

2018-2022 Consolidated Plan
City of Pasadena, Texas

Prepared By: The Community Development Department

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EXECUTIVE SUMMARY

ES-05 - 24 CFR 91.200(C), 91.220(B)

1. Introduction

Every five years, the City of Pasadena (City) develops a five-year strategic plan as required by the U.S. Department of Housing and Urban Development (HUD). On behalf of the City, the Community Development Department developed the 2018-2022 Consolidated Plan (Con Plan). The Con Plan details how the City plans to invest its resources to meet Pasadena's ambition to improve the quality of life for residents, primarily in the low-income areas of Pasadena over a five year period beginning October 1, 2018 through September 30, 2022.There are three sources of federal program funds included within this application, as follow:

- Community Development Block Grant (CDBG),
- Home Investment Partnerships Program (HOME), and
- Emergency Solutions Grants Program (ESG).

For each year of the Con Plan, the City is required to prepare an Annual Action Plan to inform citizens and HUD of the City's intended actions during that particular year. At the end of each program year, the City must prepare a Consolidated Annual Performance and Evaluation Report (CAPER) to provide information to HUD and citizens about that year's accomplishments towards achieving the goals and objectives identified for that year.

The 2018 Annual Action Plan represents the first year of the 2018-2022 Con Plan. This plan is the City of Pasadena Community Development Department's official application for HUD entitlement grants and proposes programs and services to be funded during the City's Fiscal Year (FY) 2019/Community Development Program Year (PY) 2018 (October 1, 2018-September 30, 2019).

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview

The 2018-2022 Consolidated Plan represents the City's ambition to improve the quality of life for residents, primarily in the low-income areas of Pasadena. As required by HUD, each activity is linked to one of three federal program objectives: 1) decent housing, 2) suitable living environments, or 3) economic development. Each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability. The City anticipates achieving these objectives and outcomes in the five year period through the activities listed below:

- Rehabilitate degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents;
- Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low-income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts;

- Reduce homelessness by providing supportive services through local shelters and non-profit agencies;
- Strengthen neighborhoods by investing in public service activities benefiting the community, including those with special needs; and
- Ensure fair housing choice opportunities to all residents of Pasadena.

In order to address these needs, the City of Pasadena has developed goals and measurable outcomes in housing, rapid re-housing, emergency shelter, public facility improvements and public services.

The City is committed to the proper implementation of a balanced Community Development Program that maximizes benefit to low-income persons both directly and through the improvements of their neighborhoods. By providing decent housing, suitable living environments and supportive services, the City of Pasadena intends to improve our low-income neighborhoods and provide our citizens with the needed resources to assist them in breaking both generational and circumstantial poverty.

3. Evaluation of past performance

Program Administration

To ensure compliance, the City of Pasadena Community Development Department has implemented revisions in its policies and procedures and continues to diligently work to meet all deadline requirements for CDBG timeliness, HOME commitment and ESG obligation and expenditure deadlines.

Each year the City continues to build upon its successful track record to meet community needs and improve the quality of life for Pasadena residents. Efforts are made to provide affordable housing, continue investments in neighborhood infrastructure, focus on the prevention and reduction of homelessness, provide public services, and implement strategies to affirmatively further fair housing. Highlights from 2013-2017 Consolidated Plan are summarized below:

- To improve the overall drainage system for neighborhood residents and to enhance City facilities and infrastructure improvements, CDBG funded multiple public facilities projects within the City of Pasadena Low- to Moderate-Income Target Area;
- Through the facilitation of a health benefits program, transportation services program, and a meal delivery program, the City's CDBG Program serviced a significant number of elderly and/or disabled households;
- Through the use of CDBG funds and coordination with the Pasadena Independent School District (P.I.S.D.), the City strengthened educational skills and increased job marketability of low-income households;
- CDBG funding for Pasadena Community Ministry assisted in their mission of hunger relief;
- The City strengthened educational skills and increased low- to moderate income residents' job marketability through the use of CDBG funding, and oversight of the Twin Oaks Mutual Housing's GED and ESL Education Programs;
- The City's ESG Program has provided nights of shelter and supportive services to homeless women and children, which include victims of domestic violence or abuse. To further transition to permanent housing, rent and utility assistance were provided to households at risk of homelessness; and

- The City's HOME Program, continues to assist low-income residents with affordable housing opportunities. The City's HOME Program completed rehabilitation and/or reconstruction on ten (10) low income homes. Additionally, with the continued efforts of Habitat for Humanity, new homes were constructed within the Freedom Place Subdivision and sold to first-time low-income home buyers.

The City will endeavor to carry out the 2018-2022 Consolidated Plan goals listed in this plan. Some goals may change due to unforeseen funding changes or federal rule changes. Pasadena will continue to evaluate and strive to improve upon past performance.

4. Summary of citizen participation process and consultation process

The Community Development Department actively encourages community involvement and provides residents with opportunities to become involved in the development of the Consolidated Plan. Opportunities for citizen input are provided through the planning process through publications, postings, and public hearings. Public meetings are held in well-known locations with adequate space to accommodate large residential groups, and are accessible to disabled persons. Every effort is made to ensure that there are no barriers to attendance. The public notices alert residents and provide contact information so that individuals may request special accommodations, such as interpreters for the deaf or non-English speakers. These measures help to ensure that the citizens of Pasadena, especially the residents of the affected areas, have opportunities to articulate their community development needs and preferences as they relate to CDBG, HOME and ESG program funding, participate in the development of program priorities and objectives, and have their questions addressed.

5. Summary of public comments

All comments received in regards to development and implementation of the 2018-2022 Consolidated Plan were reviewed and accepted by the Community Development Department. Copies of public notices, Needs Assessment Surveys and/or comments will be provided in Appendix I of this document. Appendix I incorporates comments received, if any, from the public hearings and the 30-day comment period that concludes on July 3, 2018. One comment was received in regards to the 2018-2022 Consolidated Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments received are reviewed and accepted by the Community Development Department.

7. Summary

The 2018-2022 Consolidated Plan provides the City of Pasadena's vision for improving the quality of life in the low- to moderate-income areas of the City. The 2018 Annual Action Plan is based on elements of the Consolidated Plan that identify housing, homeless, community needs and resources, and further implements a strategy to address those needs.

The City of Pasadena Community Development Department strives to further address needs of the community by continuing to promote citizen participation, evaluating past performance and responding to past experience with improved efficiency.

THE PROCESS

PR-05 LEAD & RESPONSIBLE AGENCIES 24 CFR 91.200(B)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	Pasadena	
CDBG Administrator		
HOPWA Administrator		
HOME Administrator		
ESG Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City of Pasadena Community Development Department serves as the lead agency responsible for administering the programs covered by the 2018-2022 Consolidated Plan and the 2018 Annual Action Plan, which includes the:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)

Consolidated Plan Public Contact Information

For questions regarding the 2018-2022 Consolidated Plan and the 2018 Annual Action Plan, please contact the Community Development Department at (713) 475-7294 or submit your comments to:

City of Pasadena, Community Development Department
1149 Ellsworth Dr., 5th Floor
Pasadena, TX 77506
CommDev@ci.pasadena.tx.us

1. Introduction

The City of Pasadena coordinates and consults with public and private agencies throughout the development of its Consolidated Plan. Partnerships with both public and private entities are crucial for the City of Pasadena to effectively service the community. To ensure the process is both comprehensive and inclusive, the Community Development Department is working with a number of city departments, the Pasadena Housing Authority, local non-profit agencies, regional organizations and HUD preferred consultants.

The Community Development Department secures information from other city departments, private organizations and residents regarding existing conditions and strategies for addressing short-term and long-term community needs. The Community Development staff will continue to meet with and strategize with a variety of groups and agencies through the year to solicit input regarding the City's programs and to plan for future activities.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Coalition for the Homeless of Houston/Harris County serves as the lead agency for the Houston/Harris County/Fort Bend County Continuum of Care (CoC) structure. The Steering Committee uses recommendations from network and task groups to guide policy development for the CoC, including funding and project prioritization. This structure was put in place to provide a more coordinated response to homelessness, where all funding in the region is targeted toward strategic solutions working to end homelessness throughout the region. The City of Pasadena Community Development Department works closely with the Continuum of Care (CoC) and the CoC Lead Agency, and holds a seat on the CoC Steering Committee. The CoC Steering Committee voted to align with the goals designated in the federal strategic plan to end homelessness, which includes a goal to end family homelessness by 2020.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Pasadena Community Development Department continues to work closely with the Continuum of Care (CoC), which is comprised of five local jurisdictions (City of Pasadena, City of Houston, Harris County, Fort Bend County, Montgomery County) and the Coalition for the Homeless of Houston/Harris County (Coalition). Representatives from each of these jurisdictions participate in meetings, referred to as the Public Funders Workgroup, a group within the CoC structure which ensures that all members of the CoC are targeting funding towards continuum-wide goals. This group assists in updating and maintaining standards for the provision of assistance and performance. These continuum-wide performance measures are used to evaluate performance and determine resource allocations based on data from HMIS.

In an effort to remain in compliance with the homeless participation requirement in 24 CFR 576.405(a), the City of Pasadena remains active within the Coalition for the Homeless and seeks guidance from the Consumer Representatives (previous homeless individuals) which currently hold a voting chair on the Steering Committee. The Community Development Department also makes every effort to attend all seminars and trainings that are provided by the Coalition for homelessness and homelessness prevention. The City of Pasadena requires subrecipients to maintain a Board of Directors, where at least one position is held by a previously homeless individual.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Coalition for the Homeless of Houston/Harris County
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Pasadena Community Development Department attends and participates in Steering Committee meetings and the Public Funders Workgroup to address the needs of the homeless population and discuss funding priorities and program written standards. The City of Pasadena also seeks guidance from the Consumer Representatives (previously homeless individuals) that currently hold a voting chair in the Steering Committee.
2	**Agency/Group/Organization**	The Bridge Over Troubled Waters, Inc.
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-Homeless Services - Victims At Risk of Homelessness
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Pasadena Community Development Department consults with The Bridge Over Troubled Waters in regards to the needs of homeless individuals and domestic violence victims within the community. Furthermore, The Bridge Over Troubled Waters operates a child care program for their residents.
3	**Agency/Group/Organization**	Pasadena Housing Authority
	Agency/Group/Organization Type	Housing Services - Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena Housing Authority was consulted to provide information on needs of the Housing Choice Voucher (HCV) Program in the City of Pasadena, including the number of clients currently being provided rental assistance and the continuous goals of the Family Self-Sufficiency Program.
4	**Agency/Group/Organization**	Madison Jobe Senior Center
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Grantee Department
	What section of the Plan was addressed by Consultation?	Fair Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Madison Jobe Senior Center personnel and participants were consulted at the 2017 Pasabilities Expo on October 21, 2017, regarding Fair Housing, Equal Opportunity and additional community needs. Community Development Department personnel provided informational materials including Fair Housing brochures and grievance forms. Fair Housing materials are available to the public and posted throughout the facility. Participants did not propose any concerns of Fair Housing issues, as many of them are aging in place within their own home.

5	**Agency/Group/Organization**	Collaborative Regional Assessment of Fair Housing
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Employment Service-Fair Housing Services - Victims Health Agency Other government - County Other government - Local Regional Organization Planning Organization Business and Civic Leaders Grantee Department Neighborhood Organization Private Sector Banking / Financing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy Fair Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Cities of Galveston, Missouri City, Pasadena, Harris County and Galveston and Harris County Housing Authorities (collectively known as the "Collaborative" have entered into an interlocal collaborative agreement to develop and submit a Regional Assessment of Fair Housing under HUD's Affirmatively Furthering Fair Housing (AFFH) rule. The Regional Assessment provides an effective planning approach to aid the participants taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice and foster inclusive communities that are free from discrimination. Other agencies consulted in the development of the AFFH and/or the Analysis of Impediments (AI) are the following:-Catholic Charities-Colalition of the Homeless of Houston/Harris County-Graber Family Partnership-Greater Houston Fair Housing Center-Gulf Coast Interfaith-Harmony House Inc.-Harris County Precinct 1-Healthcare for the Homeless - Houston-Hope Haven-Houston Apartment Association-Houston Area Urban Community Development Corp.-Houston Area Urban League-LISC -Lone Star Legal Aid-LULAC-Mounting Horizon Inc. Center for Independent Living-NAACP-Resources and Crisis Center of Galveston County-Saint Vincent's House-Steward Title Company-The House Company-Houston Launch Pad-United Way of Greater Houston-Wheeler Avenue Baptist Church-TX LIHIS

6	**Agency/Group/Organization**	Pasabilities Expo
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Service-Fair Housing Health Agency Child Welfare Agency Other Government - State Other Government - Local Regional Organization Business Leaders Grantee Department Major Employer
	What section of the Plan was addressed by Consultation?	Fair Housing

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development Department personnel consulted with many service providers at the 2017 Pasabilities Expo on October 21, 2017, regarding Fair Housing, Equal Opportunity and additional community needs. Community Development Department personnel provided informational materials including Fair Housing brochures and grievance forms. Fair Housing materials are available to the public and posted throughout the facility. Participating agencies and service providers include, but were not limited to: Texas Workforce Solutions Vocational Rehabilitation Services, Pasadena Special Olympics, WeeWaterWays, LLC, Houston Center for Independent Living (HCIL), Positive Behavior Supports, The Children's Therapy Center Inc., Disability Rights Texas, Texas Children's Health Plan, South TX College of Law - Houston, RiverKids Pediatric Home Health, The Arc of Gulf Coast, Kids Developmental Clinic, Imagine Enterprises and Galveston-Houston Families Exploring Down Syndrome (GHFEDS).
7	**Agency/Group/Organization**	Harris County Public Health and Environmental Services
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Development Department was directed to the Harris County Public Health and Environmental Services - Lead Hazard Control Program webpage, regarding Harris County households with children affected by lead-based paint hazards and contamination. The Community Development Department intends to further evaluate the age of housing stock and household composition to determine the need for lead-based paint strategies within Pasadena.
8	**Agency/Group/Organization**	Community Development Advisory Board
	Agency/Group/Organization Type	Business and Civic Leaders Advisory Committee
	What section of the Plan was addressed by Consultation?	Overall Community Development & Policies

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Community Development Advisory Board has participating members who are also members of various committees and organizations throughout the community. Additionally, the Community Development Department consults with Executive Directors and business representatives of local agencies, such as Baker Ripley Neighborhood Center, The Bridge Over Troubled Waters, United Way, and Pasadena Chamber of Commerce.
9	**Agency/Group/Organization**	Sprint
	Agency/Group/Organization Type	Broadband and Digital Divide Services
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Broadband and Digital Divide Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sprint was consulted to provide information on the needs and resources available for broadband internet services and meeting the digital divide in the City of Pasadena.
10	**Agency/Group/Organization**	Texas Governor's Committee on People with Disabilities
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-Health Services-Employment Service-Fair Housing Other government - State Transportation, Veterans & Emergency Management
	What section of the Plan was addressed by Consultation?	Disability, Welfare & Independent Life Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Texas Governor's Committee on People with Disabilities was consulted to provide information on the best practices after disaster and rehousing issues for the City of Pasadena.

11	**Agency/Group/Organization**	United Way Bay Area
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Employment Services - Victims Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The United Way Bay Area was consulted to provide information on the community needs for veterans and their families in the City of Pasadena. In addition, a consultation to address workforce development and financial resources was performed for all Pasadena residents.
12	**Agency/Group/Organization**	Literacy Advance Houston
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Regional Organization
	What section of the Plan was addressed by Consultation?	Educational Services

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Literacy Advance of Houston was consulted to provide information on literacy resources for basic reading and writing skills for families in the City of Pasadena.
13	**Agency/Group/Organization**	Pasadena Office of Emergency Management
	Agency/Group/Organization Type	Other Government - Local Planning Organization
	What section of the Plan was addressed by Consultation?	Emergency Management, Flood Management & Public Land and Water Resources
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena of Office of Emergency Management was consulted to provide information on the overall emergency management services, management of flood prone areas and public land and water resources in the City of Pasadena.
14	**Agency/Group/Organization**	Pasadena Economic Development Corporation
	Agency/Group/Organization Type	Services-Education Services-Employment Other Government - Local Planning Organization Transportation
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena Economic Development Corporations was consulted to provide information on input for City of Pasadena's strategic plan, which included metropolitan-wide planning and transportation responsibilities.
15	**Agency/Group/Organization**	Houston Hispanic Chamber of Commerce
	Agency/Group/Organization Type	Business and Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Houston Hispanic Chamber of Commerce was consulted during the Women's Conference and Business Expo to provide information on the minority needs, particular minority women's employment and business opportunities in the City of Pasadena and surrounding areas.
16	**Agency/Group/Organization**	Pasadena Chamber Hispanic Business Council
	Agency/Group/Organization Type	Services-Education Services-Employment Regional Organization Planning Organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena Chamber Hispanic Business Council was consulted to provide information on the business resources and opportunities in the City of Pasadena.
17	**Agency/Group/Organization**	Children at Risk
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-Education Services - Victims Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied Youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Children at Risk agency was consulted to provide information on the education needs of the low income, family well-being, and health and nutrition services in the City of Pasadena and the surrounding areas.
18	**Agency/Group/Organization**	Mental Health America of Greater Houston
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Mental Health America of Greater Houston was consulted to provide information on mental health resources for services members, their families and those who support them in the City of Pasadena and surrounding areas.
19	**Agency/Group/Organization**	Housing and Urban Development - Houston Field Office
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Service-Fair Housing Other government - Federal

	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The U.S. Department of Housing and Urban Development - Public and Indian Housing Department, was consulted to provide information on addressing hazards for mold and lead-based paint in affordable housing assisted units for the City of Pasadena.
20	**Agency/Group/Organization**	Pasadena Health Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Business Leaders
	What section of the Plan was addressed by Consultation?	Health Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena Health Center was consulted to provide information on a broad range of health services, including HIV/AIDS, mental health and chronic illnesses for the City of Pasadena.

