communities in Florida: A Guidebook for Local Elected Officials and Staff on Avoiding and Overcoming the Not in My Backyard Syndrome*. Rep. Tallahassee: 1000 Friends of Florida, n.d. Print.

¹⁵ Ahrentzen, Sherry, PhD. *How Does Affordable Housing Affect Surrounding Property Values?* Issue brief no. 1. Phoenix: Stardust Center for Affordable Homes and the Family, Arizona State University, 2008. Print.

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housing on property values depends on contextual conditions. These conditions can be broadly grouped into four categories:

- **Replacement**—Studies show that when blighted, vacant or other undesirable uses are replaced by quality affordable housing as part of a larger revitalization effort, neighboring property values are positively affected.
- **Degree of concentration of affordable housing units**—Depending on the host neighborhood context, the scale of affordable housing developments can have a positive, neutral or slightly negative impact on property values. Studies show that large affordable housing developments built in distressed areas as part of a larger revitalization effort (see Replacement above) have positive impacts on property values. In higher income areas, smaller scale affordable housing developments also have positive effects. There is no magic number for the number of units that have neutral or negative impacts; this depends on the neighborhood context and local market forces.
- **Host neighborhood context**—Overall, studies demonstrate that affordable housing is least likely to have neutral or negative impacts on property values when the “host neighborhood” is a high opportunity area, with low poverty, and the affordable housing development is well managed.
- **Management**—Good management seems to have a positive or neutral impact on property values. Several studies find that seasoned nonprofit affordable housing developers managing properties have a positive impact on

neighboring property values.¹⁶ The studies’ authors suggest that these experienced nonprofit organizations are more likely than other types of developers to have a long term commitment to the property, but this is just a hypothesis. An alternative theory is that nonprofit organizations tend to develop smaller properties, in terms of units, in higher opportunity areas and thus the positive property value impact is driven more by the scale of development and neighborhood context.

Case studies/best practices

This section outlines effective methodologies for approaching NIMBY opposition to affordable housing development and presents case studies and best practices for implementing the methodologies outlined below.

Elements of successful anti-NIMBY strategies

With respect to proactively addressing NIMBY opposition to affordable housing development, both academics and practitioners suggest education is the most effective strategy. Through a review of the literature, the most common and successful strategies all include three key elements:

- Educating local elected officials about the importance of affordable housing in their community;
- Educating the public about the importance of affordable housing in their community; and

¹⁶ *Ibid.*

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- Providing accurate information to neighbors residing near proposed affordable housing developments.

A fourth element falls to the development community, and that is good design and property management and maintenance.

The National Center for Real Estate Research outlines six strategies for gaining community support for affordable housing¹⁷:

1. “Establish a public commitment to affordable housing.
2. Acknowledge that negative community impacts can occur and that NIMBY is not an irrational response of fanatics.
3. Good design counts and it does not have to jeopardize affordability.
4. Communicate early and often. Target communications to elected officials and neighbors of proposed developments.
5. Address the fiscal impact of affordable housing with accurate, comprehensive data.
6. Develop a clear record that is well documented. Provide accurate information about the costs of excluding affordable housing as well as the benefits of including affordable housing.”

¹⁷ Koebel, C. Theodor, Robert E. Lang, and Karen A. Danielson. *Community Acceptance of Affordable Housing*. Faculty publication (SEPA) 350. N.p.: Virginia Tech University, 2004. Print.

In a seminal paper published in the *Journal of Affordable Housing*, Tim Iglesias outlines his approach for “Managing Local Opposition” (MLO) based on his experience working on two regional affordable housing projects that included gaining approval for more than 20 development proposals.¹⁸

Iglesias’s MLO approach advises developers of affordable housing to:

- Be proactive and collaborative;
- Consider and involve five key audiences—elected officials, supporters, concerned neighbors, media, and the courts; and
- Integrate legal strategies, community organizing and public relations.

Through advance planning, developers are encouraged to carefully listen to neighborhood concerns and to be prepared to modify plans to better tailor the project to the neighborhood’s context. This may involve increasing open space, reducing density or altering the project’s design to better blend with existing architecture. Successful processes include managing information wisely and providing facts to counter common arguments, such as a perceived negative impact of a project on property values.

¹⁸Iglesias, Tim. “Managing Local Opposition to Affordable Housing: A New Approach to NIMBY.” *Journal of Affordable Housing* 12.1 (2002): 78-122. Print.

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Educating local officials about the importance of affordable housing in their community

In *Creating Inclusive Communities in Florida: A Guidebook for Local Elected Officials and Staff on Avoiding and Overcoming NIMBY Syndrome*, author Jaimie Ross considers local elected officials the “linchpin in the NIMBY battle.”¹⁹ This guidebook is one of the best examples of an educational tool for informing local elected officials about affordable housing and its role in their community. Ross defines affordable housing, provides local examples of the types of people who live in affordable housing and reasons for including affordable housing in communities. The guidebook also includes a discussion about fair housing.

Actions local officials can take to reduce NIMBYism

Colorado’s Division of Housing developed an affordable housing guide for local officials.²⁰ One chapter provides best practices for anti-NIMBY efforts. The best practices stress the importance of promoting the value of affordable housing to the community, responding to concerns with facts and implementing a process that is inclusive and responsive to neighbors and other key constituents. The six actions recommended for local officials are:

- “Anticipate and address neighborhood concerns regarding the developing area or the specific project.
- Provide factual information on community issues, i.e. design, density, crime, traffic, parking or other topics.
- Promote housing affordability as a positive and important factor in improving neighborhood conditions.
- Ask about people’s concerns and acknowledge-address those concerns.
- Require housing developers to contact and involve all neighborhood groups and constituencies to insure their inclusion in the process.
- Demonstrate that affordable housing is a local community asset, i.e. provides housing for the workforce, provides local jobs during and after construction, brings federal and state subsidies, addresses jobs/housing balance, generates sales tax revenues, reduces traffic/pollution.”

These best practices for addressing NIMBY opposition could serve as the basis for anti-NIMBY policies. Many communities in the Houston-Galveston area have committed to develop such policies as part of their FFAST Form submission.

Educating the public about affordable housing: the Faces and Places of Affordable Housing campaign

One of the most successful examples of a campaign to educate the public about affordable housing originated in the City of Fort Collins, Colorado. In 2002, the City, in partnership with a leading developer of affordable and market rate housing, conceived the Faces and Places of Affordable Housing poster

¹⁹ Ross, Jaimie. *Creating Inclusive Communities in Florida: A Guidebook for Local Elected Officials and Staff on Avoiding and Overcoming the Not in My Backyard Syndrome*. Rep. Tallahassee: 1000 Friends of Florida, n.d. Print

²⁰ Colorado Division of Housing. *Affordable Housing: A Guide for Local Officials*. Publication. Colorado Department of Local Affairs, 2007. Web. 14 Apr. 2013.

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campaign.²¹ Working with a community readiness model developed by the Colorado State University's Tri-Ethnic Center for Prevention Research, the campaign was designed to inform residents that:

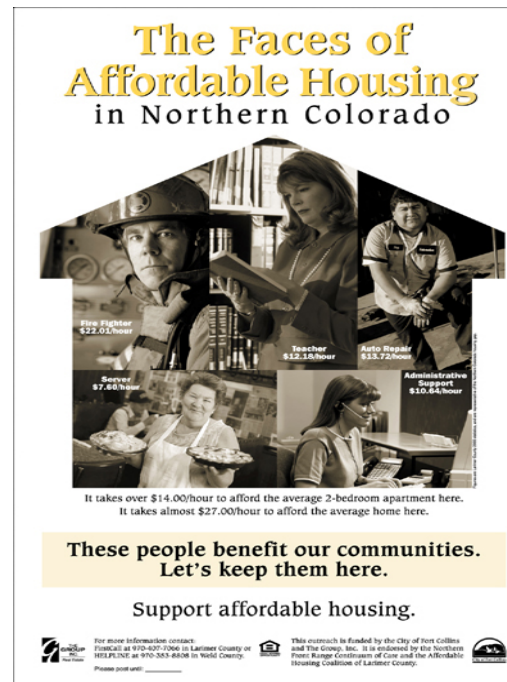
1. The unmet need for affordable housing in the community is a problem.
2. This unmet need is a local problem (not some other community's problem).
3. It is everyone's problem (at least to some extent).

The award-winning campaign's purpose was to change residents' attitudes about the types of people who live in affordable housing and their impression of what affordable housing "projects" look like.

Figure V-1 presents the poster designed to communicate the faces of residents who live in affordable housing, their hourly wage and the gap between their earnings and the average rent in the community. The City of Fort Collins partnered with numerous private and nonprofit organizations to distribute more than 3,000 posters throughout the community.

²¹ "Behind the Award-Winning 2002 "Faces & Places of Affordable Housing" Poster Campaign." *Faces & Places Posters*. City of Fort Collins, n.d. Web. 14 Apr. 2013. <<http://www.fcgov.com/socialsustainability/faces-places-posters.php?key=affordablehousing/faces-places-posters.php>>.

Figure V-1.
The Faces of Affordable Housing Poster

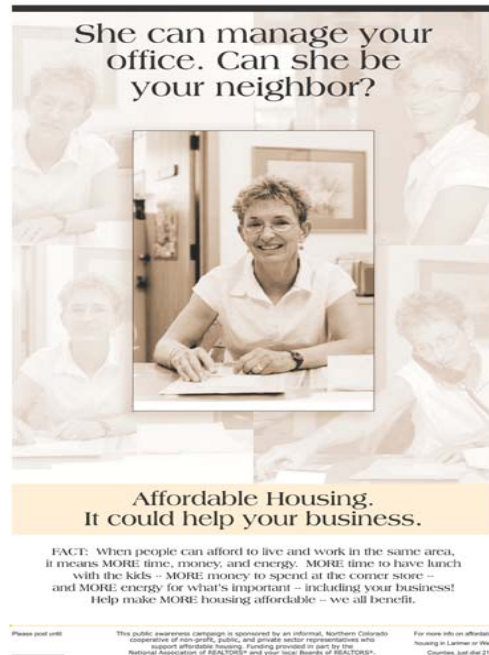


Source: City of Fort Collins,
<http://www.fcgov.com/socialsustainability/posters.php#2>

Figure V-2 shows the 2004 versions of the Faces of Affordable Housing campaign. Each of the 2004 posters featured actual community residents with the message, "Can I be your neighbor?" and facts supporting the economic benefits of having fire and health care professionals, administrative clerks and teachers living in the community.

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Figure V-2.
Faces of Affordable Housing Campaign, 2004 poster



Source: City of Fort Collins,

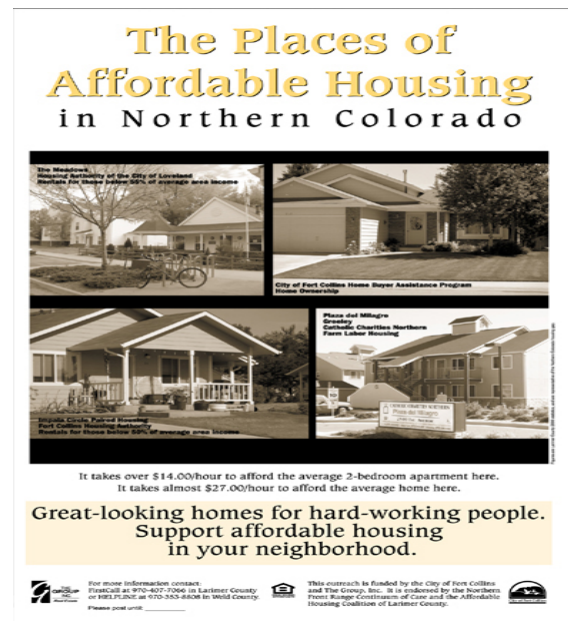
<http://www.fcgov.com/socialsustainability/neighborposters.php?key=affordablehousing/neighborposters.php>

The second component of the campaign sought to change residents' preconceived notions of what affordable housing looks like. It is not uncommon for residents to perceive modern affordable housing developments to have the look and feel of the "projects" developed in the 1960s and 1970s.

Figure V-3 shows the poster developed to show actual affordable housing developments in the area.

This campaign has been adapted and implemented in 18 states. On their website, Fort Collins discusses the campaign in detail and provides lessons learned. In addition, communities interested in tailoring the campaign to their community can easily do so by submitting a form, and the City will send the design files and specifications for the posters.²²

Figure V-3.
Places of Affordable Housing Campaign



Source: City of Fort Collins,

<http://www.fcgov.com/socialsustainability/posters.php#2>

²² "2004 Affordable Housing Poster Campaign 'Can I Be Your Neighbor?'" *Faces & Places Posters*. City of Fort Collins, n.d. Web. 14 Apr. 2013.
<<http://www.fcgov.com/socialsustainability/neighborposters.php?key=affordablehousing/neighborposters.php>>.

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Minnesota affordable housing campaign

Like the Fort Collins campaign, Minnesota Housing Partnership's (MHP's) statewide media campaign focused on putting a face to affordable housing. The faces of the MHP campaign included teachers, child care workers, line cooks and mechanics. Unlike the Fort Collins campaign, the MHP work did not create a specific linkage between wages. This campaign included a paid media component, giving the message high visibility.

Figure V-4.
Minnesota Housing Partnership campaign billboard



Source: Minnesota Housing Partnership,
<http://www.mhponline.org/policy/policytoolbox/73-campaign-advertisements/73-campaign-advertisements>

Figure V-5.
Minnesota Housing Partnership



Source: Minnesota Housing Partnership,
<http://www.mhponline.org/policy/policytoolbox/73-campaign-advertisements/73-campaign-advertisements>

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City Planning 101—City of Lakewood Citizen’s Planning Academy²³

Each year, the City of Lakewood, Colorado offers a series of six workshops to educate interested members of the community about the dynamics of city planning. Each session covers a different topic. In the 2012 sessions, topics included:

- Introduction to Planning and Community Vision;
- Zoning and Subdivision;
- Transportation Planning;
- Hands-on Site Planning exercise; and
- Legal Issues.

The purpose of this program is to engage the community in the myriad issues involved with land use and transportation planning in this mid-size inner ring suburb of Denver. The sessions purposely do not advocate for a particular planning point of view (e.g., smart growth), but provide the educational framework for citizens to understand how their community makes land use decisions and the legal framework within which planners must operate. This education program helps reduce NIMBYism by teaching community members about the diverse housing needs in the community.

Regional action steps

- Make a public commitment supporting balanced housing opportunities, including affordable/workforce housing

²³ <http://www.lakewood.org/PlanningAcademy/>

throughout the region. This commitment can take the form of a resolution or official policy to acknowledge the importance of balanced and affordable housing options, like a concentration policy.

- Convene local elected officials for a dialogue about affordable housing and NIMBYism.
- Develop or support a regional public education campaign about affordable housing. Consider using the Faces and Places of Affordable Housing as a model.
- A regional entity or partnership of local organizations can offer assistance or guidance in developing anti-NIMBYism policies to jurisdictions as part of implementing commitments made in the FFAST form process.
- Develop a model plan or toolkit for local elected officials in the region with practical, actionable ways to support opportunities to develop affordable housing in their community and strategies to effectively address NIMBY concerns. A toolkit developed by two councils of government and the Eastern Maine Development Corporation is an example.²⁴
- Support communities with best practices, research and communication strategies they can use to mitigate the effects of NIMBYism on housing choice. The creation of a regional clearinghouse for fair housing information can assist smaller communities in tailoring model practices to their jurisdiction.

²⁴ <http://www.kvcog.org/Affordable%20Housing%20Tool%20Kit.pdf>

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Action steps for counties/communities

- Make a public commitment supporting balanced housing opportunities, including affordable/workforce housing. Jurisdictions can pass a resolution for promoting balanced housing opportunities, which can be part of a new or existing Fair Housing Resolution. Also, model ordinances can be used to address obstacles created by land use practices that negatively impact housing options.
- Support a regional public education campaign about affordable housing and its benefits to the community.
- Adopt an anti-NIMBY policy that:
 - Affirms the community’s support for affordable housing;
 - Facilitates an open and inclusive fact-based public input process; and
 - Commits to work with developers on good design and management/maintenance.

Boosting Access to Residential Capital

As discussed in Section II of this report, Home Mortgage Disclosure Act (HMDA) data were analyzed to pinpoint areas in the Houston-Galveston region where investment in residential capital (e.g., home improvement loans, home purchases) is low. The analysis also examined disparities in loan approvals by race and ethnicity.

The analysis found that the region’s minority applicants faced much higher denial rates when they applied for a mortgage loan. African American applicants in the region were denied

mortgage loans 33 percent of the time; Hispanic applicants were denied 31 percent of the time. White and non-Hispanic applicants, in contrast, were denied a much lower 20 percent of the time.

Walker, Waller and Wharton Counties stood out as having very high lending disparities for African Americans, but not for Hispanic applicants: in these three counties African Americans were denied loans 49, 55 and 49 percent of the time, respectively. These counties have some of the most “high opportunity” Census tracts.

Section II also reported that the region has a very high rate of households who do not use insured depository institutions for banking.

Economic benefit

In the region overall, during 2012, 21 percent of mortgage loans applied for by residents were denied. The total value of owner occupied loans not made because of denials in 2012 alone was \$21.6 million.²⁵ The impact was disproportionately greater for minority applicants whose loans were denied at a higher rate.

Altogether in the region, 40 percent of households are unbanked or underbanked, which is significantly higher than the U.S. overall (28%). A recent study by the Brookings Institution found that a full time worker loses as much as \$40,000 during their career by using check-cashing services. Applying this to the estimate of region households who are un- and underbanked (almost one million) suggests that the annual loss of regional

²⁵ The total value of loans made was \$98.7 million.

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spending on goods and services rather than check cashing fees is \$950 million.²⁶

In sum, the economic loss related to personal credit challenges in the region is significant. And these data only capture the costs associated with personal credit. The loss to communities at risk of decline and distress is not measured, and likely very large. It is far more efficient for the public sector to address these issues in early stages, before communities are plagued with widespread foreclosures, declines in property values, vacant properties and inability to maintain public infrastructure.

Case studies/best practices

There are many examples nationwide of CDFIs that provide loans to consumers in disadvantaged areas. Recent innovations in consumer lending have focused on bringing the under- and unbanked into traditional banking products. Two credit unions—one in northern California and one in Denver—have created “check cashing” branches that are paired with traditional branches. These credit unions offer products and environments that appeal to consumers who are more comfortable using alternative financial transactions. For example, these branches offer very low cost checking services, low cost wire transfers (to send money to family members), stored-value cards and multi-lingual services. Financial literacy classes are also available at the branches, along with programs to help consumers build credit.

²⁶ This assumes that a household loses \$1,000 per year to check cashing fees.

Regional action steps

- A regional entity could make available the information on the economic loss to the region from personal credit challenges to the business and lending community and help support and organize efforts to address the challenges. This data can be organized and distributed alongside other demographic data from a regional clearinghouse.
- Future HMDA data will contain much more information about consumer creditworthiness, including applicants’ credit scores. A regional entity could routinely analyze and use new HMDA data (or circulate such an analysis performed by other institutions) to inform communities about areas where denial rates are high and could signal disinvestment. The same entity could also use such an analysis to support and help organize region-wide financial literacy programs.
- The FDIC study on un- and underbanked households concluded that households with a positive experience with banking rely less on alternative financial services such as payday lenders. Improving residents’ experience with and perception of traditional banking could reduce their reliance on such lenders and promote economic independence. A regional entity could therefore consider evaluating the need, interest and support for developing or expanding an existing CDFI²⁷ or credit union/check cashing hybrid that would provide credit improvement

²⁷ The closest CDFI that serves consumers is the Brazos Valley CDC, www.bvahc.org. Most of the CDFIs in Texas make small business loans, not consumer loans.

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services, financial products and loans to unbanked and underserved low and moderate income households.

Action steps for counties/communities

- Counties in the region with high disparities in loan originations for minority and non-minorities—particularly Walker, Waller and Wharton Counties—should work with local lenders and realtors to better understand the reasons for the denials. Because of staffing and technical expertise, local governments should partner with organizations that can facilitate credit counseling and financial literacy classes, such as Neighborhood Centers Inc. or HAUL.

Collaborating Regionally

Regional approaches to improving access to opportunity are increasingly common, particularly in addressing market dynamics that do not adhere to jurisdictional boundaries such as employment, transportation and economic development. Successful regional approaches incorporate broad, multijurisdictional, resident and stakeholder participation and seek to balance efficiency with local autonomy.^{28,29}

²⁸ Alexander, Lisa T. "The Promise and Perils of 'New Regionalist' Approaches to Sustainable Communities." *Fordham Urban Law Journal* 38 (2011): n. pag. Print.

²⁹ Longworth, Susan. "Suburban Housing Collaborative: A Case for Interjurisdictional Collaboration." *Profitwise News and Views Spotlight* Nov. 2011: n. pag. Print.

Economic benefit

The economic "benefits" of regional collaboration generally take the form of reducing the economic and social costs that occur in the absence of collaboration.

The concentration of affordable housing in certain areas—which occurs when some communities provide affordable housing for workers and others do not—has many adverse effects. The most visible is increased traffic congestion caused by low wage workers commuting into opportunity areas for work.

Less visible are economic development opportunities lost when employers and qualified employees move from a community because of high housing costs. This was recently examined in a study by The Center for Housing Policy.³⁰

According to the report, between 2000 and 2006—the period when housing costs rose at record levels in most U.S. cities—23 of the 35 metropolitan areas in the country with the highest housing costs lost population to outmigration—on average, a 6 percent loss per year. This was offset by immigration into housing markets with average to above-average costs.

Another paper reviewed in the Center for Housing Policy report analyzed housing and employment trends during the same period. The study demonstrated that an increase in the ratio of housing prices to income can slow regional employment growth, by as much as one percent per year.

³⁰ Wadrip, Keith, Laura Williams, and Suzanne Hague. *The Role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development: A Review of Literature. Rep. Washington, D.C.: Center for Housing Policy, 2011. Print.*

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Best practices

The Metropolitan Planning Council of Chicago recently published a series of best practices and recommendations for “Supporting and Sustaining Interjurisdictional Collaboration for Housing and Community Development.”

Many of the recommendations focus on reducing regulatory barriers and providing incentives for private sector investment, some of which are already present in the Houston-Galveston region:

- Update and interpret the regulations guiding key funding programs to provide flexibility and support for municipal clusters, particularly those that provide development capital.
- Allow public funding to support administrative and general operating functions, as successes stem from shared staff.
- Provide incentives for interjurisdictional collaboration by changing program criteria and goals, and reviewing competitive point structures.
- Adapt a portion of HUD funding, such as CDBG, to flow directly to metropolitan planning organizations and councils of mayors. This would strengthen the ability of subregional clusters and regional agencies to address issues that cross jurisdictional boundaries.
- Create a space for innovation, a “regulatory-free” zone similar to “Performance Partnerships” described in current federal budget proposals.

The report also presented recommendations for the operation of collaborative housing efforts, or clusters. Best practices that could be considered by the region include:

- Provide support to communities to establish predictable and consistent development approval processes through the creation of model processes, ordinances, and guidelines.
- Through mechanisms such as intergovernmental agreements, secure commitments by member municipalities to actively participate in the cluster and to work through their shared staff on local housing and community development issues.
- Adopt by-laws or some form of governance and rules to allow for prompt joint decision-making when needed.
- Structure the cluster so that it can receive public sector funding and leverage private sector resources. This could mean establishing the cluster under an existing government agency such as a council of governments or a county.
- Structure partnerships with organizations that can perform property renovations and expand the cluster’s development capacity. These development partners can serve as advisors on and help execute redevelopment.

Case studies

The following examples illustrate specific ways other Sustainable Communities grant recipients have engaged in regional collaboration. These two case studies were chosen because they focus on unique aspects of collaboration—understanding community interdependence, focusing on land

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use, development of a shared identity, and ownership of the plan by local government leaders.

Dallas-Fort Worth metro area

The North Central Texas Council of Governments (NCTCOG), which represents 16 counties in the Dallas-Fort Worth metro, conducted a land use study in 2008 that identified a number of challenges related to Naval Air Station Fort Worth Joint Reserve Base including safety, affordable housing, transportation access and land-use compatibility between military and residential uses.

In order to help local governments implement the study's recommendations, NCTCOG launched the Planning for Livable Military Communities (PLMC) project. PLMC is being conducted by representatives from local communities and aims to help local governments develop visions, plans and implementation projects to address economic, transportation and housing needs in the communities adjacent to the airbase. Local jurisdictions will also be able to use data and public input collected as part of PLMC to update individual city plans.

NCTCOG is working to connect mayors and city managers who identify common challenges as well as showcase best practices within the study area. NCTCOG's project manager, Tamara Cook, hopes the PLMC project can "serve as a model of regional cooperation to accomplish complementary needs and goals of several communities."³¹

³¹ "Grantee Spotlight: Planning for Livable Military Communities." *Sustainable Communities ENews* 2 (Apr. 2013): n. pag. *Sustainable Communities Resource Center*. U.S. Department of Housing and Urban Development. Web.

Knoxville metro area

Plan East Tennessee (PlanET) is a regional partnership of 15 cities, four towns and five counties that comprise the Knoxville MSA. The focus is to develop a regional planning "blueprint" that will address jobs, housing, transportation, environment and community health.

The first phase of PlanET is to establish a shared identity and vision through public input and data collection. The second phase is to identify a shared direction and the final (current) phase is plan adoption and implementation.³²

In a recent interview several members of the planning group described strategies for successful collaboration:

- **Local participation.** PlanET was driven by a board of mayors and emphasized stakeholder, resident and local political involvement. One of the keys to regional collaboration for PlanET was aggressively seeking public input from residents throughout the region. The leadership group conducted six regional forums and provided a "meeting-in-a-box" toolkit to equip local leaders to conduct additional public meetings. PlanET also moderated an online forum that functioned like a virtual town hall in which users could submit questions and comments, participate in ongoing discussion and vote on ideas.

³² <http://www.planeasttn.org/>

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- **Interdependency.** The group emphasized the need to acknowledge the existing interdependency of the region and assess resources within that framework. For instance, how does school quality in one county impact the overall workforce capacity and business attraction in another county and in the region as a whole?
- **Idea sharing.** The group works to benefit the region but also maintain stakeholder autonomy by establishing a culture of relationship and idea sharing. One example is the Tennessee Achieves program which started as an economic development initiative in Knox County but was recently expanded to 23 additional counties and contributes to workforce development in the region.³³

Two additional examples of successful regional cooperation include a successful city/county partnership to address stormwater problems and rural collaboration to increase economic development:

Cincinnati

The City of Cincinnati and Hamilton County, along with state and local agencies recently partnered on a revitalization plan that focused on infrastructure upgrades to the combined sewer system. The outdated system was often overwhelmed in heavy storms allowing stormwater to mix with wastewater which would then overflow into water bodies and back up into homes. Through a combined effort, the city was able to integrate “green” infrastructure solutions to reduce stormwater runoff and

³³ *Inside Tennessee*. NBC. WBIR, Knoxville, TN, 8 Apr. 2012. Television.

help restore a once-buried stream in the low-income neighborhood of South Fairmont, a target for revitalization.³⁴

Ranson and Charles Town

Ranson and Charles Town are two small, neighboring communities in Jefferson County, West Virginia. Ranson experienced substantial job loss over the past several years due to manufacturing closures, leaving the city with vacant offices, brownfield sites and economic decline. Ranson and Charles Town joined forces to develop a revitalization plan to create a high-tech commerce corridor connecting the two downtowns. The corridor is designed to make use of vacant downtown properties and prioritize brownfield cleanup with the goal of creating a mixed-use, accessible job center. In order to accomplish the joint effort, the two cities created a Commerce Corridor Council to advise the plan and incorporated site-specific community input. The two communities have already made strides toward economic revitalization by attracting both residential and commercial development to the corridor. For example, Powhatan Place is a mixed use development located on the site of a former foundry that incorporates a variety of housing types, retail and public spaces.³⁵

³⁴ *Three Years of Helping Communities Achieve Their Visions for Growth and Prosperity*. Rep. Washington, D.C.: Partnership for Sustainable Communities, 2012. Print..

³⁵ *Supporting Sustainable Rural Communities*. Rep. Washington, D.C.: Partnership for Sustainable Communities, 2011. Print.

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Improving Fair Housing Infrastructure

Section IV of this report contains an analysis of fair housing complaints, incidence of discrimination and hate crimes and legal cases. The analysis found that:

- The self-reported incidence of housing discrimination (5%) is much lower than the rates found in similar statistically significant surveys;
- Between January 2007 and March 2012; a total of 5,232 fair housing complaints were filed in the region. Disability and race comprise the basis for 35 and 30 percent of fair housing complaints filed;
- Compared to the national and state rates, the Houston-Galveston area has a much lower incidence of hate crimes.

The low incidence rate of reported discrimination and hate crimes in the region is a very positive finding—but could also indicate resident ignorance about fair housing laws and rights. In most communities, fair housing knowledge is the lowest for reasonable accommodations rules and the rights of persons with disabilities. The Houston-Galveston region is no exception, given that the highest proportion of fair housing complaints involved disability.

Case studies/best practices

As the focus on fair housing has increased nationwide, communities have implemented many innovative ways to mitigate fair housing discrimination. Many of these could be easily implemented by counties and communities in the region. For example:

- Arvada, Colorado, a suburb of the Denver metropolitan area, has an “inclusion team” with the purpose of “developing recommendations for the city’s executive management of actions, changes, additions and/or trainings that should be undertaken to move the city toward a more inclusive environment.” The city also maintains resource folders at city reception areas that can assist residents who need translations or accommodations for a disability.
- Arvada, Colorado and Pocatello, Idaho have built playgrounds that are fully accessible to persons with disabilities. Such a playground can bring together children of all abilities, improving understanding of differences over time. It also sends an important message about a city’s commitment to access to opportunity and fairness.
- Douglas County, another Denver suburb, maintains a very informative fair housing website for residents with links to the state agency that oversees fair housing complaints. See: <http://www.douglas.co.us/cdbg/fair-housing/>
- Other fair housing infrastructure case studies can be found in the NIMBY section.

Recommended action steps

Improving fair housing infrastructure in the region should focus on strengthening fair housing knowledge and awareness among residents and improving the ability to identify and enforce fair housing violations. To this end, a regional entity should:

- Support fair housing testing through the creation of a regional testing model that relies on jurisdictional data and expertise. Many jurisdictions feel they are too financially

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constrained to fund fair housing testing, so the collaboration of multi-jurisdictional resources can provide for a more complete regional result.

- Advise jurisdictions on how to use the concentration of race, ethnicity and income maps and data they have prepared for their AIs or FFAST forms. Or, if the jurisdictions do not maintain such maps and data, provide this information to them (from the FHEA). As required by the FFAST forms, some communities are already using the data to ensure that jurisdictional planning, housing and community development activities do not promote racial concentration or result in disparate treatment of protected classes. In addition, the data and maps can be used to identify areas in which housing choice should be expanded.
- Given the variety of topics required to be covered in an AI, and the difference in how each are treated in the jurisdictions, support trainings and workshops about AI requirements and best practices. Trainings should include methodologies for addressing issues such as identifying if lack of affordable housing has a disparate impact on protected classes; using minority and poverty concentration mapping and data in AIs; conducting an analysis of environmental justice issues; and understanding how lack of zoning and land use ordinances impacts affirmatively furthering fair housing.
- Similarly, work with counties and communities to encourage fair housing informational workshops. Workshops should include information on reasonable

accommodations requirements, since that area is common for fair housing complaints.

For a good publication on fair housing rights of persons with disabilities see The Bazon Center's "What 'Fair Housing' Means for People with Disabilities," <http://www.bazon.org/News-Publications/Publications/List/1/CategoryID/17/Level/a/ProductID/19.aspx?SortField=ProductNumber%2CProductNumber>

The Fair Housing Accessibility First website is another valuable resource of which building inspectors and developers should be aware: <http://www.fairhousingfirst.org/index.asp>

- Make standard language about fair housing, or a fair housing webpage that can be linked to by jurisdictions available to use as materials at community meetings and for publication on websites. The language should be in Spanish and English or have a language conversion option; provide basic information about the Federal Fair Housing Act; and instruct residents on whom to contact if they want to file a fair housing complaint or have fair housing questions. Counties and cities should include fair housing information on their webpages.
- Create a regional clearinghouse for fair housing and equity information using data and information from the FHEA and ongoing research and educational and outreach activities.

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Best Practices and Recommendations Matrix

Goals	Increasing employment and building self-sufficiency	Promoting balanced housing stock	Revitalizing disadvantaged communities
Potential Implementer, Implementation Tools, and Existing Programs	Bank On Houston; United Way THRIVE; LISC Financial Opportunity Centers; Covenant Community Capital; PeopleFund; ACCION; NCRC	Local government housing plans; Tax incentives; Master-planned developments; Local government zoning and land use policies; Public housing authority plans	Local government housing plans; Tax incentives; Community land trusts; Tax foreclosure property programs; Lien dismissals; Public housing authority plans
Possible Funding Sources	Community Development Financial Institutions Program; New Market Tax Credits	CDBG; Choice Neighborhood Initiative Planning Grants; LIHTC	
Ease of Implementation	Moderate	Moderate	Moderate-Difficult
Examples	Aspen Institute; Carbondale, Colorado;	Lowry Air Force Base	Guadalupe Neighborhood Development Corporation (Austin); Midtown Global Market; City of Dallas' Urban Land Bank Demonstration Program

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Best Practices and Recommendations Matrix

Addressing NIMBYism	Boosting resident access to capital	Regional collaboration	Improving the regional fair housing infrastructure
Anti-NIMBYism Plans (individual local governments); Education campaigns - HAUL, GHFHC, TxLIHIS; Community outreach - local government, developers	Homeowner education courses (local government requirements)	H-GAC; Inter-governmental workgroups	FHEW; HAUL; GHFHC
CDBG; Choice Neighborhood Initiative Planning Grants	CDBG; HOME; CDFIs		HUD FHIP and FHAP grants
Moderate-Difficult	Moderate-Difficult	Moderate	Moderate
Colorado's Division of Housing; City of Fort Collins, Faces and Places; Minnesota Housing Partnership; City of Lakewood Citizen's Planning Academy		Plan East Tennessee; NCTCOG	Douglas County, CO; Fair Housing Accessibility First

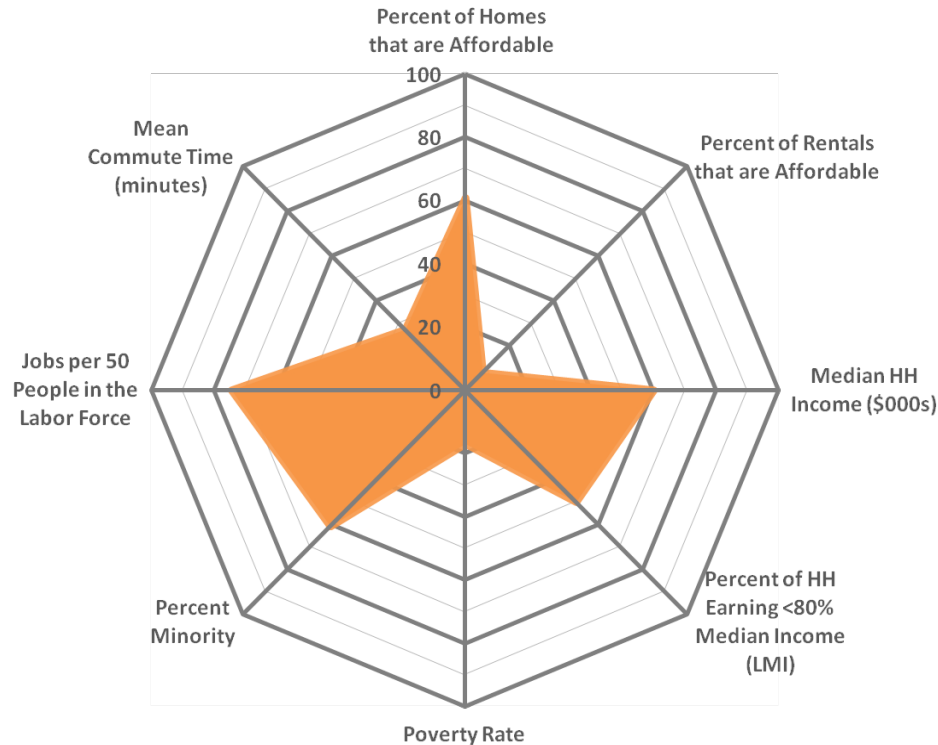
Appendix A

Community Opportunity Reports

Houston-Galveston Region

Opportunity Comparison Radial

What does the average Census tract in the Houston-Galveston Region look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** One-third of housing units in the region overall are rentals. Of these rentals, 8% are affordable to households earning less than \$20,000 per year. 12% of rental units are subsidized.

▪ **Affordable homes to buy.** A little more than half of homes in the region (55%) are valued at less than \$150,000, an affordable level for a household earning about \$50,000 per year.

▪ **Racial and ethnic diversity.** The region is one of the most diverse areas in the country. In the average Census tract in the region, 61% of residents are non-white, non-Hispanic.

▪ **Income diversity.** On average, 43% of Census tracts in the region contain a mix of household incomes. Fifteen percent of residents in the region live below the poverty line (roughly \$23,000 for a family of four). This is about the same as in the U.S. overall.

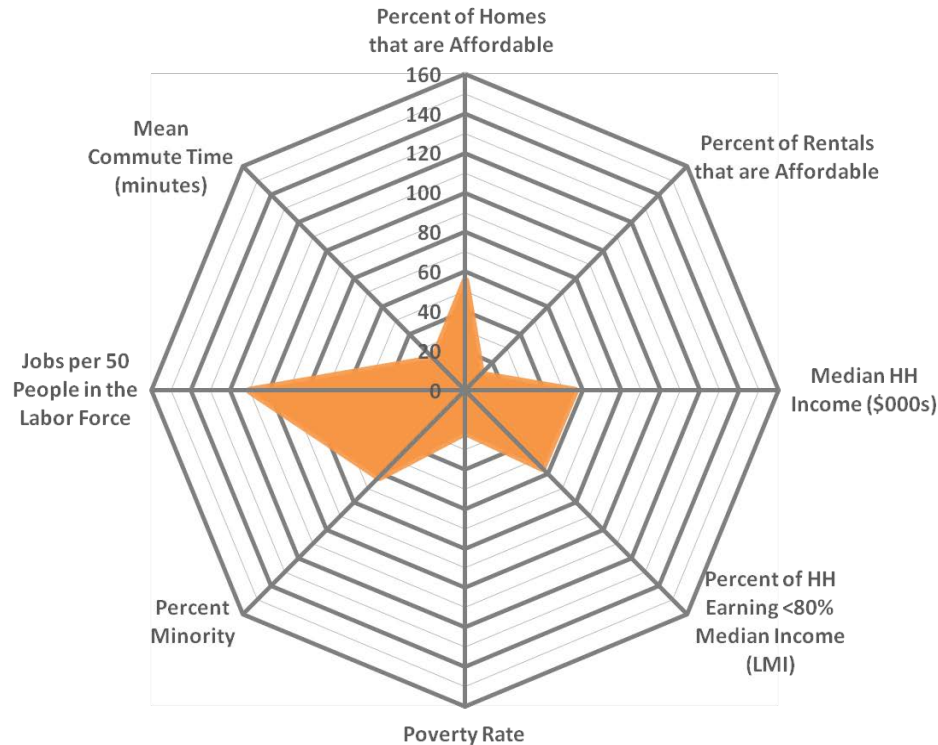
▪ **Education.** 20% of residents in the region lack a high school degree.

▪ **Unemployment and commute.** The region boasts one of the lowest unemployment rates in the country. In 2011, unemployment in the average Census tract was 8%; more recent data put unemployment for the regional overall at around 6%. The vast majority of residents in the region own a car, with an average commute of 27 minutes.

Urban Transect

Opportunity Comparison Radial

What does the average Census tract in the Urban Transect look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 160
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Despite having a larger share of housing stock that is rental, the urban transect has a lower percentage of subsidized rentals (9%) than the region overall (12%). However, "affordable" rentals, which include both publicly and privately provided, are more plentiful in the urban transect (11% of all rentals) than for the region (8%).

▪ **Affordable homes to buy.** Homeownership affordability in the urban transect is about the same as the region overall, with 52% of homes valued under \$150,000.

▪ **Racial and ethnic diversity.** Fewer Census tracts in the urban transect (65%) gained diversity than for the regional overall (90%). Of all the transects, the urban transect had the highest proportion of Census tracts that lost diversity, at 35%. Yet the urban transect is still slightly more diverse (62% non-white, non-Hispanic) than the regional overall (60%).

▪ **Poverty and crime.** High poverty (21% of residents are poor) is one of the greatest challenges to the urban transect. Crime is another, as 42% of urban transect Census tracts have high rates of crime, compared to 18% in the region.