21	**Agency/Group/Organization**	Texas Department of Family and Protective Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services - Victims Child Welfare Agency Other government - State
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Foster Care Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Texas Department of Family and Protective Services was consulted to provide information concerning the needs and requirements of children in foster care and guardianship regulations for those affected in the City of Pasadena.
22	**Agency/Group/Organization**	Pasadena Police Department
	Agency/Group/Organization Type	Services - Victims Other Government - Local Law Enforcement Organization - Correctional Institution
	What section of the Plan was addressed by Consultation?	Crime Intervention and Prevention
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Pasadena Police Department was consulted to provide information on a broad range of crime statistics, prevention and intervention services for the City of Pasadena.

23	**Agency/Group/Organization**	Baker Ripley Neighborhood Center
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Service-Fair Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development Anti-poverty Strategy Adult Education (GED) ESL, Workforce Development and Job Training
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Baker Ripley Neighborhood Center in Pasadena was consulted with on several times throughout the year in coordination with their community events to provide information on all their community services. In addition assists with our fair housing community outreach conducted by our office at their community events.

Identify any Agency Types not consulted and provide rationale for not consulting

Not Applicable

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Coalition for the Homeless of Houston/Harris County	The City of Pasadena, to the best effort, aligns the priorities of the City's homeless strategies with the Continuum-wide priorities for homelessness.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Pasadena Community Development Department works closely with the City of Pasadena Housing Department, other City departments and Texas General Land Office in the provision of programs to address local issues covered by the Consolidated Plan.

Narrative (optional):

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

All public hearings and meetings are held in well-known locations which are accessible to all residents and adequate space is provided to accommodate large groups. The meeting places are accessible to disabled persons and every effort it made to ensure that there are no barriers to attendance. The public notices alert residents and provide contact information so that individuals may request special accommodations, such as interpreters for the deaf or non-English speakers. These measures help to ensure that the citizens of Pasadena, especially the residents of the affected areas, have opportunities to articulate their community development needs and preferences about the CDBG, HOME and ESG Programs, participate in the development of priorities and objectives, and have their questions addressed.

On January 14, 2018 the City of Pasadena began its citizen participation and consultation process with the publication of the Citizen Review Public Hearings scheduled on January 31, 2018 at 10:00 A.M. and 2:00P.M.; one Needs Assessment Survey received. A second Public Notice was released on February 11, 2018 and February 14, 2018 notifying the public of anticipated funding to be received by the City of Pasadena from the U.S. Department of Housing and Urban Development, funding priorities, and dates for mandatory application workshops for non-profits, service providers, businesses, and city departments interested in applying for CDBG, ESG and HOME funds. Two application workshops were provided to educate interested parties on basic requirements for CDBG, ESG and HOME programs, with a mandatory requirement for applicants to attend one workshop. A third Public Notice for citizen review was released on March 25, 2018 and held on April 12, 2018 to gather citizen input for priority needs.

Additionally, information regarding all Public Hearings was posted to the City webpage to broaden community awareness. These hearings provided the public with opportunities to participate in an advisory role in the planning, implementation, and assessment of programs administered through the Community Development Department.

Agencies interested in applying for funds gave presentations to the Community Development Advisory Board and staff members on May 30, 2018 in City Hall Council Chambers. Upon conclusion of the applicants' presentations, a meeting was held between the Community Development Department and the Community Development Advisory Board to discuss funding recommendations for the upcoming 2018 Program Year activities and projects.

On June 3, 2018, a Public Notice was published in the Pasadena Citizen newspaper, a newspaper of general circulation, to notify the community of how Program Year 2018 CDBG, ESG and HOME Program funding will be utilized and priority needs for the 2018 – 2022 Consolidated Plan. In addition, the public was notified of the required 30-day public comment period beginning Monday, June 4, 2018 and ending Tuesday, July 3, 2018, with public hearings scheduled on Monday, June 18, 2018 at 10:00 A.M. and 2:00 P.M. during the public comment period; one Citizen Comment Form was reviewed, addressed and accepted.

Public Notices

- 1st Citizen Review: January 31, 2018
- Notice of Funding: February 11, 2018 and February 14, 2018
- 2nd Citizen Review: April 12, 2018
- Proposed Annual Action Plan 2018 and Consolidated Plan 2018 – 2022: May 28, 2017

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	Public Notices were posted in the Pasadena Citizen for two Citizen Review Hearings, Notice of Funding and the Proposed 2018 Action Plan and 2018-2022 Consolidated Plan.	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	January 31, 2018 - One citizen attended the Public Hearings. April 12, 2018 - No attendees. June 18, 2018 - One citizen attended the Public Hearings.	January 31, 2018 - One Needs Assessment Survey was received. April 12, 2018 - N/A. June 18, 2018 - One Citizen Comment Form was received.	All comments were accepted for consideration.	
3	Public Meeting	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	A Workshop was held on March 2, 2018 for potential applicants. Twenty one citizens were in attendance.	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	Public Notices were posted on the City of Pasadena's Webpage for two Citizen Review Hearings, Notice of Funding and the Proposed 2018 Action Plan and 2018-2022 Consolidated Plan. Needs Assessment Surveys were also made available on the City's Webpage for Pasadena residents.	N/A	N/A	
5	Department Outreach	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	Needs Assessment Surveys were passed out to Pasadena residents through the Housing and Community Development Departments.	Fifty six Needs Assessment Surveys were received.	All surveys were accepted for consideration.	

Table 4 – Citizen Participation Outreach

NEEDS ASSESSMENT

NA-05 OVERVIEW

Needs Assessment Overview

The priorities for the various needs and strategies have been assigned based on a number of criteria:

- Results of the Needs Assessment Survey regarding needs and priority ratings;
- Input from the Community Development Advisory Board; and
- Results of the needs assessments using definitive and objective data, such as Census data, State of Texas Housing and Health Department Data, Regional Analysis of Impediments for Fair Housing, American Community Survey data, Houston/Harris County/Fort Bend County/Montgomery County 2017 Point-in-Time Count Report, Texas HIV Surveillance Report, City of Pasadena's 2016 Sage Report and CHAS Data Query Tool.

The City of Pasadena faces overwhelming housing needs. Based on the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, approximately 39 percent of Pasadena households experience at least one of the four housing problems, with cost burden ranking as the highest problem. Pasadena requires more affordable housing, both for homeowners and renters. Regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. In addition, displacement from Hurricane Harvey exacerbated an already tight rental market. Contributing factors to disparities in housing needs include lower homeownership rates among most minority groups, availability of units in a range of sizes, lack of private investments in specific neighborhoods and lending discrimination. All three funding sources will be utilized to best provide affordable housing opportunities throughout the community, primarily addressing the needs of non-homeless and special needs households. Various programs will provide these households with rental assistance, new units or rehabilitated units.

While the City of Pasadena does not administer a Public Housing Program, eligible residents are provided housing vouchers through the Housing Choice Voucher Program. The goal of this program is to promote participants to achieve self-sufficiency and obtain homeownership.

In addition, the City provides funding to local shelters in support of their emergency shelter programs, serving those who have been forced into homelessness due to domestic violence while addressing the emergency shelter and transitional housing need. The City will continue to build an even stronger partnership with the Coalition for the Homeless and other ESG grantees within the Continuum to develop community wide strategies to end and prevent homelessness throughout the community. The City's priorities will continue to evolve and align with the continuum-wide goals to address priority needs.

NA-10 HOUSING NEEDS ASSESSMENT - 24 CFR 91.205 (A,B,C)

Summary of Housing Needs

According to the 2009-2013 ACS data provided in the tables below, there are approximately 24,360 low-to moderate income households in the City of Pasadena, accounting for more than half (51%) of the total households. Housing problems include households that lack complete kitchen facilities, complete plumbing facilities, overcrowded (more than one person per room) and have a housing cost burden of more than 30 percent of household income, affecting approximately 6,560 renter and 3,394 owner low-to moderate income households. The impact of cost burden, while affecting all household types, is most severely felt by small family households.

Demographics	Base Year: 2000	Most Recent Year: 2013	% Change
Population	141,674	150,785	6%
Households	50,367	47,387	-6%
Median Income	$38,522.00	$46,058.00	20%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	7,440	7,505	9,415	4,940	18,085
Small Family Households	3,095	3,050	3,920	2,245	9,595
Large Family Households	1,180	1,260	1,960	920	2,830
Household contains at least one person 62-74 years of age	1,049	1,060	1,610	549	3,115
Household contains at least one person age 75 or older	555	1,135	970	405	1,065
Households with one or more children 6 years old or younger	2,275	2,305	2,590	1,085	1,740

Table 6 - Total Households Table

Data Source: 2009-2013 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	65	60	75	20	220	60	45	40	50	195
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	215	175	85	70	545	45	25	95	45	210
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	575	580	600	165	1,920	185	230	355	175	945
Housing cost burden greater than 50% of income (and none of the above problems)	3,200	855	70	0	4,125	1,159	695	455	15	2,324
Housing cost burden greater than 30% of income (and none of the above problems)	335	2,230	1,170	135	3,870	275	635	1,200	680	2,790
Zero/negative Income (and none of the above problems)	395	0	0	0	395	95	0	0	0	95

Table 7 – Housing Problems Table

Data Source: 2009-2013 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,055	1,675	830	250	6,810	1,449	1,000	945	285	3,679
Having none of four housing problems	850	2,880	3,580	1,800	9,110	595	1,960	4,060	2,594	9,209
Household has negative income, but none of the other housing problems	395	0	0	0	395	95	0	0	0	95

Table 8 – Housing Problems 2

Data Source: 2009-2013 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,110	1,820	650	4,580	600	510	825	1,935
Large Related	675	545	155	1,375	315	395	285	995
Elderly	510	575	150	1,235	504	485	315	1,304
Other	1,005	730	360	2,095	205	90	265	560
Total need by income	4,300	3,670	1,315	9,285	1,624	1,480	1,690	4,794

Table 9 – Cost Burden > 30%

Data Source: 2009-2013 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,815	495	60	2,370	560	300	155	1,015

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	495	80	0	575	250	155	80	485
Elderly	410	170	0	580	349	220	110	679
Other	945	195	10	1,150	165	60	115	340
Total need by income	3,665	940	70	4,675	1,324	735	460	2,519

Table 10 – Cost Burden > 50%

Data Source: 2009-2013 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	765	600	615	170	2,150	225	210	320	195	950
Multiple, unrelated family households	24	150	64	25	263	30	55	140	25	250
Other, non-family households	4	15	0	30	49	0	0	0	0	0
Total need by income	793	765	679	225	2,462	255	265	460	220	1,200

Table 11 – Crowding Information – 1/2

Data Source: 2009-2013 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

According to Regional Analysis of Impediments to Fair Housing Choice, Section III. Housing and Lending Analysis, there are 12,790 non-family households in the Pasadena area, which accounts for approximately 27 percent of all

households. Using the statistics of the total households in Pasadena, it is estimated that approximately 51 percent, or 6,523 single person households, are low- to moderate income and may be in need of housing assistance. There is no available Census data describing then number of single person households in need of housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to Regional Analysis of Impediments to Fair Housing Choice, Section V. Disability and Access Analysis, individuals with disabilities represent 12 percent of the Pasadena population. Ambulatory difficulty is the most prevalent form of disability, followed by cognitive difficulty and independent living difficulty. Residents with disabilities are more likely than other residents to have difficulty finding housing that they can afford that meets their accessibility needs. This results in a high proportion of residents with disabilities, approximately one in four households, living in housing that does not meet their accessibility needs. Factors contributing to this situation include:

- A lack of accessible, ADA-compliant housing across the region, both market rate and affordable;
- A lack of landlords willing to accept Section 8 vouchers;
- A lack of information available to Section 8 voucher holders to help them find landlords who participate in the voucher program; and
- Many areas of the region lack public transportation and in many neighborhoods, sidewalks are missing or are dilapidated.

According to the Houston/Harris County/Fort Bend County/Montgomery County 2017 Point-in-Time Count Report, over one in three of those in shelters had experienced domestic violence. Based on reporting by a local shelter who assists homeless women and children and victims of domestic violence and sexual abuse, 73 individuals were contacted and 181 individuals entered the shelter during 2016. The Housing needs for victims of domestic violence include shelter, transitional and long-term housing.

What are the most common housing problems?

Based on the data above, 6810 renter households and 3,679 owner occupied households have at least one housing problem in the Pasadena area for all income levels. Housing costs burden greater than 50 percent of household income is the most common housing problem in Pasadena, affecting 6,449 households including both renter and owner occupied. Overcrowding, meaning more than one person per room, is the second ranked housing problem for Pasadena, affecting a total of 2,865 households.

Based on a Needs Assessment Survey conducted by the City, Pasadena residents listed affordable housing as a top priority for the area. Due to the aging housing stock and damage caused by Hurricane Harvey, there is a need for conserving and improving the existing single family residential housing units within the City, as well as the construction of new single family dwellings.

Are any populations/household types more affected than others by these problems?

As housing cost burdens, greater than 50 percent of household income, is the greatest housing problem in Pasadena, low-to moderate income households are the most affected population.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Many low income individuals and families who are currently housed but are at risk of either residing in shelters or becoming homeless are rent burdened, have low paying jobs and/or are unemployed. These factors contribute to the risk of losing their housing due to the inability to pay rent/mortgage. Based on the Regional Analysis of Impediments to Fair Housing Choice, Section VII. Community Engagement Findings, 20 percent of renters and 29 percent of precariously housed/homeless individuals in Pasadena were displaced. The highest ranked reason for displacement was rent increasing more than the household could afford. Hurricane Harvey increased homelessness in the area. People who did not have formal leases could not get FEMA assistance such as hotel vouchers.

The City of Pasadena is an active member of the Houston/Harris County Continuum of Care (CoC) serving on the CoC Steering Committee and ESG Funders Collaborative. The CoC has developed a community plan, *The Way Home*; its goals are aligned with the Opening Doors Federal Plan that is the nation's first comprehensive federal strategy to prevent and end homelessness. For the CoC, one of the ways to end homelessness includes expanding the use and effectiveness of rapid re-housing. The rapid re-housing system is intended to reduce the length of shelter stays and provide housing with intensive short-term assistance and connections to resources for long-term stability. The City of Pasadena allocated ESG rapid re-housing funds to The Bridge Over Troubled Waters, Inc. in the Pasadena area in program years 2016 and 2017. Assistance was provided for short and medium term rental assistance, security deposits and utilities. Families received case management to ensure effective transitioning from shelter to independent living with supportive services to promote self-sufficiency to assist in achieving the goal of permanent housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

N/A

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Severe cost burden is linked with housing instability and an increased risk of homelessness. Sudden and unexpected financial demands can force a family from their home when the household is paying too large a portion of their income on housing expenses.

Discussion

The City of Pasadena faces overwhelming housing needs. Based on the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, approximately 39 percent of Pasadena households experience at least one of the four housing problems, with cost burden ranking as the highest problem. Pasadena needs more affordable housing, both for homeowners and renters. Affordable housing needs to be in high-opportunity areas near transportation, schools, social services and medical care. Regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. In addition, displacement from Hurricane Harvey exacerbated an already tight rental market. Contributing factors to disparities in housing needs include lower homeownership rates among most minority groups, availability of units in a range of sizes, lack of private investments in specific neighborhoods and lending discrimination.

NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to HUD's eCon Planning Suite desk guide, a disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10% or more) than the income level as a whole. The following will provide an assessment on the disproportionate housing need in the City of Pasadena based on race and ethnicity.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,115	840	490
White	1,720	310	80
Black / African American	349	14	75
Asian	40	25	60
American Indian, Alaska Native	35	0	0
Pacific Islander	15	0	0
Hispanic	3,935	485	270

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,540	1,965	0
White	1,495	1,130	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	40	0	0
Asian	44	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	3,910	795	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,145	5,275	0
White	1,105	1,960	0
Black / African American	210	125	0
Asian	55	80	0
American Indian, Alaska Native	0	40	0
Pacific Islander	0	0	0
Hispanic	2,770	3,044	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,355	3,584	0
White	405	1,524	0
Black / African American	0	60	0
Asian	25	94	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	900	1,900	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Each income category had racial groups with a disproportional need. For the 0% - 30% AMI category, two racial groups, American Indian, Alaska Native and Pacific Islander, had a disproportional need at 100 percent. With the jurisdiction as a whole experiencing one or more housing problems at 82 percent, both groups were 18 points higher. In both the 30% - 50% and 50% - 80% AMI category, Black/African American had a disproportional need. Compared to the jurisdiction as a whole experiencing one or more housing problems, Black/African American was 26 points higher for 30% - 50% and 19 points higher for 50% - 80% AMI. In the 80% - 100% AMI category, Asian had a disproportional need of 42 percent, 15 points higher than the jurisdiction as a whole with one or more housing problems. Although these racial groups have a disproportional share of households with housing problems, the absolute number of households in these racial categories is very low compared to other racial groups. The racial groups stated above make up a range of 0.2 to 4 percent of the population for each category.

Of the 29,309 households included in Tables 13 – 16 above, 59% or 17,155 households have one or more of the four housing problems.