▪ **Education.** The urban transect has similar school quality to the regional overall. Yet residents without a high school degree is very high in the urban transect at 25%.

▪ **Unemployment and commute.** Unemployment in the urban transect mirrors the region overall. Workers living in the urban transect have the lowest commute times in the region at 22 minutes on average.

Suburban Transect

Opportunity Comparison Radial

What does the average Census tract in the Suburban Transect look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 160
Mean Commute Time ranges from 0-100 minutes.

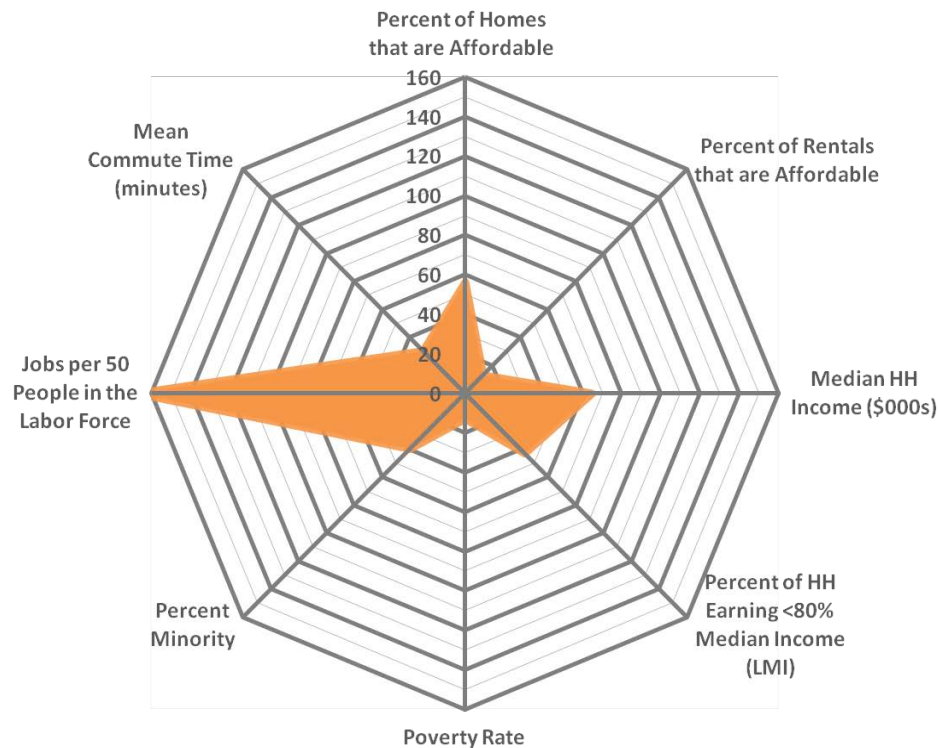
Primary Findings

- **Affordable rentals.** The suburban transect has a lower than average proportion of affordable rentals (6% of rental units), although the proportion of subsidized rentals is average.
- **Affordable homes to buy.** The region's suburban transect offers slightly more homeownership affordability than the region overall with 58% of homes valued under \$150,000.
- **Racial and ethnic diversity.** Almost all (94%) of Census tracts in the suburban transect grew racially and/or ethnically diverse in the past decade. 65% of residents are non-white, non-Hispanic, which exceeds the proportion for the urban transect (62%).
- **Income diversity.** About half of households in the suburban transect are low to moderate income. Poverty (15%) and the proportion of Census tracts that are mixed-income (42%) reflect the region overall.
- **Education.** The proportion of residents without a high school degree is the same as the regional overall at 20%.
- **Unemployment and commute.** Residents of the suburbs have the same levels of unemployment as the region overall (8%). Commute times average 27 minutes.

Rural Transect

Opportunity Comparison Radial

What does the average Census tract in the Rural Transect look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 160
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** The region's rural transect offers fewer rental opportunities than other areas, with just 18% of housing units that are rentals. Yet many of these rentals are affordable: 13% are priced less than \$500/month, which is much higher than for the region overall, and 12% are subsidized, the same as the region.

▪ **Affordable homes to buy.** Homes to buy are less affordable in rural than in other transects. 48% of homes are valued at less than \$150,000.

▪ **Racial and ethnic diversity.** The rural transect is much less diverse than both urban and suburban transects. Rural Census tracts average a minority population of 40%. Diversity in the rural transect is growing, however, as 98% of rural Census tracts gained diversity in the past decade.

▪ **Income diversity.** About half of rural Census tracts are mixed-income, higher than the region overall. Poverty is low at 13% and less than half (42%) of households are low to moderate income.

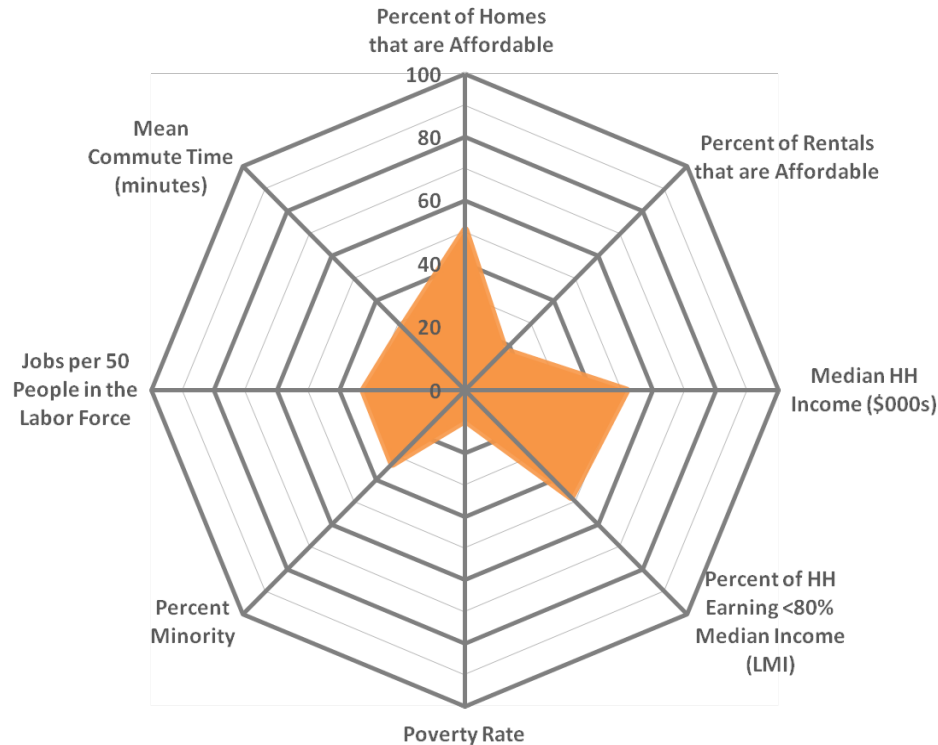
▪ **Education.** Rural residents are most likely to graduate from high school; just 14% lack a high school degree. School quality is high.

▪ **Unemployment and commute.** Unemployment for residents in rural areas mirrors the region overall. Commute times are some of the longest in the region, averaging 30 minutes.

Austin County

Opportunity Comparison Radial

What does the average Census tract in Austin County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

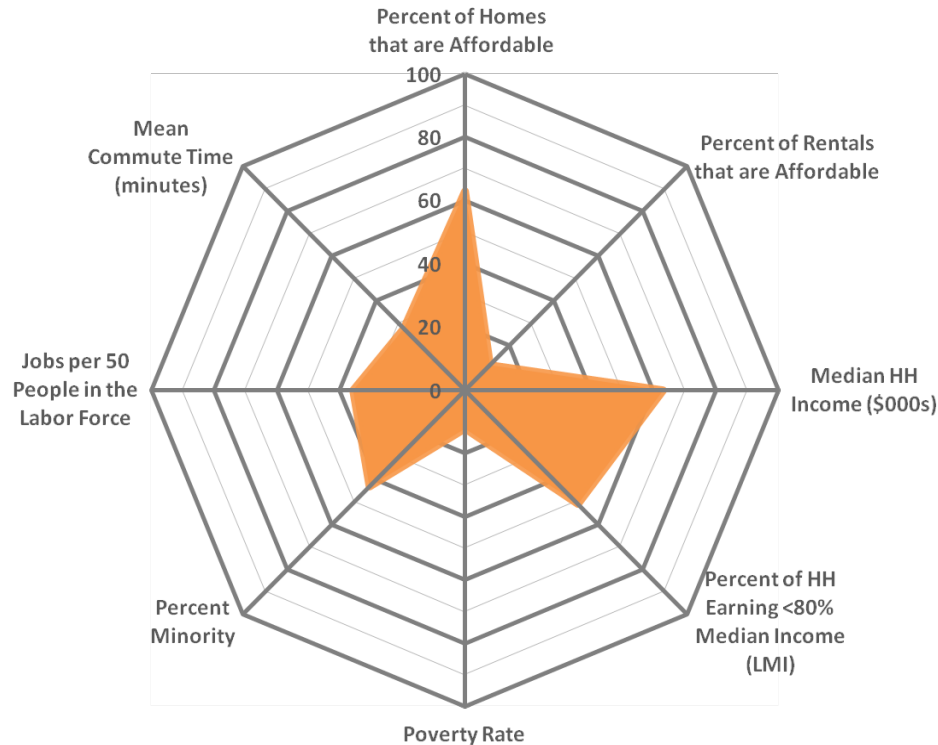
Primary Findings

- **Affordable rentals.** Rental affordability is relatively high in Austin County with nearly 1 in 5 units renting for less than \$500 per month. About 19% of the county's housing stock is renter occupied.
- **Affordable homes to buy.** Affordable ownership opportunities in Austin County are about average for the rural transect. 49% of homes in the county are valued at less than \$150,000.
- **Racial and ethnic diversity.** In Austin County, 21% of residents are racial minorities and 23% are ethnic minorities. All Census tracts in the county experienced an increase in racial and ethnic diversity between 2000 and 2010.
- **Income diversity.** Austin County scores well on income diversity. 83% of Census tracts in the county are considered mixed income compared to 51% in the rural transect.
- **Education.** Austin County has a higher proportion of residents with less than a high school degree (17%) compared to the region's rural transect (14%).
- **Unemployment.** Unemployment in Austin County (6%) is lower than the region's rural transect (7%).

Brazoria County

Opportunity Comparison Radial

What does the average Census tract in Brazoria County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Brazoria County scores moderately well on measures of rental affordability. 10 % of rentals are affordable to those earning less than \$20,000. 9% of rental units are subsidized.

▪ **Affordable homes to buy.** Ownership affordability in Brazoria County is very similar to the region overall. 53% of homes in the county are valued at less than \$150,000, compared to 55% in the region overall, 48% in the rural transect, 58% in the suburban transect and 52% in the urban transect.

▪ **Racial and ethnic diversity.** In the average Brazoria County Census tract, 43% of residents belong to a racial/ethnic minority group.

▪ **Income diversity.** Brazoria County scores very well on income measures. The poverty rate is low (11%) and the proportion of Census tracts that are mixed income is high (62%).

▪ **Education.** School quality in Brazoria County is relatively high and the proportion of adults with less than a high school education is low (15%).

▪ **Unemployment and commute.** Brazoria County's unemployment rate is 6%. For workers living in a typical Brazoria County Census tract, commute time is about 28 minutes.

Chambers County

Opportunity Comparison Radial

What does the average Census tract in Chambers County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Rental affordability in Chambers County is relatively high (11%) compared to the region as a whole (8%) but is below average compared to the rural transect (13%). About 3% of rental units are subsidized.

▪ **Affordable homes to buy.** Just over half of all homes in Chambers County are considered affordable (less than \$150,000).

▪ **Racial and ethnic diversity.** On average, Census tracts in Chambers County have fewer minority residents (31%) than the region's rural transects. However, each Census tract in the county increased in diversity between 2000 and 2010.

▪ **Income diversity.** Poverty in Chambers County is very low (8%) and 3 out of 5 Census tracts are mixed income.

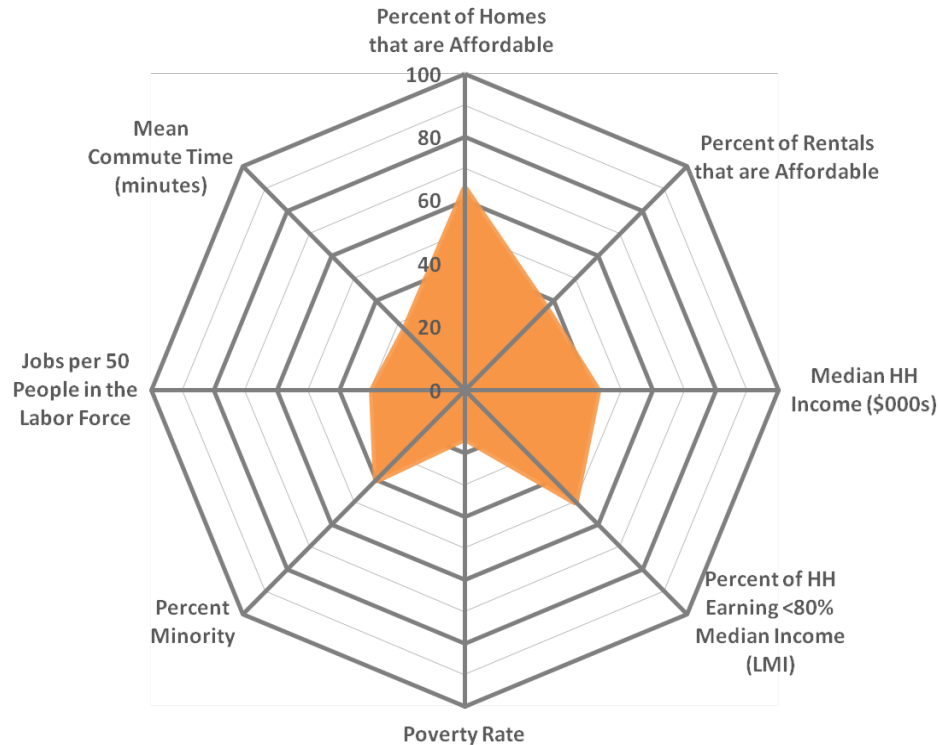
▪ **Education.** Elementary school quality ratings in Chambers County were low to average but educational attainment for adults living in the county was high (only 14% of adults had less than a high school degree).

▪ **Jobs and commute.** Jobs per person in the labor force is lower than average in Chambers County but unemployment is also low (6%). Residents of a typical Chambers County Census tract have a 29 minute commute.

Colorado County

Opportunity Comparison Radial

What does the average Census tract in Colorado County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Colorado County's rental market is very affordable. 39% of all rentals are \$500 or less per month compared to 13% in the rural transect.

▪ **Affordable homes to buy.** Colorado County is also affordable for homeowners, with 62% of homes valued at \$150,000 or less.

▪ **Racial and ethnic diversity.** All Census tracts in Colorado County experienced an increase in racial and ethnic diversity between 2000 and 2010; however, non-Hispanic white residents still constitute a majority in the average Colorado County Census tract.

▪ **Income diversity.** The poverty rate in Colorado County (16%) is higher than the rural transect (11%). All Census tracts in Colorado County are mixed income tracts.

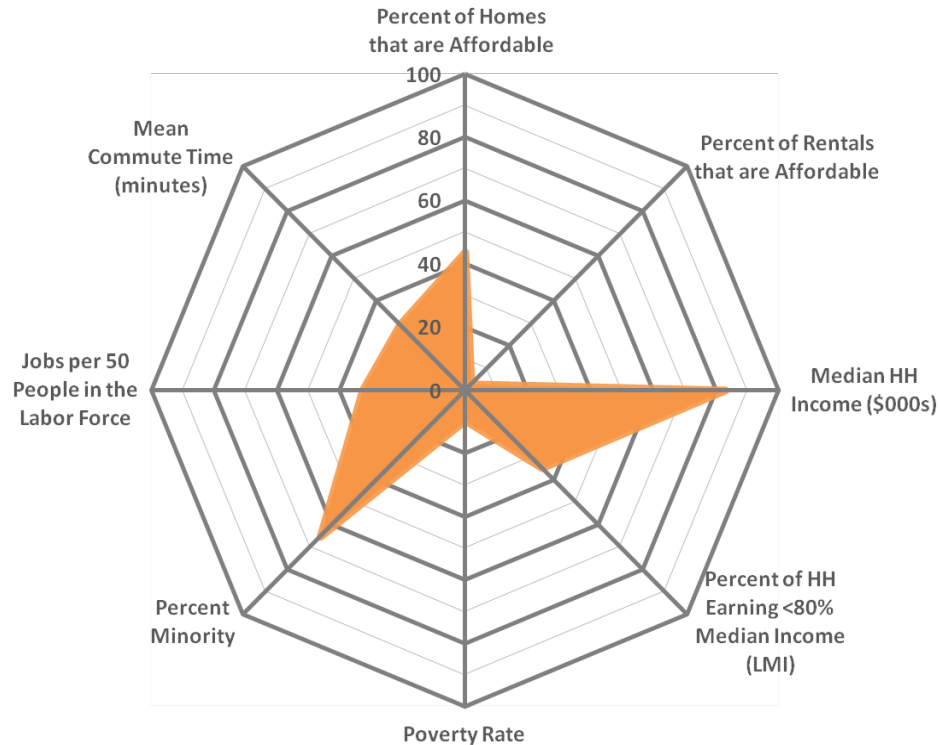
▪ **Education.** Elementary school quality is relatively low in Colorado County and the proportion of residents 25 with less than a high school degree (19%) is higher than the rural transect (14%).

▪ **Unemployment.** Unemployment is relatively low in Colorado County (5%) compared to the rural transect (7%). Jobs per person in the labor force is also lower than average for the rural transect, suggesting many workers commute to jobs outside the county.

Fort Bend County

Opportunity Comparison Radial

What does the average Census tract in Fort Bend County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Rental affordability is relatively low in Fort Bend County. Only 3% of rental units rent for less than \$500 per month compared to 13% in the rural transect, 6% in the suburban transect and 11% in the urban transect. 9% of rental units in the county are subsidized.

▪ **Affordable homes to buy.** In the average Fort Bend Census tract, 44% of the owner-occupied homes are affordable (valued at less than \$150,000), lower than the average in the rural, suburban and urban transects.

▪ **Racial and ethnic diversity.** Fort Bend County has the second highest proportion of racial and ethnic minorities of in the region: 22% of residents are African American, 17% are Asian, another 11% are some other racial minority; 24% of residents are Hispanic.

▪ **Income diversity.** Relatively few Census tracts in the county are mixed income; many have a disproportionate representation of high income households. The typical Fort Bend Census tract has a higher median income than the typical Census tract in any other county in the region; just 34% of households are low to moderate income.

▪ **Education.** Fort Bend County has a low proportion of residents with less than a high school degree (11%) compared with other counties in the region.

▪ **Unemployment.** Unemployment in the county (6%) is lower than in the region overall (8%) and the rural (7%), suburban (8%) and urban (8%) transects.

Galveston County

Opportunity Comparison Radial

What does the average Census tract in Galveston County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

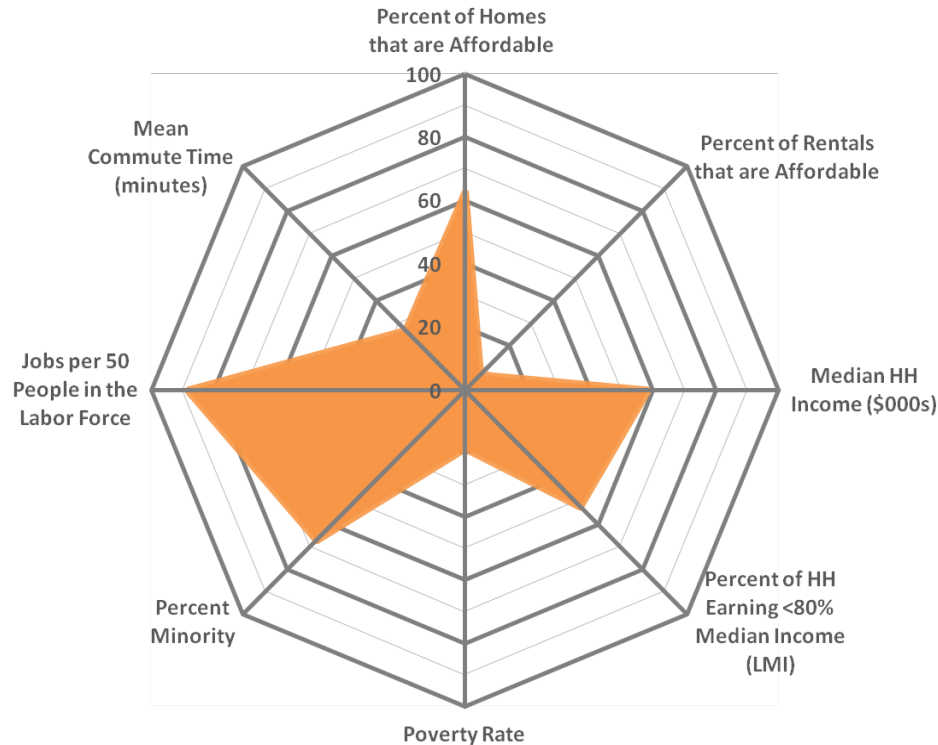
Primary Findings

- **Affordable rentals.** Galveston County has moderately high rental affordability. 10% of rental units are affordable to households earning \$20,000 or less per year. However, just over one quarter of the housing stock in the county is renter occupied.
- **Affordable homes to buy.** Affordable ownership opportunities in the county (52%) are similar to the urban transect (52%) but below the suburban transect (58%).
- **Racial and ethnic diversity.** Although Galveston County is both racially and ethnically diverse, 18% of Galveston County Census tracts lost diversity between 2000 and 2010.
- **Income diversity.** Galveston County scores well on measures of income diversity. Half of all Census tracts maintain a balance of income levels.
- **Education.** In Galveston County, 14% of residents have less than a high school degree compared with 25% in the urban transect and 20% in the suburban transect.
- **Unemployment.** Unemployment in Galveston County (9%) is slightly higher than the urban and suburban transects (both 8%). However, jobs per person in the labor force is higher than most other counties in the region. The average Galveston County Census tract contains 0.9 jobs per person in the labor force.

Harris County

Opportunity Comparison Radial

What does the average Census tract in Harris County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** In Harris County, 37% of housing units are rentals, 7% of rentals are affordable to households earning less than \$20,000 per year and 12% of rentals are subsidized. Affordable rentals are unevenly distributed—43% of tracts contain no affordable rentals.

▪ **Affordable homes to buy.** In the county as a whole, 59% of homes are affordable (less than \$150,000). Similar to rental affordability, owner affordability varies between Census tracts: 25% of tracts have low ownership affordability and 23% have high ownership affordability.

▪ **Racial and ethnic diversity.** Harris County is very diverse: 43% of residents are racial minorities and 41% are Hispanic. Most of the region's racially/ethnically concentrated areas of poverty are located in Harris County (94%).

▪ **Income diversity.** Harris County has a relatively low proportion of Census tracts that are mixed income. While the county does contain a variety of incomes, many neighborhoods are economically segregated. The poverty rate for Harris County is 17%.

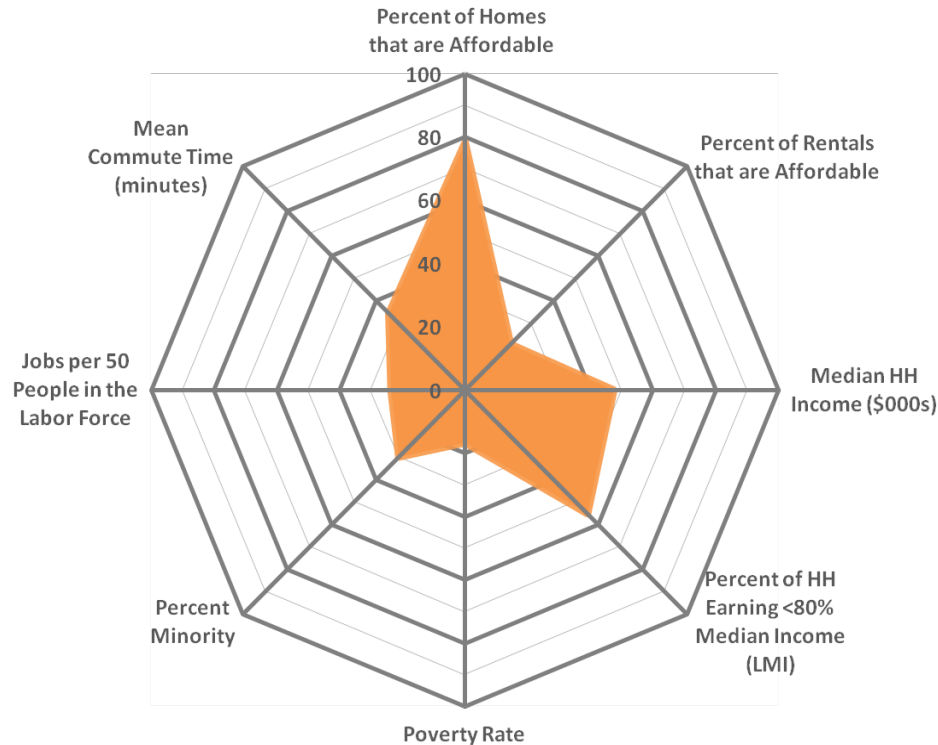
▪ **Education.** Among residents aged 25 or older, 22% have less than a high school degree.

▪ **Unemployment.** Harris County serves as a job center for much of the region overall, as reflected by the high ratio of jobs per person in the labor force. The unemployment rate for residents of Harris County is 8%.

Liberty County

Opportunity Comparison Radial

What does the average Census tract in Liberty County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Rental affordability in Liberty County is higher than average (20% of rentals are affordable), as is the proportion of rental units that are subsidized (16%). However, the proportion of total housing units that are rentals is much lower than average (18%).

▪ **Affordable homes to buy.** Opportunities for affordable home ownership are the highest in the region with 78% of homes valued at less than \$150,000.

▪ **Racial and ethnic diversity.** Racial and ethnic diversity is relatively low in Liberty County. Only 18% of residents are Hispanic and 23% are racial minorities.

▪ **Income diversity.** Liberty County maintains a good diversity of incomes with 79% of Census tracts defined as mixed income. The poverty rate is 16%.

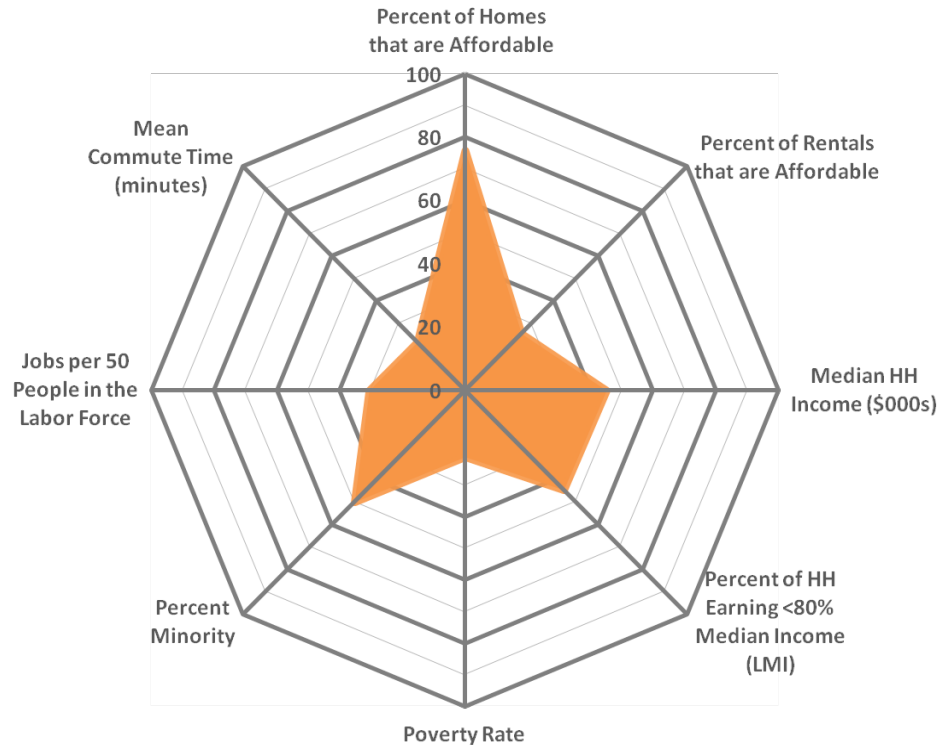
▪ **Education.** Elementary school quality is about average in Liberty County but the proportion of the population with less than a high school degree is very high (25%).

▪ **Unemployment and commute.** Unemployment is much higher in Liberty County (11%) than in the rural transect (7%). Average commute time is also higher in Liberty County than in the rural transect at 34 minutes.

Matagorda County

Opportunity Comparison Radial

What does the average Census tract in Matagorda County look like?



The radial graphic plots the Census tract average for the community, county or transect.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Rental affordability is very high with 28% of all rentals affordable to those earning less than \$20,000 per year. However, the proportion of total housing stock that is renter occupied is relatively low (19%).

▪ **Affordable homes to buy.** Opportunities for affordable home ownership are the highest of any county in the region—79% of homes are valued at less than \$150,000.

▪ **Racial and ethnic diversity.** In the average Matagorda County Census tract, 50% of residents belong to a racial or ethnic minority group. Two of the county's 10 Census tracts decreased in diversity between 2000 and 2010.

▪ **Income diversity.** Half of all Census tracts in Matagorda maintain a good mix of incomes. Other Census tracts reflect some income segregation. The poverty rate is very high at 21%.

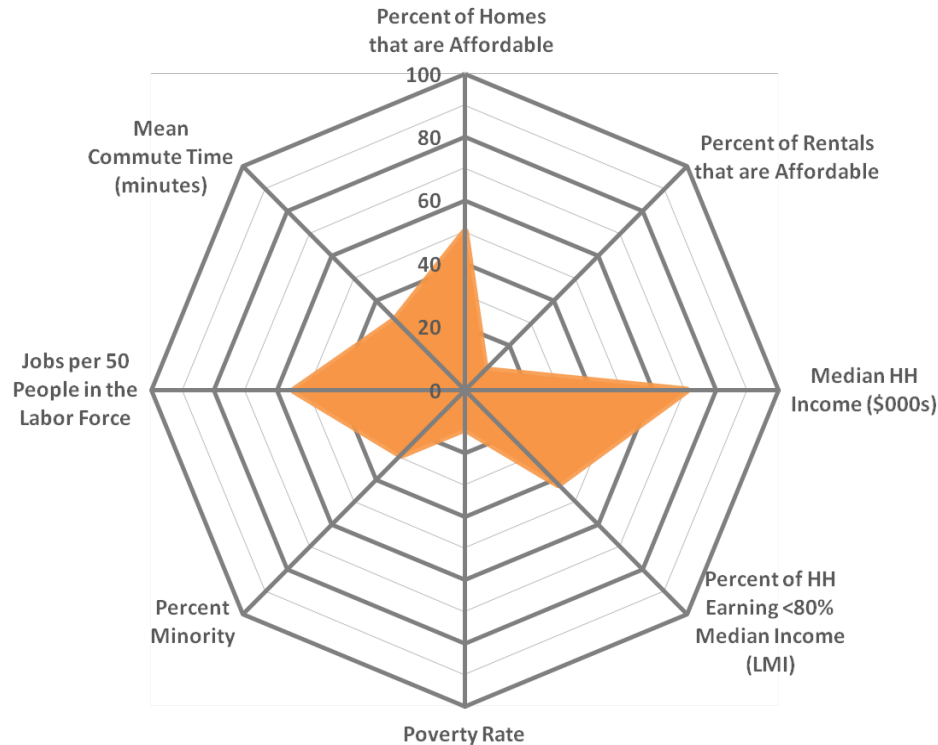
▪ **Education.** Elementary school quality in the county is about average, as is the proportion of adults with less than a high school degree (21%).

▪ **Unemployment.** Unemployment in Matagorda County (11%) is higher than in the rural transect (7%).

Montgomery County

Opportunity Comparison Radial

What does the average Census tract in Montgomery County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

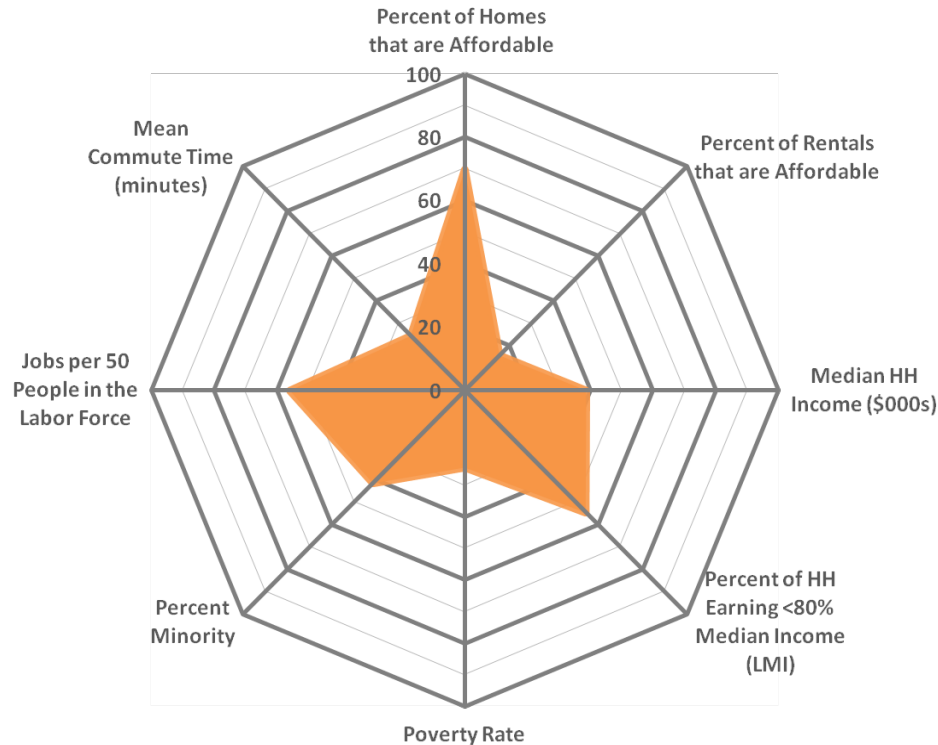
Primary Findings

- **Affordable rentals.** Montgomery County scores well on measures of rental affordability. 11% of rental units are subsidized and 9% are affordable to households earning less than \$20,000 per year.
- **Affordable homes to buy.** Montgomery County is moderately expensive for homebuyers: 45% of homes in Montgomery County are valued at less than \$150,000, compared to 48% for the rural transect and 58% for the suburban transect.
- **Racial and ethnic diversity.** This is where Montgomery County differs the most from the other counties in the region. Although the county has ethnic diversity (21% of residents are of Hispanic descent), the county has the lowest proportion of racial minorities at 16%.
- **Income diversity.** Montgomery County's poverty rate is low at 11%. The county scores well on income diversity, with 53% of Census tracts that are mixed-income.
- **Education.** Montgomery County has a lower proportion of residents with less than a high school degree (14%) compared to the suburban transect (20%) but is about average for the rural transect (14%).
- **Unemployment.** Unemployment in the county (7%) is about average for the rural transect and slightly lower than the suburban transect.

Walker County

Opportunity Comparison Radial

What does the average Census tract in Walker County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Walker County scores well on measures of rental affordability: 35% of housing units are rentals, 13% of rentals are affordable and 11% of rentals are subsidized.

▪ **Affordable homes to buy.** Walker County's ownership market is also affordable. Two thirds of homes are valued at less than \$150,000.

▪ **Racial and ethnic diversity.** In the average Walker County Census tract, 41% of residents are racial or ethnic minorities. 9 of the county's 10 Census tracts increased in diversity between 2000 and 2010.

▪ **Poverty and income diversity.** Nearly one-quarter of all Walker County residents are living in poverty (23%), the highest of any county in the region. Three of ten Census tracts have high or very high poverty levels. Half of Walker County Census tracts maintain a healthy mix of incomes.

▪ **Education.** Elementary school quality is relatively low in Walker County. Educational attainment for adults is a little lower than average: among residents aged 25 or older, 18% have less than a high school degree.

▪ **Unemployment.** Unemployment in the county is low (5%) relative to the rural (7%) and suburban (8%) transects. Jobs per person in the labor force (1.1) is higher than most other counties in the region.

Waller County

Opportunity Comparison Radial

What does the average Census tract in Waller County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

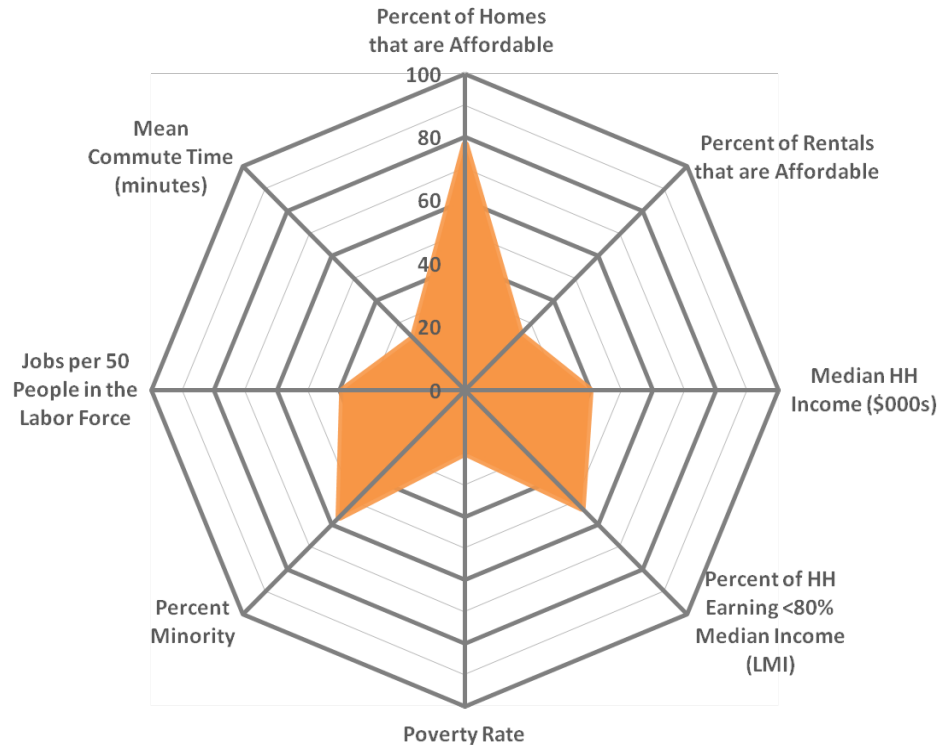
Primary Findings

- **Affordable rentals.** Measures of rental affordability in Waller County are similar to the rural transect—13% are affordable and 12% are subsidized. 28% of housing units are rentals, higher than average for the rural transect (18%).
- **Affordable homes to buy.** 58% of owner-occupied homes in the county are considered affordable (valued at less than \$150,000).
- **Racial and ethnic diversity.** One quarter of Waller County residents are African American. Another 17% are other racial minorities and 29% are of Hispanic descent.
- **Income diversity.** 4 of 5 Census tracts in Waller County maintain a healthy mix of incomes. The poverty rate for the county is 18%, higher than the rural transect (11%).
- **Education.** The proportion of adults with less than a high school degree in Waller County (21%) is higher than the rural transect (14%).
- **Unemployment and commute.** Unemployment in Waller County is lower than average (6%) but commute times are higher (33 minutes for the average worker).

Wharton County

Opportunity Comparison Radial

What does the average Census tract in Wharton County look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

- **Affordable rentals.** Wharton County has a very high proportion of affordable rentals (<\$500/month) at 25% of all rentals, compared to 3% for the rural transect.
- **Affordable homes to buy.** Wharton County is a very affordable county in which to buy a home, with 75% of homes valued at less than \$150,000.
- **Racial and ethnic diversity.** Wharton County scores well on racial and ethnic diversity: 28% of residents are racial minorities and 37% are of Hispanic descent.
- **Income diversity.** The county scores well on income diversity. The majority of the county's Census tracts (64%) are mixed income.
- **Education.** Wharton County is weaker on this measure than others. 26% of residents lack a high school degree, compared with 14% for the rural transect.
- **Unemployment.** Unemployment in the county (8%) is slightly higher than that of the rural transect (7%).

Baytown

Opportunity Comparison Radial

What does the average Census tract in Baytown look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Baytown is affordable to the region's renters. About 11% of Baytown's rental units are affordable to households earning less than \$20,000 per year. Two in five rental units are subsidized.

▪ **Affordable homes to buy.** Baytown is very affordable with respect to homes to purchase: 71% of homes are valued at less than \$150,000.

▪ **Racial and ethnic diversity.** Nearly every Census tract in Baytown (95%) increased in racial and ethnic diversity from 2000 to 2010.

▪ **Income diversity.** The majority of Baytown's Census tracts (62%) are mixed income; this is much more income diverse than the region (43%). Baytown's poverty rate is on par with the suburban transect (both 16%).

▪ **Education.** About one in five Baytown residents have less than a high school degree, similar to the suburban transect. However, 43% of the city's Census tracts have elementary schools with low school quality ratings.

▪ **Jobs and commute.** Unemployment in Baytown (10%) is higher than the suburban transect (8%). Average commute times are 26 minutes. There is approximately one job per person, similar to the suburban transect.

Conroe

Opportunity Comparison Radial

What does the average Census tract in Conroe look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

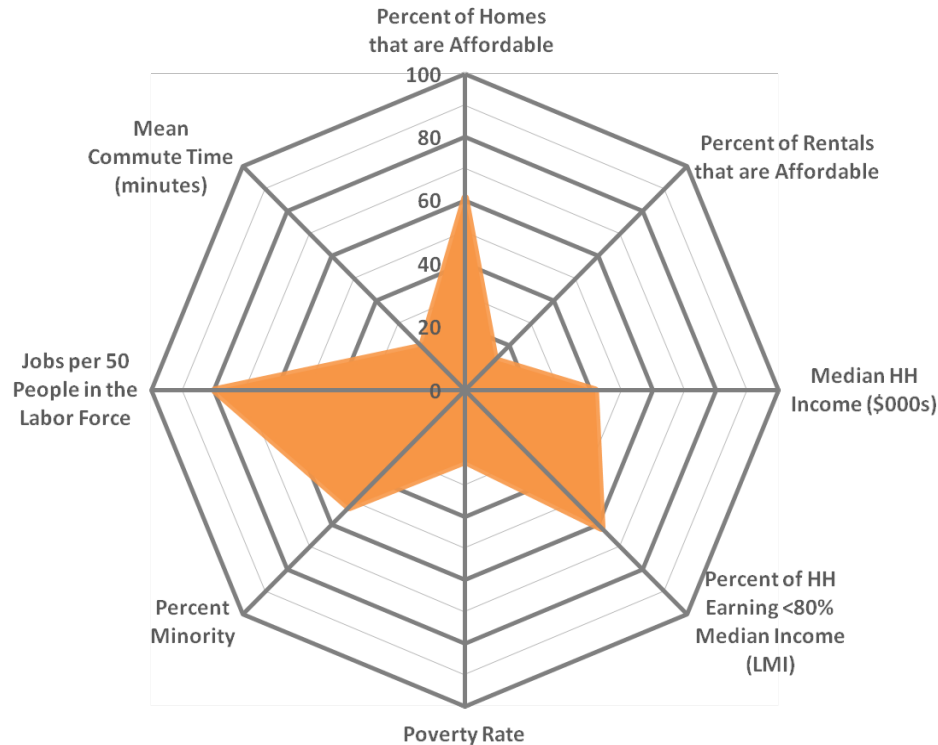
Primary Findings

- **Affordable rentals.** About one in ten rental units in Conroe are affordable to residents making \$20,000 or less. Overall, slightly less than one in four housing units are rentals in Conroe, a lower share than the urban transect (43%).
- **Affordable homes to buy.** Slightly less than half (45%) of Conroe's homes for purchase are valued at less than \$150,000.
- **Racial and ethnic diversity.** Every Census tract in Conroe increased in racial and ethnic diversity from 2000 to 2010. In the average Conroe Census tract, 33% of the population is minority.
- **Income diversity.** Conroe's income diversity is similar to that of the urban transect's: in Conroe, 40% of Census tracts are mixed income. The city's poverty rate (13%) is lower than the urban transect (21%).
- **Education.** Conroe's residents are relatively more highly educated—only 16% have less than a high school degree. Just 13% of Conroe's Census tracts include low performing schools.
- **Jobs and commute.** Conroe residents' commutes average 29 minutes, slightly higher than the urban transect average. This may be due to the low share of jobs per resident (0.78) in the city. Despite this, Conroe's unemployment (6%) is lower than the urban transect (8%).

Galveston

Opportunity Comparison Radial

What does the average Census tract in Galveston look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

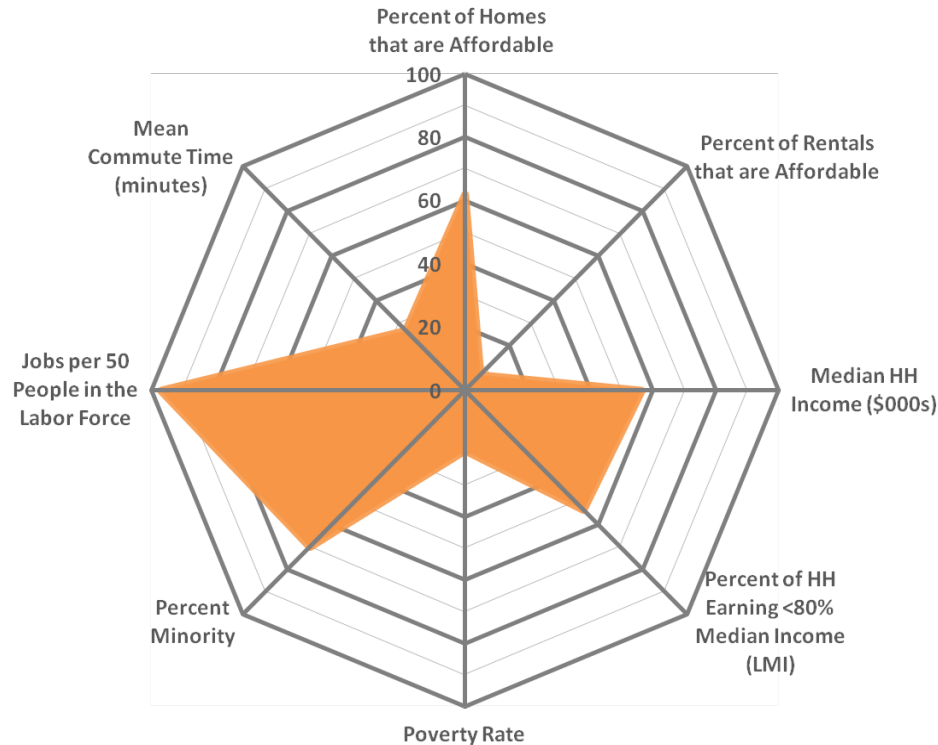
Primary Findings

- **Affordable rentals.** About one in five rental units in Galveston is subsidized and 14% are affordable to residents earning \$20,000 or less.
- **Affordable homes to buy.** Nearly 60% of the homes for sale in Galveston are valued at less than \$150,000, slightly higher than the urban transect (52%).
- **Racial and ethnic diversity.** From 2000 to 2010, 57% of Galveston's Census tracts increased in racial and ethnic diversity, lower than the urban transect overall in which 65% of Census tracts experienced increases in diversity.
- **Income diversity.** About half of Galveston's Census tracts are mixed income. Galveston's poverty rate (22%), similar to the urban transect's (21%).
- **Education.** Compared to other communities, Galveston residents are fairly well educated, with only 19% earning less than a high school degree. However, 71% of Galveston's Census tracts have low school quality ratings, compared to 25% in the urban transect
- **Jobs and commute.** Galveston residents have the shortest average commute (19.6 minutes) among the FHEA communities. Galveston's 1.6 jobs per resident may explain the relatively short commute; the city has more jobs than residents to fill them.

Houston

Opportunity Comparison Radial

What does the average Census tract in Houston look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

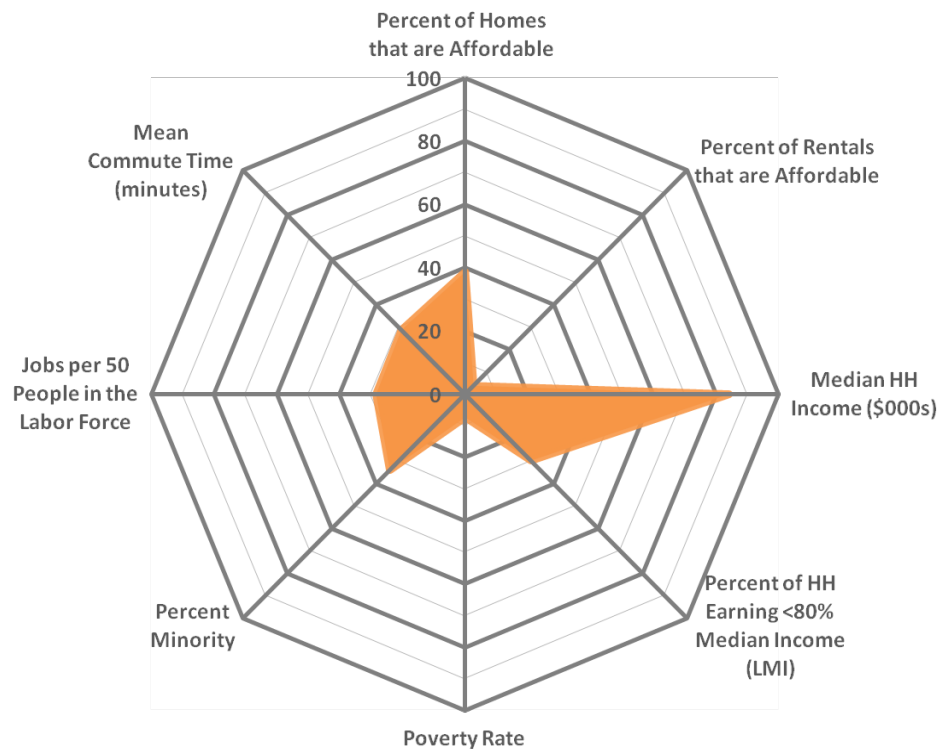
Primary Findings

- **Affordable rentals.** About 40% of the city's housing units are rentals and 12% are subsidized. Overall, 7% of Houston's rental units are affordable to residents earning \$20,000 or less, compared to 11% in the urban transect.
- **Affordable homes to buy.** The majority of Houston's homes for purchase (58%) are valued at less than \$150,000.
- **Racial and ethnic diversity.** From 2000 to 2010, 87% of the city's Census tracts increased in racial and ethnic diversity.
- **Income diversity.** Two in five Houston Census tracts are mixed income, similar to the urban transect (41%). The city's poverty rate (18%) is lower than the urban transect's (21%).
- **Education.** Slightly more than one in five Houston adults have less than a high school education. The share of Houston Census tracts with low school quality ratings (24%) is on par with the urban transect (25%).
- **Jobs and commute.** Houston's unemployment rate (8%) matches that of the urban transect. As the largest job center in the region, it is not a surprise that the city offers 1.9 jobs per resident. The average commute time for Houston residents is 27 minutes.

League City

Opportunity Comparison Radial

What does the average Census tract in League City look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Nearly one in four housing units in League City are rentals and 10% are subsidized. Only 4% of the city's rental units are affordable to a resident earning \$20,000 or less, compared to 6% in the suburban transect.

▪ **Affordable homes to buy.** Overall, 37% of League City's homes are valued at less than \$150,000.

▪ **Racial and ethnic diversity.** Every Census tract in League City increased in racial and ethnic diversity from 2000 to 2010. In the average League City Census tract 34% of residents are minority.

▪ **Income diversity.** Overall, 43% of League City's Census tracts are mixed income. Poverty in League City is very low at 7%, compared to 16% in the suburban transect.

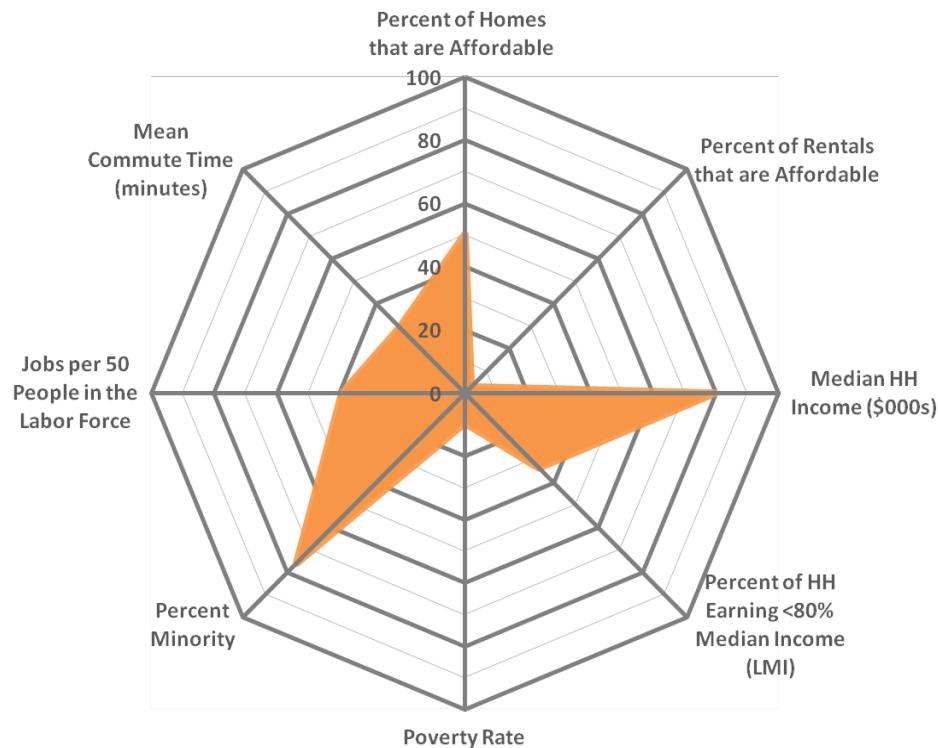
▪ **Education.** Adult residents of League City are among the most educated in the FHEA communities. Only 8% have less than a high school education. None of the city's Census tracts have low school quality ratings.

▪ **Jobs and commute.** League City residents' average commute is 29 minutes. On average, League City offers 0.57 jobs per resident, suggesting that most residents commute to jobs outside of the city. The unemployment rate in League City is 6%, lower than the suburban transect (8%).

Missouri City

Opportunity Comparison Radial

What does the average Census tract in Missouri City look like?



The radial graphic plots the Census tract average for the community, county or tract.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Slightly less than one in five housing units (16%) in Missouri City are rentals and 15% of the rental units are subsidized. Only 4% of rental units are affordable to residents earning \$20,000 or less.

▪ **Affordable homes to buy.** In Missouri City, 43% of homes to purchase are valued at less than \$150,000, compared to 58% in the suburban transect.

▪ **Racial and ethnic diversity.** From 2000 to 2010 every Census tract in Missouri City became more racially and ethnically diverse. In the average Missouri City Census tract, 76% of the population is minority.

▪ **Income diversity.** Just over one-third of the city's Census tracts are mixed income, lower than the suburban transect (42%). The city's poverty rate (9%) is much lower than the suburban transect's (16%).

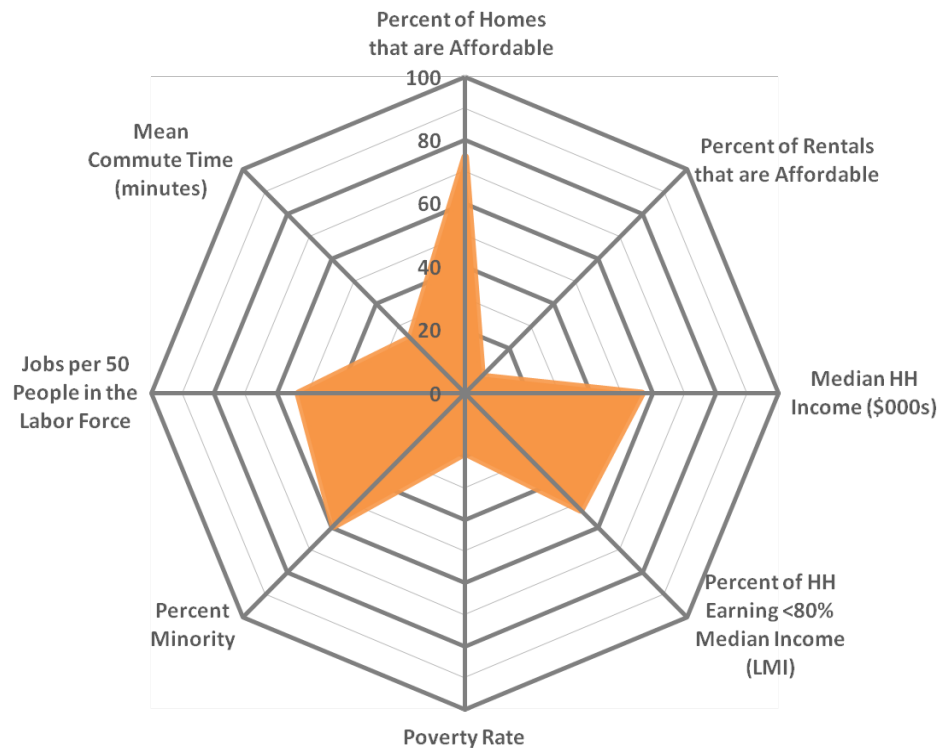
▪ **Education.** Missouri City has a well-educated adult population. Only 12% of adults have less than a high school education. Within the city, 36% of Census tracts have low elementary school quality ratings.

▪ **Jobs and commute.** Missouri City's unemployment rate (6%) is relatively lower than the suburban transect's. On average there are 0.78 jobs per resident suggesting many adults commute to jobs outside of the city. The average commute time is 29 minutes.

Pasadena

Opportunity Comparison Radial

What does the average Census tract in Pasadena look like?



The radial graphic plots the Census tract average for the community, county or transect.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** About 8% of rental units in Pasadena are affordable to households earning less than \$20,000 per year. 14% of rental units in Pasadena are subsidized.

▪ **Affordable homes to buy.** Pasadena does well in terms of for-sale affordability: 69% of homes are valued at less than \$150,000, compared to 52% in the urban transect.

▪ **Racial and ethnic diversity.** Every Census tract in Pasadena experienced an increased in racial/ethnic diversity between 2000 and 2010. 59% of residents in the average Pasadena Census tract are minority and 41% are non-Hispanic white.

▪ **Income diversity.** Pasadena scores well in terms of income diversity; 55% of Census tracts contain a healthy mix of incomes. Poverty in Pasadena (18%) is lower than the urban transect overall (21%).

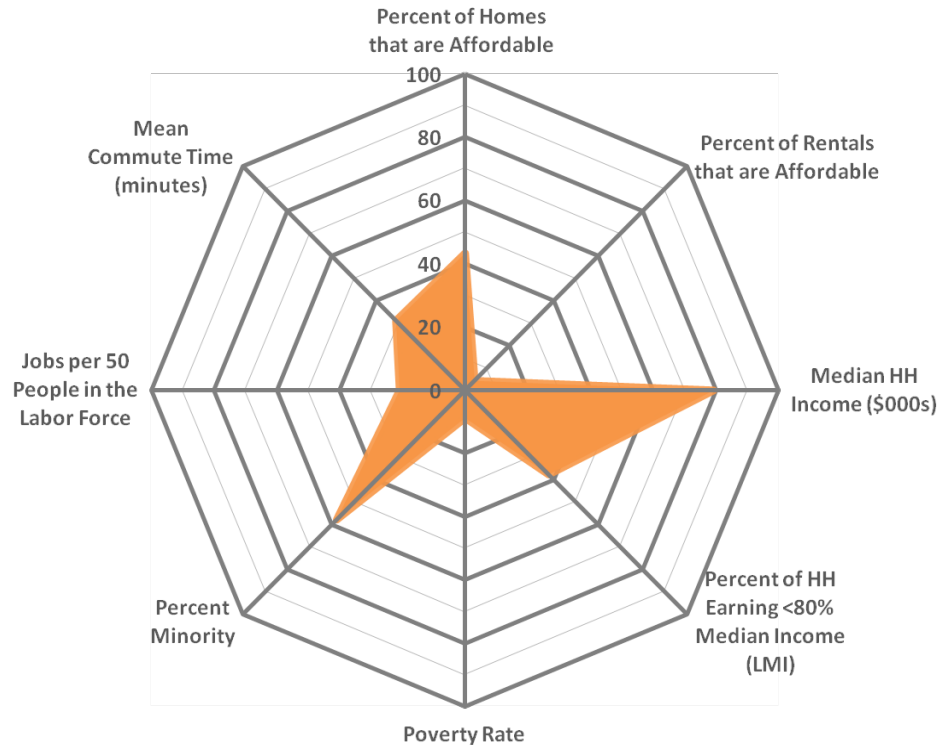
▪ **Education.** On average, Pasadena residents have relatively low educational attainment. 26% of residents have less than a high school degree compared to 25% for the urban transect.

▪ **Jobs and commute.** Unemployment in Pasadena (9%) is slightly higher than the urban transect (8%). There are 1.06 jobs per person in the labor force (lower than the urban transect average of 2.2) and average commute time is approximately 25 minutes.

Pearland

Opportunity Comparison Radial

What does the average Census tract in Pearland look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Slightly less than one in five housing units in Pearland are rentals (18%), compared to 34% in the suburban transect. Similar to the suburban transect, 13% are subsidized. Only 4% are affordable to residents earning \$20,000 or less.

▪ **Affordable homes to buy.** Nearly two in five (36%) of homes for purchase in Pearland are valued at less than \$150,000, lower than the suburban proportion of 58%.

▪ **Racial and ethnic diversity.** Every Census tract in Pearland increased in racial and ethnic diversity from 2000 to 2010. 58% of residents in the average Census tract are minorities.

▪ **Income diversity.** Overall, 35% of Pearland Census tracts are mixed income, compared to 42% in the suburban transect. Most Census tracts in Pearland have a large share of high income households. The city's poverty rate (8%) is lower than the suburban transect's (16%).

▪ **Education.** Most Pearland adults are educated. Only 12% have less than a high school education. None of the city's Census tracts have low school quality ratings.

▪ **Jobs and commute.** Pearland residents have the longest average commute among the FHEA communities at 31 minutes. There are 0.42 jobs per resident in the labor force, suggesting that most working Pearland residents commute elsewhere for work.

Sugar Land

Opportunity Comparison Radial

What does the average Census tract in Sugar Land look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
Median HH Income ranges from \$0 to \$100,000
Jobs per 50 People in the Labor Force ranges from 0 to 100
Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** Sugar Land scores low on rental affordability with only 1% of rental units affordable to households earning less than \$20,000 per year. Only 3% of rental units are subsidized, compared to 13% in the suburban transect overall.

▪ **Affordable homes to buy.** Sugar Land's ownership market is also relatively unaffordable. Only 21% of homes are valued under \$150,000 compared to 58% in the suburban transect.

▪ **Racial and ethnic diversity.** All census tracts in Sugar Land experienced an increase in racial/ethnic diversity between 2000 and 2010. Approximately 59% of residents in the average Sugar Land Census tract are minority and 41% are non-Hispanic white.

▪ **Income diversity.** Most Census tracts in Sugar Land have a disproportionate representation of high income households; only 20% of Census tracts are mixed income (containing a balance of low, middle and high income households).

▪ **Education.** Sugar Land performs well on measures of education. The city has high quality elementary schools and a relatively high proportion of the population with at least a high school degree.

▪ **Jobs and commute.** Unemployment is lower in Sugar Land (5%) compared to the suburban transect (8%). Mean commute time for the average Census tract resident is approximately 28 minutes.

Texas City

Opportunity Comparison Radial

What does the average Census tract in Texas City look like?



The radial graphic plots the Census tract average for the community, county or transect.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Primary Findings

▪ **Affordable rentals.** In Texas City, 30% of the housing units are rentals, and 16% of rental units are subsidized. This is a greater proportion than the suburban transect (13%). Slightly more than one in ten rental units are affordable to residents earning less than \$20,000.

▪ **Affordable homes to buy.** The city is an affordable place in which to buy a home: 3 out of 4 housing units for purchase are valued under \$150,000, compared to 58% in the suburban transect.

▪ **Racial and ethnic diversity.** Nearly all (94%) of Texas City's Census tracts increased in racial and ethnic diversity from 2000 to 2010.

▪ **Income diversity.** The majority of Texas City's Census tracts (67%) are mixed income. The city's poverty rate (17%) is slightly higher than the suburban transect (16%).

▪ **Education.** About one in five Texas City adults has less than a high school education. A smaller proportion of Texas City Census tracts (18%) have low performing schools, compared to the suburban transect (21%).

▪ **Jobs and commute.** Unemployment in Texas City is 11%, higher than the suburban transect average (8%). On average, residents commute 25 minutes to reach their jobs. In Texas City, there are about 0.57 jobs per person in the labor force.

Data Sheets for Small FHEA Communities

The data sheets for the following FHEA communities differ slightly from the previous data sheets in this report. Each of the following FHEA communities is composed of fewer than 12 Census tracts and those Census tracts typically extend well beyond the community's boundary. As a result, the Census tract-level analysis conducted to produce the report represents an area larger than the community itself. In addition to the named FHEA Community, the analysis area may contain portions of other communities as well as unincorporated areas. For each of the following data sheets a map is included which shows the jurisdictional boundary of the FHEA community (in pink) as well as the Census tracts for which the analysis was conducted (in orange). The Opportunity Comparison Radial and the Primary Findings represent the average Census tract in the analysis area.

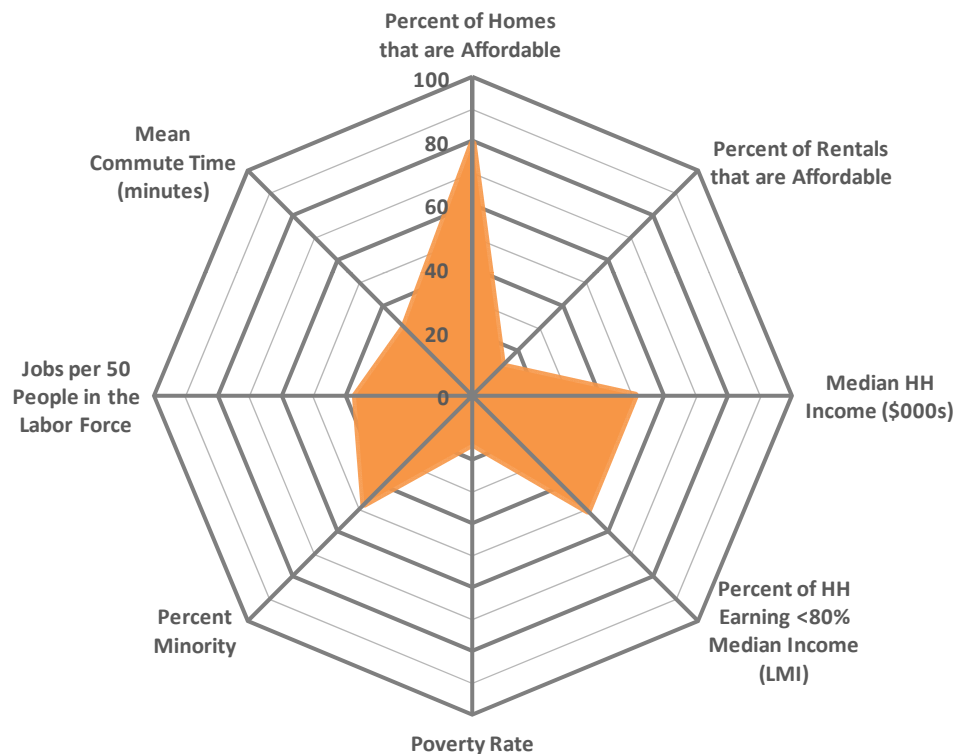
The methodology described above applies to the following FHEA Communities:

- Ames
- Anahuac
- Bay City
- Bellville
- Cleveland
- Dayton
- Eagle Lake
- El Campo
- Freeport
- Huntsville
- Katy
- La Porte
- Liberty
- Palacios
- Richmond
- Rosenberg
- Tomball
- Wharton

Ames Area

Opportunity Comparison Radial

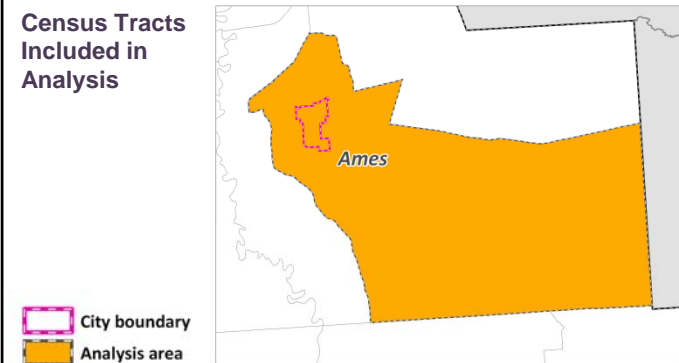
What does the average Census tract in the Ames area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



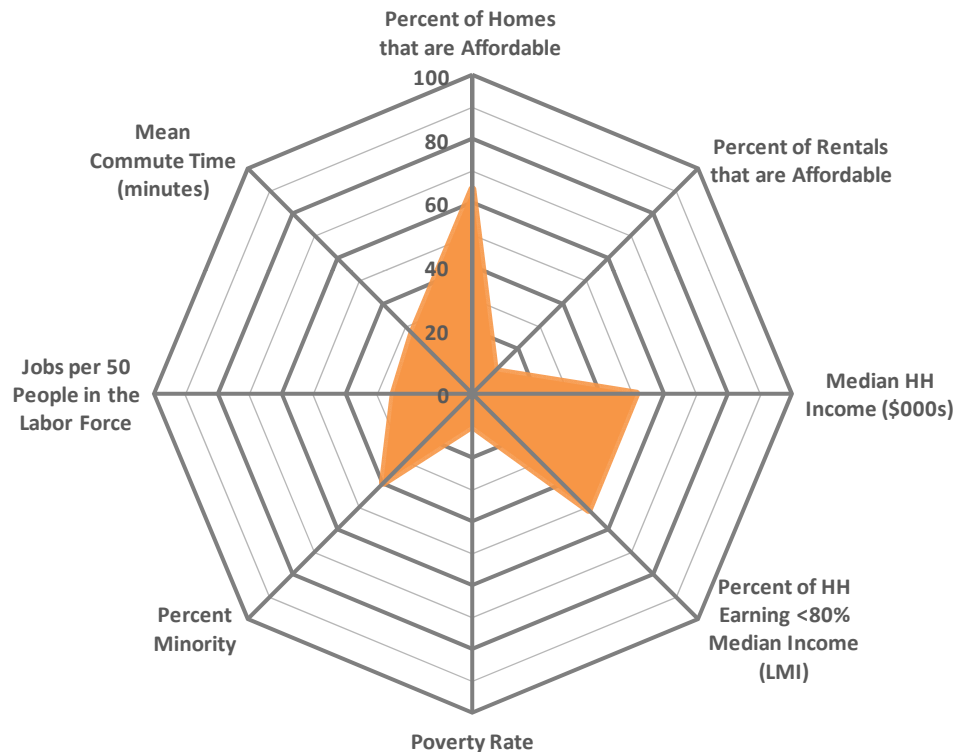
Primary Findings

- **Affordable rentals.** One in five Ames area housing units is a rental property. 13% of rentals are affordable to households earning less than 30% AMI.
- **Affordable homes to buy.** Ownership opportunities are very affordable in the area—79% of all homes are valued at less than \$150,000.
- **Racial and ethnic diversity.** All Census tracts in the area increased in diversity between 2000 and 2010.
- **Income diversity.** All Census tracts in the area contain a healthy mix of incomes.
- **Education.** Educational attainment is low compared to other rural areas—22% of residents have less than a high school degree.
- **Unemployment and Commute.** Unemployment in the area is 9% and the average commute is 30 minutes.

Anahuac Area

Opportunity Comparison Radial

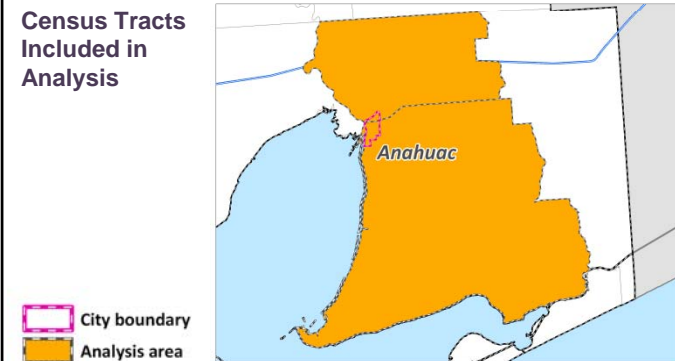
What does the average Census tract in the Anahuac area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



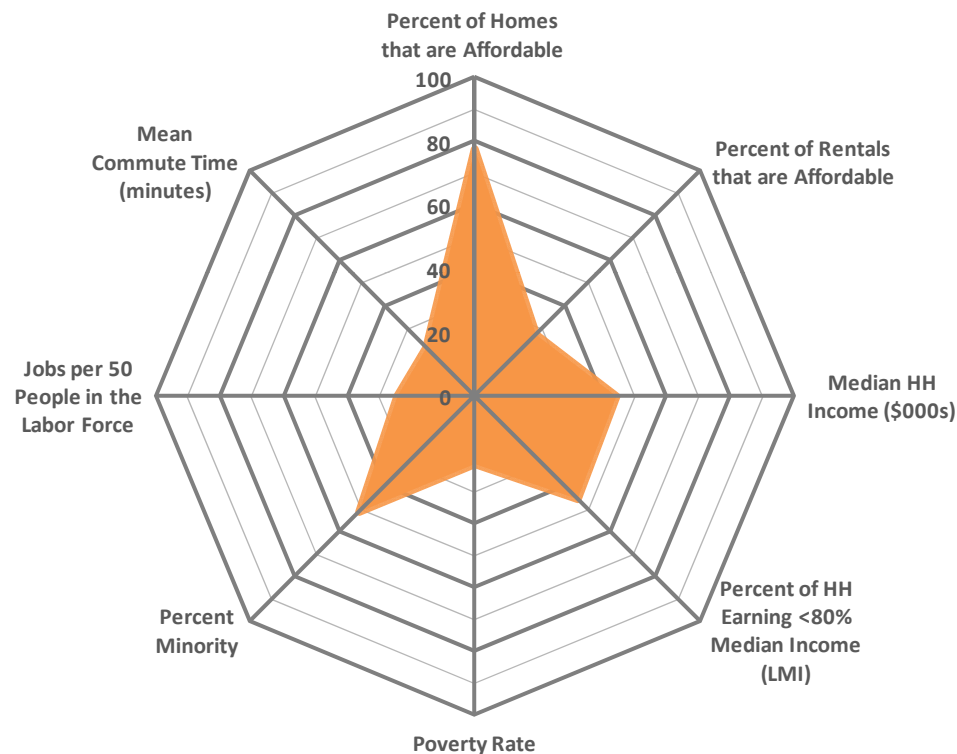
Primary Findings

- **Affordable rentals.** Rental affordability is relatively low. Only one in ten housing units in the area is a rental and only 9 percent of those are considered affordable.
- **Affordable homes to buy.** The area's ownership market is more affordable than most rural areas—two-thirds of homes are valued below \$150,000.
- **Racial and ethnic diversity.** In the average Anahuac tract, 40% of residents are minorities (typical for a rural area). All tracts increased in diversity between 2000 and 2010.
- **Income diversity.** Poverty in the area is low (10%) and income diversity is high (all tracts are mixed income).
- **Education.** Only 6% of residents 25 or older have less than a high school degree.
- **Unemployment and Commute.** Unemployment is 6% and average commute time is 27 minutes.

Bay City Area

Opportunity Comparison Radial

What does the average Census tract in the Bay City area look like?

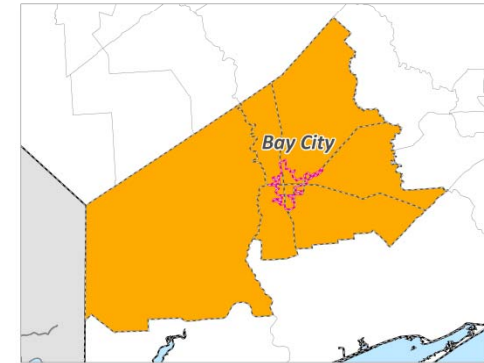


The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis

City boundary
Analysis area



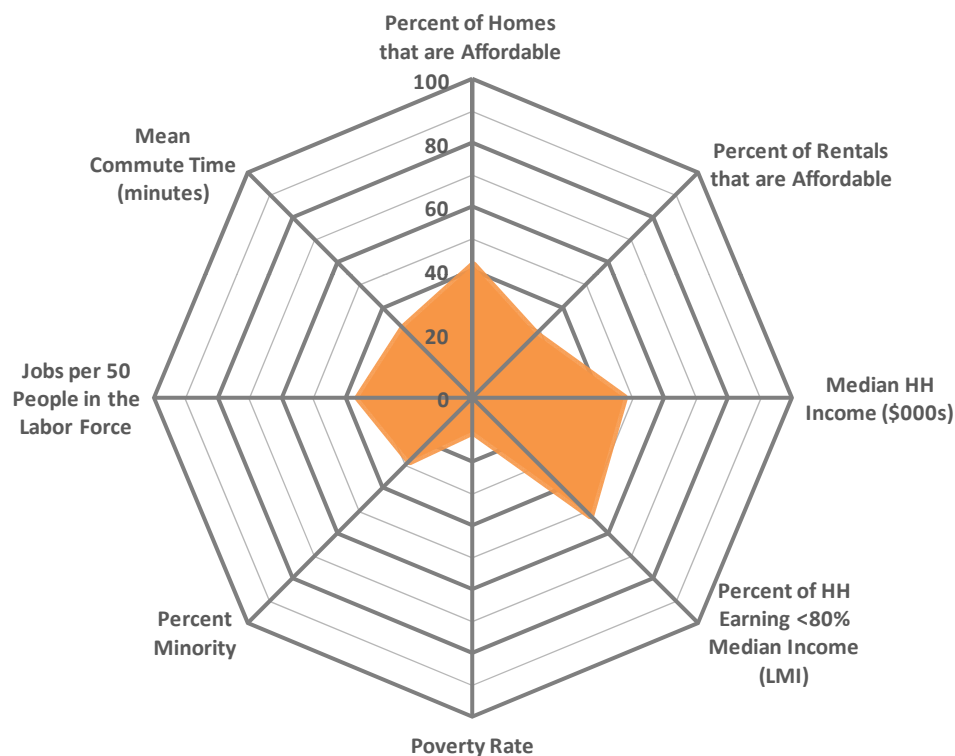
Primary Findings

- **Affordable rentals.** The Bay City area's rental market is very affordable with 30% of rental units affordable to households earning less than \$20,000. 7% of rental units are subsidized. 25% of all units are rentals.
- **Affordable homes to buy.** The area's ownership market is also affordable with 82% of homes valued at less than \$150,000.
- **Racial and ethnic diversity.** Just over half of residents in the average Bay City area Census tract are minorities.
- **Income diversity.** Income diversity is relatively low (38% of tracts are mixed income) and poverty is high (21%) relative to most rural areas (11%).
- **Education.** In the Bay City area, 21% of residents 25 or older have less than a high school degree.
- **Unemployment.** Unemployment in the area is high (12%).