Analysis of data in the Disproportionally Greater Need 0-30% AMI: Housing Problems table shows that:

- 82% of households in this income bracket have one or more housing problems, ranging from 32% to 100% in each racial and ethnic category.

- The highest incidence of problems (100%) occurred in the Pacific Islander racial category, which only represented 0.2% of the population for this income bracket and American Indian, Alaska Native representing 0.5% of the population.

Analysis of data in the Disproportionally Greater Need 30-50% AMI: Housing Problems table shows that

- 74% of households in this income bracket have one or more housing problems, ranging from 0% to 100% in each racial and ethnic category.
- The highest incidence of problems (100%) occurred in the Black/African American racial category, which represented 0.5% of the population for this income bracket.
- Also, high was the Hispanic racial group of which 83% had one or more housing problems and was approximately 9 points higher than the jurisdiction as a whole.

Analysis of data in the Disproportionally Greater Need 50-80% AMI: Housing Problems table shows that

- 44% of households in this income bracket have one or more housing problems, ranging from 0% to 63% in each racial and ethnic category.
- The highest incidence of problems (63%) occurred in the Black/African American racial category, which represented 3.6% of the population for this income bracket.

Analysis of data in the Disproportionally Greater Need 80-100% AMI: Housing Problems table shows that

- 27% of households in this income bracket have one or more housing problems, ranging from 0% to 42.0% in each racial and ethnic category.
- The highest incidence of problems (42.0%) occurred in the Asian racial category, which represented 2.4% of the population for this income bracket.

NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to HUD's eCon Planning Suite desk guide, a disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10% or more) than the income level as a whole. The following will provide an assessment on the disproportionate housing need in the City of Pasadena based on race and ethnicity.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,504	1,445	490
White	1,469	555	80
Black / African American	324	44	75
Asian	30	40	60
American Indian, Alaska Native	19	15	0
Pacific Islander	15	0	0
Hispanic	3,640	775	270

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,675	4,840	0
White	535	2,095	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	30	10	0
Asian	24	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	2,035	2,670	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,775	7,640	0
White	325	2,735	0
Black / African American	125	210	0
Asian	0	135	0
American Indian, Alaska Native	0	40	0
Pacific Islander	0	0	0
Hispanic	1,320	4,494	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	535	4,394	0
White	65	1,854	0
Black / African American	0	60	0
Asian	15	104	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	455	2,345	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

Of the 29,298 households included in these four tables, 35.8% or 10,489 households have one or more of the four severe housing problems. Of that total:

- 5,504 have an Area Median Income between 0%-30%
- 2,675 have an Area Median Income between 30%-50%
- 1,775 have an Area Median Income between 50%-80%
- 535 have an Area Median Income between 80%-100%

Hispanics have the highest number of total households with housing problems (7,440 households), followed by Whites (2,394 households) and Black/African Americans (479 households).

Three income categories had a racial group with a disproportionately greater need.

For the income category of 0%-30% AMI, Pacific Islander's had a disproportionately greater need at 100% compared to the percentage of households in the jurisdiction as a whole within housing problems at 73.9%.

For the income category of 30%-50% AMI, Black/African American's had a disproportionately greater need at 75% compared to the percentage of household in the jurisdiction as a whole with housing problems at 35.6%.

For the income category of 50%-80% AMI, Black/African American's had a disproportionately greater need at 37.3% compared to the percentage of households in the jurisdiction as a whole with housing problems at 18.9%.

Analysis of data in the Disproportionally Greater Need 0-30% AMI: Severe Housing Problems table shows that

- 73.9% of households in this income bracket have one or more severe housing problems, ranging from 23% to 100% in each racial and ethnic category.
- The highest incidence of problems (100%) occurred in the Pacific Islander racial category, which represents 0.2% of the households for this income bracket.

Analysis of data in the Disproportionally Greater Need 30-50% AMI: Severe Housing Problems table shows that

- 35.6% of households in this income bracket have one or more severe housing problems, ranging from 0% to 75% in each racial and ethnic category.
- The highest incidence of problems (75%) occurred in the Black/African American racial category, which represents 0.5% of the households for this income bracket.

Analysis of data in the Disproportionally Greater Need 50-80% AMI: Severe Housing Problems table shows that

- 18.9% of households in this income bracket have one or more severe housing problems, ranging from 0% to 37.3% in each racial and ethnic category.
- The highest incidence of problems (37.3%) occurred in the Black/African American racial category, which represents 3.5% of the households for this income bracket.

Analysis of data in the Disproportionally Greater Need 80-100% AMI: Severe Housing Problems table shows that

- 10.9% of the households in this income bracket have one or more severe housing problems, ranging from 0% to 16.2% in each racial and ethnic category.
- The highest incidences of problems (16.2%) occurred in the Hispanic racial category, which represents 56.8% of the house hold for this income bracket.

NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole. The tables below display disproportionately greater needs related to housing cost burden

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / Negative Income (not computed)
Jurisdiction as a whole	31,130	8,485	7,219	560
White	14,725	3,025	2,080	95
Black / African American	660	120	384	75
Asian	830	99	70	60
American Indian, Alaska Native	220	15	19	0
Pacific Islander	0	0	15	0
Hispanic	14,450	5,150	4,605	325

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2009-2013 CHAS

Discussion:

In Pasadena, 17.9% of households pay between 30%-50% of their household income for housing expenses and 15.2% are severely cost burdened paying over 50% of their household's income on housing expenses.

Analysis shows that two racial groups have a disproportionately greater need of severe cost burdens.

- 30.9% of Black/African American's pay more than 50% of their household income on housing expenses compared to the percentage of households in the jurisdiction at 15.2%.
- 100% of Pacific Islander's pay more than 50% of their household income on housing expenses compared to the percentage of household in the jurisdiction at 15.2%.

Approximately two thirds of all households (65.7%) spend less than 30% of their income on housing costs. Among this group, Black/African American's are disproportionately under-represented because only 53.3% are in this category. This is a 12.4% difference in the City's percentage. Pacific Islanders are also disproportionately under-represented as 0% are listed in this category.

NA-30 DISPROPORTIONATELY GREATER NEED: DISCUSSION – 91.205(B)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As described in the previous sections, Pacific Islanders, Black/African American, American Indian, Alaska Native and Asian were the racial groups with disproportionate needs greater than the needs of that income category as a whole. Although these racial groups were more than 10 points higher than the total jurisdiction, they also represented a small portion of the population. Analysis of the data provided shows Hispanics make up more than half of the households within each jurisdiction as a whole. Although there was not a disproportionately greater need, the percentage for Hispanics in each income category came in higher than the total jurisdiction, therefore Hispanic households also have substantial disparities.

If they have needs not identified above, what are those needs?

Based on the Needs Assessment Survey received by Pasadena residents, the area has a strong need for Affordable Housing. The City of Pasadena believes the most significant barriers to affordable housing in Pasadena to be non-profit capacity for affordable housing, economic market conditions for low-income homebuyers, and reductions in federal assistance. The City of Pasadena has developed specific goals and objectives to address the housing needs of low-income populations within the City's jurisdiction. These housing goals are aimed at creating the opportunity for adequate, affordable, accessible housing for low-income households through the elimination of lead based-paint hazards, encouragement of homeownership, rehabilitation of single family dwellings, provision of rental assistance, new construction and development of partnerships.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According the most recent Regional Analysis of Impediments to Fair Housing Choice, Section II. Racially/Ethnically Concentrated Areas of Poverty, over 3,500 (3,512) residents live in Racially/Ethnically Concentrated Areas of Poverty. Of these, 95.6% are minority, predominately Hispanic. The northern sections of Pasadena are more densely populated than the City as a whole. In this case, concentration is defined as an area in which a large portion of the neighborhood shows a majority of racial or ethnic minorities.

NA-35 PUBLIC HOUSING – 91.205(B)

Introduction

The City of Pasadena does not have any public housing units under its jurisdiction. The City of Pasadena's Housing Department is a Public Housing Agency (PHA) and is responsible for administering the Section 8 Housing Choice Voucher (HCV) Program for the jurisdiction. The City of Pasadena Community Development Department does not provide funding to the Housing Department. The Section 8 HCV Program provides rent subsidies for more than 1,000 low – income households. About 47% of the voucher recipients are seniors or persons with disabilities. The average annual income of those that receive Section 8 vouchers is $11,346.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	1,084	0	1,084	0	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	11,346	0	11,346	0	0
Average length of stay	0	0	0	6	0	6	0	0

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	0	2	0	2	0	0
# Homeless at admission	0	0	0	1	0	1	0	0
# of Elderly Program Participants (>62)	0	0	0	241	0	241	0	0
# of Disabled Families	0	0	0	265	0	265	0	0
# of Families requesting accessibility features	0	0	0	1,084	0	1,084	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	869	0	869	0	0	0
Black/African American	0	0	0	215	0	215	0	0	0
Asian	0	0	0	0	0	0	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	599	0	599	0	0	0
Not Hispanic	0	0	0	485	0	485	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

While the City of Pasadena does not administer a Public Housing Program, eligible residents are provided housing vouchers through the Housing Choice Voucher Program. The goal of this program is to promote participants to achieve self-sufficiency and obtain homeownership.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

There are approximately 8,481 individuals on the waiting list for housing vouchers as of 2016. The City of Pasadena's Housing Department plans to assist approximately 100 families from the waiting list for the upcoming year.

How do these needs compare to the housing needs of the population at large

The needs of those on the waiting list for Housing Choice Vouchers are similar to the population at large in that the needs are associated with economic barriers that intensify the problem of housing affordability in Pasadena.

Discussion

In conclusion, the City of Pasadena offers Housing Choice Vouchers however the demand continues to overshadow the supply.

Introduction:

The City of Pasadena as part of Harris County, falls under the umbrella of the Coalition for the Homeless of Houston and Harris County. Each year the Coalition for the Homeless of Houston and Harris County performs a Point-In-Time Homeless (PIT) Count of sheltered and unsheltered homeless persons in the Houston, Harris County, Fort Bend County and Montgomery County areas. The purpose of the count is to determine the number of homeless persons, as defined by HUD. This count is conducted in the last week of January each year as designated by HUD. The last count conducted with available results was January 23-25, 2018. The latest PIT Count was organized and led by the Coalition for the Homeless in consultation with The University of Texas School of Public Health. Many homeless service providers participated as well as community volunteers, including homeless and formerly homeless persons. The data is a combination of the results of the 2018 PIT count and data collected by local homeless shelters and service providers during the Program Year 2016 reporting period.

The following table provides an estimate of homeless individuals and families within several categories.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	886	0	108	0	0	0
Persons in Households with Only Children	2	0	0	0	0	0
Persons in Households with Only Adults	1,385	1,528	36	0	0	0
Chronically Homeless Individuals	130	181	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	73	370	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Unaccompanied Child	2	0	0	0	0	0
Persons with HIV	57	100	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Data Source: Coalition for the Homeless Houston/Harris County/Fort Bend County/Montgomery County 2018 PIT Count Report, 2016 Sage Report* Data in the table above for Estimated # of persons experiencing homelessness on a given nightÃ¿Â is based on the Houston/Harris County/Fort Bend County/Montgomery County 2018 PIT Count Report, whereas the data shown for Estimated # experiencing homelessness each yearÃ¿Â is based on local shelters in the Pasadena area, therefore the data does not correlate.

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	139	0
Black or African American	38	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	4	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	84	0
Not Hispanic	97	0

Data Source Comments: Data Source: Sage Reporting for Program Year 2016.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Those in need of housing assistance include those extremely low-income households with at least one severe housing problem who may become homeless, those who are sheltered but will leave shelter without a stable income to support independent living, and those who are unsheltered.

There were 443 self-reported veterans experiencing homelessness in the 2018 PIT count, representing an increase of 9% since the 2017 PIT count. Of the veterans included in the count, 50.8% or approximately 225 homeless veterans, were in sheltered conditions. Of these veterans, 122 (27.5%) were classified as chronically homeless. Of the chronically homeless, 83.6% or approximately 102, were unsheltered.

Data collected during the 2018 PIT count showed a total of 4,143 sheltered and unsheltered homeless individuals per HUD's definition. Of the total population, approximately one out of seven were under the age of 18, however all of those individuals were in sheltered situations. One-sixth of those individuals under the age of 18 were in transitional housing, a decrease from 2017. Two unaccompanied youth under the age of 18 years were in an emergency shelter the night of the count. Of the total 2,529 individuals in emergency shelter or transitional housing, 22% or 556 individuals, were below the age of 18.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

As shown in the table above, based on information collected by a local shelter in Program Year 2016, 77% of Pasadena homeless persons were White and over half are of Hispanic descent.

Based on the 2018 PIT Count, the vast majority of those experiencing homelessness were White or Black/African-American. In Harris County, approximately 39.7% of those experiencing homelessness were White and 17.1% were of Hispanic descent. The total of the Black/African-American population experiencing homelessness was 56.5%.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In the 2018 PIT Count there was a total of 4,143 sheltered and unsheltered homeless persons counted. According to the Coalition's 2018 Homeless Count Fact Sheet, there has been a 51% decrease in overall homelessness since 2011. However, there was a 12% increase seen in 2018 compared to the 2017 count. This may be due to the effects of Hurricane Harvey. In August 2017 Hurricane Harvey hit Southeast Texas bringing with historic flooding and unprecedented impacts on affordable housing. Nearly 18% of unsheltered individuals at the time of the 2018 PIT count reported that they became homeless due to Hurricane Harvey.

There were 2,271 people counted as sheltered in Harris County and 1,528 were unsheltered. Unsheltered homeless has been reduced by 63% since 2011.

Other subpopulations reported in the total adult populations experiencing homelessness include nearly one in three (33.2%) with self-reported serious mental illness and nearly one in three (30.4%) with substance use disorder including alcohol and/or other drugs. Both mental illness and substance abuse were higher in the unsheltered vs. the sheltered populations. Approximately one in twenty (3.8%) of the total population experiencing homelessness self-reported as HIV positive. Overall, approximately one in eight of those experiencing homelessness had experienced domestic violence. This percentage was higher in the sheltered population (12.8% vs 7.1% among unsheltered).

Discussion:

The City of Pasadena continually increases the support for organizations who address the needs of homeless persons and assists this population in obtaining permanent housing.

The City of Pasadena provides funding to local shelters in support of their emergency shelter programs, serving those who have been forced into homelessness due to domestic violence while addressing the emergency shelter and transitional housing need. The emergency shelter provides services for all adults, families and youth including case management, crisis intervention, 24-hour hotline, domestic violence and sexual assault prevention presentations, food, clothing, child care, transportation and access to other mainstream resources designed to assist in the development of self-sufficiency, improvement in the quality of life and promote the transition from homelessness to permanent stabilized housing.

NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT - 91.205 (B,D)

Introduction:

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The special needs populations includes:

- Elderly (defined as 62 and older)
- Frail Elderly (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking and performing light housework)
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug addiction
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault and stalking

Describe the characteristics of special needs populations in your community:

According to the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, residents who participated in a prioritization exercise at pop up community engagement events and the open house events identified “accessible housing for disabled persons/elderly” and “housing options for persons with severe mental illness” as the top priorities for housing in the region.

Elderly and Frail Elderly

Supportive housing needs for the elderly and frail elderly continues to increase in Pasadena. Based on the 2012-2016 American Community Survey 5-Year Estimates, approximately 17,830 people (12%) of the population is elderly. Housing needs for senior citizens often include smaller units that have supportive services nearby or on-site. Deferred maintenance on homes is often an issue with elderly homeowners, and strengthens the need for housing rehabilitation assistance.

Persons with Disabilities

Based on the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, 12% of the population of Pasadena has some type of disability. Ambulatory difficulty is the most prevalent form of disability in the Pasadena area, followed by cognitive difficulty and independent living difficulty. Region-wide, people age 65 or older with a disability account for about one-third of all residents with a disability. Various methods of outreach are being explored to promote community involvement and enhanced communication with residents who have a disability. Persons with disabilities who are in need of supportive housing include those with physical and/or

intellectual disabilities that limit their everyday activities including employment, transportation or medical services.

Persons with Alcohol or other Drug Additions

Persons affected by alcohol or other drug addictions may need many different kinds of supportive services, including counseling and treatment. Based on the Regional Analysis of Impediments to Fair Housing Choice, Section VII. Community Engagement Findings, a survey conducted demonstrated that about one-third of Pasadena residents thought their neighbors would support a residential home for people recovering from substance abuse.

Persons with HIV/Aids

The Texas Department of State Health Services shows that Pasadena has 31 residents living with HIV/AIDS. Harris County is ranked as number one on the 25 counties with the highest cases numbers for HIV/AIDS, with approximately 24,699 documented cases for HIV and 602 with AIDS. Documented cases have steadily increased since 2007 from 1,162 HIV diagnoses to 1,205 in 2016.

Victims of Domestic Violence

Housing needs for victims of domestic violence include shelter, transitional and long-term housing. The City of Pasadena plans to provide financial support to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse. Through case management, multiple services are provided to each homeless individual or family upon entry into the program to assess further needs, such as child care, transportation, counseling and support groups, legal aide, medical services and education services to promote self-sufficiency. The City will also support rapid re-housing and stabilization services through financial assistance in the form of deposits, short and medium term rental assistance and utility payments.

What are the housing and supportive service needs of these populations and how are these needs determined?