Bellville Area

Opportunity Comparison Radial

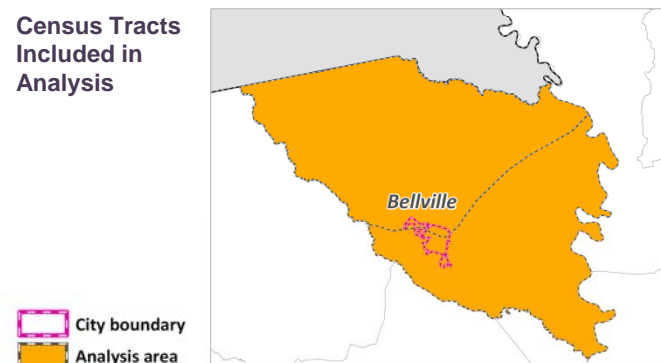
What does the average Census tract in the Bellville area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



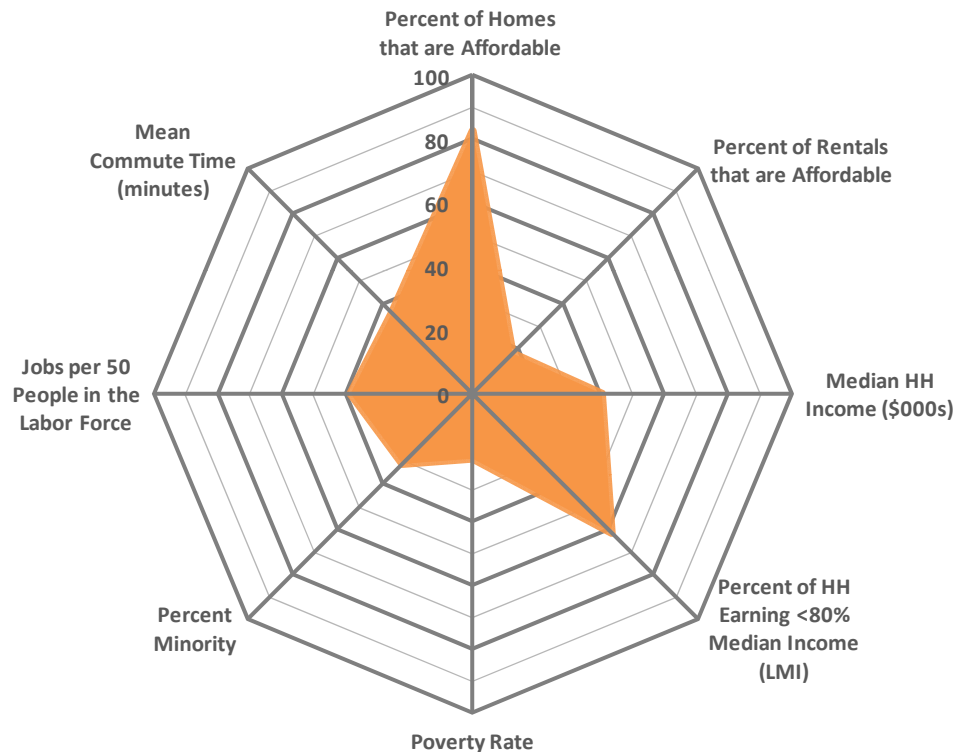
Primary Findings

- **Affordable rentals.** In the Bellville area, 18% of units are rentals, 30% of rentals are affordable and 13% of rentals are subsidized.
- **Affordable homes to buy.** The ownership market is slightly less affordable than is typical for a rural area. 42% of homes are valued below \$150,000.
- **Racial and ethnic diversity.** In the typical Census tract, relatively few residents are minorities (28%) but all tracts in the area increased in diversity between 2000 and 2010.
- **Poverty.** The poverty rate in the Belleville area is 11%, about average for a rural area.
- **Education.** In the Belleville area, 12% of residents 25 or older have less than a high school degree.
- **Unemployment.** Unemployment is very low – 4% in the Bellville area compared to 7% in the rural transect.

Cleveland Area

Opportunity Comparison Radial

What does the average Census tract in the Cleveland area look like?

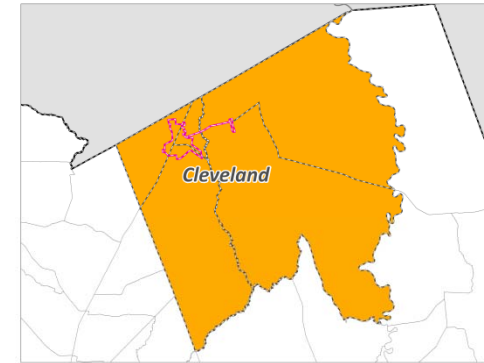


The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis

City boundary
Analysis area



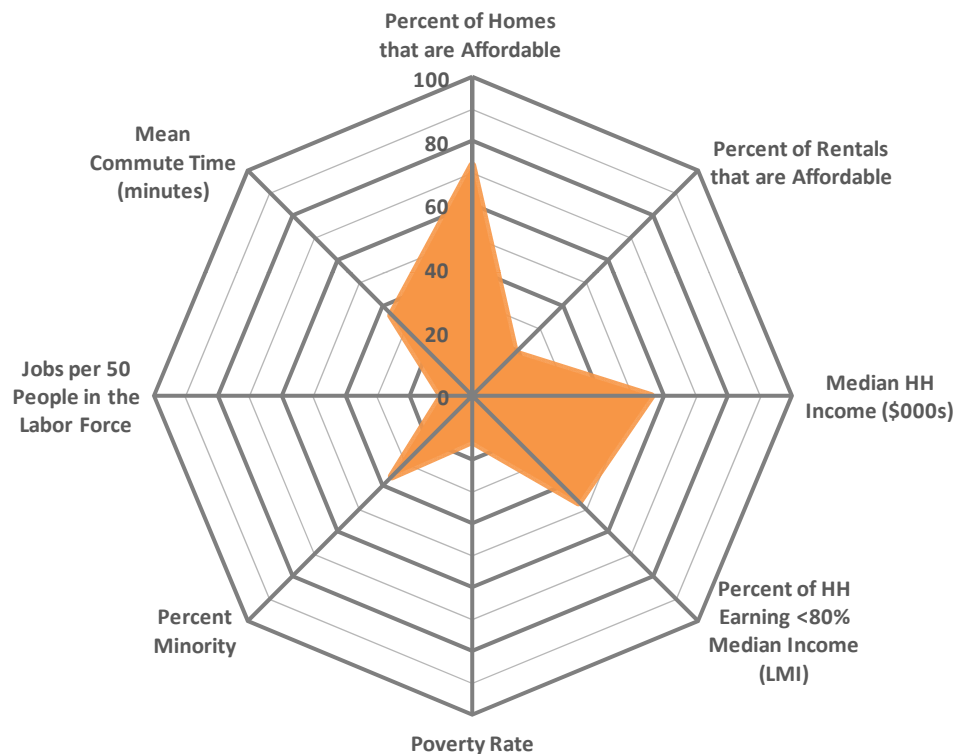
Primary Findings

- Affordable rentals.** Rental affordability is relatively high in the Cleveland area. 22% of housing units are rentals, 21% of rentals are affordable and 14% are subsidized.
- Affordable homes to buy.** Affordable ownership opportunities are also abundant: 82% of homes are valued at less than \$150,000.
- Racial and ethnic diversity.** Although diversity is relatively low, all Census tracts in the area increased in diversity between 2000 and 2010.
- Poverty.** Poverty is relatively high in the Cleveland area – 20% of residents are living in poverty.
- Education.** Nearly one-quarter of adults in the area have less than a high school degree.
- Unemployment and Commute.** Unemployment is high (11%) and the average commute is long (36 minutes).

Dayton Area

Opportunity Comparison Radial

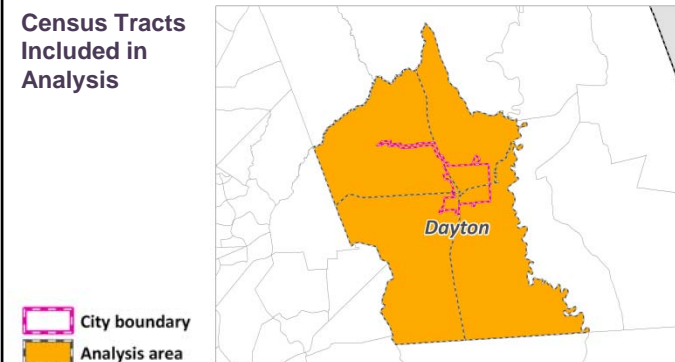
What does the average Census tract in the Dayton area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



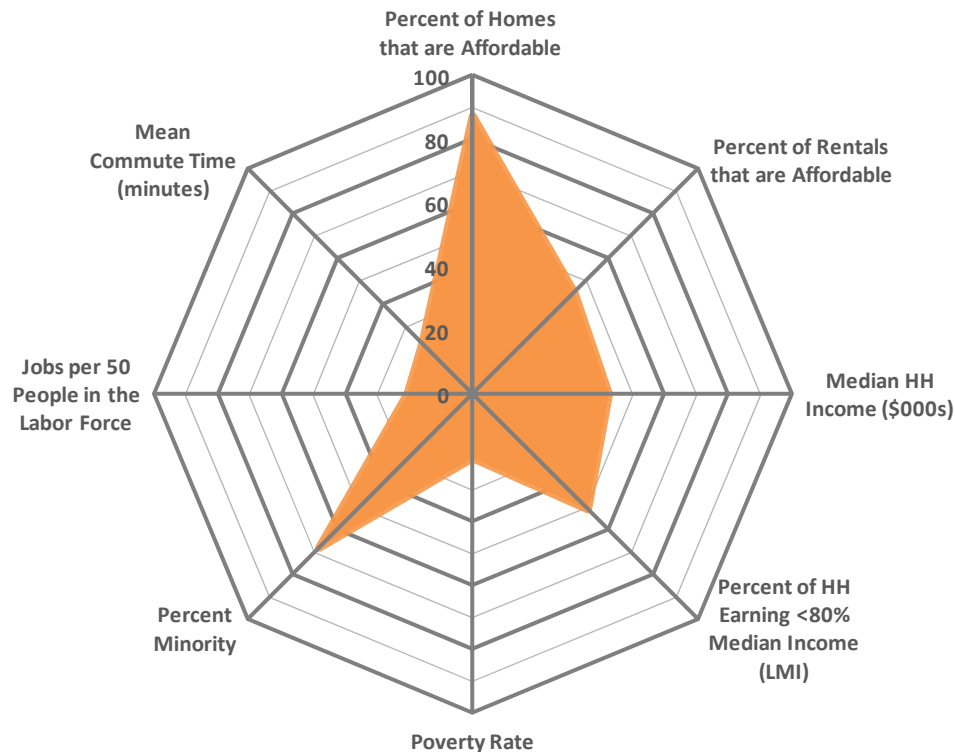
Primary Findings

- **Affordable rentals.** In the Dayton area, the proportion of housing units that are rentals is typical for a rural community and affordability is slightly higher than average. The area has a very high proportion of subsidized units (25%), compared to the rural transect (12%).
- **Affordable homes to buy.** Nearly three-quarters of homes are affordable (valued at less than \$150,000).
- **Racial and ethnic diversity.** In the average Dayton area tract, 36% of residents are minorities. Three of the four tracts increased in diversity between 2000 and 2010.
- **Income diversity.** Three of the four Census tracts are mixed income and the area's poverty rate is 14%.
- **Education.** Just over one quarter of adult residents have less than a high school degree.
- **Unemployment.** Unemployment is relatively high (10%).

Eagle Lake Area

Opportunity Comparison Radial

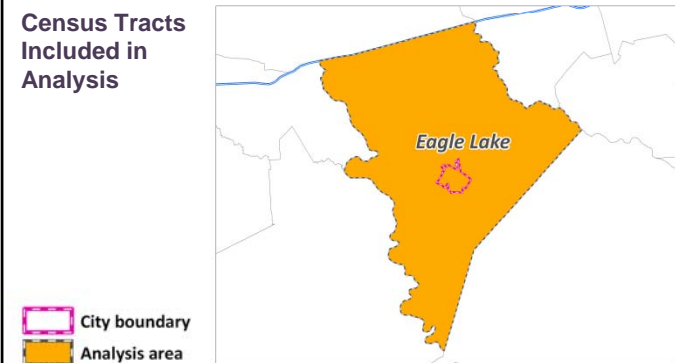
What does the average Census tract in the Eagle Lake area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



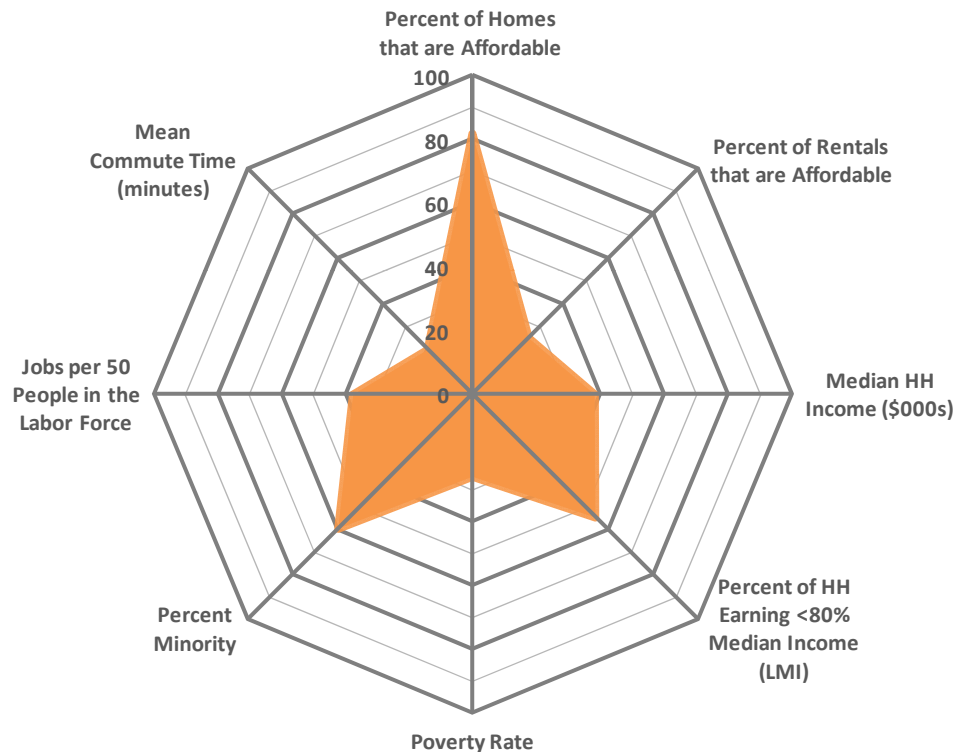
Primary Findings

- Affordable rentals.** In the Eagle Lake Area's sole Census tract, a higher proportion of the housing stock are rentals (27%). Nearly half (45%) of rentals are affordable, compared to 13% in the rural transect.
- Affordable homes to buy.** As with rentals, a very high share of homes to purchase are affordable (87%).
- Racial and ethnic diversity.** More than two-thirds (68%) of the residents in the Eagle Lake Area are minorities, compared to 40% in the average rural Census tract. The area increased in diversity from 2000 to 2010.
- Income diversity.** The Eagle Lake Area is mixed income with a relatively high poverty rate (20%).
- Education.** A higher proportion of adults (26%) have less than a high school degree.
- Unemployment.** Unemployment (13%) is relatively high.

El Campo Area

Opportunity Comparison Radial

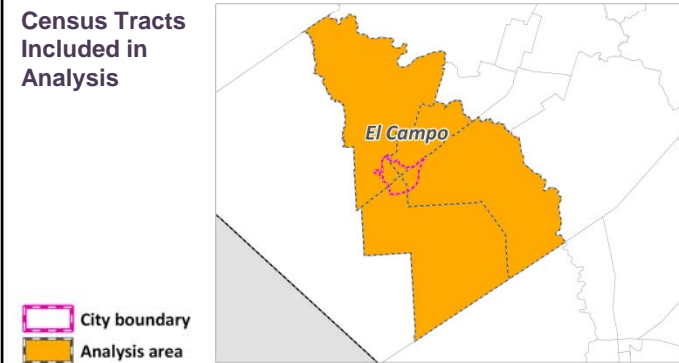
What does the average Census tract in the El Campo area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



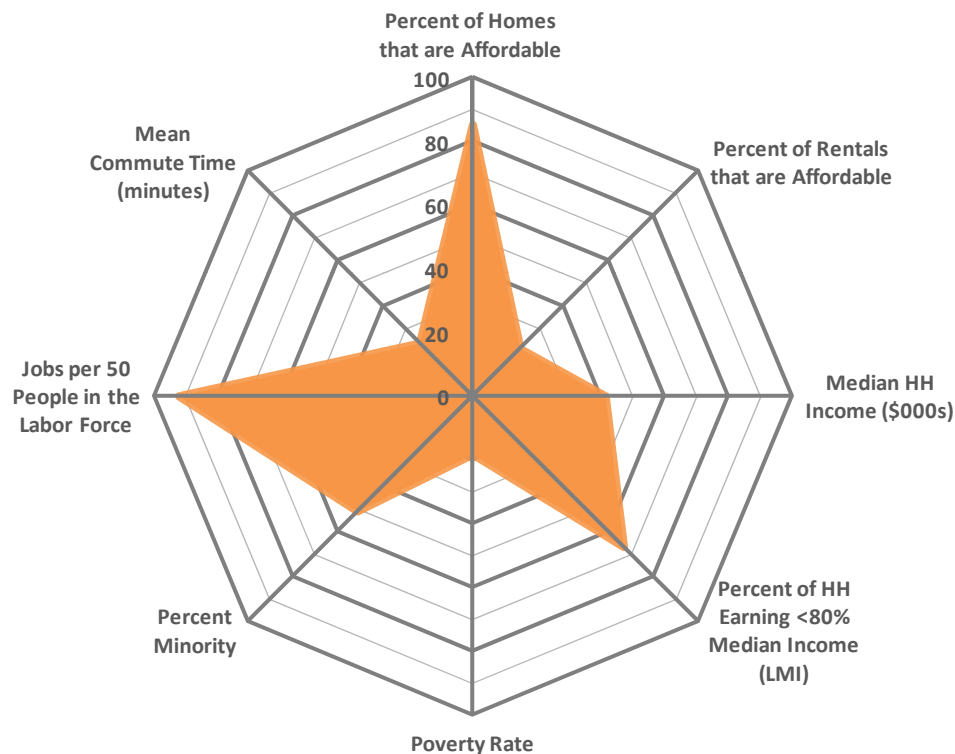
Primary Findings

- **Affordable rentals.** About one-quarter of the El Campo Area's rentals are affordable and 16% are subsidized.
- **Affordable homes to buy.** Compared to the rural transect (48%), a greater share of homes (75%) are affordable to purchase in the El Campo Area.
- **Racial and ethnic diversity.** The area is 53% minority, compared to 40% in the average rural Census tract.
- **Income diversity.** Two of the area's four Census tracts are mixed income. Poverty (22%) is higher than the rural transect (11%).
- **Education.** Nearly one in three El Campo Area adults have less than a high school degree, compared to 14% in the rural transect.
- **Unemployment.** The El Campo Area's unemployment rate (7%) is the same as the rural transect.

Freeport Area

Opportunity Comparison Radial

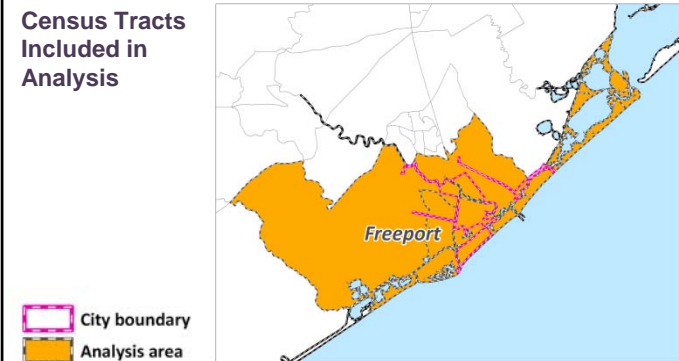
What does the average Census tract in the Freeport area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



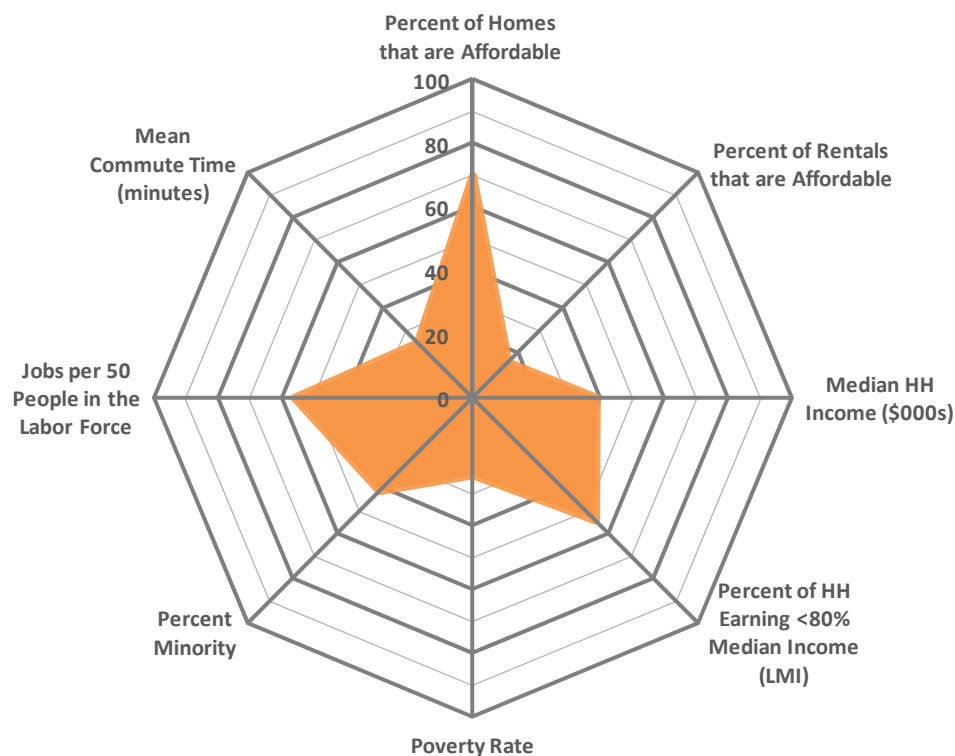
Primary Findings

- **Affordable rentals.** The Freeport Area's rental units are more likely to be affordable (23%) than the urban transect (11%).
- **Affordable homes to buy.** Overall, 85% of homes for purchase are affordable in the Freeport Area, compared to 52% in the urban transect.
- **Racial and ethnic diversity.** Each of the four Census tracts in the Freeport Area gained in diversity and the area is 58% minority.
- **Income diversity.** Three of the area's Census tracts are mixed income. The poverty rate (19%) is slightly lower than the urban transect (21%).
- **Education.** One in four adults have less than a high school diploma, the same as the urban transect.
- **Unemployment.** The area's unemployment rate is 8%.

Huntsville Area

Opportunity Comparison Radial

What does the average Census tract in the Huntsville area look like?

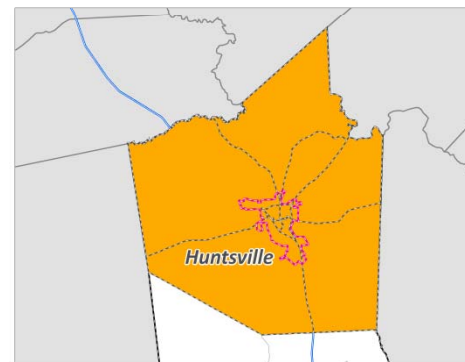


The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis

City boundary
 Analysis area



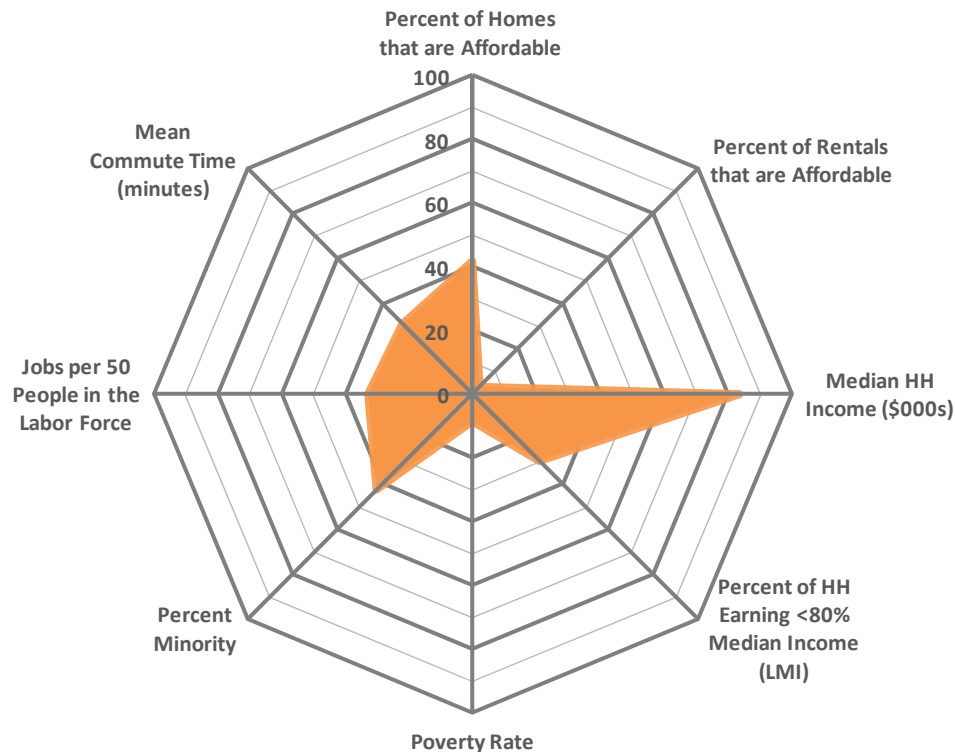
Primary Findings

- Affordable rentals.** While the Huntsville Area has a smaller share of rental housing stock than the urban transect (35% vs. 43%), its rental affordability (13%) and share of subsidized units (13%) is similar to the urban transect.
- Affordable homes to buy.** A greater proportion of homes to buy are affordable in the area (66%) than the urban transect (52%).
- Racial and ethnic diversity.** Nine of the area's ten Census tracts became more diverse from 2000 to 2010. Overall, 41% of residents are minorities.
- Income diversity.** Half of the area's Census tracts are mixed income. The poverty rate (23%) is slightly higher.
- Education.** Fewer than one in five adults have less than a high school education.
- Unemployment.** Unemployment (5%) is relatively lower.

Katy Area

Opportunity Comparison Radial

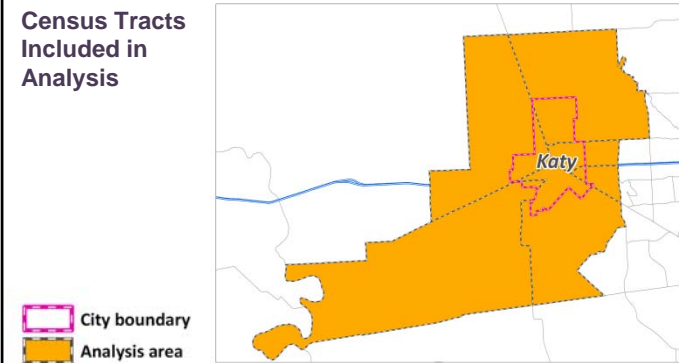
What does the average Census tract in the Katy area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



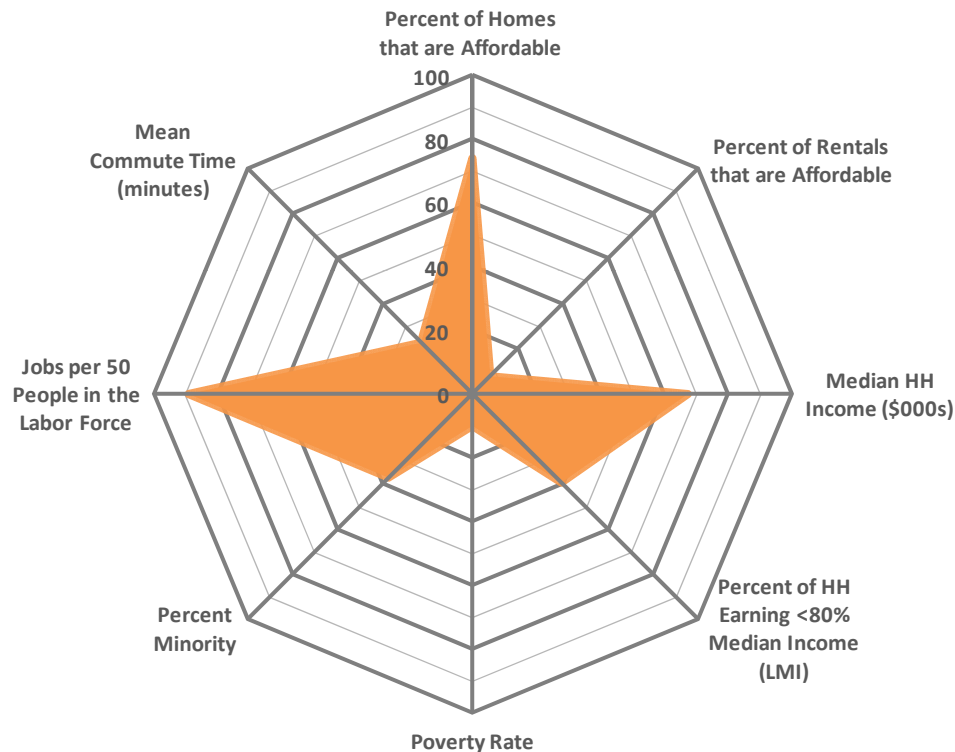
Primary Findings

- **Affordable rentals.** Compared to the suburban transect, the Katy Area has a smaller share of rental housing stock (34% vs. 16%). Only 2% of rentals are affordable.
- **Affordable homes to buy.** Overall, 30% of homes to buy are affordable, compared to 58% in the suburban transect.
- **Racial and ethnic diversity.** Most (88%) of the area's 8 Census tracts gained in diversity and 43% of residents are minorities.
- **Income diversity.** About 38% of Census tracts in the Katy Area are mixed income. The area's poverty rate (7%) is much lower than the suburban transect (16%).
- **Education.** Only 9% of adults have less than a high school diploma, compared to 20% in the suburban transect.
- **Unemployment.** Unemployment (5%) is relatively lower. The average commute time is 31 minutes.

La Porte Area

Opportunity Comparison Radial

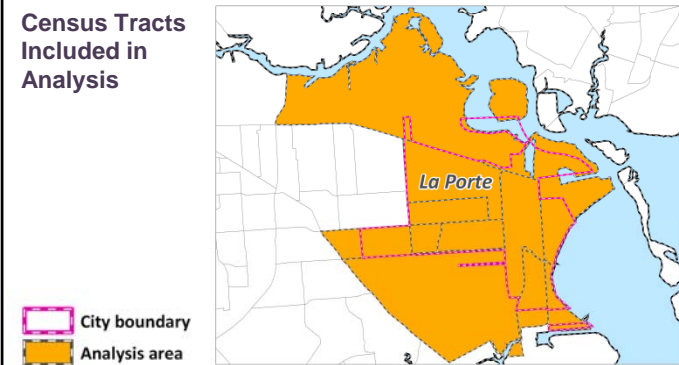
What does the average Census tract in the La Porte area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



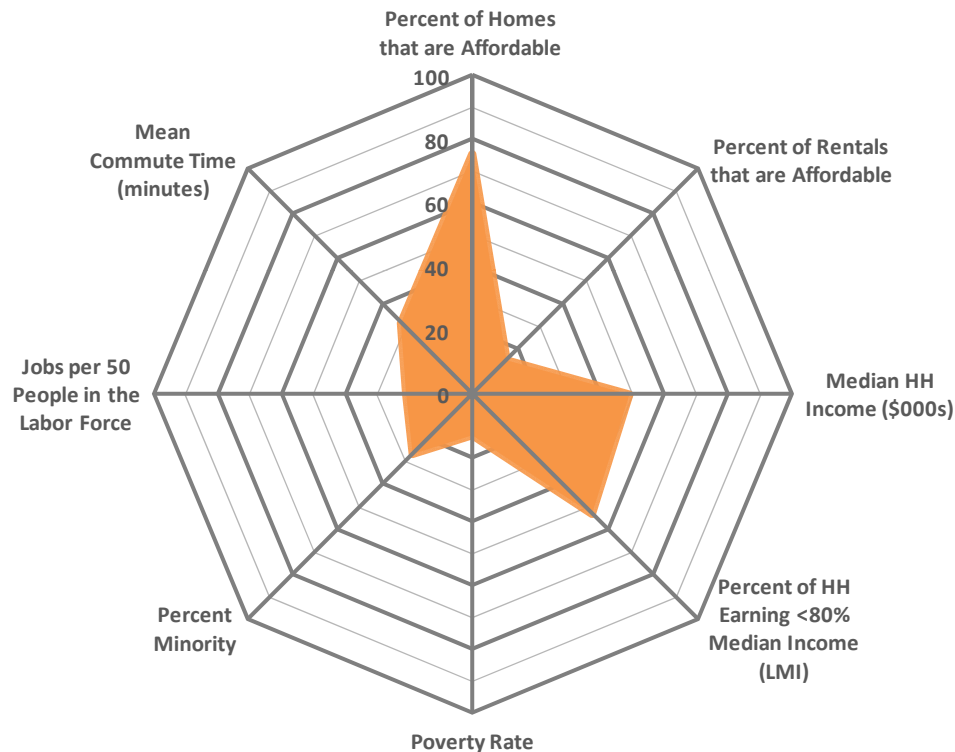
Primary Findings

- **Affordable rentals.** About one in five housing units are rentals. Overall, 16% of the La Porte Area's rental housing is subsidized, compared to 13% in the suburban transect.
- **Affordable homes to buy.** Overall, 75% of homes for purchase are affordable.
- **Racial and ethnic diversity.** All of the La Porte Area's nine Census tracts became more diverse from 2000 to 2010. The area is 38% minority.
- **Income diversity.** Two-thirds of the La Porte Area's Census tracts are mixed income. The area's poverty rate (10%) is lower than the suburban transect (16%).
- **Education.** Overall, 16% of adults have less than a high school diploma.
- **Unemployment.** The unemployment rate is 7%. The mean commute time (23 minutes) is less than the suburban transect.

Liberty Area

Opportunity Comparison Radial

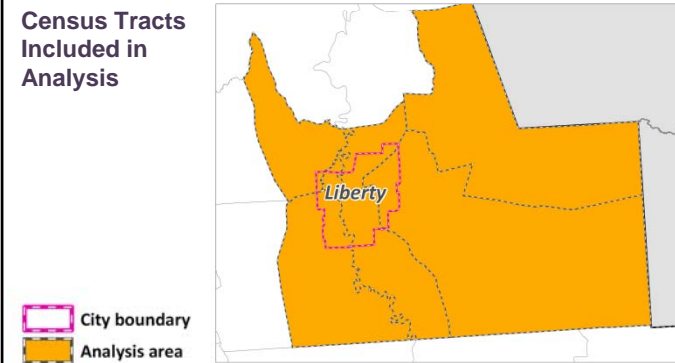
What does the average Census tract in the Liberty area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



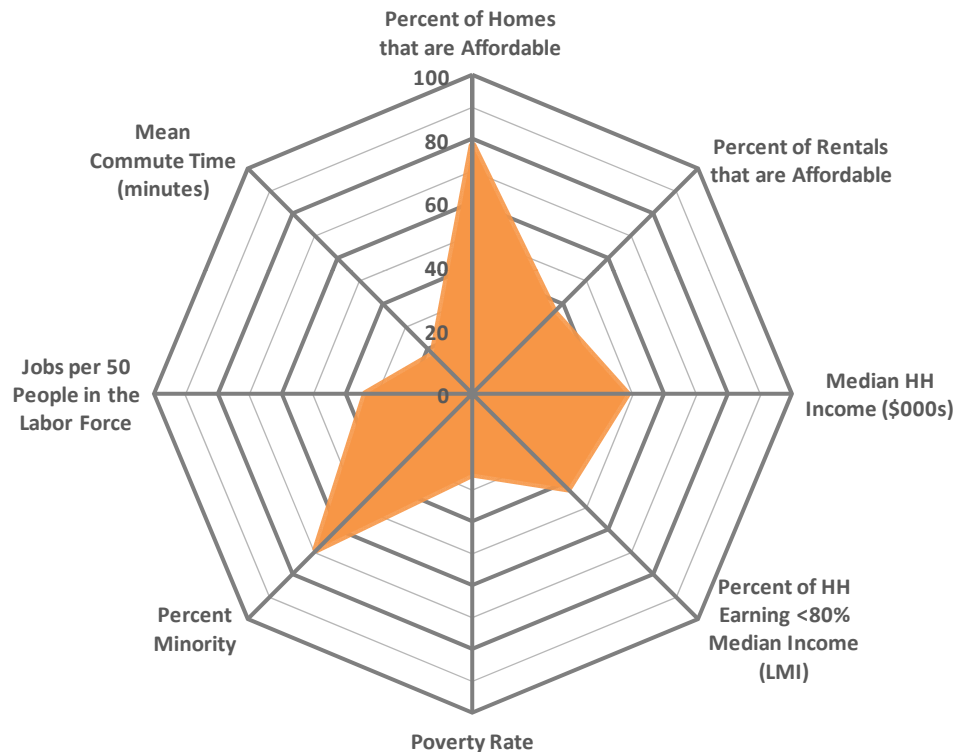
Primary Findings

- **Affordable rentals.** In the Liberty area, 19% of housing units are rentals, 16% of rentals are affordable to households earning less than \$20,000 and 19% of rentals are subsidized.
- **Affordable homes to buy.** Nearly three-quarters of the homes in the Liberty area are affordable (valued at less than \$150,000).
- **Racial and ethnic diversity.** Only 27% of residents are minorities but all Census tracts experienced an increase in racial/ethnic diversity between 2000 and 2010.
- **Income diversity.** The area is income diverse—four out of five tracts are mixed income.
- **Education.** Educational attainment is relatively low; 27% of adults have less than a high school degree.
- **Unemployment.** Unemployment is relatively high (10%).

Palacios Area

Opportunity Comparison Radial

What does the average Census tract in the Palacios area look like?

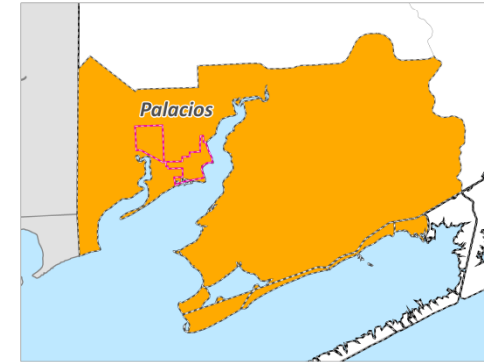


The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis

City boundary
Analysis area



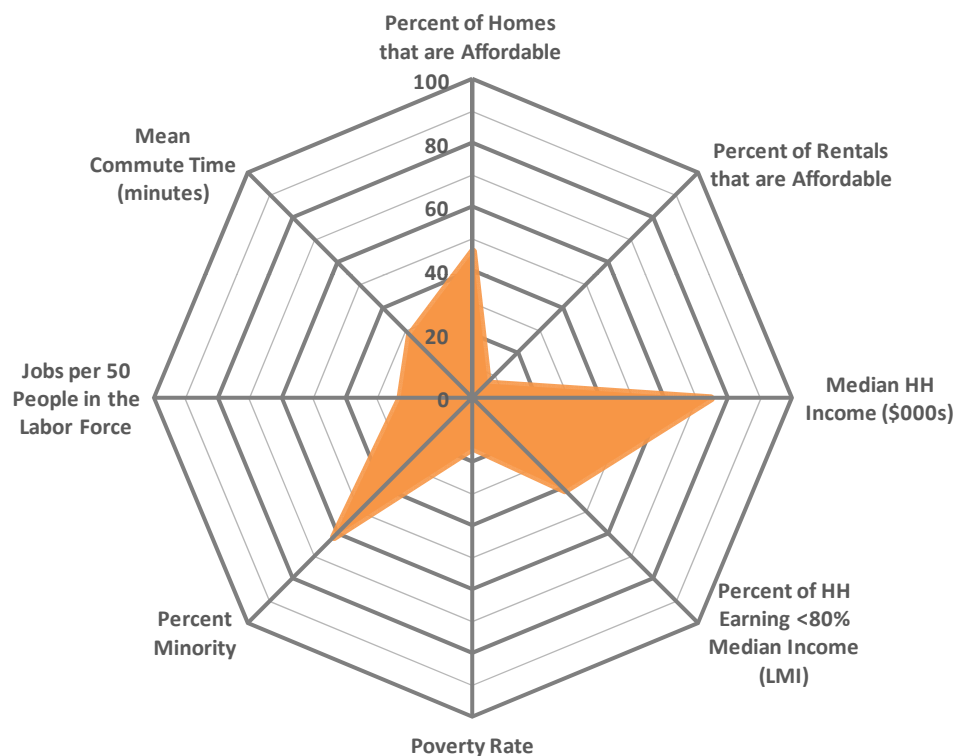
Primary Findings

- **Affordable rentals.** In the Palacios area, the proportion of housing units that are rentals (15%) is typical for a rural area but the proportion of rentals that are subsidized is very high (49%), compared to the rural transect (12%).
- **Affordable homes to buy.** The area's for-sale market is very affordable. 78% of homes are valued below \$150,000.
- **Racial and ethnic diversity.** Over two-thirds of residents belong to a racial/ethnic minority group.
- **Poverty.** The poverty rate in the Palacios area is very high—one-quarter of all residents are living in poverty.
- **Education.** More than one-quarter of adults (27%) have less than a high school degree.
- **Unemployment.** Unemployment is typical for a rural area (7%) and the average commute is relatively short (17 minutes).

Richmond Area

Opportunity Comparison Radial

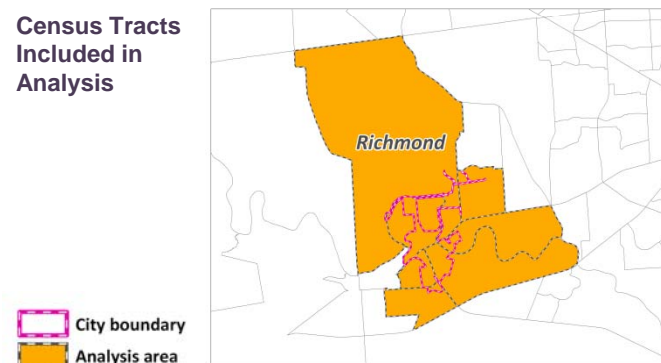
What does the average Census tract in the Richmond area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

All "percent" variables range from 0% to 100%.
 Median HH Income ranges from \$0 to \$100,000
 Jobs per 50 People in the Labor Force ranges from 0 to 100
 Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



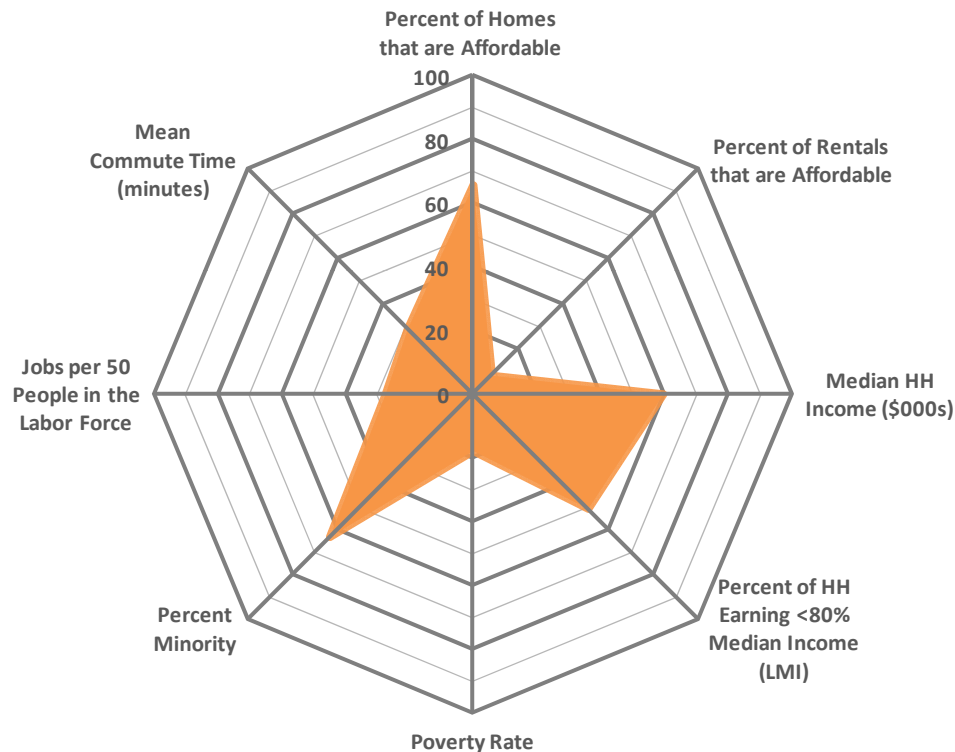
Primary Findings

- Affordable rentals.** In the Richmond area, 9% of rentals are affordable, higher than the suburban transect (6%). However, the proportion of units that are rentals and the proportion of rentals that are subsidized is lower than the suburban transect.
- Affordable homes to buy.** Affordable ownership opportunities are relatively low. In the area as a whole, only 32% of homes are valued at less than \$150,000.
- Racial and ethnic diversity.** In the average Richmond area Census tract, 61% of residents are minorities.
- Income diversity.** Compared to the suburban transect, income diversity is typical (43%) and poverty is low (13%).
- Education.** Among residents 25 or older, 16% have less than a high school degree.
- Unemployment.** Unemployment is relatively low (5%).

Rosenberg Area

Opportunity Comparison Radial

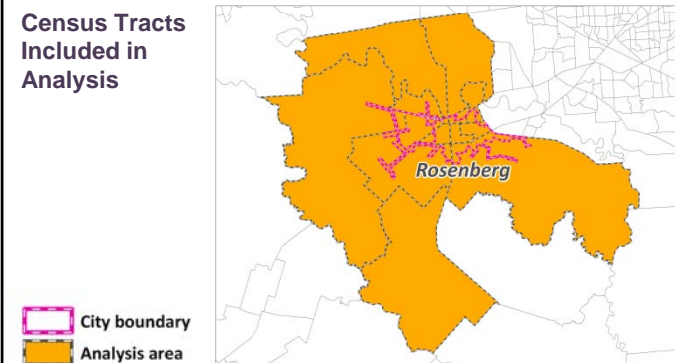
What does the average Census tract in the Rosenberg area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



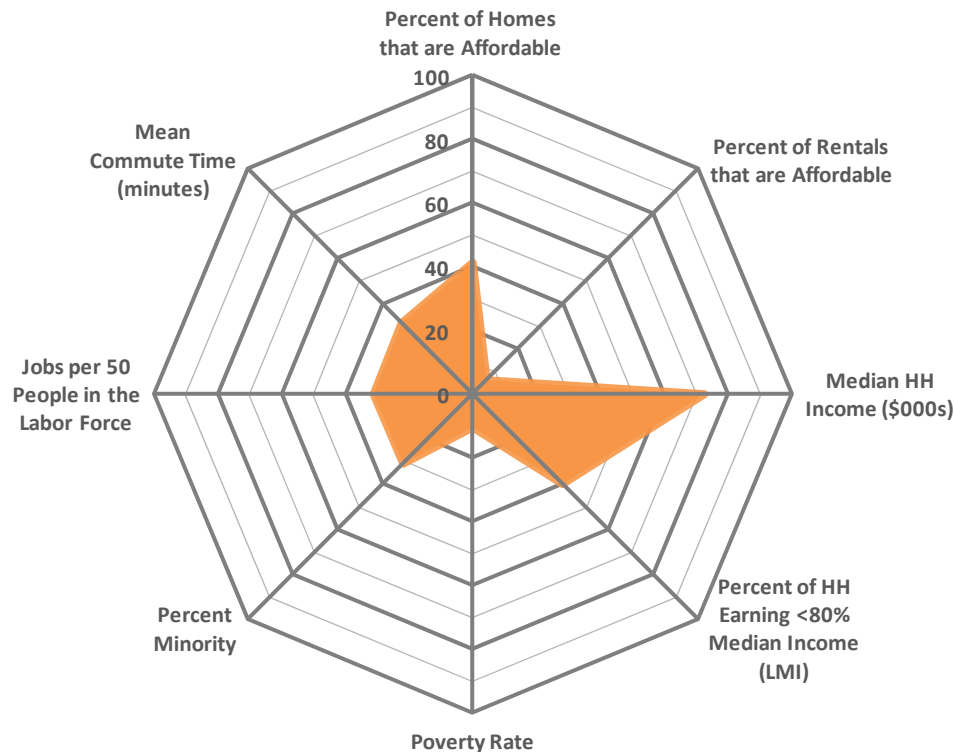
Primary Findings

- **Affordable rentals.** In the Rosenberg area, 11% of rentals are affordable, much higher than the suburban average (6%). However, there are relatively few subsidized rentals. The proportion of housing units that are rentals is also low.
- **Affordable homes to buy.** Over half (53%) of owner-occupied homes are affordable (valued below \$150,000).
- **Racial and ethnic diversity.** All tracts in the area increased in diversity between 2000 and 2010. In the average tract, nearly two-thirds (63%) of residents are minorities.
- **Income diversity.** The Rosenberg area is very income diverse—over two-thirds (67%) of Census tracts contain a healthy balance of incomes.
- **Education.** One in five adults has less than a high school degree, typical for a suburban area.
- **Unemployment.** Unemployment in the area is low (5%).

Tomball Area

Opportunity Comparison Radial

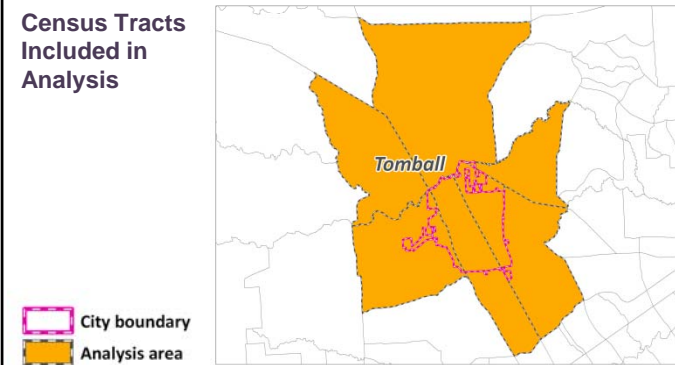
What does the average Census tract in the Tomball area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



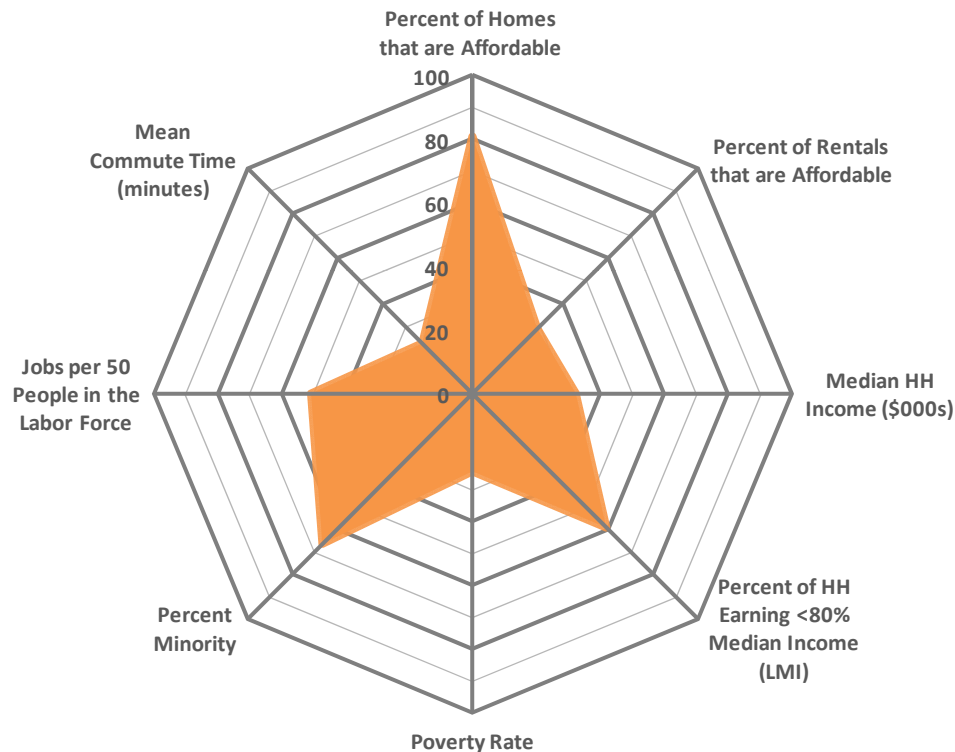
Primary Findings

- **Affordable rentals.** In the Tomball area, rental affordability is similar to the suburban transect. However, there are relatively few rentals overall and the proportion of rentals that are subsidized is relatively low.
- **Affordable homes to buy.** Ownership affordability is also relatively low. 40% of homes are valued below \$150,000.
- **Racial and ethnic diversity.** Fewer than one-third of residents are racial/ethnic minorities but all Census tracts increased in diversity between 2000 and 2010.
- **Income diversity.** Half of all Census tracts in the area are mixed income and poverty is relatively low (9%).
- **Education.** Only 7% of adults have less than a high school degree.
- **Unemployment and commute.** Unemployment in the area is 7% and the average commute is 31 minutes.

Wharton Area

Opportunity Comparison Radial

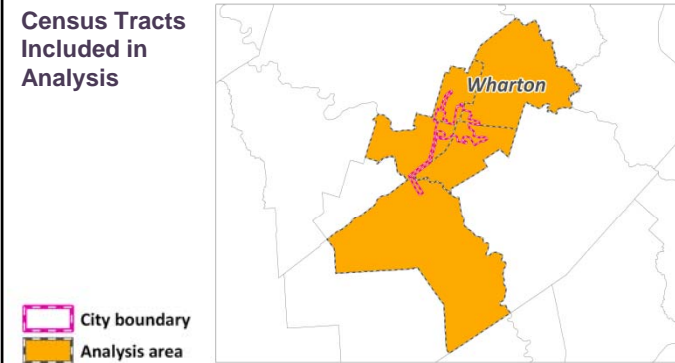
What does the average Census tract in the Wharton area look like?



The radial graphic plots the Census tract average for all Census tracts containing portions of the community. As such, the analysis area extends beyond the community boundary and may contain portions of other communities and/or unincorporated areas.

- All "percent" variables range from 0% to 100%.
- Median HH Income ranges from \$0 to \$100,000
- Jobs per 50 People in the Labor Force ranges from 0 to 100
- Mean Commute Time ranges from 0-100 minutes.

Census Tracts Included in Analysis



Primary Findings

- **Affordable rentals.** Rental affordability is relatively high in the Wharton area with 28% of rentals affordable to households earning less than \$20,000 per year.
- **Affordable homes to buy.** Ownership affordability is also relatively high (78% of homes are valued below \$150,000).
- **Racial and ethnic diversity.** In the typical Wharton area Census tract, about two-thirds of residents are minorities.
- **Income diversity.** Two of the five Census tracts in the area are mixed income and the poverty rate is 21%.
- **Education.** One-quarter of residents 25 or older have less than a high school degree.
- **Jobs and commute.** Unemployment is 8% and the average commute time is 22 minutes. The area supports approximately one job per person in the labor force.

Appendix B

Jurisdiction FFAST and AI Analysis

Appendix B – Jurisdictional FFAST and AI Analysis

Introduction

This section summarizes the primary findings of jurisdictional FFAST form and/or AI reviews for the Houston-Galveston Fair Housing Equity Assessment (FHEA). Reviews of FFAST forms and/or AIs were conducted of FHEA Communities in the Houston-Galveston region. The reviews were completed to determine if there were common or unique elements in the communities that impact fair housing compliance and housing choice.

Background

As part of the Fair Housing and Conditions Research for the Houston-Galveston FHEA, 31 jurisdictional AIs and/or FFAST forms were reviewed. Nineteen of the jurisdictions had year 2011 FFAST forms only. The remaining jurisdictions had available either a completed AI or both a FFAST form and an AI

There are some limitations to the reviews performed. First, FFAST forms contain very little detail regarding a jurisdiction's specific fair housing practices and potential impediments. Second, many of the AIs or Fair Housing Plans available for review were not completed recently, primarily covering the years 2006 through 2009.

Summary of Findings

This section summarizes the common elements in jurisdictional policies and procedures related to impediments to fair housing choice as well as identified impediments.

Policies and procedures

The majority of jurisdictions were lacking policies and procedures to ensure non-discriminatory housing practices to protected classes, in addition to lacking fair housing complaint contacts and commitments to affirmatively further fair housing.

Below are the areas that were consistently missing policies and procedures, had not been reviewed for possible discrimination against protected classes, or were not present at all:

- Policies on translation of vital documents into languages other than English – only four FHEA communities discussed translation of documents in AIs/FFAST forms;
- Fair housing complaint contacts at local, state, and federal level on jurisdiction websites. Most jurisdictions do not have but intend to add;
- Clear statement on jurisdiction websites to affirmatively further fair housing. Most jurisdictions do not have but intend to add;
- Development of anti-NIMBYism action plan: 21 entities do not have anti-NIMBYism plan but will develop one; four entities show some kind of impediments based upon NIMBYism. Several rural communities questioned the

Appendix B – Jurisdictional FFAST and AI Analysis

value of an anti-NIMBYism plan stating that multifamily units were not appropriate and/or planned;

- Zoning codes that promote affordable housing and do not impose conditions. Many areas do not have zoning codes but did not examine the effect of lack of regulations on housing choice;
- Existence of ADA accessibility policies for new housing projects and rehabilitation of public housing—generally not reviewed or in existence;
- Lending practices and foreclosure analysis. Lending practices were reviewed more frequently—in seven communities, six of which found impediments—more than the existence or impact of foreclosures, which was examined in just three communities;
- Fair housing education and training—generally not provided but most jurisdictions committed to providing in the future;
- Five jurisdictions did not have Section 3 programs in place (Huntsville, Baytown, Freeport, Fort Bend, and South Houston);
- Many jurisdictions did not have policies in place to ensure ADA compliant construction of non-federally funded infrastructure projects; and
- Fair housing testing programs—generally not done by jurisdictions. Most jurisdictions stated lack of resources to perform such testing due to its sophisticated nature,

believing that such testing should be done at regional and state levels.

Impediments

The review of the 31 jurisdiction AI, FFAST, and/or Fair Housing Plans revealed the following common issues that could be or are impediments:

- Lack of affordable housing—note, few jurisdictions link a lack of affordable housing to a disparate impact on members of protected classes. A lack of affordable housing per se is not an impediment to fair housing choice unless it can be shown that members of a protected class are disparately impacted;
- Lack of funding to address the identified affordability shortages;
- Minority and/or poverty concentrations where affordable housing exists;
- Older housing stock lacking ADA accessibility;
- Inadequate public transportation;
- High rates of loan denial among racial and ethnic minorities and, in some cases, alleged lending discrimination; and
- Lack of public housing units.

Appendix B – Jurisdictional FFAST and AI Analysis

FFAST Form Analysis

The FHEA team performed an in in-depth analysis of completed FFAST forms, which included 34 city forms, nine county forms, and three public housing forms. Below are trends noted in the FFAST Form review:

- Jurisdictional hesitance to tackle fair housing problems locally, but a willingness to cooperate with existing state/regional/federal programs;
- Most jurisdictions do not have policy that places limits on concentration of undesirable infrastructure in minority/poverty concentrated areas, but committed to develop such policy;
- Most jurisdictions have not completed Fair Housing reviews but plan to do so;
- Most jurisdictions do not consistently try to apply for additional funding to repair substandard housing; and
- There appears to be an inadequate institutional framework for furthering fair housing with collected demographic data.

Figure B-1 summarizes all of the impediments found in the TDHCA AI and the H-GAC findings.

How to Improve Fair Housing Choice

The findings from the reviews of the FFAST forms and AIs suggest many ways to assist jurisdictions with fair housing compliance and encourage best practices in fair housing. These include:

- Make standard language about fair housing—or a fair housing webpage that can be linked to by the jurisdictions—available to jurisdictions for internal circulation, to use as materials at community meetings and for publication on websites. The language should be in Spanish and English or have a language conversion option; provide basic information about the Federal Fair Housing Act; and instruct residents on whom to contact if they want to file a fair housing complaint or have fair housing questions.
- Offer assistance or guidance in developing anti-NIMBYism plans. Develop a model plan for the region with practical, actionable ways to address NIMBYism. Support communities with best practices, research and communication strategies they can use to mitigate the effects of NIMBYism on housing choice. Work to disabuse the public of the notion that multifamily housing is undesirable.
- Support fair housing testing region wide. Many jurisdictions note that they are too financially constrained to fund fair housing testing.
- Provide guidance and best practices on how the jurisdictions can increase housing diversity, both by type (multifamily, single family) and price point. This could include how jurisdictions can work with public housing authorities and other assisted housing providers to meet unmet demand for housing and further opportunities for housing choice.
- Offer model regulations and practices on permitting by right group homes in residential settings, ADA compliance and encouraging visitability in development.
- Advise jurisdictions on how to use the concentration of race, ethnicity and income maps and data they have prepared for

Appendix B – Jurisdictional FHAST and AI Analysis

their AIs or FHAST forms. Or, if the jurisdictions do not maintain such maps and data, provide this information to them (from the FHEA). As required by the FHAST forms, some communities are already using the data to ensure that jurisdictional planning, housing and community development programs and activities do not promote racial concentration or result in disparate treatment of protected classes. In addition, the data and maps can be used to identify areas in which housing choice should be expanded.

- Given the variety of topics required to be covered in an AI—and the difference in how each are treated in the jurisdictions—support trainings and workshops about AI requirements and best practices. Such trainings should include methodologies for addressing issues such as identifying if lack of affordable housing has a disparate impact on protected classes; using minority and poverty concentration mapping and data in AIs; conducting an analysis of environmental justice issues; understanding how lack of zoning and land use ordinances can impact housing choice; and how to conduct lending and foreclosure analyses. Materials should be tailored for community size, budget and time to conduct such..

Appendix B – Jurisdictional FFAST and AI Analysis

Figure B-1.
TDHCA AI (Phase 1) and H-GAC findings Summary, Impediments and Plans to Address

Impediment Addressed	Impediment Description	H-GAC Comments on Plans to Address
Impediment #1	Protected classes may experience disparities in home mortgage lending and high cost loans.	1) No local action required at this time.
Impediment #2	There is inadequate information available to the real estate community, governments and the public about fair housing requirements/enforcement procedures.	1) No local action required at this time.
Impediment #3	The public is not sufficiently aware of their Fair Housing rights and how to obtain the assistance necessary to protect those rights.	1) Passage of resolution, placing posters in public buildings, governing body will hold special hearing. 2) Placing ads, updating websites, placing taglines in bulletins like "Fair Housing is Law" or "Fair Housing is your Right."
Impediment #4	NIMBY may be an impediment to fair housing in Texas communities.	1) Will develop an anti-NIMBYism plan by a city or county agency, committee, workgroup.
Impediment #5	Certain governmental policies and practices may not meet current HUD policy concerning affirmatively furthering fair housing.	1) Most jurisdictions need to review policies and practices to ensure that fair housing implications are addressed in all aspects of planning. 2) Most jurisdictions do not have policy for staff to receive training but will develop one. 3) Most jurisdictions do not place limits on concentration of undesirable infrastructure improvements/policies that take resident location of protected classes into account but will develop formal limits. 4) Most jurisdictions do not have a policy/do not offer affirmative marketing incentives. 5) Most jurisdictions have not consistently tried to make an application for additional funding to repair substandard housing. 6) About half of jurisdictions do not require ADA compliance with infrastructure improvements but will develop policies. 7) Most jurisdictions have not, but plan to review/analyze policies regarding denying applicants' access to disaster recovery CDBG funds if residence is located in flood plain. 8) Most jurisdictions did not accommodate the relocation of Hurricane survivors. 9) Most jurisdictions have not, but will develop standards to ensure that infrastructure projects funded with disaster recovery funds are accessible to persons with disabilities. 10) Most jurisdictions do not have public housing units and are not taking any DRS housing activities. 11) Most jurisdictions do not have policy for staff to receive fair housing training but will develop one.
Impediment #6	Governmental entities at all levels do not appear to have been proactive in the enforcement of both the Fair Housing Act and the obligation to affirmatively further fair housing.	1) Half of jurisdictions do not have Fair Housing testing program. Process is too sophisticated and should be handled by regional/statewide authorities. 2) Most jurisdictions have not posted fair housing enforcement contacts on their websites, or accessible locations if no website. 3) Most jurisdictions do not have, but will publish policy statement expressing obligation to affirmatively further fair housing.

Source: H-GAC.

Appendix B – Jurisdictional FFAST and AI Analysis

Figure B-1. (continued)

TDHCA AI (Phase 1) and H-GAC findings Summary, Impediments and Plans to Address

Impediment Addressed	Impediment Description	H-GAC Comments on Plans to Address
Impediment #7	Many local jurisdictions have zoning codes, land use controls and administrative practices that may impede fair housing choice and fail to affirmatively further fair housing.	1) Most jurisdictions have not reviewed ordinances for potential to create disparate impacts. 2) Most jurisdictions have not, but will conduct a Fair Housing review after state suggested guidelines are made available.
Impediment #8	Inadequate planning for re-housing after an emergency situation creates a situation where persons who are uninsured or under-insured, low income, or special needs can be displaced for long periods of time.	1) About one-third of jurisdictions do not have zoning requirements, and another third have not reviewed zoning requirements for displacement.
Impediment #9	There are impediments in public and private actions and private attitudes to housing choice for persons with disabilities.	1) Most jurisdictions have not reviewed their zoning codes to assess potential impediments, but plans to do so.
Impediment #10	There are barriers to mobility and free housing choice for Housing Choice Voucher holders.	1) No local action beyond compliance with Round 2 Housing Guidelines.
Impediment #11	Loss of housing stock in Hurricanes Dolly and Ike compounded the shortage of affordable housing in disaster recovery areas.	1) No local action required at this time. TDHCA will develop statewide strategic plan to address.
Impediment #12	Lack of financial resources for both individuals and housing providers limits Fair Housing choice.	1) Most jurisdictions do not have a Section 3 program but plan to develop one.
Impediment #13	Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choices for persons with disabilities.	1) Most jurisdictions do not offer incentives for increasing housing units for the disabled/elderly; those that do have not conducted those policies to determine effectiveness.
Impediment #14	Many colonias residents live in developments that have insufficient infrastructure and protections against flooding and are impacted by flooding beyond events like Hurricanes Dolly and Ike.	1) There are no colonias in any of the respondent jurisdictions.
Impediment #15	Minority neighborhoods in disaster areas are primarily served by non-regulated insurance companies that do not adhere to underwriting guidelines and may be discriminated against in the provision of insurance.	1) No local action is required at this time.
Impediment #16	Many jurisdictions do not have adequate analysis of impediments to Fair Housing or Fair Housing Plans and do not keep sufficient records of their activities.	1) Most jurisdictions have not maintained records according to regulations but plan to do so.

Source: H-GAC.

Appendix C

Public Housing Authority Plans Review

Appendix C – Public Housing Authority Plans Review

Introduction

This section summarizes a review of 5-year public housing authority (PHA) plans, which were reviewed for 17 PHAs in the Houston-Galveston region as part of the FHEA. Plans were not available for two housing authorities, the Huntsville PHA and the Bellville PHA.

It is important to note that PHAs have many plans that discuss their policies, procedures and efforts to increase mobility and affirm housing choice. A review of all documents was beyond the scope of this study. We acknowledge that some of the concerns identified in this document may be mitigated by information provided in other PHA plans and documents.

Background

Altogether, the PHAs in the region manage more than 8,600 public housing units (PHUs) and administer more than 26,000 housing choice vouchers (HCVs). The vast majority of the units and vouchers are located in Harris County (84% of PHUs and 82% of HCVs) and Galveston County (6% of PHUs and 9% of HCVs).

The region's PHAs provide a critical service housing the region's low income residents, yet, as evidenced below, demand far exceeds the supply of units. Figure B-1 summarizes wait lists and characteristics of wait listed households. As the figure demonstrates, the numbers of households on the wait lists of the PHAs are in the hundreds of thousands. Many households on the wait list are families and racial/ethnic minorities.

The review in this section focused on the activities that the PHAs have in place and/or propose to undertake to expand housing choice for their clients and low income residents in the region. The review also focused on Section 504 compliance, the reasons for “troubled” status and the existence of any voluntary compliance agreements.¹

While many of the PHAs provided clear plan objectives, specific action steps for accomplishing those objectives were only modestly discussed in some plans.

¹ Troubled Applicants, as defined by HUD, refer to all applicants found to have capacity or past performance problems that call into question the ability of the applicant to properly administer an effective ROSS-SC program.

Appendix C – Public Housing Authority Plans Review

Figure C-1.
PHA Plan Review Summary, PHA Wait Lists

Jurisdiction	Section 8 Housing Choice Vouchers (HCV)	Public Housing Units (PHU)	HCV and PHU Combined	Number Voucher and/or Units Managed	Number of Families on Wait List	Extremely Low-income Families (≤ 30% AMI)	Families with Children	Elderly Households	Households with Disabilities	Black/ African American	White	Other Race	Hispanic	Wait List Open	If closed, how long (months)
Bay City HCV PHU	✓	✓		247 92											
Baytown			✓	912	450	84%	56%	14%	20%	41%	8%	0%	51%	Y	42
Brazoria	✓			586	223	100%	87%	4%	13%	58%	39%	3%	28%	N	
Cleveland		✓		70	75	0%	36%	12%	13%	68%	25%	7%	0%	Unknown	
Dayton		✓		100											
El Campo		✓		150											
Galveston HCV PHU	✓			1,231 410	1,114 1,513	93% 90%	26% 35%	0% 0%	4% 6%	78% 55%	19% 41%	1% 1%	0% 0%	Y N	22
Harris County	✓			4,095											
Houston HCV PHU	✓			16,175 3,657	19,507 14,447	73% 79%	60% 61%	7% 3%	21% 2%	N/A 78%	N/A 6%	N/A 4%	5% 12%	Y N	31
La Marque	✓			58	19	79%	79%	5%	5%	74%	26%	0%	0%	Y	40
Liberty County	✓			271	250	40%	40%	50%	10%	39%	44%	17%	0%	Unknown	
Montgomery County	✓			364											
Palacios HCV PHU	✓				5 53	0% 9%	100% 70%	N/A 9%	N/A 2%	40% 13%	40% 21%	0% 0%	20% 43%	Y N	5
Pasadena	✓			1,078											
Rosenberg	✓			499											
Texas City HCV PHU		✓		74 478	42 60	83% 82%	81% 80%	19% 18%	33% 38%	81% 65%	14% 13%		5% 22%	Y Y	22 39
Walker County	✓			251											

Source: Jurisdictional PHA Plans.

Appendix C – Public Housing Authority Plans Review

Primary Findings

Commonalities among PHA goals and objectives in the 5-year and annual plans include:

- Educating HCV recipients about housing mobility options, i.e., mixed-income neighborhoods. Ten out of the 17 PHA plans included this objective. PHAs that did not, included Brazoria County, Baytown, Cleveland, El Campo, Dayton, Harris County and Walker County.
- Employing outreach efforts to potential Section 8 landlords/owners, particularly those in areas outside of minority and/or poverty concentrations. Same as above, 10 out of the 17 PHA plans included this objective.
- Applying for additional HCVs, when available. All PHA plans listed this objective.
- Reducing turn-around time for vacant public housing units. All PHA plans listed this objective.
- Improving efficiency of PHU and HCV program management. All PHA plans listed this objective.

Commonalities among public housing authorities were also found in terms of challenges and impediments:

- Lack of affordable housing options, noted as severe for extremely low-income families and families with children. The PHAs noted that lack of affordable housing options disproportionately affects non-white, non-Hispanic racial and ethnic groups, as these populations make up a greater

portion of lower income families in most areas. All PHA plans listed this as a primary challenge/impediment.

- Section 504 accessibility and livability improvements are either non-existent or not specifically addressed in most of the PHA plans. Two PHAs addressed Section 504 accessibility very directly (the City of Houston and City of Galveston). The City of Baytown addressed accessibility indirectly through a specific program to improve ADA accessibility at a complex for the elderly, as did Harris County, with plans to build two elderly-specific housing units.
- An emphasis on improving housing quality and expanding assisted housing units, despite limited resources to do so.
- The PHAs' civil rights certifications are often lacking sexual orientation or gender identification as protected classes, which are now protected from discrimination in federally-subsidized housing. It should be noted that many of the plans were prepared before this class became protected under HUD policies. Administrative plans and PHU and HCV resident orientation materials (not reviewed for this study) should contain such information as part of the fair housing information provided to clients.

PHA Plan Summaries by City/County

The 17 PHA plan review summaries follow. The summaries provide detail regarding the most important goals and objectives, PHA wait list data if available, challenges each entity faces in achieving housing goals and objectives and concerns particular to each entity. The amount of information

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depends on the content and extent of information in the 5-year plans.

Bay City

Bay City manages 92 PHUs and 247 HCVs. The PHA's 5-year plan states specific goals—but is void of action steps—to:

- Expand the supply of assisted housing,
- Improve the quality of assisted housing and modernize units to help with marketability,
- Improve customer satisfaction,
- Improve quality of life and economic vitality,
- Promote self sufficiency and asset development of families and individuals, and
- Ensure equal housing opportunity.

There were no indications of Section 504 compliance reviews, or goals and objectives for meeting the accessibility needs of tenants with disabilities. A lack of reviews found does not mean the PHA is non-compliant. Similarly, the plan did not provide specific details on expanding the supply and improving the condition of assisted housing.

City of Baytown

The Baytown PHA operates 150 PHUs and 762 HCVs. The PHA goals were standard and actions to meet the goals were discussed.

Positive actions the PHA has taken to improve housing include utilizing federal recovery American Recovery and Reinvestment Act (ARRA) funds to upgrade the elderly complex and

increasing the number of ADA accessible units; increasing safety by hiring off duty patrol officers; conducting landlord meetings to encourage participation in the HCV program; counseling HCV holders about locations outside areas of poverty and minority concentration; and increasing efficiencies in unit turnover.

Modest concerns were noted in the review:

The Baytown 5-year and annual plan is quite detailed and includes information on deconcentration and income mixing analysis and preferences. The PHA does not have developments covered by the deconcentration rule nor does it plan to operate any site-based waiting lists.

The only preference priority given by the PHA is “involuntary displacement.” The PHA does not plan to exceed federal targeting requirements by targeting HCVs to families at or below 30 percent of the AMI, even though 84 percent of families on the PHAs combined Section 8 and PHU waiting lists are extremely low income (earn less than 30% AMI). The combined Section 8 and public housing wait list in Baytown had 450 families at the time the 5-year plan was prepared, and the list had been closed for 42 months. More than 80 percent of families on the list were extremely low-income and 56 percent were families with children.

The PHA's pet policy is very detailed but does not provide information about pet fee waivers as part of reasonable accommodations, which is a good practice.

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Brazoria County

The Brazoria County PHA does not manage any public housing, but does administer 586 HCV. Brazoria County PHA has standard goals in their 5-year plan, with specific details as to how the goals will be met. Positive actions toward attaining goals have increased the PHA SEMAP score from Standard to High Performer. The actions include:

- Receipt of 26 additional enhanced vouchers;
- Give training and certification to staff;
- Increase in the HCV lease-up rate to 98 percent;
- Outreach to developers who have built, or are considering building, tax-credit properties. This has resulted in an increase in Section 8 voucher acceptance for some developers; others will re-evaluate their rules and consider accepting vouchers in the future;
- Annual evaluation of payment standards to maximize options for families to rent in lower poverty areas.

Expanding availability of vouchers for veterans was a material goal in the county's PHA 5-year plan. The PHA was coordinating with the Veteran's Administration and the State of Texas to gain access to HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers; however, the county did not qualify due to lack of experience.

Brazoria County PHA had 223 families on their post-purge Section 8 wait list at the time of the PHA submission. Families with children made up 87 percent of the wait list. Virtually all families on the wait-list were extremely low income. The wait list was re-opened at that time and 1,493 applications were received.

The review found several areas of possible concern:

- The PHA plan does not specify a commitment to educate Section 8 recipients on housing mobility choices, nor to outreach with potential landlords in areas of non-minority/poverty concentration.
- The PHA plan relies primarily on applications for additional vouchers as the strategy for addressing housing needs. In addition, the lease-up rate is already very high, at 98 percent. Continued funding cuts to the Section 8 HCV program make this strategy very limiting to effectively addressing housing affordability in Brazoria County.
- The PHA Administrative Plan includes a restriction on adding new household members who are not related by blood or marriage. The restriction should be reviewed for compliance with HUD regulations requiring non-discrimination based upon sexual orientation and gender identification.
- There were no indications of Section 504 compliance reviews, or goals and objectives for meeting the accessibility needs of persons with disabilities in the county PHA plan. However, the PHA does give preference to Section 8 applicants who are elderly or disabled.

City of Cleveland

The PHA manages 70 PHUs and administers no Section 8 HCV. The PHA lists standard HUD objectives in its 5-year plan, with very specific goals. Absent in the goals were a commitment to educate Section 8 tenants about housing mobility options and outreach with potential landlords in non-concentrated areas.

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The PHA's five year plan focuses on reporting progress infrastructure improvements: (1) HVAC upgrades in units to decrease utility costs, (2) repair of most sidewalks, (3) re-roof all units, (4) replacement of old cabinets at the elderly site, and (5) installation of new efficiency light fixtures. Almost \$250,000 was earmarked in the 5-year plan toward physical improvements, representing about two-thirds of each annual funding program budget.

There were no indications of Section 504 compliance reviews, or goals and objectives for meeting the accessibility needs of the disabled in the PHA plan.

City of Dayton

The City PHA manages 100 PHU and no Section 8 HCV. The city has standard HUD objectives in its PHA 5-year plan, but no specific action steps included in the plan document.

The PHA plan has no information in it to assess fair housing practices.

City of El Campo

The PHA manages 150 PHUs and administers no Section 8 HCV. The PHA plan only contained the city's high-level objectives, which are standard HUD objectives.

The plan has no information in it to assess fair housing practices.

City of Galveston

As of July, 2010 the Galveston PHA managed 410 PHUs, significantly fewer than the 990 PHUs prior to Hurricane Ike. The PHA also managed 1,231 HCVs. 1,513 families were wait-

listed for PHUs, of which 90 percent were extremely low income. Another 1,114 families were on the HCV wait list; 93 percent were extremely low income.

Galveston's PHA plan contains standard goals and clearly defines objectives and activities to achieve those goals. The most significant activities include:

- Redevelop 569 units destroyed by Hurricane Ike,
- Construct 179 scattered site units in non-poverty impacted areas,
- Apply for relocation vouchers and Hope VI funding,²
- Improve management scores to attain 90 or above during the 5-year planning period,
- Significantly increase outreach and communication to residents,
- Conduct outreach efforts to landlords through apartment and real estate agent associations,
- Conduct landlord receptions,
- Designate developments for particular resident groups (e.g., persons with disabilities, elderly),
- Partner with local educational institutions to improve residents' employability,
- Apply for Low Income Housing Tax Credits (LIHTC), and

² Housing Opportunities for People Everywhere (HOPE VI) – Established in 1992, HOPE VI is a HUD led revitalization effort which combined grants for physical redevelopment with funding for management improvements and supportive services to promote resident self-sufficiency.

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- Assist 50 percent of HCV moves to areas of low minority concentration.

The PHA gives preferences to those who are involuntary displaced as well as working families, those unable to work because of disability/age, those enrolled in educational or job training programs, veterans (HCVs) and households contributing to meeting income requirements (PHUs). The PHA does plan to exceed federal targeting for both PHUs and HCVs for extremely low income households.

The PHA's pet policy discusses reasonable accommodations but there is little in the plan about Section 504 requirements and increasing accessibility.

Harris County Housing Authority

Harris County manages 4,095 HCV units and has no PHUs. The county's 5-year plan contains the standard HUD objectives and specific strategies to carry out those objectives. Included in the strategies are marketing to potential owners, and educating voucher recipients of housing availability outside of minority and poverty concentration. The PHA is the winner of the 2009 Nan McKay Award of Merit in Housing and Community Development and reports being a leader in disaster assistance housing nationwide.

Harris County's PHA has outlined a rich set of strategies for meeting their 5-year plan goals. Highlights of the PHA goals are as follows:

- Develop an 88-unit senior housing community, which will also be the first affordable green housing building in Harris County (Leadership in Energy and Environmental Design (LEED) certified);

- Develop a 90-unit LIHTC senior housing community;
- Double the number of families participating in the Housing Choice homeownership program (Harris County PHA had 19 families participating in 2010);
- Continue to maintain close to 100 percent lease-up rate;
- Increase housing choices through the assistance of a relocation specialist;
- Partner with The WorkSource and Harris County Social Services to provide every client an opportunity to seek employment or gain additional skills needed to become self-sufficient;
- Continue to be a national leader in DHAP client assistance (2,000 participants being assisted into self-sufficiency); and
- Continue to seek national awards when merited.

Harris County PHA's 10 year vision includes development of the first master planned veteran community in the country and becoming a national model for damage and risk assessment after a natural disaster.

The Harris County PHA's wait list for HCV was 21,284 applicants, as of the 5-year Plan. The list had been closed since October 2008 and is not expected to reopen in the short term. The Harris County Consolidated Plan 2008 – 2012 indicated material housing needs in the county, with 35,572 very low income families (at or below 30% AMI) in need as well as many families with disabilities.

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To address needs of those living in poverty, the county has targeted 75 percent of new HCV admissions for very low income families.

The PHA has addressed Section 504 housing compliance through developing two new senior housing communities and committing to apply for special-purpose HCVs for the elderly and persons with disabilities. The PHA also gives disability preferences.

Houston Housing Authority

The city PHA manages 3,657 PHUs and 16,175 HCVs. The housing needs assessment completed for the PHA plan estimates that more than 80,000 families in the city are in critical need of affordable, quality housing. Most of the families are of either Hispanic or African American descent. This need for housing is evidenced in the PHA's very lengthy wait list.

The PHA employs admissions preferences aimed at families with economic hardships. The PHA also is committed to affirmatively market to races/ethnicities shown to have disproportionate housing needs.

To address the shortage of affordable housing in Houston, the PHA plan outlines specific strategies. Those strategies include carrying out needed modification in public housing to address section 504 needs assessment, and to affirmatively market to local non-profit agencies that assist families with disabilities. The plan also includes commitments to counsel Section 8 tenants regarding units available outside minority/poverty concentrated areas and to market to owners outside these areas

of concentration. The PHA indicates that funding and staffing constraints limit their ability to address housing shortages.

The PHA received two HOPE VI revitalization action grants, plans to apply for additional grant(s) during the action plan year as well as engaging in mixed-finance development activities for public housing. Houston also has 194 PHUs available for ownership under Section 32 of the U.S. Housing Act of 1937 and a Section 8 home ownership program. The Fourth Ward new construction homeownership program has provided six new construction and four rehabilitated homeownership replacement units within the Fourth Ward/Freedmen's Town. The units are all single-family detached homes being sold to eligible purchasers on a fee-simple basis. The target population is 60-80 percent of AMI.