The City will provide housing and supportive services that address the needs of various special needs populations who are not homeless through the following activities:

- Utilizing HOME funds to assist income-eligible Pasadena residents including seniors, persons with disabilities, or other special needs populations maintain their home through the Housing Rehabilitation Program. If rehabilitation is not considered cost reasonable, the City may offer to provide demolition and reconstruction of the existing single-family home. Participation in the demolition and reconstruction process is on a voluntary basis of the homeowner;
- Funds provided by CDBG will support affordable housing through the Housing Rehabilitation Program Administration and Public Service Activities, such as transportation services for special needs populations including elderly and persons with disabilities; and
- Rapid re-housing and stabilization services will be provided through ESG funds in the forms of deposits, rent and utility payments for victims of domestic violence. The City also plans to provide financial support

to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse.

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Texas Department of State Health Services shows that Pasadena has 31 residents living with HIV/AIDS, approximately 0.02% of the population. Although the City does not directly fund these services, the City plans to provide financial support to local emergency shelters who collaborate with many community partners including health services through the AIDS Foundation Houston.

Discussion:

The City will utilize all three funding sources to best provide affordable housing opportunities throughout the community, primarily addressing the needs of non-homeless and special needs households. Various programs will provide these households with rental assistance, new units or rehabilitated units.

Additionally, the City will continue to build an even stronger partnership with the Coalition for the Homeless and other ESG grantees within the Continuum to develop community wide strategies to end and prevent homelessness throughout the community. The City's priorities will continue to evolve and align with the continuum-wide goals to address priority needs.

NA-50 NON-HOUSING COMMUNITY DEVELOPMENT NEEDS – 91.215 (F)

Describe the jurisdiction's need for Public Facilities:

A Needs Assessment Survey was conducted in order to include residents in the citizen participation process and to identify areas in need of improvement. Citizens ranked public facilities, specifically Senior Centers, as a top priority. The City is committed to improving public facilities in the CDBG Target Area to increase accessibility and address the needs of the community.

How were these needs determined?

Feedback gathered from the Needs Assessment Survey provided input and suggestions of residents' community desired improvements. Respondents rated the level of public facilitates need from low, medium and high. The City plans to address the needs desired by the community throughout the five year period of the Consolidated Plan and looks forward to creating and/or assisting activities that further the commitment to develop viable urban communities and expand economic opportunities each year.

Describe the jurisdiction's need for Public Improvements:

Due to flooding and drainage problems, accentuated by the recent effects from Hurricane Harvey the City's drainage infrastructure, streets, sidewalks and street lighting are in great need of improvements. Infrastructure additions and improvements will assist in the City's mission to provide suitable living environments.

How were these needs determined?

Feedback gathered from the Needs Assessment Survey provided input and suggestions of residents' community desired improvements. Respondents rated the level of public facilitates need from low, medium and high. Drainage improvements ranked as the highest need overall of the Needs Assessment Survey completed by residents. The City plans to address the needs desired by the community throughout the five year period of the Consolidated Plan and looks forward to creating and/or assisting activities that further the commitment to develop viable urban communities and expand economic opportunities each year.

Describe the jurisdiction's need for Public Services:

A number of public services are viewed as important to City residents illustrated through the Needs Assessment Survey including; Homeless Shelter/Services, Centers/Services for the Disabled, Transportation Services, Educational Services and Health Services.

How were these needs determined?

Feedback gathered from the Needs Assessment Survey provided input and suggestions of residents' community desired improvements. Respondents rated the level of public facilitates need from low, medium and high. The City plans to address the needs desired by the community throughout the five year period of the Consolidated Plan and looks forward to creating and/or assisting activities that further the commitment to develop viable urban communities and expand economic opportunities each year.

HOUSING MARKET ANALYSIS

MA-05 OVERVIEW

Housing Market Analysis Overview:

Based on the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. The effects of Hurricane Harvey only intensified market prices due to an increase in displacement (demand) and a decrease in supply of homes. Contributing factors to disparities in housing needs include availability of affordable units in a range of sizes, the aging housing stock and the effects of Hurricane Harvey. Housing is generally more available and affordable for individuals and small families than for large families. This means that low-to-moderate-income families with small children are more likely to be exposed to substandard housing characteristics, such as lead-based paint hazards.

MA-10 NUMBER OF HOUSING UNITS – 91.210(A)&(B)(2)

Introduction

The housing stock of Pasadena is heavily weighted toward single-family housing, with 59% of households residing in single-family detached structures. Approximately 61% of households are homeowners, with 86% of homeowners living in housing units with three or more bedrooms. Therefore, the need for larger single-family affordable housing exists.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	31,389	59%
1-unit, attached structure	1,078	2%
2-4 units	2,457	5%
5-19 units	8,788	16%
20 or more units	7,280	14%
Mobile Home, boat, RV, van, etc	2,382	4%
Total	***53,374***	***100%***

Table 27 – Residential Properties by Unit Number

Data Source: 2009-2013 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	202	1%	566	3%
1 bedroom	428	2%	6,761	33%
2 bedrooms	3,229	12%	7,818	38%
3 or more bedrooms	23,029	86%	5,354	26%
Total	***26,888***	***101%***	***20,499***	***100%***

Table 28 – Unit Size by Tenure

Data Source: 2009-2013 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Pasadena utilizes the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program and Emergency Solutions Grants (ESG) funds on projects. These programs have annual income limits that determine participation. The City of Pasadena focuses and serves areas designated by HUD as low-to-moderate income; and HOME affordable homeownership limits for the area as provided by HUD. From 2013-2017,

the City of Pasadena completed rehabilitation/reconstruction on 10 owner-occupied housing units with HOME dollars, and currently has six housing units in the reconstruction phase with anticipated completion dates during PY 2017 and 2018. The City will use HOME funds to construct and rehab approximately 10 housing units over the next five years. CDBG funds will be utilized to support the Housing Rehabilitation Program under HOME through Housing Rehabilitation Administration.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are no units expected to be lost from inventory.

Does the availability of housing units meet the needs of the population?

Based on the Regional Analysis of Impediments to Fair Housing Choice, Executive Summary, regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. In addition, displacement from Hurricane Harvey exacerbated an already tight rental market. Furthermore, there is a lack of housing units suitable for large families and a lack of accessible housing options for people with disabilities.

Describe the need for specific types of housing:

Due to the aging housing stock and damage caused by Hurricane Harvey, the abandoned and dilapidated structures within the City of Pasadena, there is a need for conserving and improving the existing single family residential housing units within the city as well as the construction of new single family dwellings.

While a trend towards more, smaller households can be met with one or two bedroom affordable units, Pasadena continues to need larger units that provide safe, affordable options for families with children and extended families. Also, Pasadena needs accessible units that are not only affordable but integrated with traditional housing units.

Discussion

Based on the Regional Analysis of Impediments to Fair Housing Choice, Section IX. Fair Housing Goals and Priorities, contributing factors to disparities in housing needs include lower homeownership rates among most minority groups, availability of affordable units in a range of sizes, lack of private investments in specific neighborhoods and lending discrimination. Contributing factors to disparities in access to opportunity include availability of affordable units in a range of sizes, limited support for multifamily housing, NIMBYism, lack of private investments in specific neighborhoods, lending discrimination, land use and zoning laws, limited/lack of public transit in certain areas, including Pasadena.

MA-15 HOUSING MARKET ANALYSIS: COST OF HOUSING - 91.210(A)

Introduction

Based on the Regional Analysis of Impediments to Fair Housing Choice, Section III. Housing and Lending Analysis, the Greater Houston Region is known as a relatively affordable housing market with median rent and median home values below the national rates, however, housing prices relative to national markets is not the best indicator of affordability in a given market. Rather, housing prices should be considered relative to the incomes of residents within that market. The City of Pasadena housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. The effects of Hurricane Harvey only intensified market prices due to an increase in displacement (demand) and a decrease in supply of homes.

According to the data below, the median home values for the City of Pasadena shows a 51% increase since 2000. Rental costs had similar, though somewhat lower, increases rising 38% from $468 in 2000 to $647 in 2013. Less than 5% of the rental housing stock was affordable to the households earning less than 30% of the area median income. No homes were priced in a range that would be affordable for a household earning less than 30% of the area median income.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2013	% Change
Median Home Value	67,600	102,400	51%
Median Contract Rent	468	647	38%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	3,847	18.8%
$500-999	14,970	73.0%
$1,000-1,499	1,346	6.6%
$1,500-1,999	301	1.5%
$2,000 or more	35	0.2%
Total	***20,499***	***100.0%***

Table 30 - Rent Paid

Data Source: 2009-2013 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,005	No Data
50% HAMFI	7,045	4,230
80% HAMFI	15,935	9,684
100% HAMFI	No Data	12,707
Total	***23,985***	***26,621***

Table 31 – Housing Affordability

Data Source: 2009-2013 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	701	797	976	1,333	1,690
High HOME Rent	701	797	976	1,304	1,435
Low HOME Rent	626	670	805	930	1,037

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Hurricane Harvey has impacted the area since it made landfall in Texas on August 25, 2017. Recovery from the hurricane is on-going and has worsened the housing issues already in place. According to a residential survey conducted, described in the Regional Analysis of Impediments, Section VII. Community Engagement Findings, water damage impacted 40% of Pasadena, with 16% of residents having damage that made their home unlivable. Although this hurricane caused flooding in middle- and upper-income communities that have not flooded historically, stakeholders particularly noted the disproportionate impact on low-income communities that were most affected.

As would be expected, low-income households have the least housing stock from which to choose, clearly not enough to meet the needs of the community. With no homes priced at a level affordable to those earning 30% of the area median income, rental properties are their only option. The data shows that less than 5% of rental units are affordable to those earning less than 30% of the area median income. With the limited housing stock, many households are forced to spend more of their income on housing expenses, moving up to higher priced rental housing. This creates a cost burden for those households, requiring that they spend more than 30% of their household income on housing expenses. In many cases it creates an extreme cost burden, requiring more than 50% of their income for housing.

How is affordability of housing likely to change considering changes to home values and/or rents?

With the increase in median home value, homeownership is becoming less affordable, causing a large majority of the low-to-moderate-income households into rental housing. Despite the large and growing demand for more affordable units, the housing market is not responding to the acute needs of the lowest income renters. With an increasing lower income population, the affordable housing market is not keeping up with demand, especially the demand for affordable, accessible and larger units. As unit price increases, programs that preserve affordable housing will be essential. Until the market begins addressing the need for more affordable units, affordable single family rehabilitation and/or reconstruction will be needed to supplement the housing deficit.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME and Fair Market Rents compare favorably to the area median rent of $647 in 2013. In almost all cases, the HOME and Fair Market Rents exceed the median rent and those that do not are efficiency or one bedroom units, which are likely renting below the area median rent figure of $647. Fair Market Rents for 3 and 4 bedroom units are sufficiently high to justify housing strategies that target the development of larger units for larger households looking for rental properties with Section 8 assistance.

Discussion

The increasing deficit between income and housing cost impact low-to-moderate-income populations more significantly and with greater frequency than those earning greater than 80 percent of MFI. This results in low-to-moderate-income families settling for homes of lower quality and inadequate space. The ability to pay for an adequate housing unit in the City of Pasadena depends mainly on income and number of persons in the household. Housing is generally more available and affordable for individuals and small families than for large families. This means that low-to-moderate-income families with small children are more likely to be exposed to substandard housing characteristics, such as lead-based paint hazards.

MA-20 HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210(A)

Introduction

Approximately 27 percent of homeowners and 46 percent of renter households in Pasadena experience at least one severe housing problem. HUD defines housing problems as units having incomplete kitchen facilities incomplete plumbing facilities, more than one person per room and households with cost burden greater than 30 percent of household income.

More than one half of housing in Pasadena was built prior to 1980, approximately 63 percent for owner-occupied and 64 percent for renter-occupied. Older housing stock is at a greater risk of containing hazards, such as lead-based paint. Lead hazards can lead to a range of health problems, especially in young children.

Definitions

For the purposes of the 2018-2022 Consolidated Plan, the City defines housing conditions as the following:

- Standard Condition – housing units that meet applicable federal standards and local building codes.
- Substandard Condition – housing unit which is deficient in any or all of the acceptable criteria of the City's current building and property maintenance codes, Uniform Physical Conditions Standards, Section 8 Housing Quality Standards of HUD and other applicable housing and property standards.
- Substandard Condition but Suitable for Rehabilitation – any housing unit in need of rehabilitation in order to satisfy the City's current building and property maintenance codes, Uniform Physical Conditions Standards, Section 8 Housing Quality Standards of HUD and other applicable housing and property standards. The property must be in such a condition as to be feasible for repair to property standards for a cost at, or below, $80,000, plus 10% contingency.
- Substandard Condition and Not Suitable for Rehabilitation – housing unit neither structurally or financially feasible for rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	7,126	27%	9,516	46%
With two selected Conditions	526	2%	1,449	7%
With three selected Conditions	32	0%	10	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	19,204	71%	9,524	46%
Total	***26,888***	***100%***	***20,499***	***99%***

Table 33 - Condition of Units

Data Source: 2009-2013 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	3,601	13%	2,770	14%
1980-1999	6,373	24%	4,679	23%
1950-1979	15,300	57%	12,162	59%
Before 1950	1,614	6%	888	4%
Total	***26,888***	***100%***	***20,499***	***100%***

Table 34 – Year Unit Built

Data Source: 2009-2013 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	16,914	63%	13,050	64%
Housing Units build before 1980 with children present	3,950	15%	1,910	9%

Table 35 – Risk of Lead-Based Paint

Data Source: 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Table 35 - Vacant Units

Table 35 does not allow for data entry. According to the American Community Survey 5-year estimate, the number of vacant housing units within Pasadena is 4,467, of which 357 are abandoned. Of the Vacant Units 1,563 are Suitable for Rehabilitation and 2,904 are Not Suitable for Rehabilitation. For Abandoned Vacant Units 125 are Suitable for Rehabilitation and 232 are Not Suitable for Rehabilitation

Need for Owner and Rental Rehabilitation

Table 36 does not allow data entry.

According to the 2009 – 2013 ACS and as shown in *Table 32 – Conditions of Units*, 29 percent of owner-occupied units and 53 percent of renter-occupied units have one or more selected housing conditions.

Due to the aging housing stock and damage caused by Hurricane Harvey, there is a need for conserving and improving the existing single family residential housing units within the City as well as the construction of new single family dwellings.

Based on the Needs Assessment Survey conducted by the City, Pasadena residents listed affordable housing as a top priority for the area.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The data shows that the number of housing units in the City of Pasadena built prior to 1980, and potentially where lead-based paint hazards might be found, include 63 percent of all owner and 64 percent of all rental housing. According to the 2009 – 2013 ACS, 54 percent of Pasadena households earn 80 percent or below HAMFI. As a result, it is reasonable to assume that the majority of the 29,964 homeowner and rental units in Pasadena, shown in *Table 34 – Risk of Lead-Based Paint*, are likely occupied by low- or moderate-income families.

Discussion

There is an extensive need for rehabilitation programs in Pasadena targeting the improvement of the City's older housing stock. The destruction caused by Hurricane Harvey in 2017 only worsened the need with approximately 40% of Pasadena homes impacted by water damage. Of the homes affected, 16% of Pasadena residents had damage that made their homes unlivable. The Housing Rehabilitation Services Program, administered with HOME funds, provides rehabilitation, as well as demolition/reconstruction, of homes owned & occupied by low/mod residents. These repairs include structural & cosmetic repairs both inside/outside the unit, testing & remediation of lead-based paint hazards for homes built prior to 1980. Housing Rehabilitation Administration funded through CDBG, is used to support staff costs for administration associated with application in-take, eligibility determination, project inspections & oversight of construction & site work completed for the Program. The City has evaluated the following data: Broadband Data from the Federal Communication Commission (FCC) regarding broadband availability within the area. Resilience Data from the Harris County Multi-Hazard Mitigation Plan (HCMHMP) as well as the Pasadena's Floodplain Management Plan. As most of information, services & resources have transitioned to online, the digital inequality has a direct impact on low income households. The City's broadband access is more than 66% higher than the State & 13% higher than the total US. The City's broadband access is mainly served by Comcast Cable & AT&T Services. According to the FCC, the City has 3 other companies that provide satellite services. Although the City has broadband availability for most residents, over 10% of residents are still severely limited in wired broadband choices. To assist the City in meeting the need for broadband, some service providers have qualifying low-cost broadband services. For example, AT&T offers low-cost wireline home internet service to qualifying low income households. Hazard Mitigation is any sustained action taken to reduce or eliminate the long-term risk to human life & property from hazards. One of the most effective tools a community can use to reduce hazard vulnerability is to develop, adopt, & update, a local hazard mitigation plan. An assessment of natural hazard

risks to low/mod income residents, including risk expected to increase due to climate change, the City's primary & most occurring hazard is flooding. HCMHMP from June 2015 suggests the City is susceptible to risks such as hurricanes, coastal storms & severe thunderstorms. Hazardous results from significant flooding include: rising water levels can quickly sweep people along in its path, rapidly moving water destroys anything in its path, leave hazardous mold & breed insects, breached dams & levees allow water to flood into surrounding areas resulting in destruction residential, commercial & critical infrastructure. The City participates in the National Flood Insurance Program which provides federally supported flood insurance in communities that regulate development in floodplains. The City adopted & developed a Floodplain Management Plan in 2010 in order to reduce the potential for personal/property loss in flood prone areas & ensure the lowest possible flood insurance premiums for its residents. In addition to flooding, the City's close proximity to numerous petro chemical plants also poses a higher risk to chemical releases in the area during hurricanes & strong winded thunderstorms. Hazardous results from chemical releases include: contamination of water supply from hazardous chemical leaks, radiological emergencies & public health emergencies.