During the 2012 action plan year, Houston PHA actively worked to modernize and rehabilitate its older housing stock. The PHA also pursued efforts to add 1,000 new units to its inventory. The Board of Commissioners also authorized the PHA to purchase a 484 unit development.

In 2008 and 2009, the city won High Performer designation for its two core programs: Low Rent Public Housing Program and Section 8 Housing Choice Voucher Program. The Section 8 Family Self-Sufficiency Program had 534 participants as of the action plan submittal, and 198 were depositing into escrow accounts. In the first seven months of 2009, 37 clients successfully completed the program. The Family Self-Sufficiency (FSS) program is widely supported by the community through a Program Council.

The PHA continues to pursue development opportunities of LIHTC properties, as well as ARRA funding. The PHA has

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received \$7.8 million in ARRA monies which are targeted for the Kennedy Place Apartments demolition and rebuild project.

City of La Marque

La Marque PHA administers 58 HCV units and has no public housing. The PHA 5-year plan outlines standard HUD goals, including voucher mobility counseling, outreach to potential voucher landlords, and providing or attracting supportive services to increase independence of the elderly or families with disabilities.

The La Marque PHA had 19 families on the Section 8 HCV wait-list as of October, 2010. Extremely low-income families with children made up 79 percent of the wait-list, and 74 percent of the families were African American. The PHA wait-list had been closed 40 months and was not expected to reopen in the PHA plan year.

To address the affordable housing shortages in the city, the PHA lists specific strategies, including;

- Increasing lease-up rates for Section 8 housing through establishment of appropriate payment standards;
- Marketing to program owners, particularly those outside areas of minority and poverty concentration; and
- Improving effective screening of Section 8 applicants.
- The PHA also committed to exceed HUD federal targeting requirements for families at or below 30 percent of AMI (extremely low income) in tenant-based Section 8 assistance. Mixed-income HCV usage is encouraged through the PHA strategies by counseling and assisting Section 8 tenants to locate units outside areas of poverty or

minority concentration, and marketing the Section 8 program to owners outside of poverty/minority concentrations. For example, the PHA held a “Landlord Appreciation” luncheon for current and prospective landlords.

The PHA commits very indirectly to Section 504 accessibility requirements by committing to work with agencies that assist persons with special needs.

Liberty County

Liberty County PHA administers 271 Section 8 HCVs and has no public housing. The PHA 5-year plan outlines standard HUD goals and basic objectives to meet those goals. Included in the PHA goals are objectives to increase assisted housing choices by providing voucher mobility counseling, outreach efforts to potential voucher landlords, and measures to deconcentrate poverty by promotion of income mixing in Section 8 housing location.

As of January, 2010 the Liberty County PHA had 250 families on Section 8 HCV wait list. Extremely low-income families, with children made up 40 percent of that list, and 50 percent were elderly. The PHA did not specify whether the wait-list was closed.

The PHA does not specify any action items to address accessibility per Section 504.

Montgomery County

The Montgomery County PHA administers 364 HCVs and has no public housing; the PHA has also been a provider of disaster recovering assistance. The county PHA annual action plan for

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2011 indicated that housing needs had increased over the prior year due to economic downturn. In addition, Hurricane Ike destroyed many homes of families with very low income. The PHA indicated that most families affected had poor credit, minimum wage jobs, if they were employed at all, or they were disabled/elderly with limited housing choices.

The PHA plan indicates an HCV preference for veterans, the elderly, and persons with disabilities. The Montgomery PHA has also applied for and provided Disaster Housing Assistance Program (DHAP) resources to Section 8 vouchers, thereby increasing the numbers of families being assisted.

City of Palacios

The Palacios PHA 5-year plan outlines standard HUD goals and objectives. The city PHA manages both PHU and HCV, but the plan document does not specify exact numbers of units or vouchers. Planned strategies for achieving the objectives include Section 8 tenant mobility counseling and marketing the Section 8 program to owners outside of poverty/minority concentration areas.

The PHA plan does not specifically address objectives and strategies for compliance with Section 504 accessibility. The PHA does commit to applying for special-purpose vouchers targeted to elderly and families with disabilities should they become available. The PHA has not established PHU or HCV preferences.

The PHA plans to administer a Section 8 Homeownership program through the Family Self Sufficiency Program. The number of participants will be limited to 45 or fewer participants. Palacios PHA has been granted \$59,137 in Capital

Fund Program grant monies, but the plan document does not specify how the monies would be utilized.

City of Pasadena

The Pasadena PHA administers 1,078 Section 8 HCV and has no public housing. The PHA 5-year plan contains standard HUD goals and objectives, including increase in Section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction, and to increase lease-up rates by marketing the program to owners, particularly those outside areas of minority and poverty concentration.

Pasadena's PHA plan primary focus is to improve specific management functions, maximize lease-up rates, and assist as many families as possible with available funding. The city PHA manages Katrina Disaster Program (KDP) where they have received additional vouchers, and the PHA has maintained a 95 percent lease-up rate.

The PHA plan did not define any objectives or strategies to be compliant with Section 504 accessibility regulations. The PHA plan also did not contain enough detail to adequately assess their programs.

City of Rosenberg

Rosenberg PHA administers 499 HCVs and has no public housing. During the previous five years, the PHA increased the number of HCVs from 340 to the current 499 vouchers. The additional vouchers helped to improve their Section Eight Management Assessment Program (SEMAP) score to higher performing. The management improvements were achieved despite funding constraints and increasing housing and utility

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costs. The PHA has reportedly worked diligently with landlords to keep rental prices reasonable, thus allowing the PHA to maximize funding to the unit allocations.

The Rosenberg PHA has specified goals and objectives in its 5-year plan, including increasing voucher mobility by counseling families at admission and re-certification briefings by promoting freedom of housing choice, as well as conducting an annual outreach to potential landlords through meetings and newspaper media. The PHA maintains a staff training program as well.

The PHA is committed to increasing self-sufficiency of participants in the HCV program. The 5-year plan goal is to achieve a two percent increase in self-sufficiency by partnering with Workforce Solutions and Wharton Community College to provide supportive services for employment. The PHA FSS program has graduated 18 families, two of which have purchased homes.

The PHA offers a homeownership program by offering monthly mortgage payment assistance to eligible families. There is no limit to the number of families eligible to participate in the program.

The PHA states that supply of affordable housing is severe for all families with incomes less than 80 percent of AMI, identifying 4,150 families with severe housing need. About half of those families are of Hispanic origin and 31 percent have incomes less than 30 percent of AMI. No information was provided in the plan regarding the size of the PHA wait list or the composition of families on the list.

The PHA plan does not specifically address objectives and strategies for compliance with Section 504 accessibility;

however the PHA does offer preference to families with a member who is elderly, displaced, or has a disability.

Texas City

The Texas City PHA manages 74 PHUs and administers 478 HCVs. The 5-year plan contains standard HUD goals and objectives, including providing Section 8 voucher mobility counseling, and continuing to conduct outreach efforts for potential voucher landlords, particularly those outside areas of poverty/minority concentrations. The PHA stated in the plan that Section 8 rental stock has spread into areas of lower concentration of poverty since the previous plan.

The Texas City PHA identified a severe need for affordable, quality, accessible housing for families with income less than 30 percent of AMI. The PHA maintains a wait list for public housing. The PHA plan did not specifically address objectives and strategies for compliance with Section 504 accessibility; however the PHA did commit to applying for special-purpose vouchers targeted to elderly or families with disabilities, should they become available. The PHA pet policy is amenable to persons with disabilities, waiving pet size limitations for such persons and making the non-refundable pet fee nominal. The PHA does not have, or plan to have, any units designated specifically for the elderly or persons with disabilities.

A couple areas of concern in the PHA plan are as follows;

- In 2009, the PHA was able to obtain HUD approval for the disposition of 56 dwelling units that were severely distressed and in a petrochemical refineries danger zone. Disposal of the units will help the PHA see a decrease in

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unit turn-around. Absent from the plan were unit replacement strategies.

- The most recent HUD audit found an area of concern with the PHA's FSS program due to a low level of participation.

Walker County

The Walker County PHA administers 251 HCVs and has no public housing. Goals and objectives in the PHA 5-year plan include conducting outreach to potential landlords, improving voucher management, providing voucher mobility counseling, and increasing voucher payment standards.

The biggest challenge for the Walker County PHA is a shortage of affordable housing for all eligible populations. To address the shortage, the PHA plans to establish payment methods that enable families to rent throughout the jurisdiction, and to market to landlords/owners in areas outside of minority/poverty concentration.

The PHA plan does not address accessibility for the elderly or those with disabilities.

Appendix D

Opportunity Mapping

Appendix D – Opportunity Mapping

Opportunity Mapping

The Opportunity Mapping portion of the FHEA was a truly collaborative process involving H-GAC staff, the FHEW, and the Kirwan Institute. The first major activity of the mapping initiative was a meeting of the FHEW in October 2012, where Kirwan Institute staff presented an overview of the Opportunity Mapping concept and previous mapping work. During the meeting, the group decided to focus on the following goals:

- Understanding trends in the region, such as identifying emerging areas and gentrifying neighborhoods.
- Addressing NIMBYism and creating a narrative to convince local leaders that expanding opportunity for all people benefits the whole region.
- Establishing planning strategies for such a large, multi-jurisdictional region. This discussion led to the idea of splitting the region into typologies for analysis – urban, suburban, and rural. Communities in these typologies have similar assets and similar challenges.

To address these goals, the Kirwan Institute conducted a series of interviews with FHEW members to better understand member perspectives regarding how opportunity functions throughout the region. In total, 15 FHEW members representing 14 different organizations took part in phone interviews with Kirwan Institute staff.

The results of the interviews can generally be summarized by three themes:

- Attitudes – Refers to several deeply-held beliefs regarding political beliefs about the role of government, NIMBYism with respect to affordable housing, and differing levels of community-mindedness throughout the region.
- Size – The Houston-Galveston region is over 12,500 square miles and the size of the region is seen as positive in that it allows for reasonable housing prices and growth. However, the distances that are travelled to get from one place to another in the region are described as an obstacle to community engagement and collaboration.
- Coordination - Working group members described a need for better coordination between governmental entities, jurisdictions, and community organizations.

Opportunity has many dimensions, from educational quality to socioeconomic status to transportation access. Because of the multi-faceted nature of opportunity, it is not enough to map a single indicator. The Kirwan Institute used a method that combines many indicators of opportunity into indexes by category. The indexes and the indicators for the mapping project were determined as part of a collaborative process with the FHEW members, H-GAC staff, and Kirwan Institute staff. Each of the five indexes contain four specific indicators:

- Education – math proficiency, reading proficiency, high school graduation rates, and free and reduced lunch
- Neighborhood Quality – family poverty rate, vacancy rate, percent receiving public assistance, and median home value

Appendix D – Opportunity Mapping

- Health and Environment – toxic release site proximity, landfill proximity, grocery stores, and parks
- Economy and Employment – unemployment rate, labor force participation, adult education attainment rate, and job counts
- Transportation – transit proximity, fare cost, households without a car, and mean commute time.

The indexes are calculated by normalizing the different indicators to give each an equal weight. The result is a z-score for each indicator. A z-score of greater than zero means that the indicator is higher than the overall area mean for the region, and a z-score of less than zero means it is lower. An indicator that promotes opportunity, such as high proficiency test scores, is multiplied by +1; and indicator that is detrimental to opportunity, such as proximity to landfills, is multiplied by -1. Appendix D – Opportunity Mapping contains a table of all of the individual indicators used for each category index.

To create a map for each index, Census Block Groups are symbolized with a color gradient according to their average z-score. A five-shade color spectrum is used for each index, with darker shades representing higher z-scores and lighter scores representing lower z-scores. It is important to note that index scores are relative measures, and they compare neighborhoods only to other neighborhoods in the Houston-Galveston region. A low opportunity neighborhood in the region could be considered moderate or even high opportunity in another region.

Opportunity Mapping Results

On a regional level the Comprehensive Opportunity Map shows a general East-West divide inside Beltway 8, with those neighborhoods west of Interstate 45 being dominantly mid to very high opportunity and those east of 45 being mostly low or very low opportunity.¹ Outside of Beltway 8 a ring of higher opportunity areas surrounds the city on nearly all sides. This high opportunity extends out into more rural areas further to the northwest of the city than in any other direction. There is also a cluster of high opportunity suburbs outside of Beltway 8 along 45 extending southeast toward the Gulf Coast. The most rural areas of the region show visible patterns of low or very low opportunity, with the exception of The Woodlands and its surrounding areas in the north. Additional opportunity maps are contained within Appendix D.

¹ Based on the Kirwan Institute methodology, Opportunity ranges include very low, low, moderate, high, and very high opportunity.

Appendix D – Opportunity Mapping

There are clusters of public housing units in high opportunity areas in western Houston and in some of the high opportunity suburbs, with a large portion of housing choice vouchers located in low or very low opportunity areas. A concentration of vouchers is located in very low opportunity areas of Galveston County, both on the mainland and island. It should be noted that visible relationships between type of housing and opportunity should not be interpreted as causal. There are many mechanisms at work in the region that can cause a certain type of housing to be located in proximity to other aspects of the environment.

With respect to the urban, suburban, and rural typologies, Figure D-2 and Figure D-3 show the distribution of Comprehensive Opportunity in terms of total population and population percent.

Figure D-2. Comprehensive Opportunity by Typology (population)

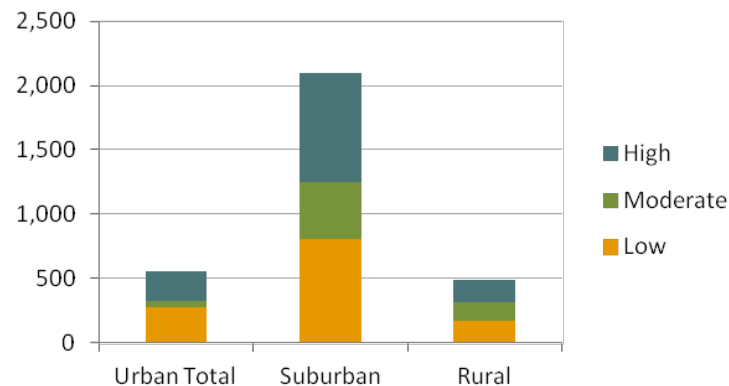
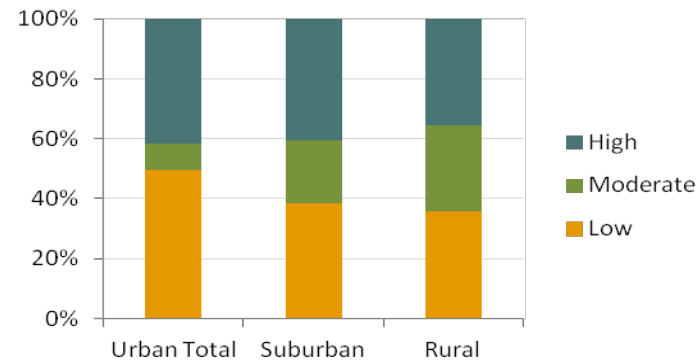
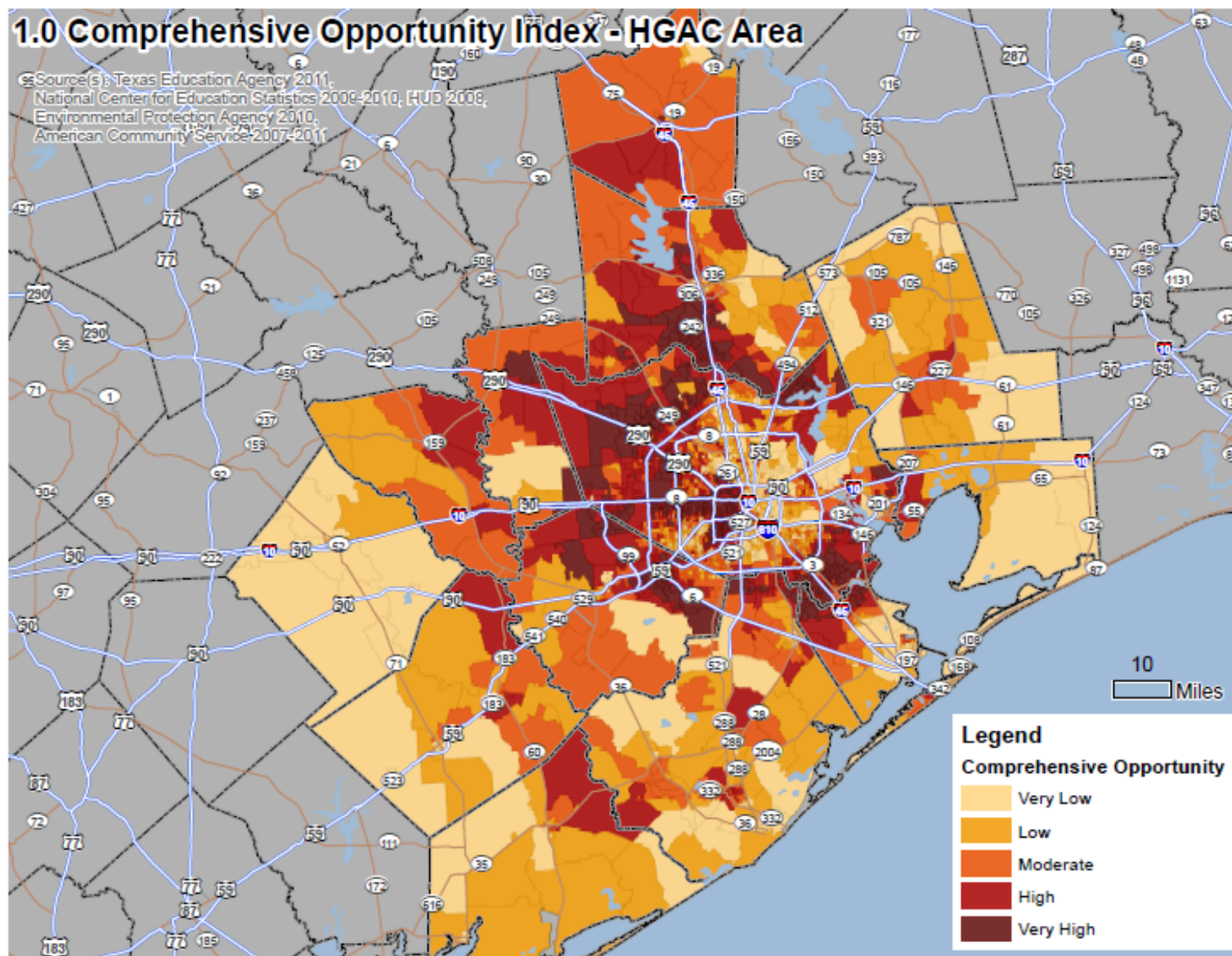


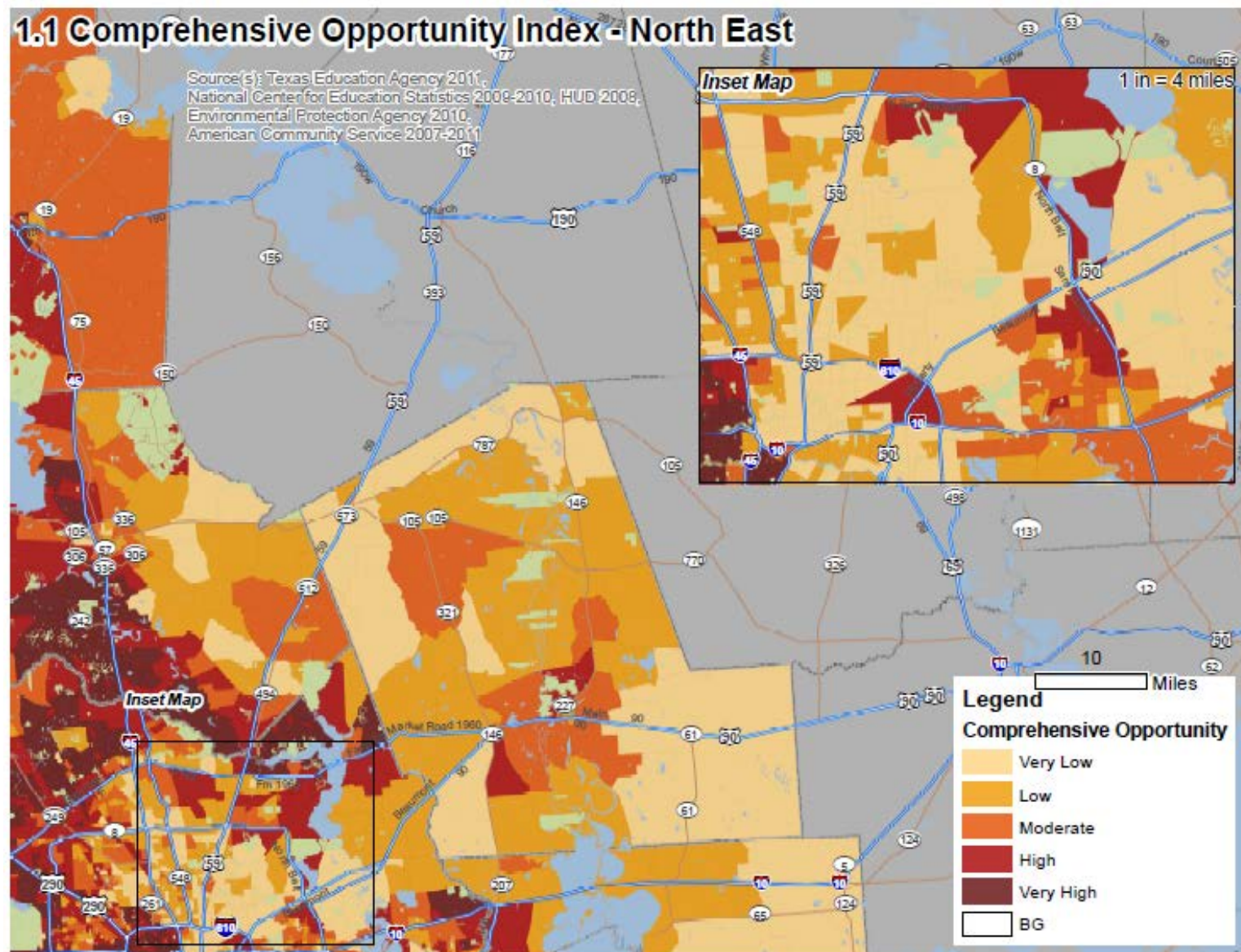
Figure D-3. Comprehensive Opportunity by Typology (percent)



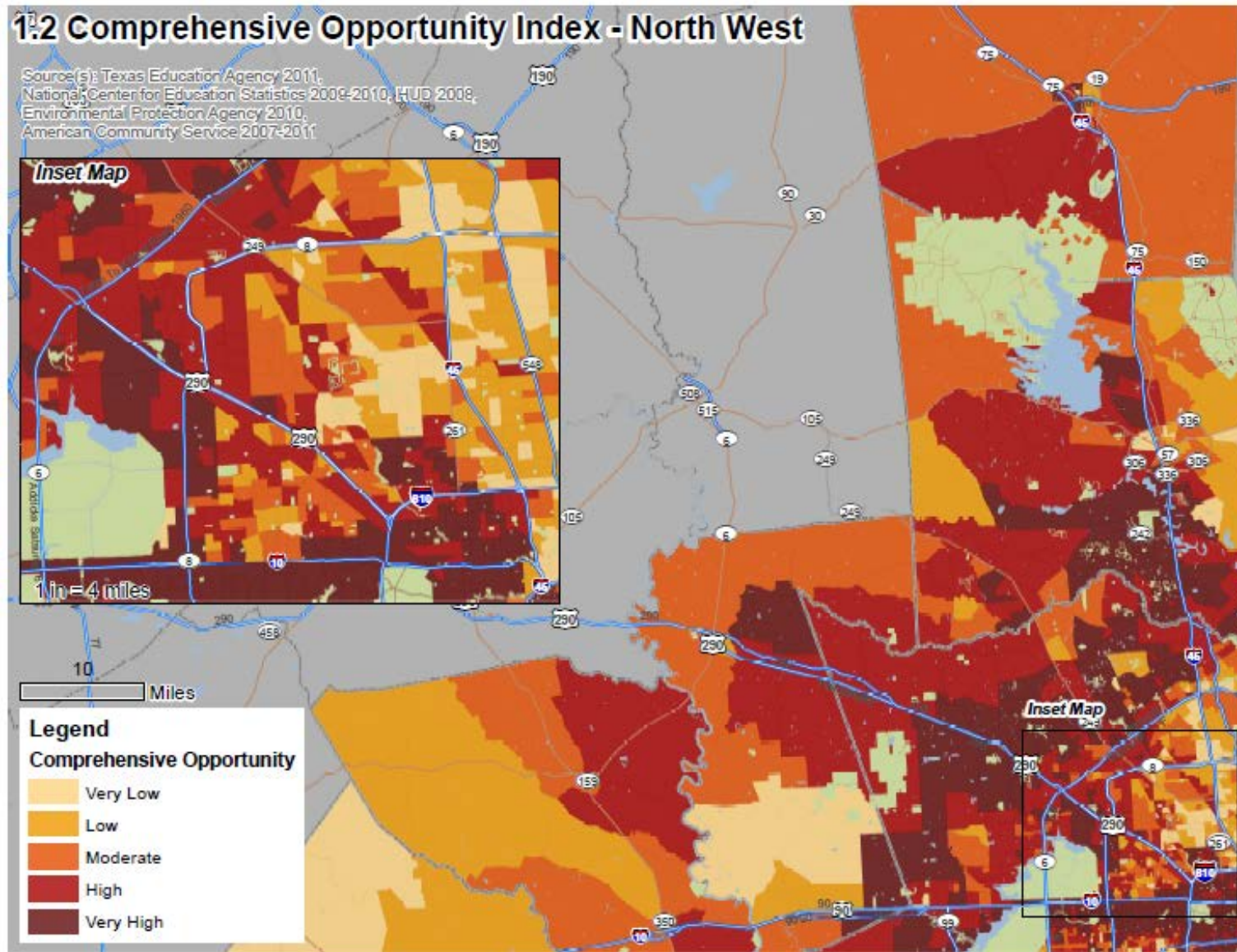
Appendix D – Opportunity Mapping



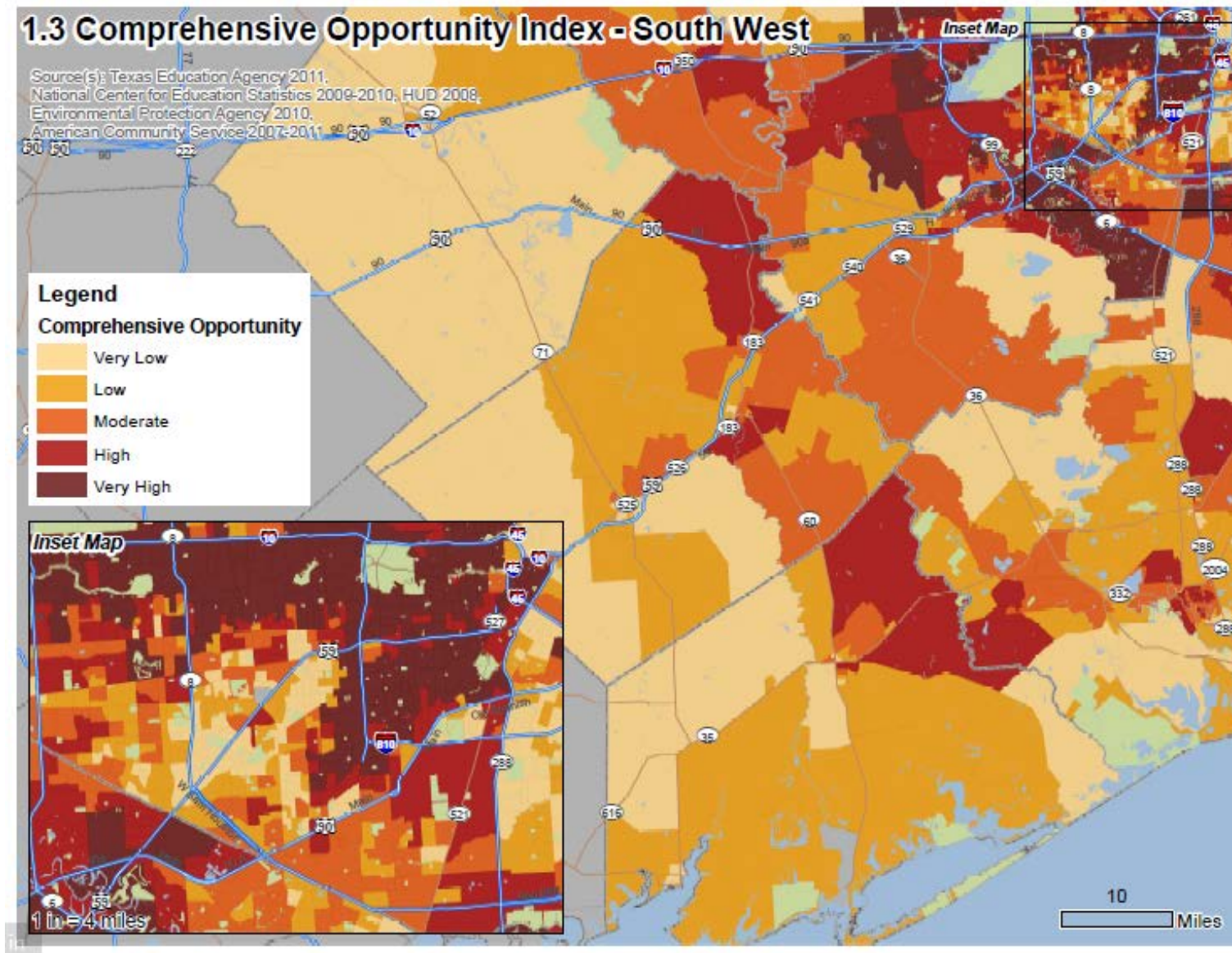
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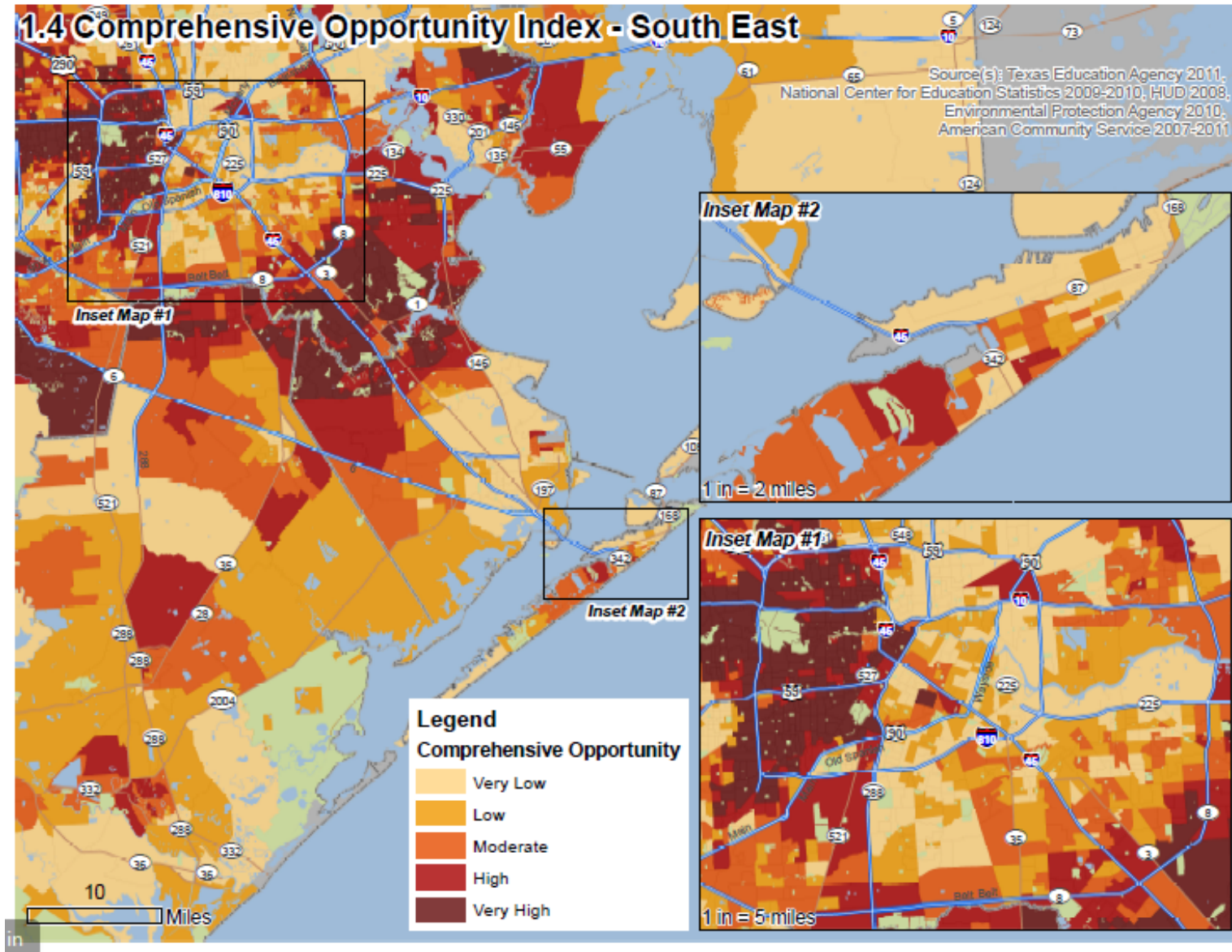
Appendix D – Opportunity Mapping