(This section was abbreviated due to IDIS character limit restrictions).

MA-25 PUBLIC AND ASSISTED HOUSING – 91.210(B)

Introduction

The City of Pasadena has no public housing developments it owns or administers. The City of Pasadena administers the Housing Choice Voucher Program which provides affordable housing for more than 1,000 families. While this program supports many households in finding affordable housing, there is need of subsidized housing. The City of Pasadena Housing Program (PHA TX440) is rated a HIGH Performer PHA in the HUD's Section Eight Management Assessment Program (SEMAP) which provides a quality delivery of service to its participants. In addition, the City of Pasadena Housing Program (PHA TX440) ensures that all voucher program assisted units meet HUD's Housing Quality Standards requirements by inspecting all units before occupancy and annually.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				1,079			0	0	0
# of accessible units									
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The question above does not give a space to answer the following - "Describe the supply of public housing developments". The City's response to this question: The City of Pasadena Housing Assistance Program (PHA TX440) does not own or administer public housing developments. The City of Pasadena Housing Assistance Program (PHA TX440) does not own or administer public housing developments.

Public Housing Condition

Public Housing Development	Average Inspection Score
Not applicable.	0

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The City of Pasadena Housing Assistance Program (PHA TX440) does not own or administer public housing developments.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The mission of the City of Pasadena Housing Assistance Program is to *"promote quality, accessible, affordable housing, economic opportunity, and encourage families to achieve self-sufficiency."*

The City of Pasadena Housing Assistance Program (PHA TX440) describes a number of goals and objectives in their 5 year PHA Plan that will enable to serve the needs and improve the living environment of low and moderate-income families.

1. Goal: Improve the quality of assisted housing.
Objective: Concentrate on efforts to improve specific management functions by maintaining as many vouchers under lease and assist as many families as allowed within the HUD approved voucher funding.

2. Goal: Increase assisted housing choices.
Objective: Increase new potential landlord participation in the Housing Choice Voucher Program.

3. Goal: Promote self-sufficiency and asset development of assisted households.
Objective: Increase the number and percentage of employed persons in assisted families.

4. Goal: Ensure equal opportunity and affirmatively further fair housing.
Objective: Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability.

Discussion:

While the City of Pasadena does not own or operate public housing developments, the administration of HUD's Housing Choice Voucher Program by the City of Pasadena Housing Assistance Program (PHA TX440) provides access to affordable housing to 1,079 families with 2,578 persons. This program supports greater mobility for families in choosing housing options. The City of Pasadena will continue to promote such programs as the Housing Choice Voucher Program in addition to the programs in the Community Development Grant Programs to help address the needs of the low to moderate-income families in Pasadena.

MA-30 HOMELESS FACILITIES AND SERVICES – 91.210(C)

Introduction

The City of Pasadena assists local shelters and service providers by utilization of funding through the Emergency Solutions Grant (ESG) and Community Development Block Grant (CDBG). Shelters within Pasadena offer support including but not limited to homeless prevention, chronically homeless, domestic violence victims, child care, job searches, transportation and case management for guidance to self-sufficiency for homeless individuals and their families. Agencies working with homeless and at risk of homelessness, types of services provided and housing status in addition to basic demographic and income data.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	111	0	25	42	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	111	0	25	42	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Data Source: based on local shelters in the Pasadena area.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

Homeless service providers in Pasadena provide a wide range of housing and services to their clients, including shelters and transitional housing facilities, substance abuse treatment, case management, job training, clothes closets to provide clothing suitable for job interviews, food, and transportation. All depend, to some extent, on mainstream services to supplement those offered in-house. These include transportation services, health and mental health care, job training, and childcare. Some of these services are offered pro bono from caring professionals. Other services require some payment from the client.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The City of Pasadena has two emergency shelters, Sarah's House and The Bridge Over Troubled Waters, located within the city limits.

Sarah's House provides shelter assistance for a capacity of 36 women and children in a dormitory setting. The focus of the program is to provide emergency shelter housing focusing on stabilizing the individual and/or family. Once stabilized, Sarah's House provides case management, job search and placement, referral and childcare services.

The Bridge Over Troubled Wates has a 100 bed emergency shelter (25 beds are used as Transitional Housing) for women and children experiencing domestic violence. The shelter has assistance for emergency crisis clients and provides emergency shelter, meals, clothing, personal necessities, counseling services, childcare services, transportation services, job search and placement also provides public service for domestic violence prevention. The Bridge Over Troubled Waters has 42 units of permanent housing (30 units at The Bridge Over Troubled Waters operated apartment complex, Destiny Village, and 12 units located in apartment complexes within the community) are available for adult victims of domestic violence and/or sexual assault with a documented disability and at least one child in their care. The permanent housing program provides subsidized rent on a sliding scale, on-site children's services and counseling services.

Introduction

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly and Frail Elderly

Supportive housing needs for the elderly and frail elderly continues to increase in Pasadena. Housing needs for senior citizens often include smaller units that have supportive services nearby or on-site. Deferred maintenance on homes is often an issue with elderly homeowners, and strengthens the need for housing rehabilitation assistance. The City of Pasadena provides rehabilitation and/or reconstruction for qualified participants through the HOME Program, which often targets seniors.

Persons with Disabilities

Based on the Regional AI, Executive Summary, 12% of the population of Pasadena has some type of disability. Ambulatory difficulty is the most prevalent form of disability in the Pasadena area, followed by cognitive difficulty and independent living difficulty. Region-wide, people age 65 or older with a disability account for about one-third of all residents with a disability. The AI survey conducted on housing challenges experienced by residents with disabilities showed landlords refused to make accommodations for the household member with a disability and landlords refused a service animal.

Various methods of outreach are being explored to promote community involvement and enhanced communication with residents who have a disability. Persons with disabilities who are in need of supportive housing include those with disabilities that limit everyday activities including employment, transportation or medical services. The Transportation RIDES Program of the elderly and disabled is a public service provided within the City of Pasadena. This program is highly requested and supported by the citizens of the community.

Persons with Alcohol or other Drug Additions

The City does not currently fund these services, but supports the submission of applications for funding from agencies with experience providing these special needs services. Although the City does not directly fund these

services, the City plans to provide financial support to local emergency shelters who collaborate with many community partners including mental health services through the Bay Area Council on Drugs and Alcohol.

Persons with HIV/Aids

The City does not currently fund these services, but supports the submission of applications for funding from agencies with experience providing these special needs services. Although the City does not directly fund these services, the City plans to provide financial support to local emergency shelters who collaborate with many community partners including health services through the AIDS Foundation Houston.

Victims of Domestic Violence

Housing needs for victims of domestic violence include shelter, transitional and long-term housing. The City of Pasadena plans to provide financial support to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse. Through case management, multiple services are provided to each homeless individual or family upon entry into the program to assess further needs, such as child care, transportation, counseling and support groups, legal aide, medical services and education services to promote self-sufficiency. The City will also support rapid re-housing and stabilization services through financial assistance in the form of deposits, short and medium term rental assistance and utility payments.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Currently, there are no direct programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing in the City of Pasadena. However, Arc of Greater Houston does provide residential services and group homes in Harris County for those with mental disabilities. Other special needs populations are referred to supportive housing programs in surrounding areas, including Houston.

The Houston Center for Independent Living (HCIL) is a key resource locally for residents with disabilities in the Greater Houston Region and has helped approximately 2,000 local residents transition from nursing homes to independent living situations (Section V, Pg. 14).

The City of Pasadena Community Development Department also continues to work closely with the Continuum of Care (CoC), which is comprised of five local jurisdictions (City of Pasadena, City of Houston, Harris County, Fort Bend County, Montgomery County) and the Coalition for the Homeless of Houston/Harris County (Coalition) which coordinates housing and services for these populations. Representatives from each of these jurisdictions participate in meetings, referred to as the Public Funders Workgroup, a group within the CoC structure which ensures that all members of the CoC are targeting funding towards continuum-wide goals.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City will provide housing and supportive services that address the needs of various special needs populations who are not homeless through the following activities:

- Utilizing HOME funds to assist income-eligible Pasadena residents including seniors, persons with disabilities, or other special needs populations maintain their home through the Housing Rehabilitation Program. If rehabilitation is not considered cost reasonable, the City may offer to provide demolition and reconstruction of the existing single-family home. Participation in the demolition and reconstruction process is on a voluntary basis of the homeowner;
- Funds provided by CDBG will support affordable housing through the Housing Rehabilitation Program Administration; and
- Rapid Re-housing and stabilization services will be provided through ESG funds in the forms of deposits, rent and utility payments for victims of domestic violence.

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Pasadena will continue to provide housing and supportive services that address the needs of various special needs populations who are not homeless through:

- Providing rehabilitation and/or demolition and reconstruction services to seniors, persons with disabilities, or other special needs populations through the Housing Rehabilitation Program administered under the HOME Program;
- Providing funding for rapid re-housing services for those who are victims of domestic violence; and
- Provide funding for public service activities, such as transportation services for special needs populations including elderly and persons with disabilities.

MA-40 BARRIERS TO AFFORDABLE HOUSING – 91.210(E)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Pasadena has reviewed the public policies to determine their impact on affordable housing. The City found that there are no policies that contribute to the concentration of racial/ethnic minorities, and no city building codes or ordinances that limit the development or improvement of affordable housing in Pasadena.

The City of Pasadena believes the most significant barriers to affordable housing in Pasadena to be non-profit capacity for affordable housing, economic market conditions for low-income homebuyers, and reductions in federal assistance.

Introduction

The non-housing community development plan section provides a brief summary of the City of Pasadena's priority non-housing community development needs that are eligible for assistance under HUD's community development program categories.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,554	479	3	1	-2
Arts, Entertainment, Accommodations	5,885	4,336	12	9	-3
Construction	7,600	9,727	15	21	6
Education and Health Care Services	6,090	7,023	12	15	3
Finance, Insurance, and Real Estate	2,789	2,567	6	6	0
Information	522	339	1	1	0
Manufacturing	6,442	3,423	13	7	-6
Other Services	1,919	1,224	4	3	-1
Professional, Scientific, Management Services	3,898	3,922	8	9	1
Public Administration	0	0	0	0	0
Retail Trade	6,411	7,240	13	16	3
Transportation and Warehousing	2,897	3,145	6	7	1
Wholesale Trade	3,393	2,273	7	5	-2
Total	49,400	45,698	--	--	--

Table 40 - Business Activity

Data Source: 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	70,094
Civilian Employed Population 16 years and over	62,516
Unemployment Rate	10.81
Unemployment Rate for Ages 16-24	24.70
Unemployment Rate for Ages 25-65	6.55

Table 41 - Labor Force

Data Source: 2009-2013 ACS

Occupations by Sector	Number of People
Management, business and financial	9,027
Farming, fisheries and forestry occupations	2,399
Service	7,245
Sales and office	14,974
Construction, extraction, maintenance and repair	11,334
Production, transportation and material moving	4,464

Table 42 – Occupations by Sector

Data Source: 2009-2013 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	37,179	62%
30-59 Minutes	19,180	32%
60 or More Minutes	3,624	6%
Total	***59,983***	***100%***

Table 43 - Travel Time

Data Source: 2009-2013 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	12,443	1,564	7,315
High school graduate (includes equivalency)	14,832	1,897	6,252
Some college or Associate's degree	14,854	1,124	4,280
Bachelor's degree or higher	8,029	301	1,660

Table 44 - Educational Attainment by Employment Status

Data Source: 2009-2013 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	564	1,993	3,039	5,479	2,825
9th to 12th grade, no diploma	3,115	3,003	3,636	4,172	1,540
High school graduate, GED, or alternative	5,794	7,485	5,993	9,503	3,930
Some college, no degree	5,893	4,576	4,163	7,347	2,553
Associate's degree	552	1,425	1,087	1,660	348
Bachelor's degree	818	2,135	1,505	3,581	975
Graduate or professional degree	17	415	717	1,637	802

Table 45 - Educational Attainment by Age

Data Source: 2009-2013 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,535
High school graduate (includes equivalency)	29,981
Some college or Associate's degree	35,982
Bachelor's degree	53,216
Graduate or professional degree	64,198

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2009-2013 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Construction, Retail, Manufacturing and Education and Health Care Services are the major employment sectors within our jurisdiction.

Describe the workforce and infrastructure needs of the business community:

- The workforce is primarily composed of construction, manufacturing and retail workers.
- The City of Pasadena does not have a Public Transportation System.
- Economic Development and transportation are often hindered due to flooding issues that affect the area.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

With the construction of new restaurants and retail establishments, Pasadena is seeking more retail and construction applicants. This will create more jobs within Pasadena, strengthening the workforce attributes of the City. Most new jobs will be for skilled and unskilled laborers in the retail trade and construction arena. The City is also seeing major growth in the infrastructure development to alleviate drainage concerns and improve mobility.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Those with a higher education levels are more likely to be employed and may earn higher wages. Residents living in Pasadena with some college or associates degree were more likely to be in the labor force and to be employed, than residents who did not have a degree. The unemployment rate was higher for residents with only a high school diploma, compared to residents with some form of higher education. Those with less than a high school diploma have the lowest rate of participation in the labor force compared to other groups.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Gulf Coast Workforce Board and its operating affiliate Workforce Solutions, is the public workforce system located in the Pasadena surrounding area. Their Career Offices assist employers meet their human resource needs and individuals build careers, so both can compete in the global economy. Workforce training, technology and customized training, job search and job matching assistance is provided at these Career Offices.

San Jacinto Community College is located within the City of Pasadena and provides college and trade education with degrees and certifications in number of areas.

The Pasadena Independent School District has programs and campuses that provide workforce training. The Lewis Career Technical High School provides an array of opportunity in workforce training which encourages academic and career development in local sectors that offer self-sustaining opportunities.

The headquarters campus for the Houston Area Safety Council is located in Pasadena. This new 68, 000 square foot expansive training center assists to help the Houston Area Safety Council invest in the future of workforce training and development.

The Baker Ripley Neighborhood Center located in Pasadena provides adult education GED, English Literacy, Citizenship Classes, Career Development including partner trainings to the citizens of Pasadena.

These current initiatives with these organizations, assist the Citizens of Pasadena in workforce training and development for a greater sustainable community.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Pasadena anticipates focusing its CDBG funding towards infrastructure improvements and public services, in order to revitalize the low to moderate income areas within the City.

The Pasadena Economic Development Corporation is creating a strategic plan to identify the most effective way to attract new jobs and build economic development for the entire community. The plan will develop programs to keep Pasadena businesses growing and to attract new companies to Pasadena. It will align workforce development partnerships with the skills needed to help residents qualify for these new jobs. Pasadena will be a destination to live and work.

Discussion

In conclusion, The City of Pasadena will continue to promote equality and accessibility in Pasadena through planning and administration of the CDBG, HOME and ESG programs.

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The Census tracts that are identified as eligible for CDBG area benefit include some of the oldest neighborhoods in the City. The housing in these neighborhoods are often in poor condition and many are in need of extensive rehabilitation or removal. These neighborhoods are also where the lowest income households live. The housing stock in these areas are in poor condition and therefore, offered at lower rents or sales prices. Despite the lower rents or purchase price, the lower income households pay a large portion of their income on housing expenses. In this case, concentration is defined as an area in which a large portion of the neighborhood shows the impact of housing problems.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

According the most recent Regional Analysis of Impediments to Fair Housing Choice over 3,500 (3,512) residents live in Racially/Ethnically Concentrated Areas of Poverty. Of these, 95.6% are minority, predominately Hispanic. The northern sections of Pasadena are more densely populated than the City as a whole. In this case, concentration is defined as an area in which a large portion of the neighborhood shows a majority of racial or ethnic minorities.

What are the characteristics of the market in these areas/neighborhoods?

These areas of concentration have significantly older housing stock, a greater population of renter households and a higher percentage of low-to moderate-income households. Generally, these areas also contain households with low adult education and higher proportions of persons with disabilities. As such, area needs include: residential rehabilitation, lead-based paint abatement, access to education, workforce training initiatives, access to public services, and reliable transportation to area job centers outside of the target area.

Are there any community assets in these areas/neighborhoods?

Community assets in these areas include: community/senior centers, access to nearby job centers and the City's focus for increasing infrastructure improvements. In many neighborhoods, there is a strong sense of community with many residents that act as advocates for the neighborhood. A large group of

involved residents is an important community asset. In addition, Pasadena has educational institutions nearby including San Jacinto College, Central Campus and medical institutions including Bayshore Medical Center, CHI St. Luke's Health – Patients Medical Center and Kindred Hospital – Bay Area.

Are there other strategic opportunities in any of these areas?

CDBG funding has focused on the target areas to alleviate hazardous conditions and increase mobility through infrastructure improvements. The City has partnered with local agencies and City departments to provide funding for special needs services to foster community welfare, expand opportunity, and address essential needs. The Transportation RIDES Program provides resources to elderly and disabled clients to maintain an independent lifestyle and facilitate essential services. With the limited/lack of public transit being a disparity discussed in the Regional Analysis of Impediments, Section IV. Disparities in Access to Opportunity, this program is an asset to Pasadena. The City's Housing Rehabilitation Program, administered through HOME, provides minor to moderate rehabilitation of homes owned and occupied by low to moderate income residents of Pasadena. If rehabilitation needs are too excessive, the City will provide demolition and reconstruction of single – family homes owned and occupied by low to moderate income residents of Pasadena.

STRATEGIC PLAN

SP-05 OVERVIEW

Strategic Plan Overview

The Consolidated Plan objectives represent high priority needs for the City of Pasadena and serve as the basis for the strategic actions used to meet these needs. These goals are listed below in no particular order or ranking:

- Rehabilitate degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents;
- Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low-income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts;
- Reduce homelessness by providing supportive services through local shelters and non-profit agencies;
- Strengthen neighborhoods by investing in public service activities benefiting the community, including those with special needs; and
- Ensure fair housing choice opportunities to all residents of Pasadena.

SP-10 GEOGRAPHIC PRIORITIES – 91.215 (A)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	**Area Name:**	CDBG Low/Mod Income Tracts
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	CDBG Eligible Areas

	Identify the neighborhood boundaries for this target area.	The CDBG Low/Mod Target Area includes all of the concentrated low-income census tracts within the Pasadena City limits. Boundaries of the geographic area coincide with the boundaries of the census tracts which have been identified through examination of the 2010 U.S. Census Data as having median incomes below 80 percent of the area median income. These tracts are located throughout the City and include census tract numbers 3212, 3216, 3219, 3220, 3221, 3222, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3241, 3242, 3416, 3421, 3422, 3423, 3424 and 3425. In general, the CDBG Low/Mod Target Area is bound by State Highway 225 in the north and the corporate limits to the west. The eastern boundary begins at the intersection of Highway 225 and Louisiana, south to Red Bluff, southeast to Fairmont, proceed north to Spencer to Preston, Preston south to Vista, then west to Allen Genoa then Shaver, west towards Allen Genoa, northwest to Shaver, then Shaver to north Allendale and proceed west on Allendale to the western corporate limits. A map illustrating the boundaries is attached and located within the Appendices.
	Include specific housing and commercial characteristics of this target area.	The majority of the target area is residential with a mix of commercial properties and parts of the target area are located adjacent to refineries.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The target area was identified by using the U.S. Census Bureau data to determine block groups, within the City's service area, where 51 percent or greater of the residents are classified as low-to moderate-income. A majority of the low-to moderate-income population makes the area eligible for use of federal funds. Also, the Community Development Advisory Board members reside in or work nearby these target areas and are available to report citizen requests and concerns regarding needed improvements to the Community Development Department.
	Identify the needs in this target area.	The priorities of this target area follow the general needs described in the previous section, NA-05, and citizen responses to the Needs Assessment Survey. The target area is comprised of low-to-moderate income households living in unsuitable living conditions. Based on the Needs Assessment Survey received by Pasadena residents, the area has a strong need for Infrastrucutre Improvements, Affordable Housing, Homeless and Public Service Needs.

	What are the opportunities for improvement in this target area?	CDBG funds are utilized towards revitalization and improvements of infrastructure and to address public service needs. Infrastructure improvements include street replacement, sidewalk repairs and waterline replacement services to increase mobility and reduce hazardous conditions for Pasadena residents. The City utilizes Home Investment Partnership (HOME) Program dollars for affordable housing projects through the Housing Rehabilitation Services Program. Housing Rehabilitation provides minor to moderate rehabilitation of homes owned and occupied by low to moderate income residents of Pasadena. If rehabilitation needs are too excessive, the City will provide demolition and reconstruction of single family homes owned and occupied by low to moderate income residents of Pasadena. The Housing Rehabilitation Services Program waiting list is open periodically to receive applications for assistance based on the City's receipt of HOME funding allocations. The Homelessness goals are supported through ESG components, Emergency Shelter and Rapid Re-housing. ESG funds will provide support to local emergency shelters by assisting with costs related to shelter operations and essential services. Rapid re-housing and stabilization services will be provided through financial assistance in the form of deposits, short and medium term rent and utility payments.
	Are there barriers to improvement in this target area?	The primary obstacle to meeting underserved needs is limited availability of federal and local funding. The needs of the community are greater than the available funds. The aging of residential units and increased numbers of under-resourced residents in conjunction with a lack of public housing leads to limited housing stock available to low-to-moderate income residents. Additionally, the City has a high demand to find qualified agencies with the capacity to operate programs efficiently and within compliance of applicable federal regulations. Although the City is trying to improve outreach strategies to gain more public response, there is still a lack of citizens becoming involved in the decision making process.
2	**Area Name:**	Citywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	

	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	Activity is available to all eligible Pasadena residents.
	Identify the neighborhood boundaries for this target area.	The borders of the City of Pasadena.
	Include specific housing and commercial characteristics of this target area.	This is a general designation that is inclusive of all areas within the City's jurisdiction; including eligible and ineligible CDBG target areas.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	No consultation necessary - entire City jurisdiction.
	Identify the needs in this target area.	The priorities of this target area follow the general needs described in the previous section, NA-05, and citizen responses to the Needs Assessment Survey. Based on the Needs Assessment Survey received by Pasadena residents, the area has a strong need for Infrastructure Improvements, Affordable Housing, Homeless and Public Service Needs.

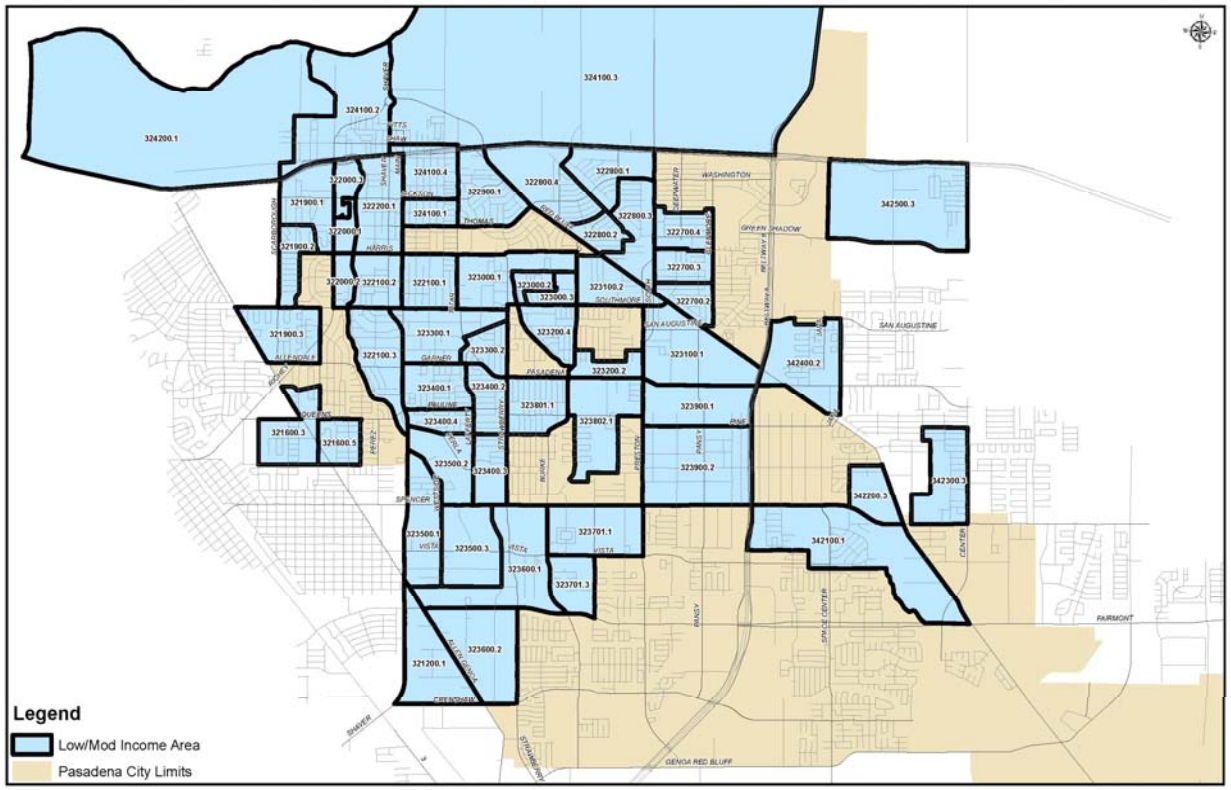
	What are the opportunities for improvement in this target area?	CDBG funds are utilized towards revitalization and improvements of infrastructure and to address public service needs. Infrastructure improvements include street replacement, sidewalk repairs and waterline replacement services to increase mobility and reduce hazardous conditions for Pasadena residents. The City utilizes Home Investment Partnership (HOME) Program dollars for affordable housing projects through the Housing Rehabilitation Services Program. Housing Rehabilitation provides minor to moderate rehabilitation of homes owned and occupied by low to moderate income residents of Pasadena. If rehabilitation needs are too excessive, the City will provide demolition and reconstruction of single family homes owned and occupied by low to moderate income residents of Pasadena. The Housing Rehabilitation Services Program waiting list is open periodically to receive applications for assistance based on the City's receipt of HOME funding allocations. The Homelessness goals are supported through ESG components, Emergency Shelter and Rapid Re-housing. ESG funds will provide support to local emergency shelters by assisting with costs related to shelter operations and essential services. Rapid re-housing and stabilization services will be provided through financial assistance in the form of deposits, short and medium term rent and utility payments.
	Are there barriers to improvement in this target area?	The primary obstacle to meeting underserved needs is limited availability of federal and local funding. The needs of the community are greater than the available funds. The aging of residential units and increased numbers of under-resourced residents in conjunction with a lack of public housing leads to limited housing stock available to low-to-moderate income residents. Additionally, the City has a high demand to find qualified agencies with the capacity to operate programs efficiently and within compliance of applicable federal regulations. Although the City is trying to improve outreach strategies to gain more public response, there is still a lack of citizens becoming involved in the decision making process.

General Allocation Priorities

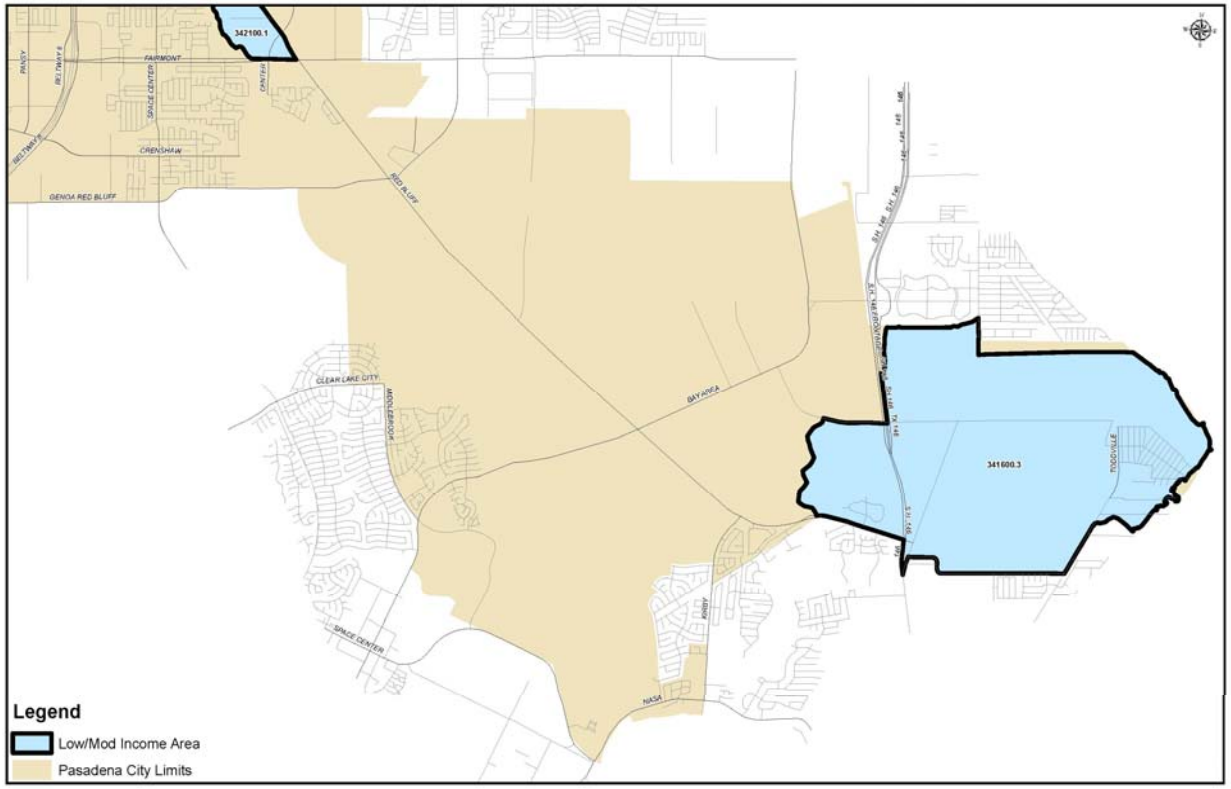
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Pasadena is mindful of the location of services and seeks to ensure equitable distribution of funding to serve families in need across the City. Although the CDBG Low/Mod Income Target Area is the primary service area, additional target areas will be identified. Target areas are identified based on

income determination data and revitalization efforts needed. The City allocates funding based on priorities identified in its Needs Assessment Survey and proposals submitted in its annual application process.



Low/Mod Income Target Area - Map A



Low/Mod Income Target Area - Map B

Priority Needs

Table 48 – Priority Needs Summary

1	**Priority Need Name**	Infrastructure Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	CDBG Low/Mod Income Tracts
	Associated Goals	Infrastructure Improvements
	Description	Infrastructure Improvements will provide assistance to the community through the revitalization and improvements of: Drainage, Street, Sidewalk and Street/Sidewalk Lighting, thus rehabilitating degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents.
	Basis for Relative Priority	Based on the Needs Assessment Survey received by Pasadena residents, the City has a strong need for Infrastructure Improvements.
2	**Priority Need Name**	Affordable Housing
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Housing Rehabilitation Promote Fair Housing Homeownership
	Description	The City will strive to utilize all three funding sources to best provide affordable housing opportunities throughout the community. Funds provided by CDBG will support affordable housing with Housing Rehabilitation Program Administration. The HOME Program will support affordable housing by providing housing rehabilitation services and homebuyer opportunities to eligible low-income households. The ESG Program will provide housing opportunities to homeless households through the facilitation of the Rapid Re-housing Program Component administered by subrecipient agencies.
	Basis for Relative Priority	Based on the Needs Assessment Survey received by Pasadena residents, the City has a strong need for Affordable Housing.

3	**Priority Need Name**	Homeless Needs
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Reduce Homelessness
	Description	The City of Pasadena plans to provide financial support to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse. Through case management, multiple services are provided to each homeless individual or family upon entry into the program to assess further needs, such as child care, transportation, counseling and support groups, legal aide, medical services and education services to promote self-sufficiency.
	Basis for Relative Priority	Based on the Needs Assessment Survey received by Pasadena residents, the City has a strong need for Homeless Needs.

4	**Priority Need Name**	Public Service Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development

	Geographic Areas Affected	Citywide
	Associated Goals	Enhance quality of life through Public Services
	Description	Providing and maintaining a high quality of life for all citizens is a high priority for the City. In past years, Community Development has allocated CDBG funding for public services near the CDBG public services funding cap. Even with this allocation, the City continues to receive request from service agencies in need of funding to address the continued demand for services throughout the City. The following are the priority Community Development needs the City will address in the next five years: Senior Services, Transportation Services, Educational Services and Health Services.
	Basis for Relative Priority	Based on the Needs Assessment Survey received by Pasadena residents, the City has a strong need for Public Service Needs.

Narrative (Optional)

The 2018-2022 Consolidated Plan represents the City's ambition to improve the quality of life for residents, primarily in the low-income areas of Pasadena. As required by HUD, each activity is linked to at least one of three federal program objectives: 1) decent housing, 2) suitable living environments, or 3) economic development. Each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability. The City looks forward to achieving these objectives and outcomes within the next five years through:

- Rehabilitation of degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents;
- Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low-income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts;
- Reduce homelessness by providing supportive services through local shelters and non-profit agencies;
- Provide a high quality of life to all citizens through the facilitation of public service needs.

In order to address these needs, the City of Pasadena has developed goals and measurable outcomes in infrastructure improvements, affordable housing, homeless needs and public service needs.

The City is committed to the proper implementation of a balanced Community Development Program that maximizes benefit to low-income persons both directly and through the improvements of their neighborhoods. By providing decent housing, suitable living environments and supportive services, the City of Pasadena intends to improve our low-income neighborhoods and provide our citizens with the needed resources to assist them in breaking both generational and circumstantial poverty.

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	According to the Regional Analysis of Impediments to Fair Housing Choice, regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. In addition, displacement from Hurricane Harvey exacerbated an already tight rental market. In Pasadena, 43% of all household are renters. The City of Pasadena does not anticipate using HOME funds for TBRA, however rental assistance is provided under the ESG Program Component of Rapid Re-housing. Services provided under rapid re-housing include financial assistance in the form of deposits, short and medium term rental assistance and utility payments. Although, the City of Pasadena Community Development Department does not provide funding to the City of Pasadena Housing Program, the Community Development Department consults with the Pasadena Housing Authority to provide information on needs of the Housing Choice Voucher (HCV) Program, including the number of clients currently being provided rental assistance and the continuous goals of the Family Self-Sufficiency Program. The City of Pasadena Housing Program provides tenant-based voucher rental assistance to 1,079 participating families in the Housing Choice Voucher Program (HCV) and administers the Family Self-Sufficiency (FSS) Program for eight (8) of the Housing Choice Voucher Program participant families.
TBRA for Non-Homeless Special Needs	The City of Pasadena does not anticipate funding TBRA for Non-Homeless Special Needs in the near future.
New Unit Production	The City of Pasadena provides demolition and reconstruction of single-family homes owned and occupied by low to moderate income residents of Pasadena when rehabilitation needs are too excessive. The City anticipates completing two (2) units each reporting period.
Rehabilitation	The City of Pasadena provides minor to moderate rehabilitation of single-family homes owned and occupied by low to moderate income residents of Pasadena. Many homeowners in the Pasadena area are in need of repairs that they cannot afford to make.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	The City of Pasadena does not anticipate funding Acquisition, including preservation in the near future.