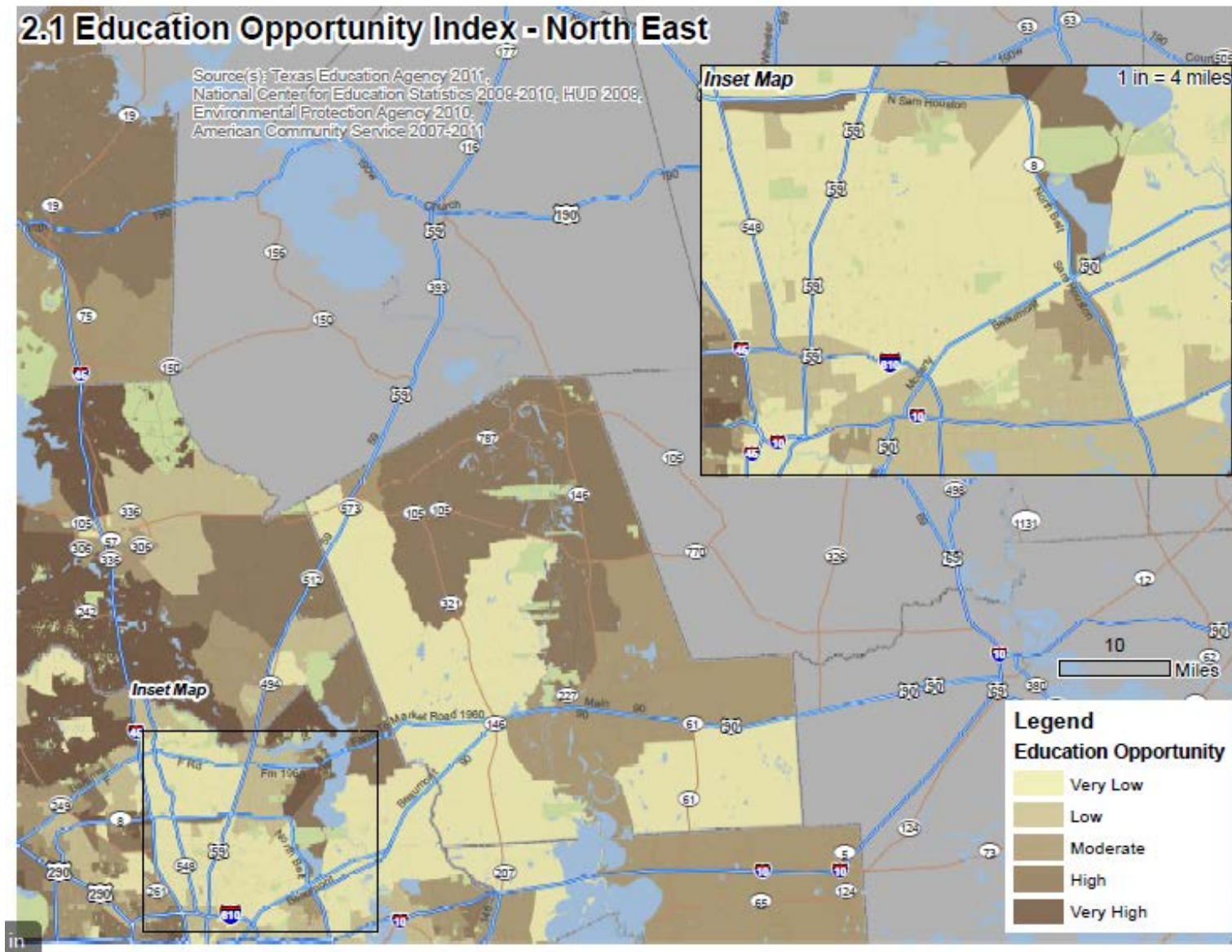
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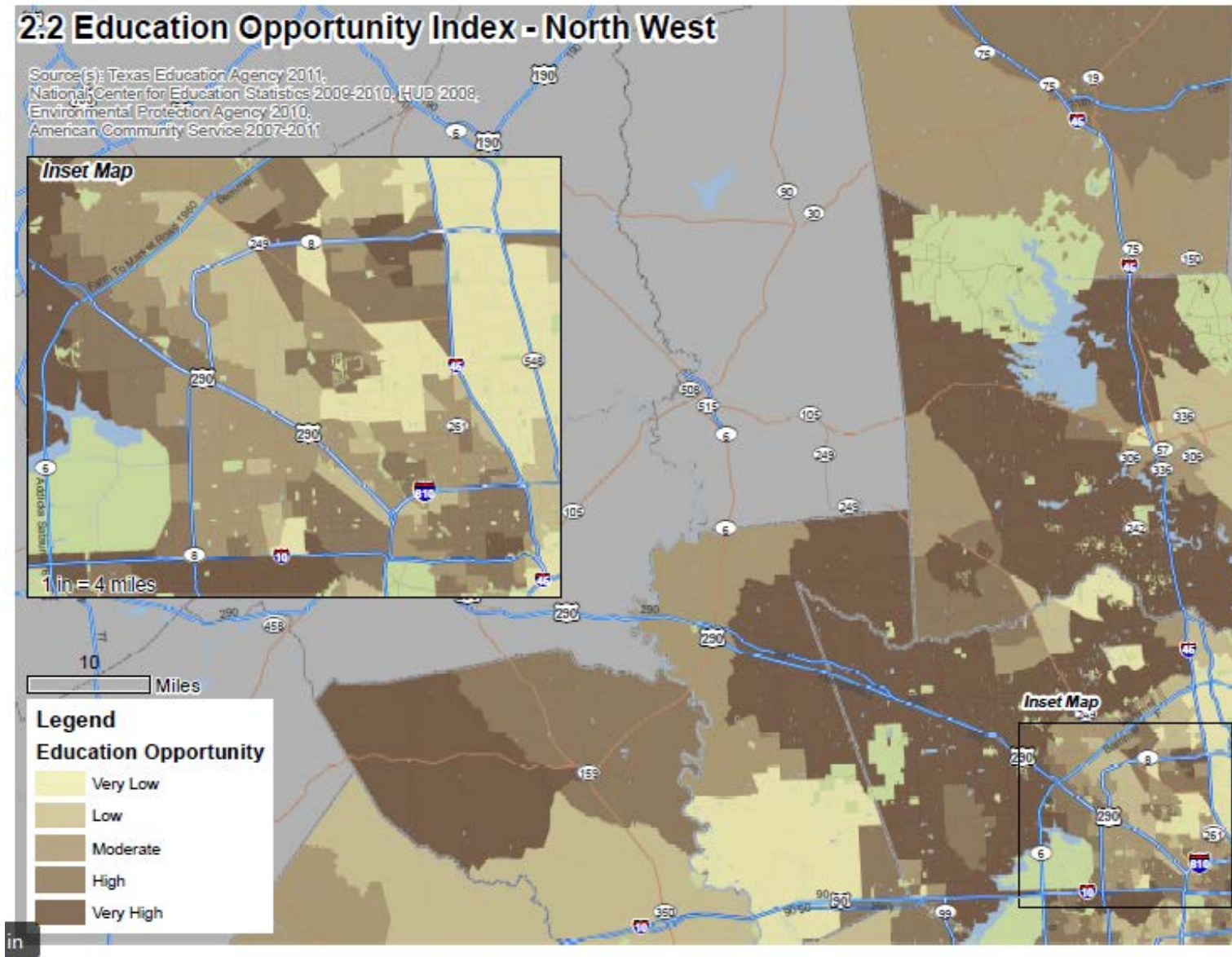
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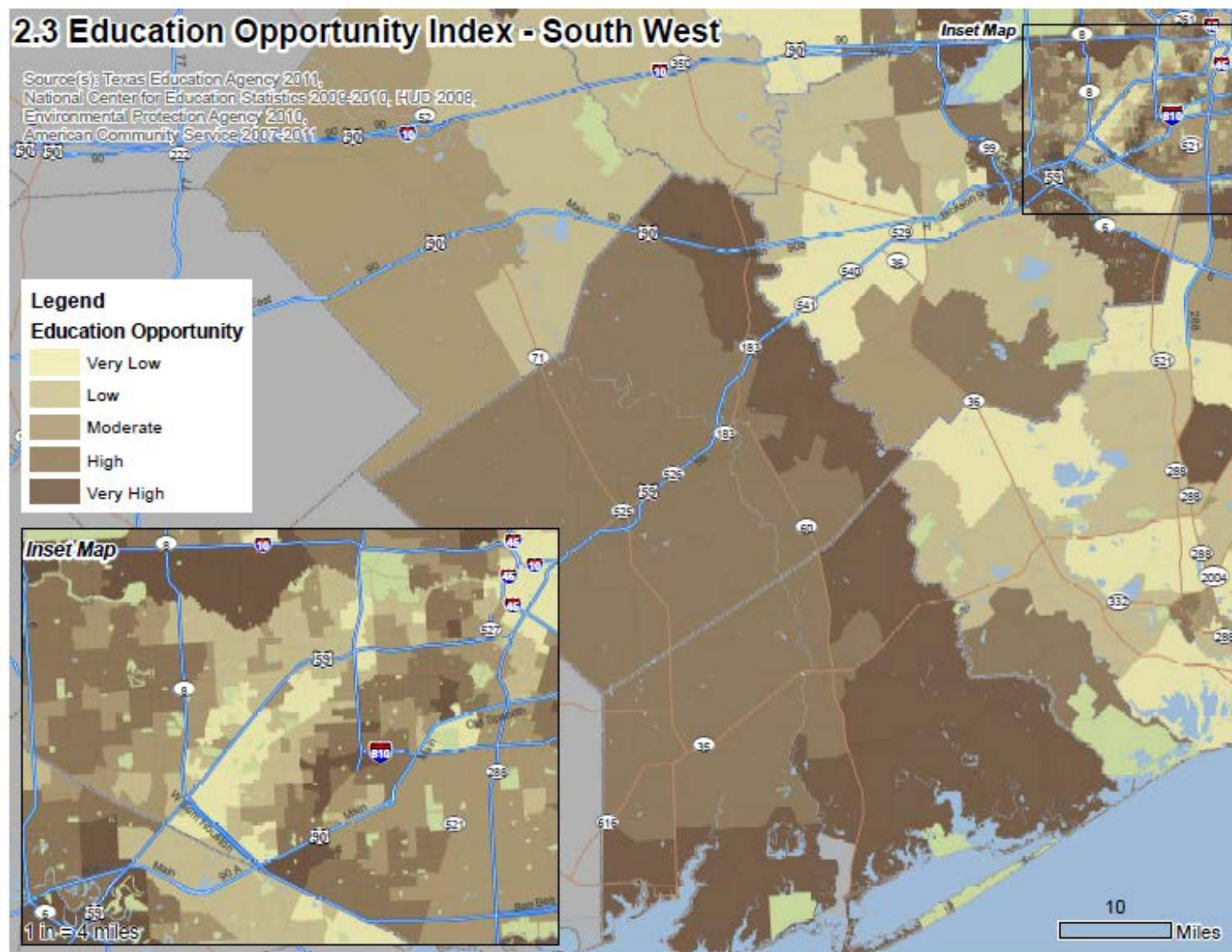
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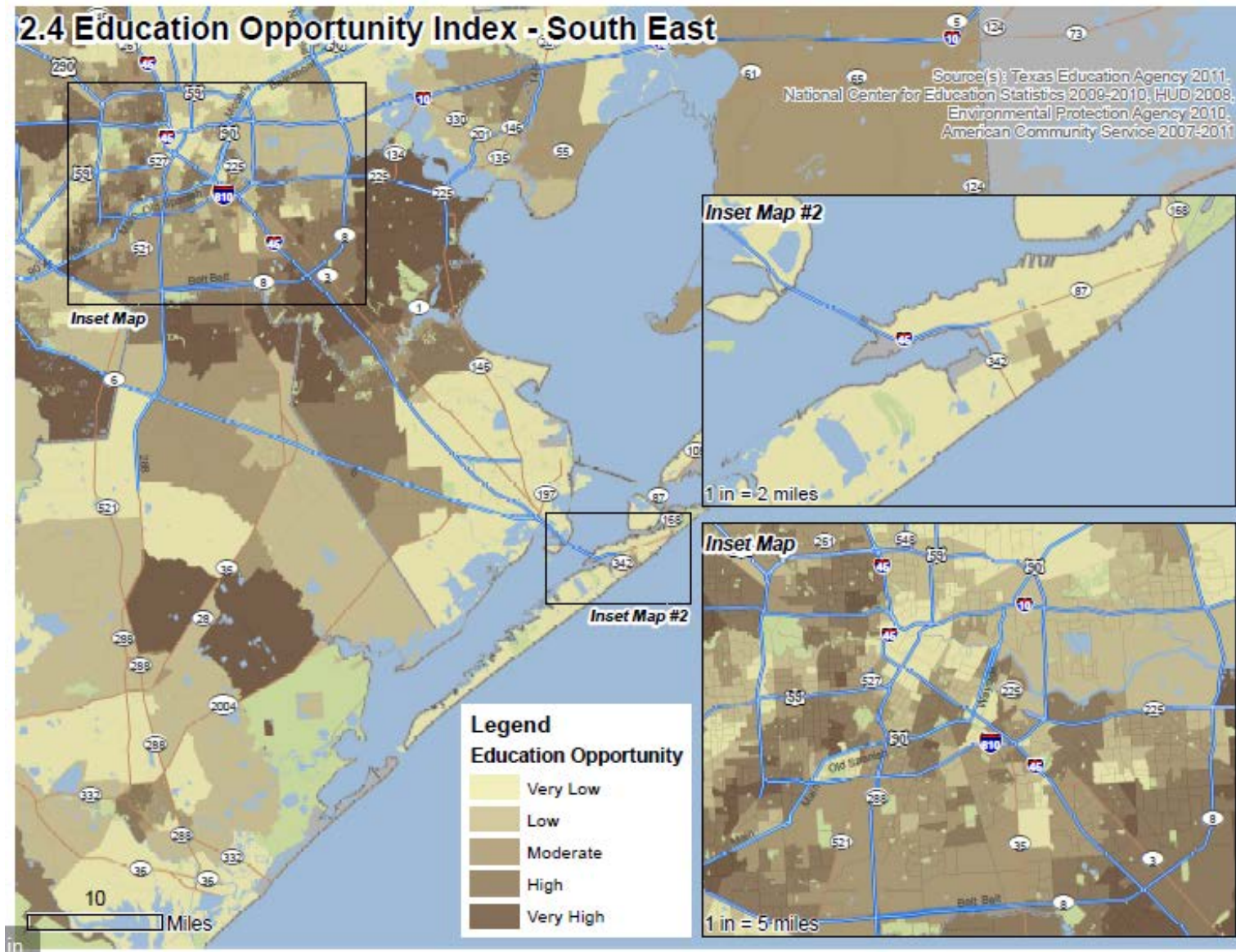
Appendix D – Opportunity Mapping



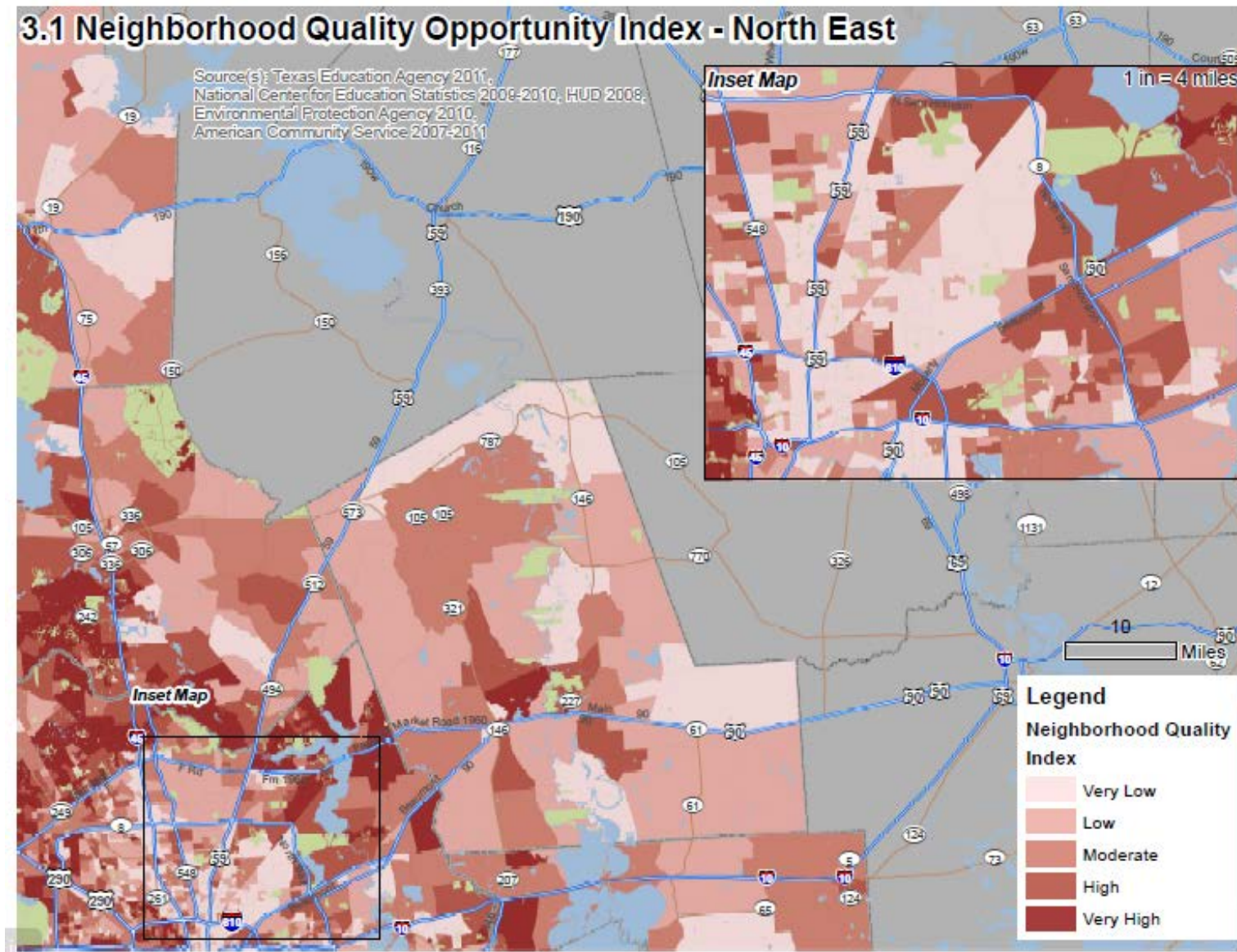
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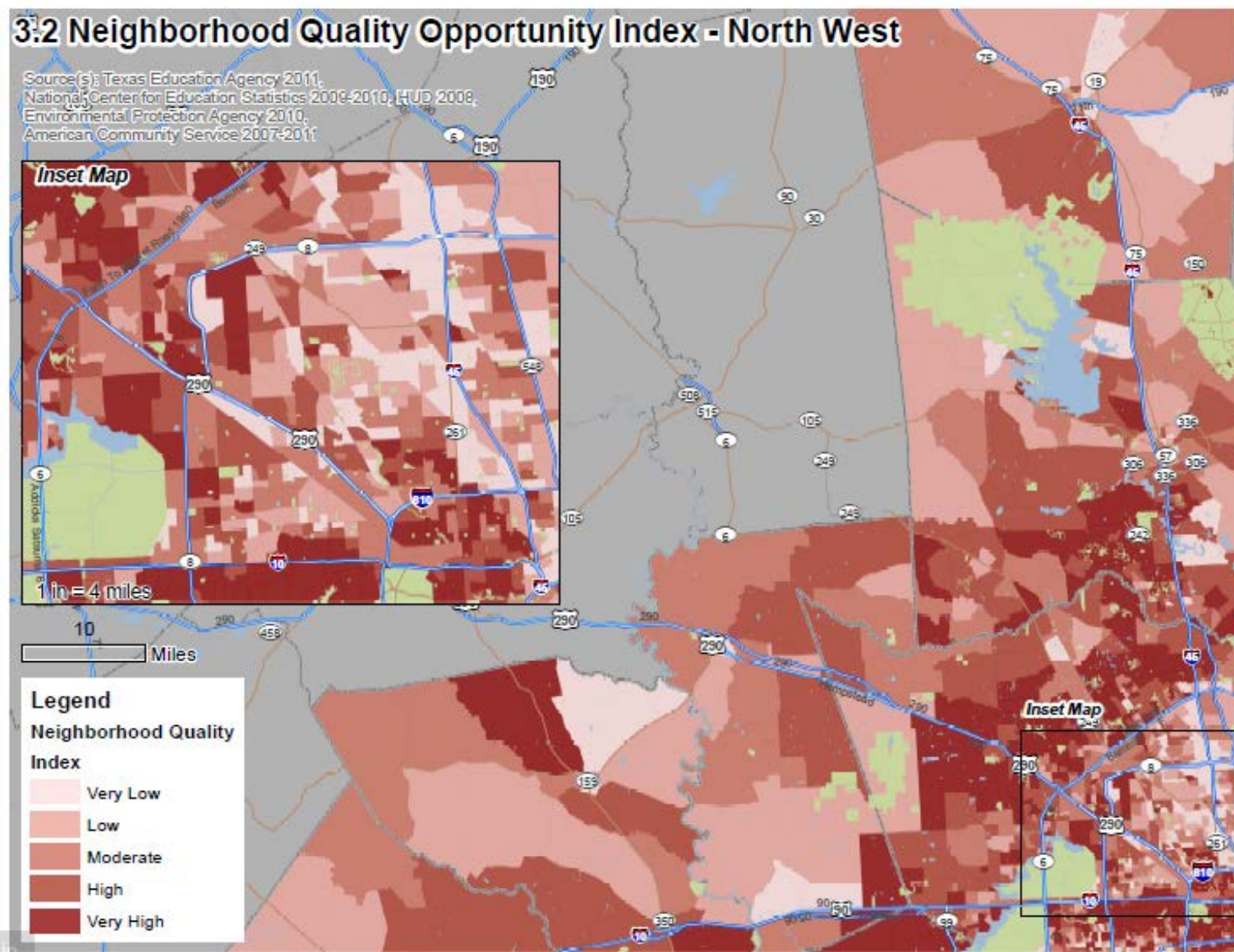


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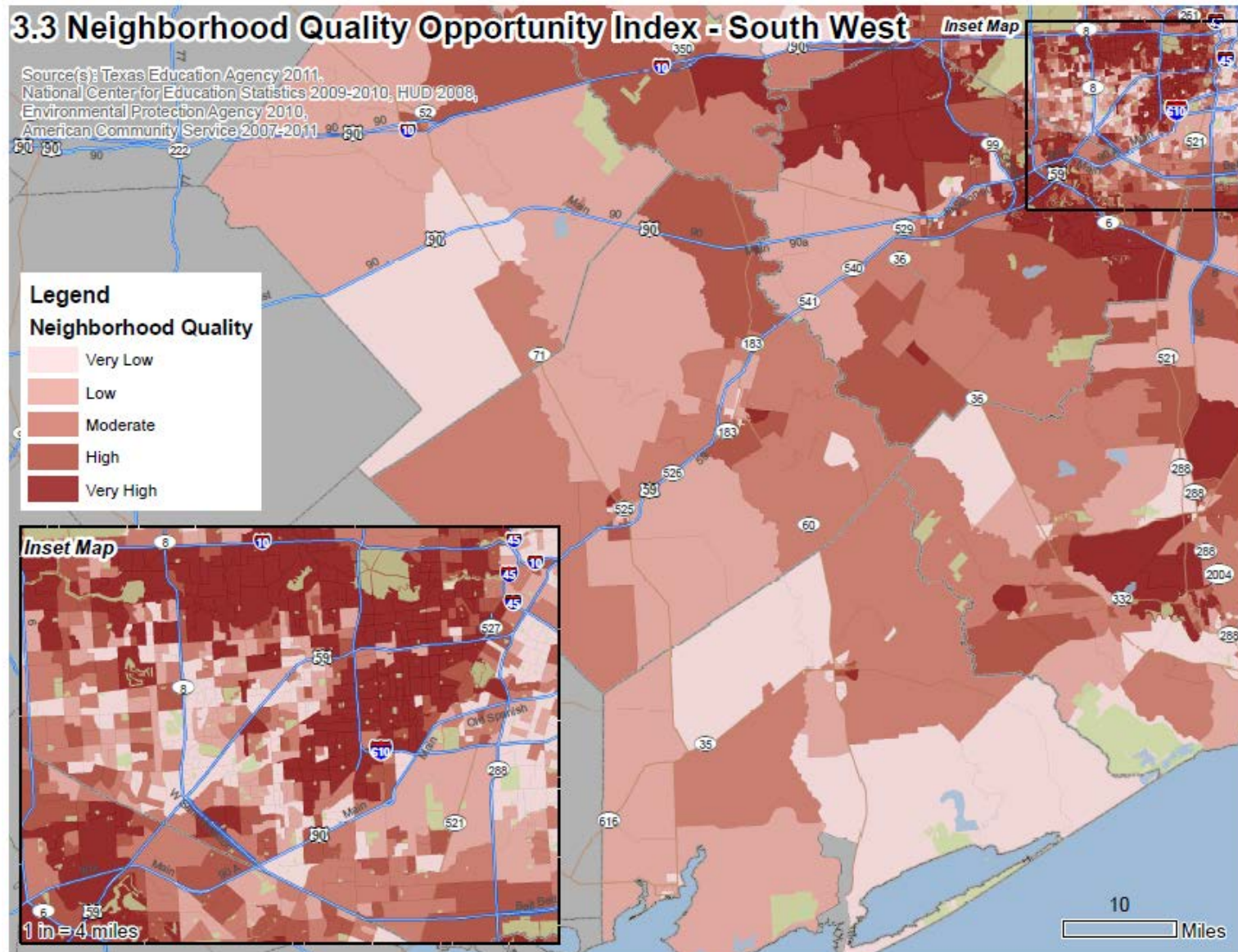


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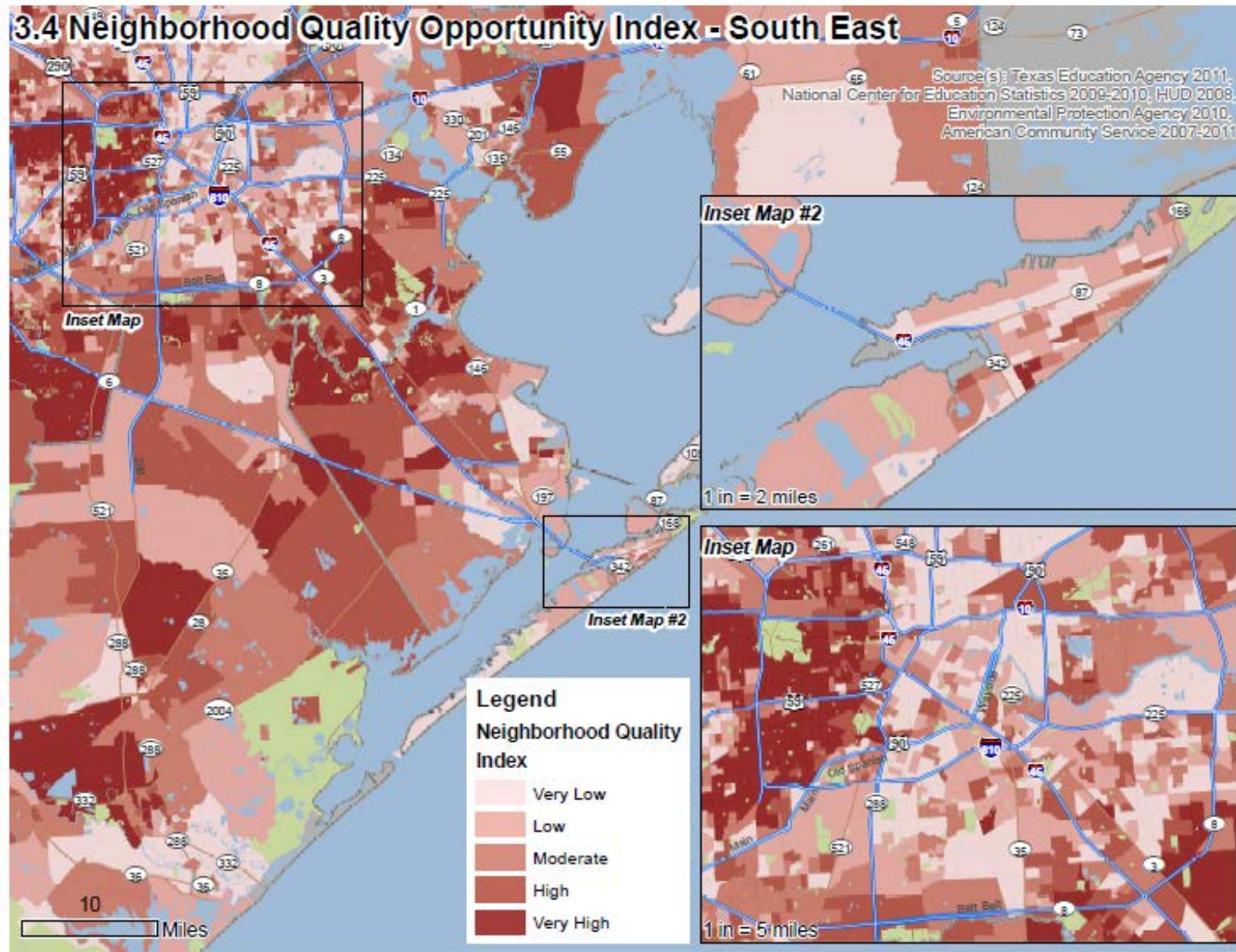




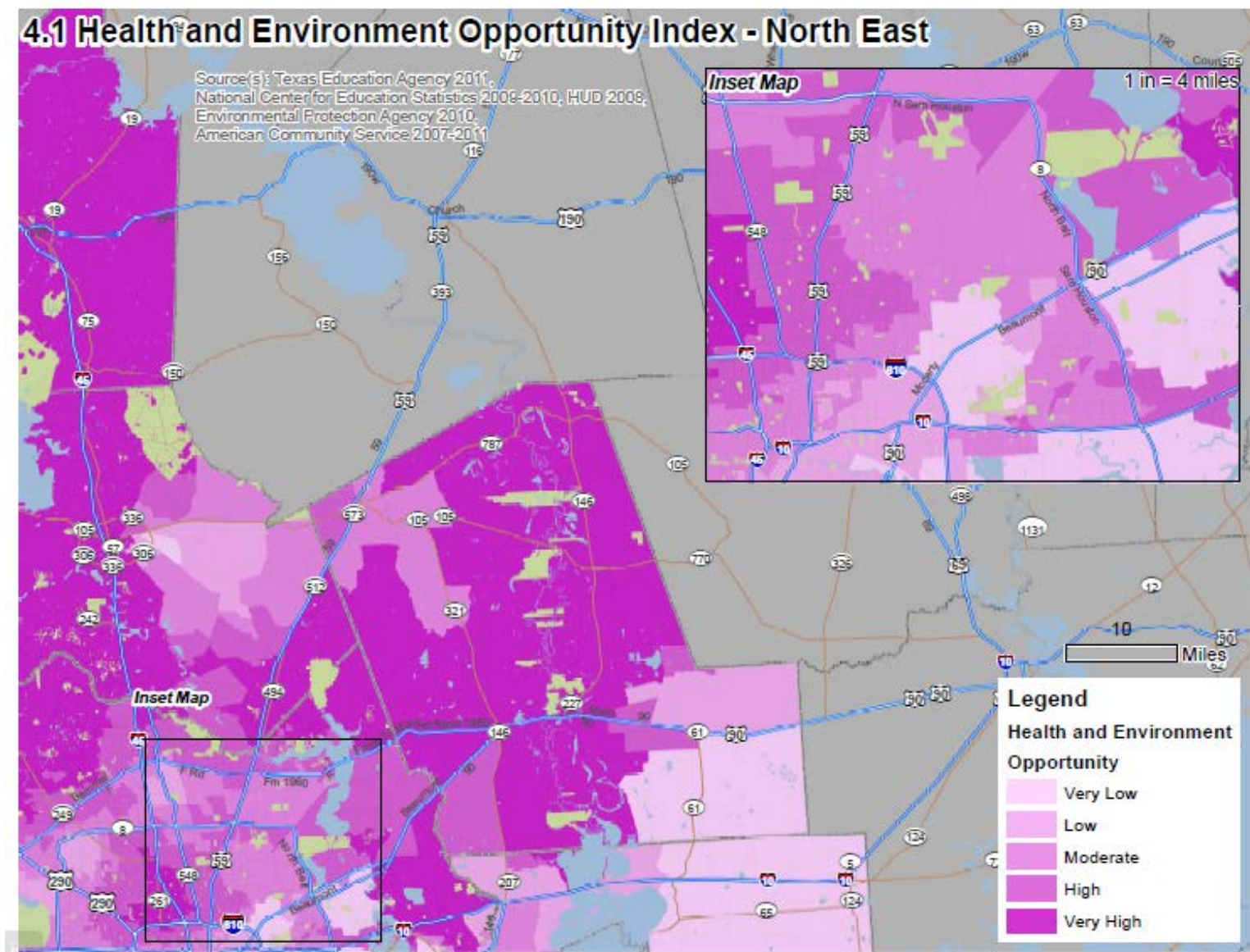
Appendix D – Opportunity Mapping



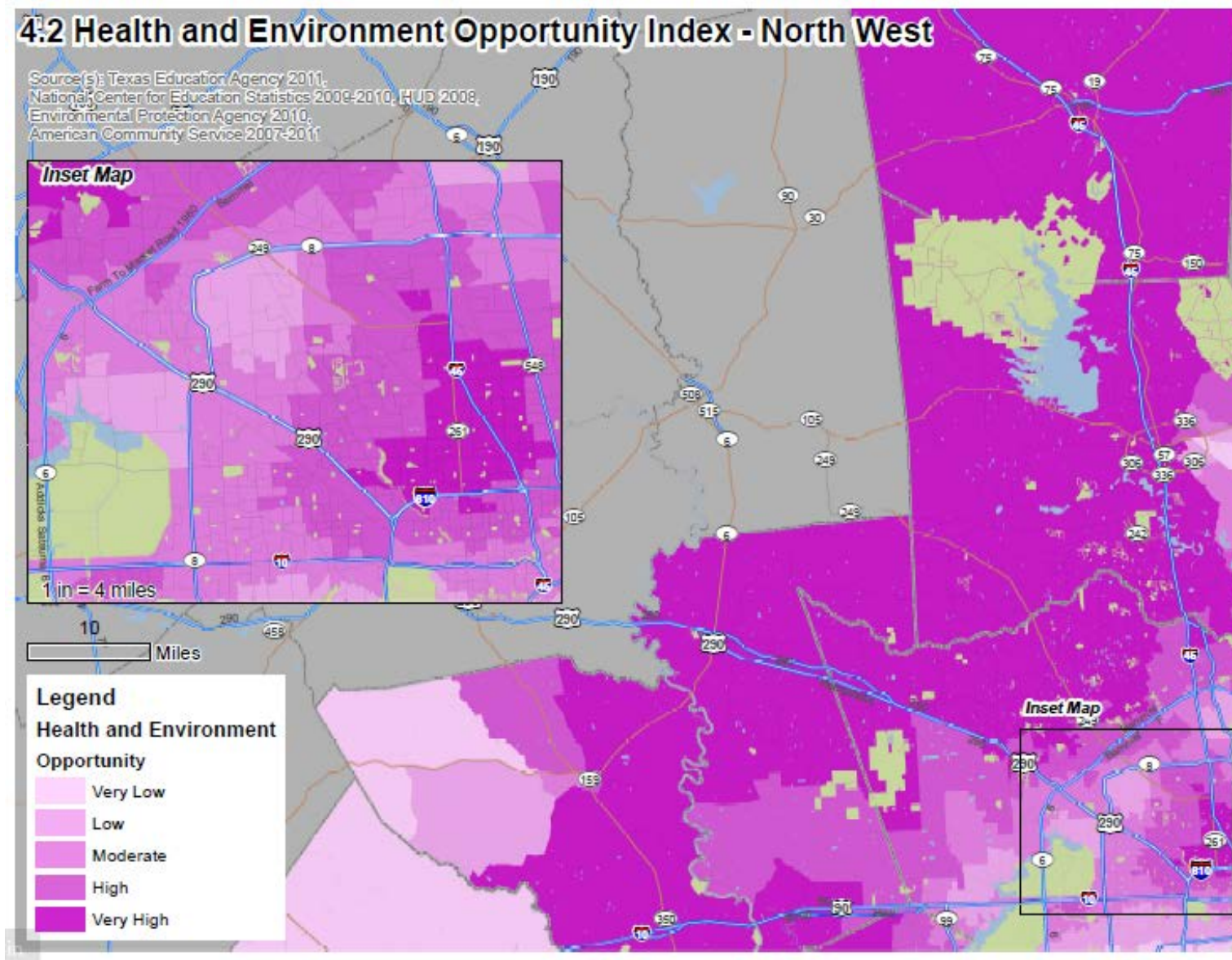
Appendix D – Opportunity Mapping



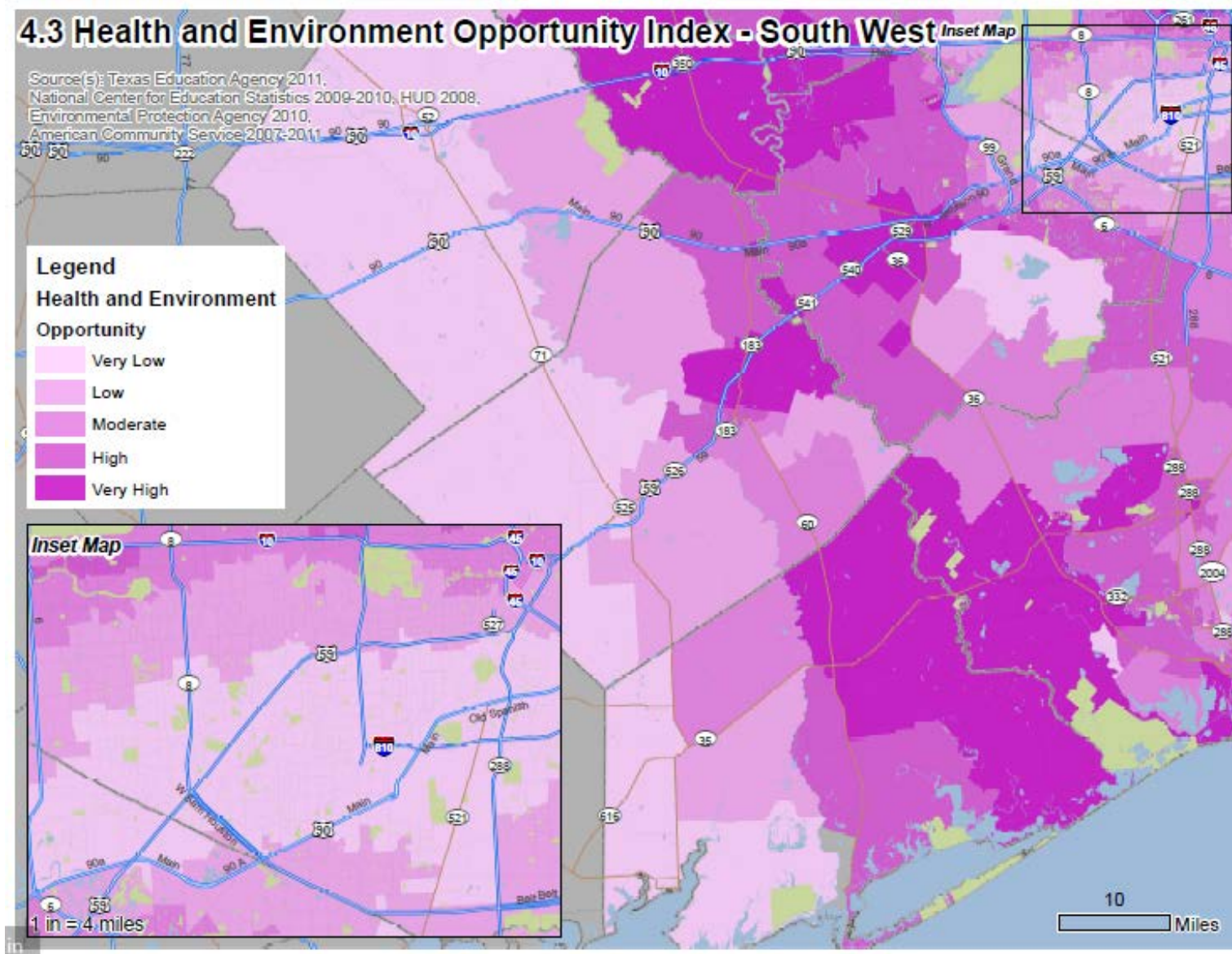
Appendix D – Opportunity Mapping



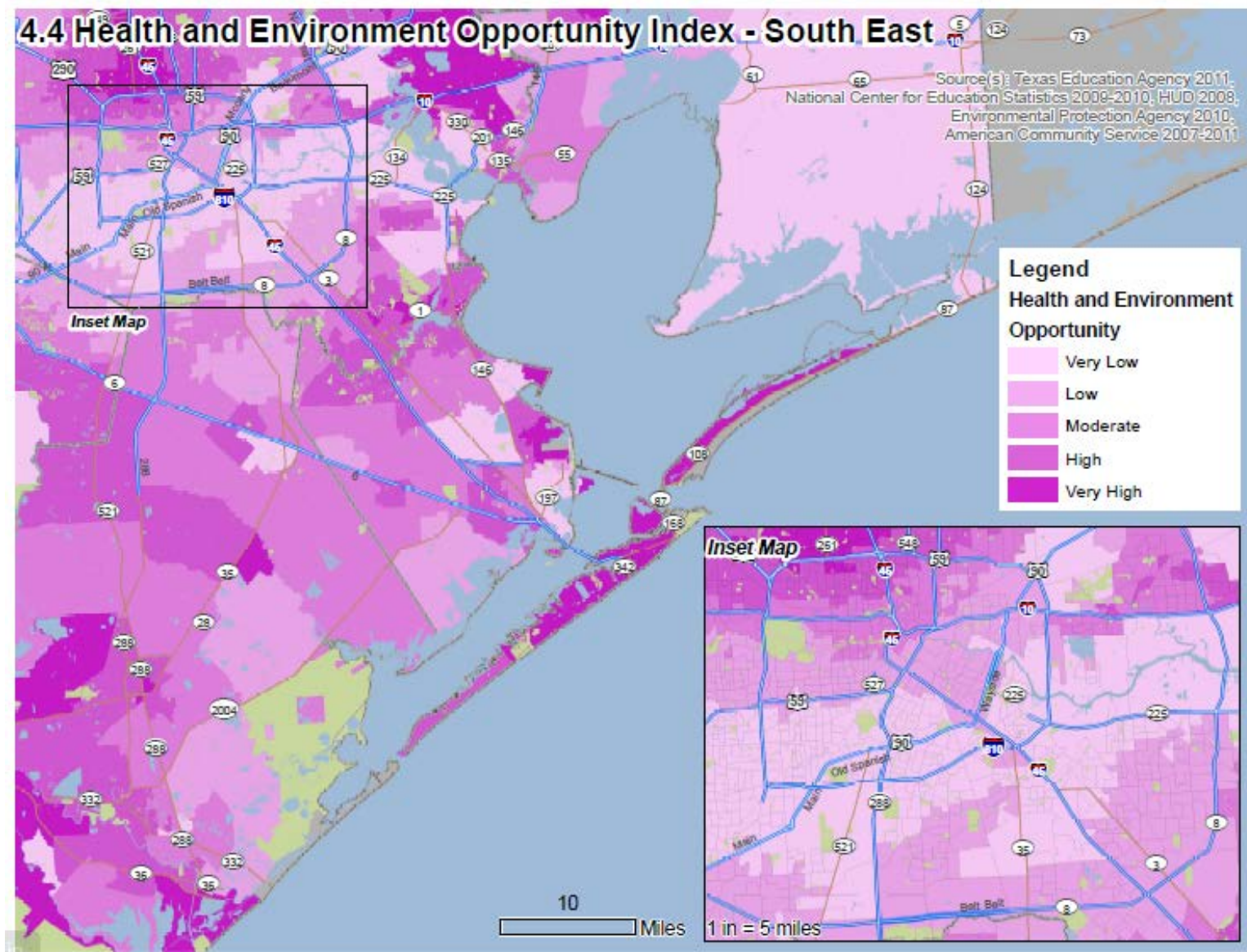
Appendix D – Opportunity Mapping



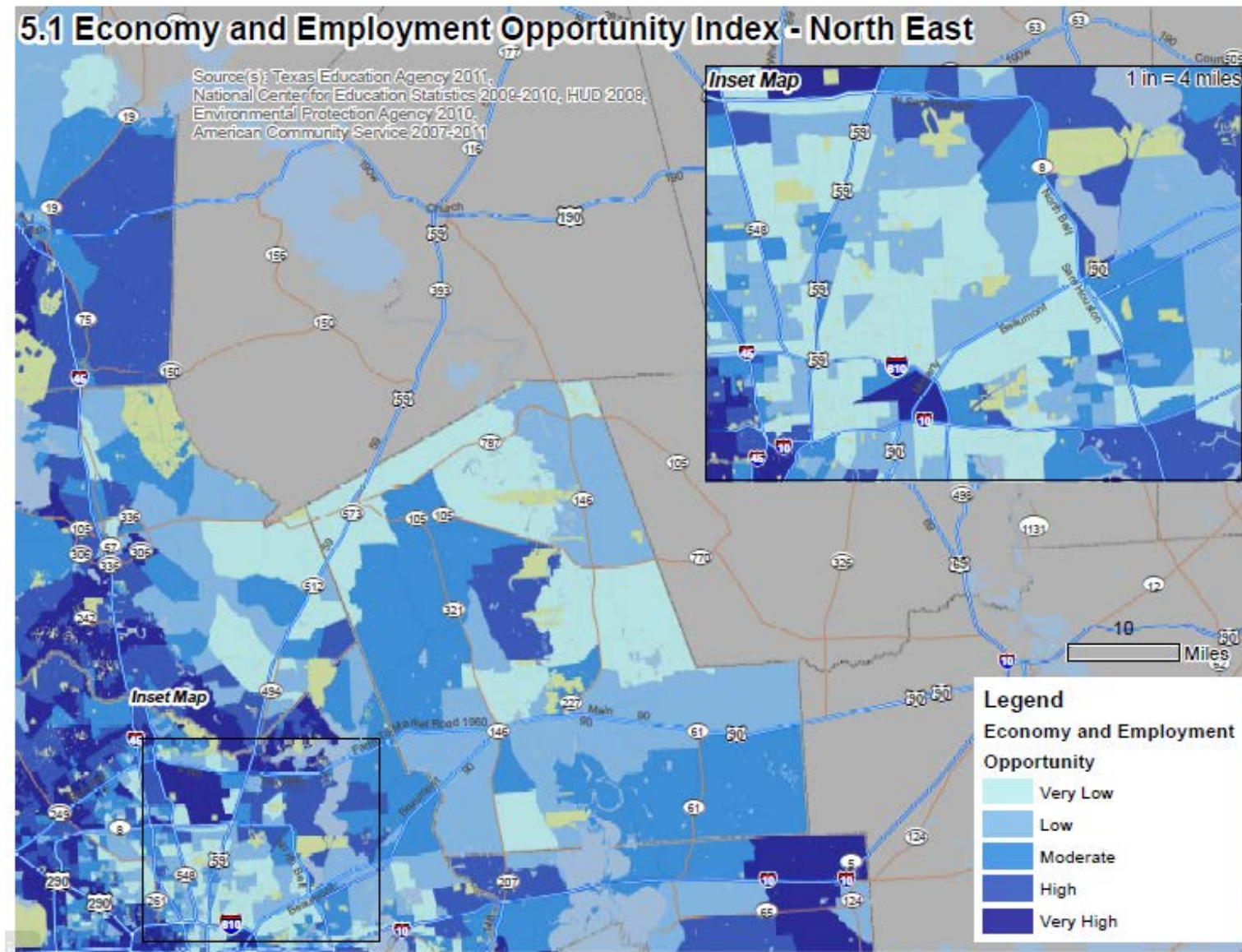
Appendix D – Opportunity Mapping



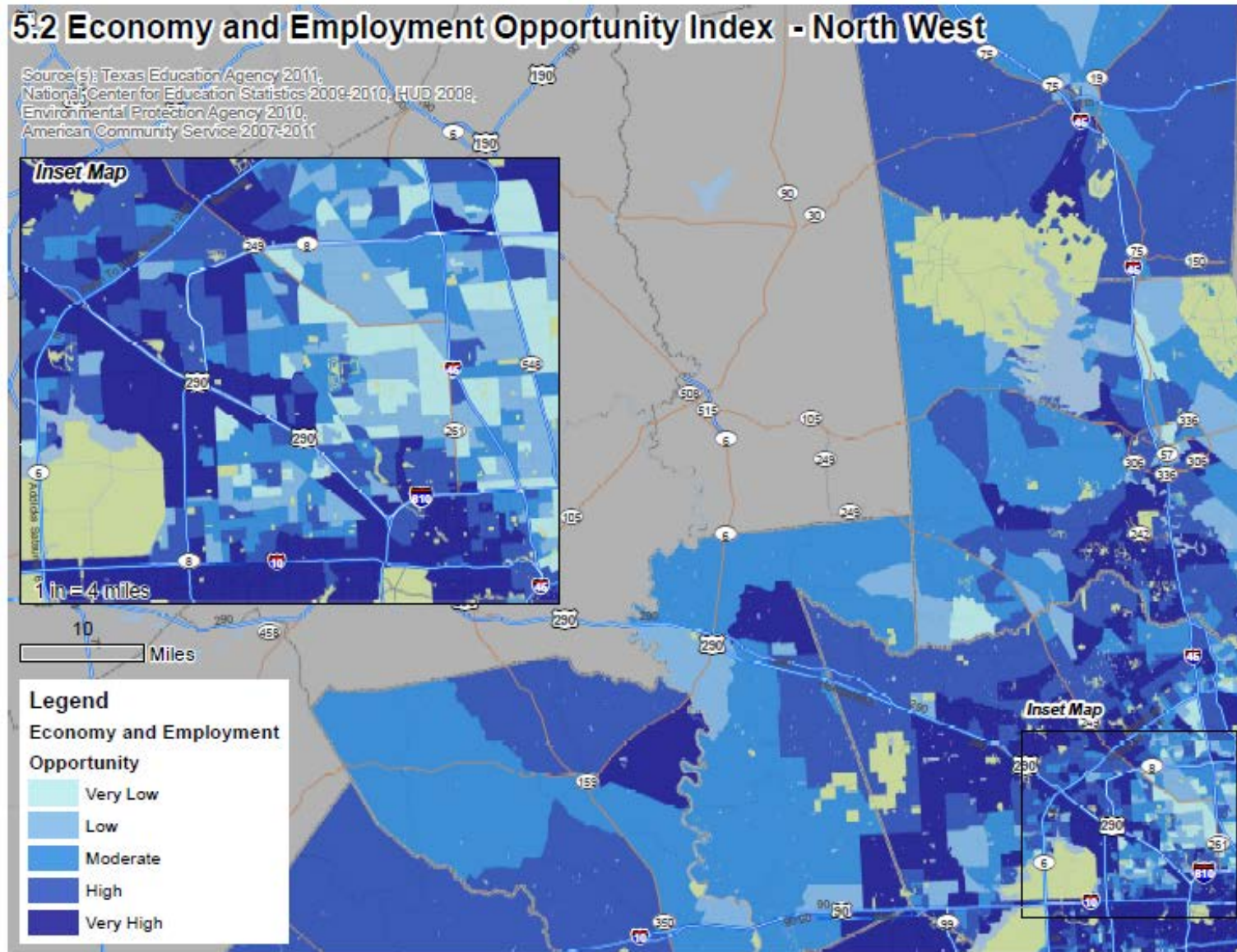
Appendix D – Opportunity Mapping



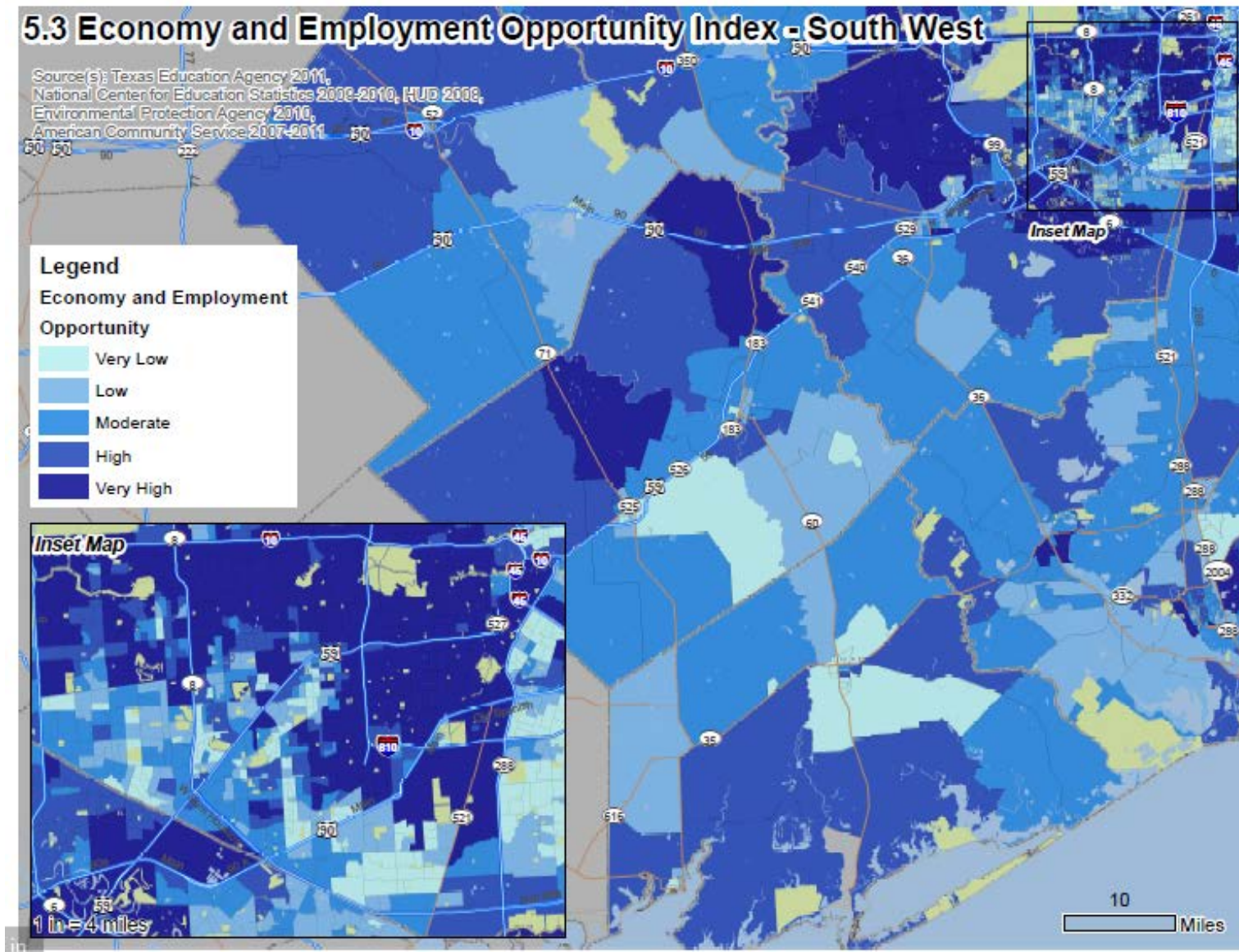
Appendix D – Opportunity Mapping



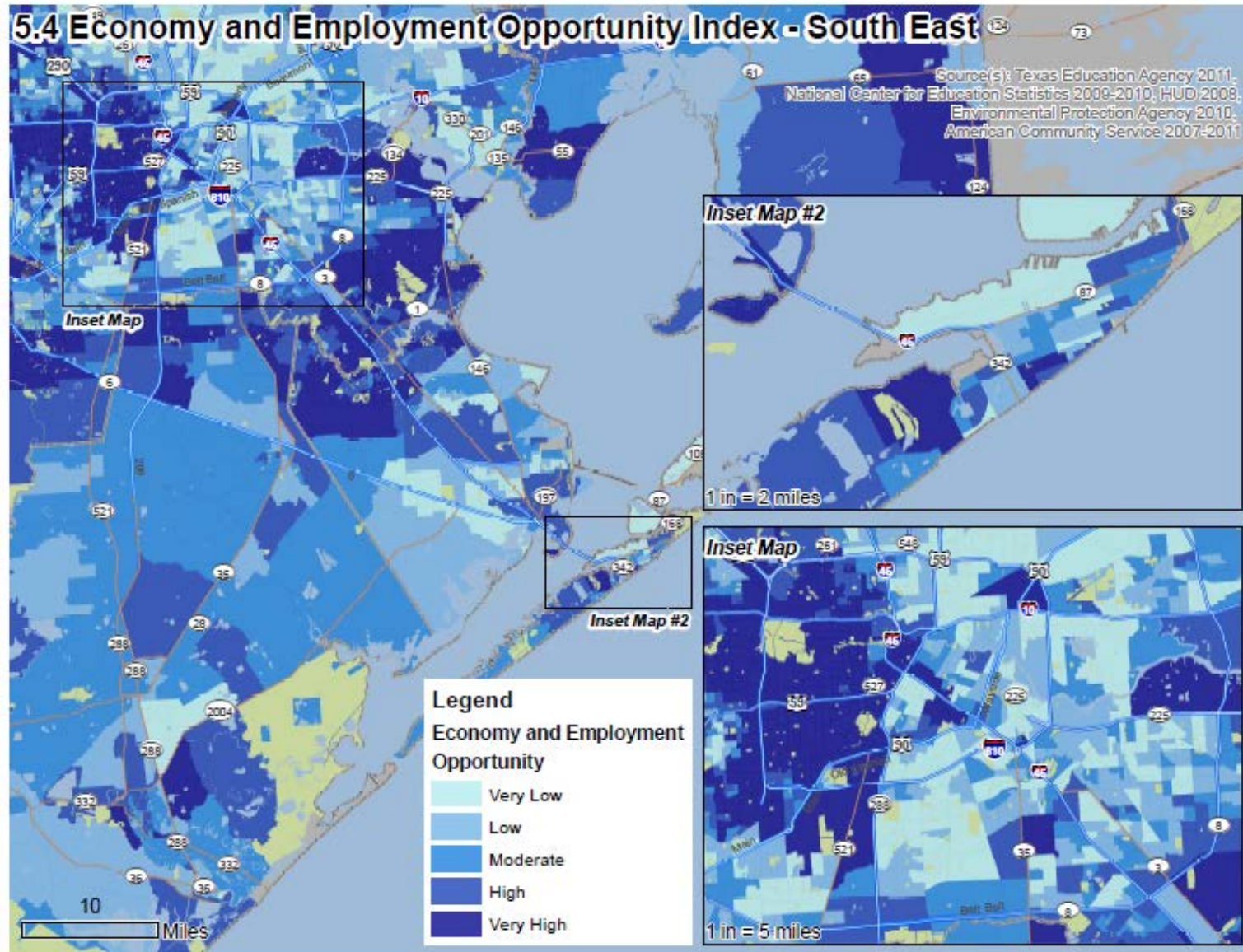
Appendix D – Opportunity Mapping



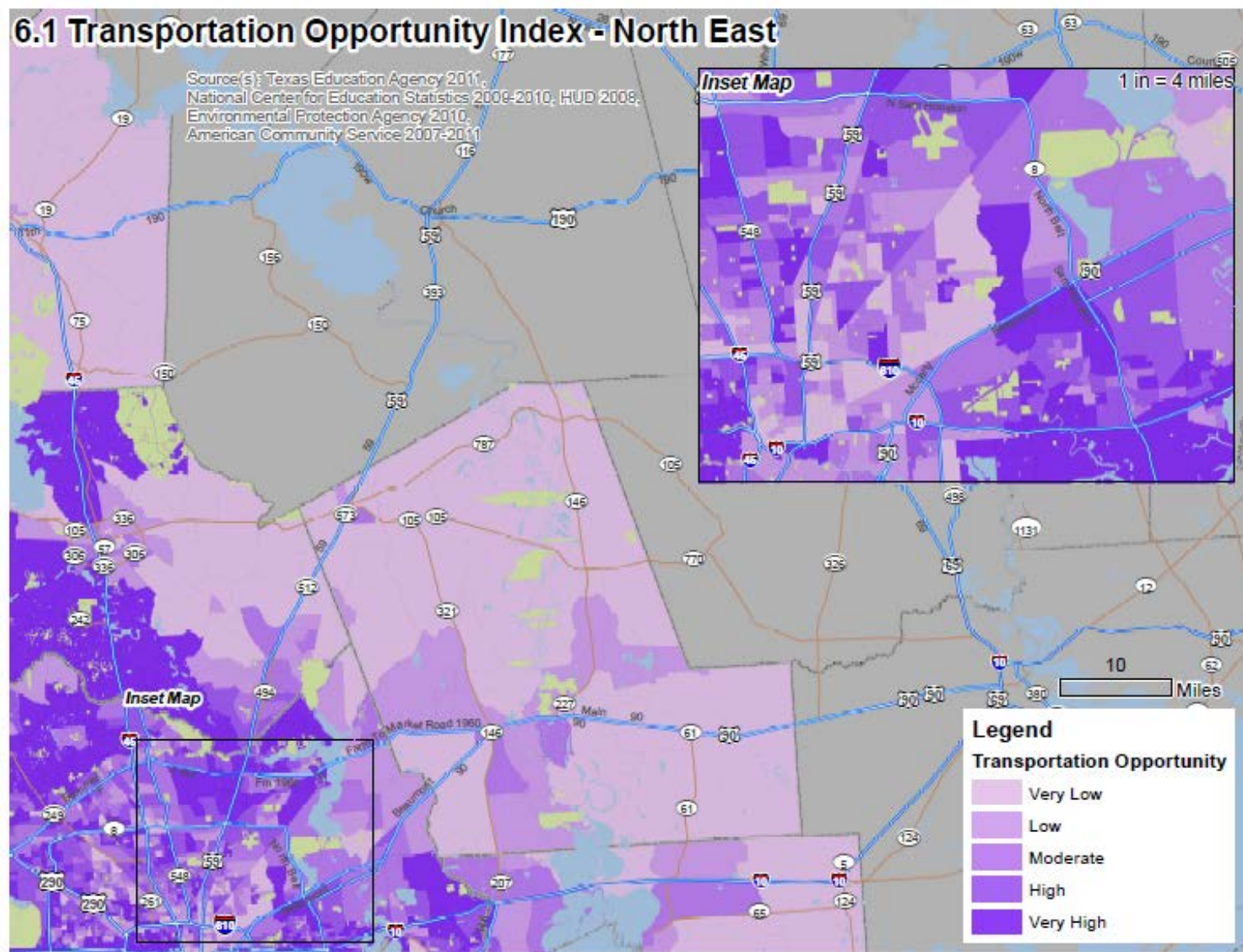
Appendix D – Opportunity Mapping



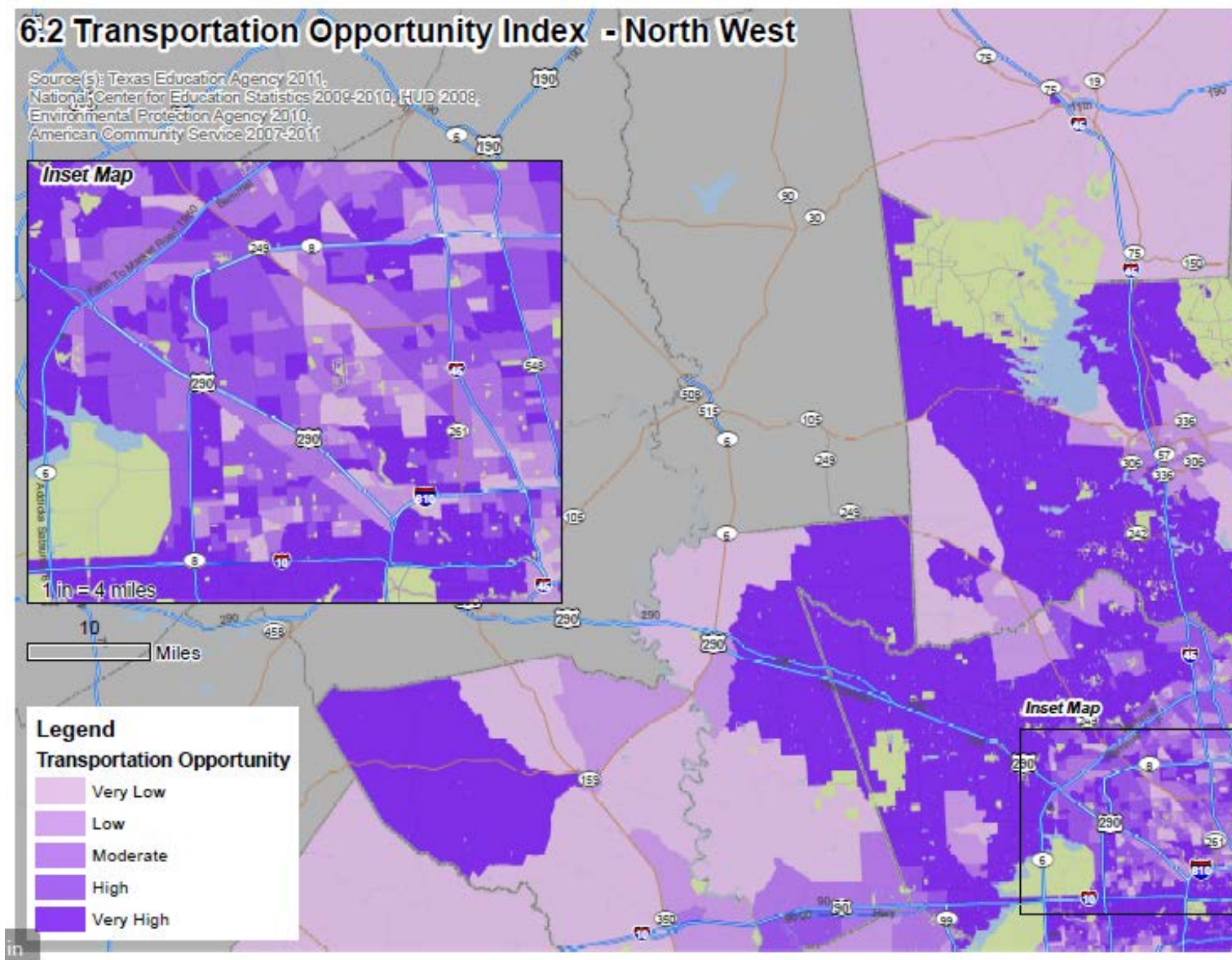
Appendix D – Opportunity Mapping



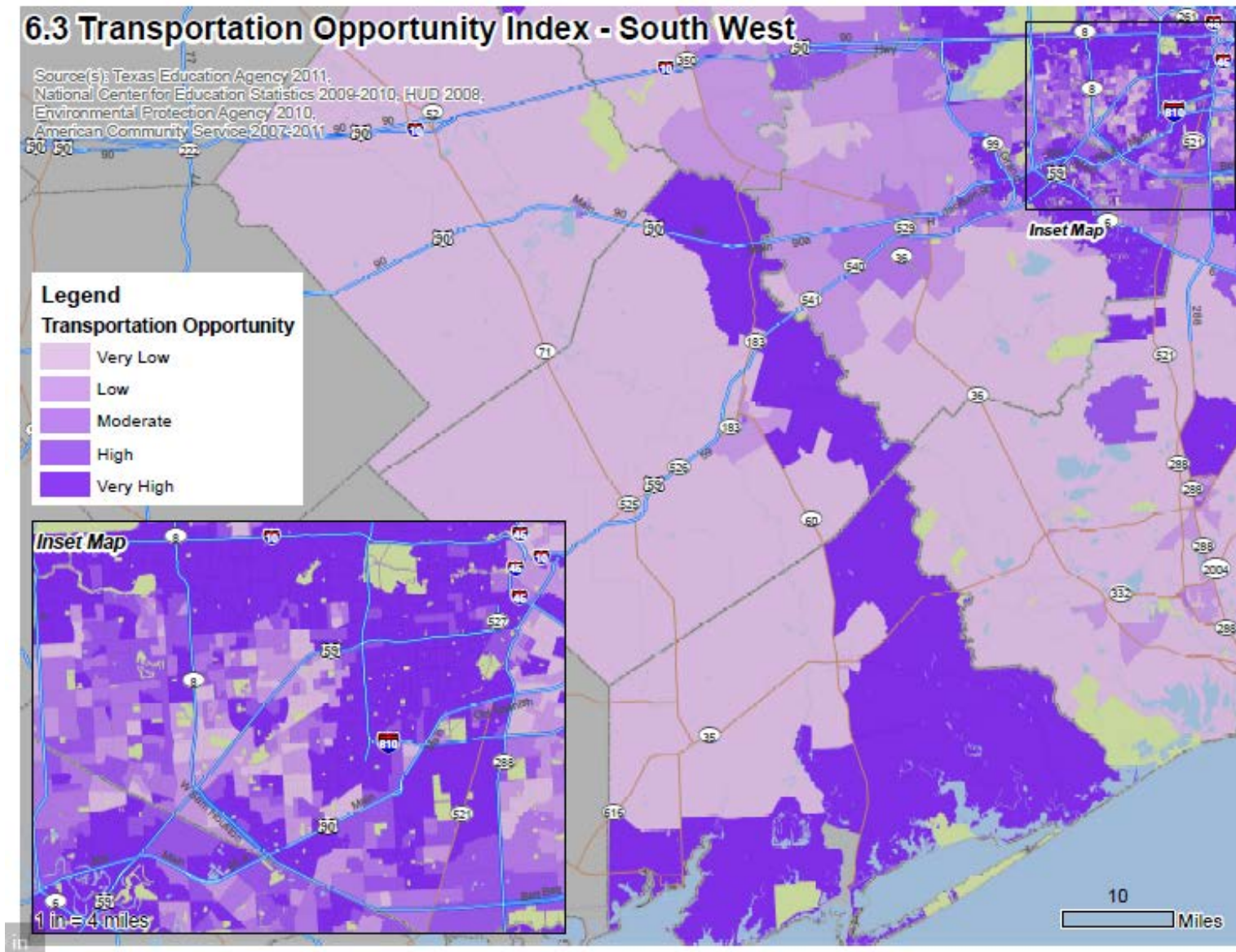
FAIR HOUSING EQUITY ASSESSMENT



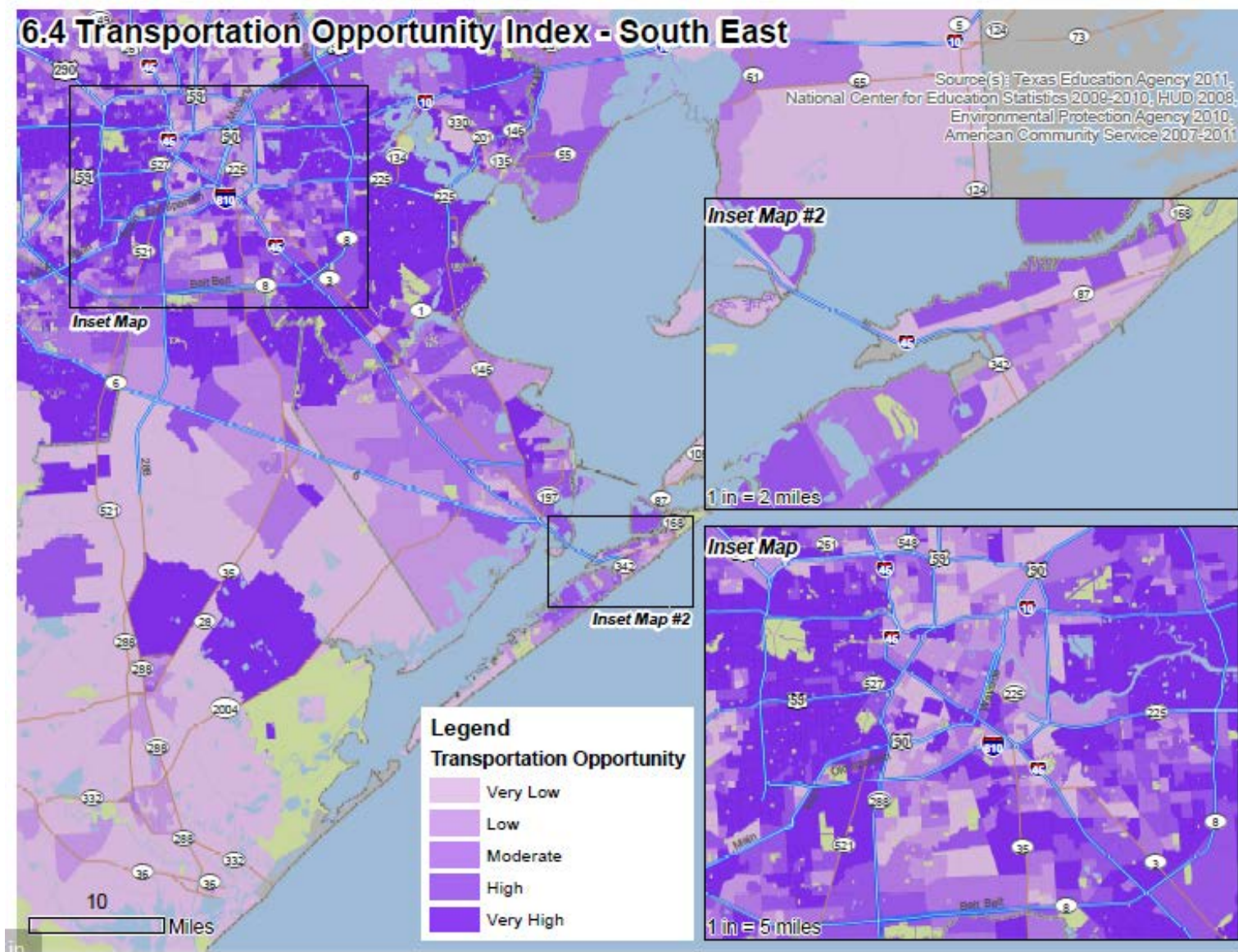
Appendix D – Opportunity Mapping



Appendix D – Opportunity Mapping



Appendix D – Opportunity Mapping



Appendix D – Opportunity Mapping

Opportunity Index and Indicators - Methodology

Education Indicators

- **Math Proficiency**
Description: Average Math Score of students (all grades)
Field Code: EDU_1
Data Source: Texas Education Agency
Geography: Census Block Group 2010
Date: 2010-2011
Methodology: Each block group was assigned the school proficiency rate of the three elementary schools nearest the block group centroid. This process also considered school district boundaries, so as to assign data to block groups only according to the district in which the block group centroid resides (Deleting schools from different school zones and sorting them depending on the distance between the block group centroid and the school, and then picking the nearest three schools).
- **Reading Proficiency**
Description: Average Reading Score of students (all grades)
Field Code: EDU_2
Data Source: Texas Education Agency
Geography: Census Block Group 2010
Date: 2010-2011
Methodology: Same as Math Proficiency
- **High School Graduation Rates**
Description: High School Student Graduation Rates
Field Code: EDU_3

Data Source: Texas Education Agency
Geography: Census Block Group 2010
Date: 2010-2011
Methodology: Same as Math Proficiency

- **Free and Reduced Lunch**
Description: Percent of Students w Free or Reduced Lunch (all grades)
Field Code: EDU_4
Data Source: Texas Education Agency/National Center for Education Statistics
Geography: Census Block Group 2010
Date: 2010-2011
Methodology: Same as Math Proficiency

Neighborhood Quality

- **Family Poverty Rate**
Description: % of people who are living under poverty
Field Code: NQ_1
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Convert the ACS tract level data to the block group level [tract level data \times (block group area/tract area)] and join the calculated table to block group shapefile.
- **Vacancy Rate**
Description: % of housing units vacant
Field Code: NQ_2
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011

Appendix D – Opportunity Mapping

Methodology: Join ACS table to block group boundary layer based on block group ID.

- **Percent Receiving Public Assistance**
Description: % of households receiving public income assistance
Field Code: NQ_3
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Join ACS table to block group boundary layer based on block group ID.
- **Median Home Value**
Description: Median housing value (Median House Value for All Owner-Occupied Housing Units)
Field Code: NQ_4
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Join ACS table to block group boundary layer based on block group ID.

Health & Environment Indicators

- **Toxic Release Site Proximity**
Description: Distance to the nearest toxic release site
Field Code: HE_1
Data Source: EPA, TCEQ
Geography: Census Block Group 2010
Date: 2010
Methodology: Measure the distance (ft) from block group centroid to the nearest toxic release site.

- **Landfill proximity**
Description: Distance to the nearest landfill centroid (ft)
Field Code: HE_2
Data Source: H-GAC
Geography: Census Block Group 2010
Date: 2012
Methodology: Measure the distance from block group centroid to the nearest landfill centroid (ft).
- **Grocery Stores**
Description: Number of groceries within 5 miles buffer from block group centroid
Field Code: HE_3
Data Source: H-GAC
Geography: Census Block Group 2010
Date: 2012
Methodology: Create 5 mile buffer from block group centroid and count the number of groceries within the buffer.
- **Parks**
Description: Distance to the nearest park centroid (ft)
Field Code: HE_4
Data Source: H-GAC
Geography: Census Block Group 2010
Date: 2012
Methodology: Measure the distance from block group centroid to the nearest park centroid (ft)

Economy and Employment

- **Unemployment Rate**
Description: Unemployment Rate
Field Code: EE-1

Appendix D – Opportunity Mapping

Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011

Methodology: Convert the ACS tract level data (civilian and unemployed people) to the block group level [tract level data \times (block group area/tract area)] and join the calculated table to the block group shapefile. Divide the unemployed people by the number of civilian.

- **Labor Force Participation**
Description: Percent of civilians in the labor force (employed or unemployed)
Field Code: EE_2
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Convert the ACS tract level data (total people and civilian) to the block group level [tract level data \times (block group area/tract area)] and join the calculated table to block group shapefile. Divide the number of civilian labor force participants by the total number of people.
- **Adult Education Attainment Rate**
Description: Percent of People 25 and over with at least a Bachelor's Degree
Field Code: EE_3
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Sum up the number of people who with a bachelor's degree or higher, then divide by the total

number of people who are 25 years old or above. Join the ACS table to the block group boundary layer based on the block group ID.

- **Job Counts**
Description: Number of Jobs in 2010
Field Code: EE_4
Data Source: U.S. Department of Housing and Urban Development
Geography: Census Block Group 2010
Date: 2012
Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

Transportation

- **Transit proximity**
Description: Miles to Nearest Bus Stops
Field Code: T_1
Data Source: Retrieved from GIS
Geography: Census Block Group 2010
Date: 2012
Methodology: Measure the distance from the block group centroid to the nearest bus stop (ft).
- **Households without a car**
Description: Percent of households without access to a vehicle
Field Code: T_3
Data Source: American Community Survey
Geography: Census Block Group 2010
Date: 2007-2011
Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

Appendix D – Opportunity Mapping

- Mean Commute Time

Description: Average travel time to work per commuter, in minutes

Field Code: T_4

Data Source: American Community Survey

Geography: Census Block Group 2010

Date: 2007-2011

Methodology: Multiply the median commuting time (in minutes) for each category by the number of commuters and divide them with the total number of commuters.

Housing Overlay Data

- Total Units

Description: Total housing units

Field Code: HO_1

Data Source: American Communities Survey

Geography: Census Block Group 2010

Date: 2007-2011

Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

- Owned

Description: Owner occupied housing units

Field Code: HO_2

Data Source: American Communities Survey

Geography: Census Block Group 2010

Date: 2007-2011

Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

- Rented

Description: Renter occupied housing units

Field Code: HO_3

Data Source: American Communities Survey

Geography: Census Block Group 2010

Date: 2007-2011

Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

- Affordable/Subsidized

Description: Housing vouchers and public housing units

Field Code: HO_4

Data Source: H-GAC

Geography: Census Block Group 2010

Date: 2012

Methodology: Join the ACS table to the block group boundary layer based on the block group ID.

Appendix D – Opportunity Mapping

Code	Category/Indicator	Description	Source	Date	Mean	S.D.	Sign	Original Description
Education								
EDU_1	Math Proficiency	Average Math Score of students (all grades)	TEA	2010-2011	86.2379	14.1098	+	Income in 2010 below poverty level/Total Families
EDU_2	Reading Proficiency	Average Reading Score of students (all grades)	TEA	2010-2011	86.1982	13.8967	+	Vacant housing units/total housing units
EDU_3	High School Graduation Rates	High School Student Graduation Rates	TEA	2010-2011	73.5447	18.5126	+	Households with public assistance income/total households
EDU_4	Free and Reduced Lunch	% of Students w Free or Reduced Lunch (all grades)	TEA/NCES	2010-2011	20.9935	31.1516	-	Median value of owner-occupied housing units
Neighborhood Quality								
NQ_1	Family Poverty Rate	% of people who are living under poverty	ACS	2007-2011	14.2179	15.0022	-	Income in 2010 below poverty level/Total Families. Raw data is a tract level data and it has to be recomputed by multiplying the ratio of block
NQ_2	Vacancy Rate	% of vacant housing unit	ACS	2007-2011	12.0425	11.1097	-	Vacant housing units/total housing units. Raw data is a tract level data and it has to be recomputed by multiplying the ratio of block group area (Block
NQ_3	Percent Receiving Public Assistance	% of households with public income assistance	ACS	2007-2011	1.6075	2.9852	-	Households with public assistance income/total households
NQ_4	Median Home Value	Median housing value	ACS	2007-2011	145808.1882	130094.2235	+	Median value of owner-occupied housing units
Health & Environment								
HE_1	Toxic Release Site Proximity	Amount of released toxic within 2mile buffer from block group centroid	EPA, TCEQ	2010	81084.0786	341979.4946	-	The distance from block group centroid to the nearest toxic release site.
HE_2	Landfill proximity	Distance to the nearest landfill centroid (ft)	HGAC	2012	41326.5115	34855.8494	+	The distance from block group centroid to the nearest landfill centroid
HE_3	Grocery Stores	# of groceries within 5 miles buffer from block group centroid	HGAC	2012	16.0662	20.9011	-	The number of groceries within 5 mile buffer from block group centroid
HE_4	Parks	Distance to the nearest park centroid (ft)	HGAC	2012	7448.6860	18406.3416	-	The distance from block group centroid to the nearest park centroid
Economy & Employment								
EE_1	Unemployment Rate	Unemployment Rate	ACS	2007-2011	7.8291	4.3860	-	Unemployed civilian/total civilian
EE_2	Labor Force Participation	% of civilian	ACS	2007-2011	57.1053	80.1801	+	Civilian/total people. Raw data is a tract level data and it has to be recomputed by multiplying the ratio of block group area (Block group
EE_3	Adult Education Attainment Rate	Percent of People 25 and over with at least a Bachelor's Degree	ACS	2007-2011	25.9761	22.4056	+	Sum of people with Bachelor degree or higher /Population 25 Years and
EE_4	Job Counts	Jobs in 2010	HUD	2012	695.5379	2019.9124	+	The number of jobs within a block group
Transportation								
T_1	Transit proximity	Miles to the Nearest Bus Stop	Retrieved from GIS	2012	36066.8972	64123.8586	-	Miles to the nearest bus stop from the block group centroid
T_2	Fare cost		HGAC	2012				
T_3	Households without a car	% of households without access to a vehicle	ACS	2007-2011	3.6278	4.6934	-	Workers 16 years and over in households with No Vehicle Available/Total
T_4	Mean Commute Time	average travel time to work, in minutes	ACS	2007-2011	30.5717	6.4609	-	Sum (median minutes of each commute time box x # of commuters)/total

Appendix E

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Appendix F

FHEA Comments

Appendix F – FHEA Comments

Commenter/ Interested Party	Date Recorded	Message	Comment Keywords
HUD, LISC, FHEW	Sep-13	The “Opportunity Comparison Radial Model” is an interesting, novel idea. It seems to work well in the FHEA draft to communicate a few important pieces of information, allowing for easy comparisons between transects and communities. It will be interesting to hear how the general public responds to these graphics and if you have ideas for using them during the implementation of the recommendations you’ve included.	Opportunity Model
HUD, Fort Bend County, FHEW	Sep-13	In the fair housing section, consider examining data about people with limited English (LEP) proficiency as a group. LEP is not a protected class, of course, but it correlates with protected classes and presents its own set of challenges. Assuming that there is a significant population of LEP people, you might consider: how does limited English proficiency affect access to government services and housing? What is existing outreach for LEP populations? How available are translators or translated materials?	English language proficiency
FHEW, HUD	Sep-13	You should mention the public engagement you have done/are doing around the FHEA explicitly in the document. You have done that well for everything that fed into this draft, but you should add more to summarize the further outreach and public comments.	Public engagement
FHEW, HUD, Town Hall meetings (October)	Sep-13	Due to the length and density of the FHEA, H-GAC should either expand the Executive Summary to 4-5 pages or create a standalone document that includes findings and recommendations. This will be better to market the FHEA to policy makers.	Executive Summary
HUD, FHEW, TxLIHIS	Sep-13	You have great recommendations, but to the extent you can be more specific or identify certain responsibilities and priorities for implementation, the better. Some of this may come out of the engagement work and could be incorporated into the final draft. For example, if there is a natural fit to lead the regional group that does outreach on housing affordability, naming that group or collaboration of groups in the document provides more detail and accountability.	Implementation
HUD, UTMB, FHEW	Sep-13	I think there’s an important connection to be made between the idea that the petrochemical industry is expanding and while that does offer a lot of economic value, this could very easily impact RCAPS/ECAPS/poorer areas in a negative way (and, historically, it has). You do discuss environmental hazards as being part of areas of low opportunity, but I think this could be a place to consider strengthening your analysis.	Environmental Justice

HUD's Office of Sustainable Housing and Communities (OSHC) guidance to Regional Planning grantees states that "the findings of the FHEA should inform strategy development, priority setting, and investments as part of the regional plan." (OSCH 2012-03) The guidance also states that FHEA activities must be "meaningful and consequential for the region."

Grantees should emphasize principles/commitments that would be clearly measurable so as to create the right conditions for accountability with the FHEA. For example, given the FHEA data findings, grantees could determine that preferences for affordable housing production be allocated to "high opportunity areas." Similarly, grantees could make a commitment to a percentage decrease in concentrated poverty over a period of time. (OSCH 2012-03).

While the FHEA makes a number of findings, and includes commendable goals (balancing housing stock in areas where subsidized and affordable housing stock is lacking, revitalizing disadvantaged communities while preserving their cultural heritage and income, racial, and ethnic diversity, and addressing NIMBYism, etc.), the FHEA lacks a firm commitment to "meaningful and consequential" activities with measurable outcomes, or an explanation of how the findings of the FHEA will guide priority setting and investment in the final regional plan.

This is not to say that there are no proposed meaningful activities in the FHEA, but they are referred to as "Best Practices and Recommendations," and do not include any assignment of responsibility, identification of resources, performance measures, or timelines. Many of these recommended action steps are couched in highly indefinite language; "the region could encourage the adoption of best practices by their jurisdictions", for example, is a statement of possibility, not a commitment to a course of action.

H-GAC's commitment to implementing the action steps identified in the FHEA is particularly important because, "[t]here is a hesitance to address fair housing at a local level through resolutions and policies, but there is a willingness to participate in regionally driven fair housing initiatives." (FHEA IV-90) The region itself has identified a barrier to increasing equity and a course of action to overcome that impediment. However, the implementation of that course of action is the most vital step. If "because of lack of funding and prioritization, there exists no regional coordination efforts," we would expect to see the necessary prioritization and allocation of resources as part of regional Sustainable Communities planning. (FHEA IV-90).

The incorporation of fair housing, and equity considerations into regional (and indeed all) planning activities - and the need to ensure that H-GAC can do so effectively- is not important solely because of civil rights requirements attached to federal housing and community development funds. Many other federal funding sources, including Department of Transportation funds, have independent civil rights obligations attached to their use. For example, in 2010, the Federal Transit Authority withheld \$70 million in funds for a planned light-rail project in California because the plan failed to take the needs of low-income, minority, and other historically underrepresented communities into account.

For the same reasons, we strongly encourage H-GAC to take the additional steps necessary to turn the FHEA into a regional Analysis of Impediments to Fair Housing.

TxLIHIS, Texas Appleseed

Implementation