Table 49 – Influence of Market Conditions

SP-35 ANTICIPATED RESOURCES - 91.215(A)(4), 91.220(C)(1,2)

Introduction

The City of Pasadena is an entitlement jurisdiction that receives federal funds annually through the U.S. Department of Housing and Urban Development including Community Development Block Grant Funds (CDBG), Emergency Solutions Grant Funds (ESG) and HOME Investment Partnerships Program (HOME). Through the use of federal, state and local funds the City plans to carry out the objectives set forth in the 2018 – 2022 Consolidated Plan.

Entitlement grant resources totaling $2,335,129 are estimated for the next fiscal year (October 1, 2018 through September 30, 2019) to address obstacles to meet underserved needs, foster decent housing, support public services and improve public facilities, while enhancing the coordination between public and private agencies. The results of these activities will be reported in the Consolidated Annual Performance and Evaluation Report, to be published in December 2019.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,652,416	0	0	1,652,416	6,400,000	The CDBG allocation for Program Year 2018 is anticipated in the amount of $1,652,416.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	544,284	65,000	0	609,284	1,600,000	The HOME allocation for Program Year 2018 is anticipated in the amount of $544,284. Program Income is anticipated in the amount of $65,000.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	138,429	0	0	138,429	560,000	The ESG allocation for Program Year 2018 is anticipated in the amount of $138,429.

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Community Development Block Grant (CDBG) funds will leverage City General Fund and Bond Fund dollars for all infrastructure, revitalization, parks and public facility projects.

Home Investment Partnership (HOME) Program partners are required to provide matching contributions of $0.25 for every $1.00 of funding expended. This is usually achieved by volunteer hours worked, donation of funds, supplies and equipment.

Emergency Solutions Grant (ESG) Program subrecipients are required to provide matching contributions of 100% of federal dollars expended. This is achieved by shelter donations of supplies, equipment, funding and volunteer hour services. Also, some subrecipient agencies meet matching requirements by contributing a portion of operational costs in addition to ESG funds, therefore, splitting the expense.

Program income is accumulated through the HOME program only. HOME program income is acquired by repayment of amortized loans provided to households assisted by the Housing Rehabilitation Services Program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

N/A

SP-40 INSTITUTIONAL DELIVERY STRUCTURE – 91.215(K)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Pasadena Public Works Department	Departments and agencies	Economic Development Non-homeless special needs neighborhood improvements public facilities public services	Jurisdiction
City Of Pasadena Parks Department	Departments and agencies	Non-homeless special needs public facilities public services	Jurisdiction
Bridge Over Troubled Waters	Non-profit organizations	Homelessness	Region
Sarah's House	Non-profit organizations	Homelessness	Jurisdiction
Coalition or the Homeless of Houston/Harris County	Non-profit organizations	Homelessness	Region
Habitat for Humanity - Pasadena	Non-profit organizations	Ownership	Jurisdiction
Pasadena Housing Authority	Departments and agencies	Public Housing	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The greatest strength of the institutional delivery system is the long-term relationship between the City of Pasadena and its coordination with outside agencies. Internally, the City of Pasadena Community Development Department works in conjunction with other City departments including, but not limited to, the City Controller's Office, Planning, Housing, Purchasing and Public Works. The City's current structure highlights commitment to ensuring that all functions perform in a concerted manner to guarantee an efficient and effective use of public and private resources with maximum output in the form of accomplishments. Underlying this effort is the recognized need to maintain a high level of coordination on projects involving other City departments and/or outside agencies.

The City of Pasadena Community Development Department will address gaps and improve institutional structure using the following strategies:

- Identify, work with, and financially support community housing development organizations (CHDOs) to develop or rehabilitate affordable housing within the community. CHDOs are certified annually or at the time of a project application. In order for an agency to qualify as a CHDO, they must have staff with housing experience appropriate to their role as a project developer, sponsor or owner;
- Use high level communication and project coordination among City departments and support the City's efforts to revitalize and/or stabilize low- and moderate-income neighborhoods; and
- Reduce and/or alleviate gaps in services and expedite the delivery of community development services to eligible residents.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X		
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X		
Transportation	X		
Other			
	X		

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The service delivery system in Pasadena meets the needs of homeless persons through regular and ongoing coordination among partner organizations, local governments, service providers, and interested stakeholders. A combination of resources is used to address the needs of chronically homeless individuals and families, families with children, veterans and their families, unaccompanied youth and others in need. The City is part of the Houston/Harris County Continuum of Care which brings together organizations with a broad range of services, to focus on a variety of target groups that experience homelessness. Regular meetings are supplemented with targeted training sessions and in-depth initiatives, designed to address and end homelessness for veterans, families, and youth.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The supportive service agencies in Pasadena are well established and successful in accessing public and private funds. However, there are very few agencies, as most housing and social service nonprofits are located within Houston where there is a much higher concentration of need.

The City of Pasadena Community Development Department is working to improve coordination with various public, private, and non-profit groups in the Pasadena community to address the community's priority needs, especially those of targeted low-income persons and special needs populations. The City strives to partner with public and private agencies to ensure funding priorities are in line with current community development goals, and continues to enhance coordination among housing and service providers to better serve the community.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

It has always been and remains a priority for the City of Pasadena to develop and enhance an effective and efficient program delivery system for the use of federal funds. Even though the system has been improved in recent years, the City continues to monitor, assess, and seek ways to further improve its performance. Solid relationships have been built with public institutions, private and nonprofit partners, to implement activities and projects that require multiple funding sources. All partners are encouraged to share their thoughts on how the delivery system and programs could be made better.

SP-45 GOALS SUMMARY – 91.215(A)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2018	2022	Non-Housing Community Development	CDBG Low/Mod Income Tracts	Infrastructure Improvements	CDBG: $5,183,370	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
2	Housing Rehabilitation	2018	2022	Affordable Housing	Citywide	Affordable Housing	CDBG: $186,975 HOME: $1,199,278	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Reduce Homelessness	2018	2022	Homeless	Citywide	Homeless Needs	CDBG: $313,022 ESG: $692,145	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homeless Person Overnight Shelter: 1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Enhance quality of life through Public Services	2018	2022	Non-Housing Community Development	CDBG Low/Mod Income Tracts Citywide	Public Service Needs	CDBG: $926,290	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted
5	Promote Fair Housing	2018	2022	Non-Housing Community Development	Citywide	Affordable Housing	CDBG: $1,652,416	Other: 5000 Other
6	Homeownership	2018	2022	Affordable Housing	Citywide	Affordable Housing	HOME: $250,000	Homeowner Housing Added: 5 Household Housing Unit

Table 53 – Goals Summary

Goal Descriptions

1	**Goal Name**	Infrastructure Improvements
	Goal Description	The City will rehabilitate degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents by supporting activities that will enhance and preserve neighborhoods.
2	**Goal Name**	Housing Rehabilitation
	Goal Description	Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low-income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts.
3	**Goal Name**	Reduce Homelessness
	Goal Description	Reduce Homelessness by providing supportive services through local shelters and non-profit agencies

4	**Goal Name**	Enhance quality of life through Public Services
	Goal Description	Strengthen neighborhoods by investing in public service activities benefiting the community, including those with special needs
5	**Goal Name**	Promote Fair Housing
	Goal Description	Ensure fair housing choice opportunities are promoted to residents, landlords and lenders of Pasadena.
6	**Goal Name**	Homeownership
	Goal Description	Homebuyer programs may be offered to assist low- to moderate-income homebuyers with down payment and closing cost assistance to transition low-to moderate-income families from renter status to homeownership. Homeownership counseling courses are provided for these activities through the subrecipient agencies. Construction of new, quality and affordable single family detached homes is also a goal.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

In general, the City utilizes Home Investment Partnership (HOME) Program dollars for affordable housing projects. The table below estimates the number of households, by income category, to whom the City will provide affordable housing. This estimate, for Program Years 2018-2022, is based on the number of households that were assisted during Program Year 2017. The information estimated below is the assistance that is anticipated to be provided under the Housing Rehabilitation Services Program and homebuyer activities. Further assistance of affordable housing may be provided under programs yet to be determined.

SP-50 PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215(C)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The City of Pasadena's Housing Program is a voucher program only PHA. The City of Pasadena does not own nor does it administer a Public Housing Program.

Activities to Increase Resident Involvements

The City of Pasadena does not own, nor does it administer a Public Housing Program for residents. However, the City of Pasadena encourages families to achieve self-sufficiency and homeownership through the Family Self Sufficiency Program, available to current Housing Choice Voucher Program participants.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

N/A

Barriers to Affordable Housing

The City of Pasadena has reviewed the public policies to determine their impact on affordable housing. The City found that there are no policies that contribute to the concentration of racial/ethnic minorities, and no city building codes or ordinances that limit the development or improvement of affordable housing in Pasadena.

The City of Pasadena believes the most significant barriers to affordable housing in Pasadena to be non-profit capacity for affordable housing, economic market conditions for low-income homebuyers, and reductions in federal assistance.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Pasadena has developed specific goals and objectives to address the housing needs of low-income populations within the City's jurisdiction. These housing goals are aimed at creating the opportunity for adequate, affordable, accessible housing for low-income households through the elimination of lead based-paint hazards, encouragement of homeownership, minor home repairs, rehabilitation of single family dwellings, provision of rental assistance, new construction and development of partnerships.

The City will continue to utilize all three funding sources to best provide affordable housing opportunities throughout the community. The HOME Program will support affordable housing by providing housing rehabilitation services and homebuyer opportunities to eligible low-income households that own and occupy a single-family home within the City of Pasadena. If rehabilitation is not considered cost reasonable, the City may offer to provide demolition and reconstruction of the existing single-family home. Participation in the demolition and reconstruction process is on a voluntary basis of the homeowner. The Community Development Department is committed to assisting these low-income homeowners repair and rehabilitate their deteriorating homes. Additionally, the City plans to identify, work with and financially support community housing development organizations (CHDOs) to develop or rehabilitate affordable housing within the community. Funds provided by CDBG will support affordable housing with Housing Rehabilitation Program Administration. Housing Rehabilitation Program Administration funds will support staff administrative costs associated with application in-take, eligibility determination, project inspections and oversight of construction and site work completed for housing rehabilitation projects. The ESG Program will provide housing opportunities to homeless households through the facilitation of the Rapid Re-housing Program Component administered by subrecipient agencies. Rapid re-housing and stabilization services will be provided through financial assistance in the form of deposits, rent, and utility payments.

The City of Pasadena Housing Department plans to continue to assist and administer the allocated 1,079 voucher participants with their rental assistance within the Housing Choice Voucher HUD requirements, in accordance with 24 CFR 982, during the next year while maintaining a High Performer PHA Rating with the U.S. Department of Housing and Urban Development (HUD) in the Section Eight Management Assessment Program (SEMAP) report in

management of the program. The goal of this program is to promote participants to achieve self-sufficiency and obtain homeownership.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Pasadena does not currently fund Street Outreach through the Emergency Solutions Grants (ESG) Program. However, homeless service providers within the area network with mainstream resources including, but not limited to, medical facilities, financial institutions, housing providers, law enforcement, childcare facilities and education systems, to help spread awareness and assess needs of homeless individuals. The City will continue to build an even stronger partnership with the Coalition for the Homeless and other ESG grantees within the Continuum to develop community wide strategies to end and prevent homelessness throughout the community. The City's priorities will continue to evolve and align with the continuum-wide goals to address priority needs.

In addition, the ESG Program through the facilitation of the Emergency Shelter Component administered by subrecipient agencies, will provide direct services to meet the immediate needs of homeless and chronically homeless persons and families to stabilize and engage them in services to assist in achieving the goal of permanent housing.

Addressing the emergency and transitional housing needs of homeless persons

The City of Pasadena plans to provide financial support to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse. Through case management, multiple services are provided to each homeless individual or family upon entry into the program to assess further needs, such as child care, transportation, counseling and support groups, legal aide, medical services and education services to promote self-sufficiency.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Rapid re-housing assistance will be supported through use of ESG funds to provide rental, utility, and/or financial assistance. Homeless individuals or families will receive case management to ensure effective transitioning from shelter to independent living. Clients will also receive supportive services to promote self-sufficiency to assist in achieving the goal of permanent housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being

discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

In efforts to coordinate with continuum-wide goals, the City of Pasadena does not plan to provide ESG funds for Homelessness Prevention activities, but will instead support rapid re-housing goals.

Although the City does not directly fund these services, the City plans to provide financial support to local emergency shelters who collaborate with many community partners to ensure high-quality, cost effective services are available for clients including partners associated with law enforcement, health services, mental health services, child and family services, legal services, employment assistance and mainstream resources.

SP-65 LEAD BASED PAINT HAZARDS – 91.215(I)

Actions to address LBP hazards and increase access to housing without LBP hazards

Goal: Increase the inventory of lead safe housing units.

Strategies:

1. Continue to meet HUD lead-based paint abatement standards in housing rehabilitation programs.
2. Continue to ensure that housing units entering the Section 8 program meet lead-based paint guidelines found in HQS regulations.
3. Expand the stock of lead safe housing units through continuation of the reconstruction program and other new home construction efforts.

How are the actions listed above related to the extent of lead poisoning and hazards?

The effectiveness of the programs operated by the City of Pasadena work through the City's housing rehabilitation program. This program targets some of the oldest housing stock in the city, which is typically in the worst condition and most likely to have lead-based paint hazards. To the extent that lead-based paint hazards are found in the older housing stock, these programs address the issue directly.

The City of Pasadena addresses lead-based paint hazards on all rehabilitation projects that it undertakes. When lead-based paint is found to be present, the City notifies the occupants of the lead hazard assessment provides the household with the lead hazard information pamphlet in accordance with 24 CFR 35.130. The household will acknowledge the receipt of the pamphlet by signing and dating the Lead Hazard Information Pamphlet Affidavit.

How are the actions listed above integrated into housing policies and procedures?

The City's policies and procedures manual regarding housing rehabilitation contains procedures to be followed regarding the assessment and remediation of lead-based paint hazards. All housing rehabilitation projects follow the current policies and procedures.

For properties receiving up to and including $5,000 per unit in rehabilitation assistance, the City will authorize a State licensed Lead Risk Assessor to conduct testing in accordance with 24 CFR 35.930 (a) and will implement action as follows: 1. If paint testing indicates that the painted surfaces are not coated with lead-based paint, then safe work practices will not be required and the City will proceed with the rehabilitation; 2. If lead- based paint is present, then the City will require the contractor to implement safe work practices in accordance with 24 CFR 35.1350 and repair any paint that is disturbed and 3. After the work is completed conduct a clearance examination of the worksite(s) pursuant to 24 CFR 35.1340.Clearance will not be required the disturbance of painted surfaces fall below the total area as set forth in 24 CFR 35.1350 (d).

Properties receiving more than $5,000 and up to and including $25,000 per unit in rehabilitation assistance, the City will authorize a State licensed Lead Risk Assessor to perform a lead-paint risk assessment in the interior and exterior of the dwelling unit pursuant to 24 CFR 35.1320 (b) before the rehabilitation begins. The City will require the contractor to perform interim controls in accordance with 24 CFR 35.1330 of all lead-based paint hazards identified and any lead-based paint hazards created as a result of the rehabilitation work.

Properties receiving more than $25,000 per unit in rehabilitation assistance, the City will authorize a State licensed Lead Risk Assessor to perform a lead-paint risk assessment in the interior and exterior of the dwelling unit pursuant to 24 CFR 35.1320 (b) before the rehabilitation begins. The City will require the contractor to abate all lead-based paint hazards and any lead-based paint hazards created as a result of the rehabilitation work in accordance with 24 CFR 35.1325, except that interim controls are acceptable on exterior surfaces that are not disturbed by the rehabilitation.

All Lead-Based Paint Hazard reports, assessments or inspections will be provided to the homeowner and the homeowner will sign an affidavit acknowledging receipt of said documents.

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Based on the 2012-2016 American Community Survey 5 Year Estimates, approximately 20 percent of Pasadena's population was documented as living below the poverty level, which translates to 29,750 residents. The City of Pasadena plans to reduce the number of poverty-level families through the coordination of efforts among City departments and local businesses and service providers. To assist families achieve financial stability, the City of Pasadena Housing Department administers the Family Self-Sufficiency Program to current HCV residents. Additionally rapid re-housing activities will assist households in obtaining self-sufficiency and permanent housing. By collaborating with local agencies, additional resources may be secured and duplicated efforts may be reduced.

The City of Pasadena has developed specific goals and objectives to address the housing needs of low-income populations within the City's jurisdiction. These housing goals are aimed at creating the opportunity for adequate, affordable, accessible housing for low-income households through the elimination of lead based-paint hazards, encouragement of homeownership, rehabilitation and/or reconstruction of single family dwellings, provision of rental assistance, new construction and development of partnerships.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City of Pasadena will assist with reducing the number of residents living below the poverty level through the following programs:

- The HOME Program will support affordable housing by providing housing rehabilitation and/or reconstruction services to eligible low-income households. Housing Rehabilitation provides minor to moderate rehabilitation of homes owned and occupied by low to moderate income residents of Pasadena. If rehabilitation needs are too excessive, the City will provide demolition and reconstruction of single – family homes owned and occupied by low to moderate income residents of Pasadena. If applicable, lead based paint assessment and abatement, is also required for all housing rehabilitation activities.
- The ESG Program will provide housing opportunities to homeless households through the facilitation of the Rapid Re-housing Program Component administered by subrecipient agencies. Homeless individuals or families will receive case management to ensure effective transitioning from shelter to independent living. Clients will also receive supportive services to promote self-sufficiency to assist in achieving the goal of permanent housing.

The City of Pasadena also plans to continue to assist and administer the allocated 1,079 voucher participants with their rental assistance within the Housing Choice Voucher Program. Families are also encouraged to achieve self-sufficiency and homeownership through the Family Self Sufficiency Program, available to current Housing Choice Voucher Program participants.

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Program monitoring is a continuous process for all programs. Through the experience of monitoring visits, the City has gained an understanding of HUD's expectations & standards for the administration of activities & programs. By mirroring similar processes, the City now utilizes HUD's CPD monitoring exhibits as a guide to conduct internal self-monitoring & monitoring of subs. Subs & City departments administering HUD-funded programs are monitored by the Community Development Dept. based on a performed risk analysis. A risk analysis will assist to determine how often a sub shall be monitored, the program components to be reviewed & procedures to be evaluated. PROJECT SELECTION & RISK ASSESSMENT All potential applicants are required to attend an Application Workshop that provides technical info. to familiarize themselves with all relevant application documents, including the requirements est. in the Federal Register for 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles & Audit Requirements for Federal Awards. Applicants are also required to have a federal DUNS number & be registered on www.sams.gov. Once selected, all projects require an agreement/commitment with specific project requirements. Applicants are made aware all projects are subject to all federal requirements, including but not limited to CDBG, HOME or ESG regulations, fair housing laws, HUD issued certifications, & standards under 2 CFR Part 200. SUB MONITORING During the year the City conducts on-site monitoring of its funded agencies. Subs are monitored through desk monitoring, annual reviews, site visits, etc. The reviews examine adherence to all applicable regulations & standards for the use of funds, eligibility of service and/or area, eligibility of beneficiaries & compliance with other federal requirements such as; National Environmental Policy Act, SAM Debarment List, Prevailing Wage, Minority & Business Enterprise (MBE), Section 3, Federal Labor Standards, Equal Opportunity, etc. to ensure compliance with the U.S. Office of Management and Budget (OMB) & HUD. SELF-MONITORING The City sets deadlines to ensure all required tasks & activities relating to the annual funding process are completed on time. Info. from the sub's reimbursement requests, such as expenditures to date & programmatic reports provide data for the IDIS system. LONG-TERM COMPLIANCE In an effort to ensure long-term compliance with program requirements & comprehensive planning requirements, all subs enter into a contractual agreement with the City. These agreements include a detailed scope of services with measurable objectives. The federal general provisions, along with reference to applicable OMB regulations, are included in contractual agreements to ensure compliance. Some funded activities, such as housing rehabilitation, require additional long-term compliance efforts. Homeowner rehabilitation activities are initially monitored & inspected by an appropriate building inspector during the construction phase. On completion & occupancy, rehabilitation projects are monitored annually for compliance with the terms & conditions of the agreement. MINORITY BUSINESS OUTREACH The City has a designated staff member to ensure compliance with Section 3 & Davis Bacon, who has the primary responsibility of enforcing the requirements of labor standards, in conjunction with the Community Development Dept. measures. City staff also promote Section 3 programs by conducting various seminars discussing employment, training & contracting opportunities for residents & qualified businesses interested in participating in federally assisted projects. Staff ensures that the MBE & Small Business Enterprises (SBE) participation goals are met.

(This section was abbreviated due to IDIS character limit restrictions.)

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES – 91.220(C)(1,2)

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Introduction

The City of Pasadena is an entitlement jurisdiction that receives federal funds annually through the U.S. Department of Housing and Urban Development including Community Development Block Grant Funds (CDBG), Emergency Solutions Grant Funds (ESG) and HOME Investment Partnerships Program (HOME). Through the use of federal, state and local funds the City plans to carry out the objectives set forth in the 2018 – 2022 Consolidated Plan.

Entitlement grant resources totaling $2,335,129 are estimated for the next fiscal year (October 1, 2018 through September 30, 2019) to address obstacles to meet underserved needs, foster decent housing, support public services and improve public facilities, while enhancing the coordination between public and private agencies. The results of these activities will be reported in the Consolidated Annual Performance and Evaluation Report, to be published in December 2019.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,652,416	0	0	1,652,416	6,400,000	The CDBG allocation for Program Year 2018 is anticipated in the amount of $1,652,416.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	544,284	65,000	0	609,284	1,600,000	The HOME allocation for Program Year 2018 is anticipated in the amount of $544,284. Program Income is anticipated in the amount of $65,000.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	138,429	0	0	138,429	560,000	The ESG allocation for Program Year 2018 is anticipated in the amount of $138,429.

Table 54 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Community Development Block Grant (CDBG) funds will leverage City General Fund and Bond Fund dollars for all infrastructure, revitalization, parks and public facility projects.

Home Investment Partnership (HOME) Program partners are required to provide matching contributions of $0.25 for every $1.00 of funding expended. This is usually achieved by volunteer hours worked, donation of funds, supplies and equipment.

Emergency Solutions Grant (ESG) Program subrecipients are required to provide matching contributions of 100% of federal dollars expended. This is achieved by shelter donations of supplies, equipment, funding and volunteer hour services. Also, some subrecipient agencies meet matching requirements by contributing a portion of operational costs in addition to ESG funds, therefore, splitting the expense.

Program income is accumulated through the HOME program only. HOME program income is acquired by repayment of amortized loans provided to households assisted by the Housing Rehabilitation Services Program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

N/A

ANNUAL GOALS AND OBJECTIVES

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Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2018	2022	Non-Housing Community Development	CDBG Low/Mod Income Tracts	Infrastructure Improvements	CDBG: $1,036,675	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
2	Housing Rehabilitation	2018	2022	Affordable Housing	Citywide	Affordable Housing	CDBG: $37,396 HOME: $239,856	Homeowner Housing Rehabilitated: 2 Household Housing Unit
3	Reduce Homelessness	2018	2022	Homeless	Citywide	Homeless Needs	CDBG: $62,604 ESG: $138,429	Tenant-based rental assistance / Rapid Rehousing: 8 Households Assisted Homeless Person Overnight Shelter: 75 Persons Assisted
4	Enhance quality of life through Public Services	2018	2022	Non-Housing Community Development	CDBG Low/Mod Income Tracts	Public Service Needs	CDBG: $185,258	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
5	Promote Fair Housing	2018	2022	Non-Housing Community Development	CDBG Low/Mod Income Tracts Citywide	Affordable Housing	CDBG: $330,483	Other: 1000 Other
6	Homeownership	2018	2022	Affordable Housing	Citywide	Affordable Housing	HOME: $250,000	Homeowner Housing Added: 5 Household Housing Unit

Table 55 – Goals Summary

Goal Descriptions

1	**Goal Name**	Infrastructure Improvements
	Goal Description	Infrastructure improvements include street replacement, sidewalk repairs and waterline replacement services to increase mobility and reduce hazardous conditions for Pasadena residents. Additional rehabilitation projects will include pool renovations to improve the circulatory system to reduce health risks for area clients. Need is based upon the evaluation of service improvements within the CDBG target areas.
2	**Goal Name**	Housing Rehabilitation
	Goal Description	Housing Rehabilitation provides minor to moderate rehabilitation of homes owned and occupied by low to moderate income residents of Pasadena. If rehabilitation needs are too excessive, the City will provide demolition and reconstruction of single – family homes owned and occupied by low to moderate income residents of Pasadena. If applicable, lead based paint assessment and abatement, is also required for all housing rehabilitation activities. Prospective applicants may contact the City of Pasadena Community Development to obtain information about assistance provided by the HOME Program. The HOME Program waiting list is open periodically to receive applications for assistance based on the City's receipt of HOME funding allocations. Prior to the waiting list, the Community Development Department will notify the public by means of a public notice, social media, flyers, mail outs to community residents, and on the City of Pasadena website. Assistance shall be provided on a first come, first serve basis.
3	**Goal Name**	Reduce Homelessness
	Goal Description	The Homelessness goal supports the broad range of homeless prevention and street outreach activities, critically homeless, rapid re-housing, domestic violence victims and assistance with childcare and employment searches and training. Funding will support essential needs and operational costs of the local shelters of Pasadena.
4	**Goal Name**	Enhance quality of life through Public Services
	Goal Description	The transportation of the elderly and disabled is a major public service provided within the City of Pasadena. This program is highly requested and supported by citizens of the community. However, services are also needed for mental health, HIV/AIDS and substance abuse. The City does not currently fund these services, but supports the submission of applications for funding from agencies with experience providing these special needs services. Although the City does not directly fund these services, the City plans to provide financial support to local emergency shelters who collaborate with many community partners including health services through the AIDS Foundation Houston and mental health services through Bay Area Council on Drugs and Alcohol.

5	**Goal Name**	Promote Fair Housing
	Goal Description	The City will fund activities related to the promotion of fair housing through education, outreach, research, and other methods. Although CDBG administration funding will be used to carry out this goal, this goal will not correspond with a project in IDIS.
6	**Goal Name**	Homeownership
	Goal Description	Homeownership opportunities may be supported by the development or rehabilitation of affordable housing units to be sold to eligible homebuyers. Down payment and closing cost assistance may be provided to further enable households to obtain homeownership.

PROJECTS

AP-35 PROJECTS – 91.220(D)

Introduction

Below is a summary of eligible projects that will take place during the program year that address a portion of the City's priority needs. Specific objectives are detailed in the individual project descriptions below. The Community Development Department captures the accomplishments of its activities and projects through a reporting process which requires City Departments and partner agencies to report on the beneficiaries of HUD-funded activities.

Projects

#	Project Name
1	CDBG Program Administration
2	Housing Rehabilitation Administration
3	Wafer Street Paving & Drainage Improvements Project
4	Transportation RIDES Program
5	Sarah's House Operational Services
6	ES18 Pasadena
7	HOME Program Administration
8	Housing Rehabilitation Services Program
9	CHDO Housing Set Aside

Table 56 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocated priorities were based upon the City of Pasadena's approved 2018-2022 Five Year Consolidated Plan which was constructed with input from public service agencies, residents of Pasadena, and city departments. It was determined that a high priority level should be assigned to the following: Infrastructure Improvements, Housing Rehabilitation, Reduce Homelessness, Enhance quality of life through Public Services and Promote Fair Housing. The reasons for allocation priorities and obstacles follow:

- The primary obstacle to meeting underserved needs is limited availability of federal and local funding. The needs of the community are greater than the available local and federal funds.
- The degradation of street infrastructure has produced hazardous conditions and a reduction in Pasadena resident's mobility. To eliminate potential health risks and increase community welfare pool renovations have been prioritized.
- The lack of a public transportation system places elderly and/or disabled Pasadena residents at-risk of maintaining a healthy and independent lifestyle.
- The aging of residential units and increased numbers of under-resourced residents in conjunction with a lack of public housing leads to a limited housing stock available to low-to-moderate income residents.
- Additionally, the City has a high demand to find qualified agencies with the capacity to operate programs efficiently and within compliance of applicable federal regulations.

The Community Development Department has the primary responsibility for the administration, planning, organizing and monitoring of the City's Community Development Block Grant (CDBG) Program, HOME Program and Emergency Solutions Grant (ESG) Program. In addition, Community Development is responsible for implementing required procedures to ensure City compliance with specific U.S. Department of Housing and Urban Development (HUD) and other federal regulations.

Project Summary Information

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1	**Project Name**	CDBG Program Administration
	Target Area	CDBG Low/Mod Income Tracts Citywide
	Goals Supported	Infrastructure Improvements Housing Rehabilitation Reduce Homelessness Enhance quality of life through Public Services Promote Fair Housing
	Needs Addressed	Infrastructure Improvements Affordable Housing Homeless Needs Public Service Needs
	Funding	CDBG: $330,483
	Description	The Community Development Department has the primary responsibility for the administration, planning, organizing and monitoring of the City's Community Development Block Grant (CDBG) Program. In addition, Community Development is responsible for implementing required procedures to ensure City compliance with specific U.S. Department of Housing and Urban Development (HUD) and other federal regulations.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Administration will serve all programs and projects.
	Location Description	The Community Development Department is located in Pasadena City Hall: 1149 Ellsworth Drive, Pasadena, Texas, 77506.
	Planned Activities	CDBG funds will be used to support full time staff and administrative costs associated with the monitoring and oversight of the CDBG program including contracting, compliance, grant management, monitoring and fiscal related activities. Program administration costs are limited to 20% of the Program Year 2018 CDBG allocation.
2	**Project Name**	Housing Rehabilitation Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing

	Funding	CDBG: $37,396
	Description	Housing Rehabilitation Program Administration will support administration, inspection, and management costs necessary to administer the Housing Rehabilitation Services activities as needed. Amount funded includes $37,395.58 CDBG funds.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that a minimum two eligible households will be provided housing rehabilitation services. Therefore, approximately two households will receive assistance under the Housing Rehabilitation Services Program.
	Location Description	The City of Pasadena Community Development Department will administer the Housing Rehabilitation Services Program. The Community Development Department is located in Pasadena City Hall: 1149 Ellsworth Drive, Pasadena, Texas, 77506
	Planned Activities	Housing Rehabilitation Program Administration will support administration, inspection, and management costs necessary to administer the Housing Rehabilitation Services activities as needed. Amount funded includes $37,395.58 CDBG funds.
3	**Project Name**	Wafer Street Paving & Drainage Improvements Project
	Target Area	CDBG Low/Mod Income Tracts
	Goals Supported	Infrastructure Improvements
	Needs Addressed	Infrastructure Improvements
	Funding	CDBG: $1,036,675
	Description	The Wafer Street Paving and Drainage Improvements Project will assist 4,240 Pasadena residents by improving mobility, drainage conditions and reduce overall hazardous conditions. The service area will include census tracts 324100-1, 324100-4 and 324100-5, which is approximately 56.60% low-to-moderate income.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	The area served by the Wafer Street Paving and Drainage Improvements Project includes low-to moderate income individuals, who's living conditions will be improved by increased mobility, better drainage conditions, and the overall reduction of hazardous conditions. Approximately 4,240 persons will benefit from this activity. Goal Outcome Indicator beneficiary data derives from Census Tract Information: 324100-1, 324100-4 and 324100-5.

	Location Description	Construction oversight will be provided by the City of Pasadena Public Works Department, located at 1149 Ellsworth Drive, Pasadena, Texas 77506, in the City of Pasadena City Hall. Wafer Street is a north-south corridor located in North Pasadena. The census tracts served are 324100-1, 324100-4 and 324100-5.
	Planned Activities	The Wafer Street Paving & Drainage Improvements Project includes replacing the existing concrete street along Wafer Street from Eagle Ave to Broadway Blvd and from Jackson Ave to Harris Ave with 8-inch thick reinforced concrete pavement for a distance of approximately 3,300 feet and improving the sidewalks, drainage and utilities systems.
4	**Project Name**	Transportation RIDES Program
	Target Area	Citywide
	Goals Supported	Enhance quality of life through Public Services Promote Fair Housing
	Needs Addressed	Public Service Needs
	Funding	CDBG: $185,258
	Description	The City of Pasadena Parks and Recreation Department, specifically the Madison Jobe Senior Center, works in conjunction with RIDES (Specialized Transportation for Harris County) to provide free FARE Card loads to eligible elderly and/or disabled residents of Pasadena. The transportation services provided by the program allow clients to make medical appointments, go grocery shopping and conduct errands necessary to meet life needs.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 200 unduplicated clients will benefit from transportation services. Elderly and disabled clients must meet program eligibility requirements to receive a transportation service voucher (FARE Card) through the City of Pasadena Transportation RIDES Program.
	Location Description	The Transportation RIDES Program is administered by the Madison Jobe Senior Center located at 1700 E. Thomas Ave. Pasadena, Texas 77506
	Planned Activities	CDBG Funds will be utilized to support staff costs directly related to the administration of the Transportation RIDES Program. Funds will also pay for transportation service vouchers (FARE Card) to eligible elderly and/or disabled persons residing within Pasadena.
5	**Project Name**	Sarah's House Operational Services
	Target Area	Citywide

	Goals Supported	Reduce Homelessness
	Needs Addressed	Homeless Needs
	Funding	CDBG: $62,604
	Description	Sarah's House will provide Emergency Shelter Services to assist homeless women and children within the Pasadena area transition from homelessness to independent living.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 50 unduplicated clients will benefit from the Emergency Shelter Services. Homeless women and homeless women with children will benefit from these services.
	Location Description	Sarah's House is located at 711 Perla Road, Pasadena, Texas 77502
	Planned Activities	CDBG funds will be utilized to support staff costs directly related to the administration of the Emergency Shelter Services. Funds will also pay for the operational costs associated with the Emergency Shelter.
6	**Project Name**	ES18 Pasadena
	Target Area	Citywide
	Goals Supported	Reduce Homelessness
	Needs Addressed	Homeless Needs
	Funding	ESG: $138,429
	Description	The Emergency Solutions Grant (ESG) Program will provide assistance under the Emergency Shelter and Rapid Re-housing components; ESG administrative costs will also be used.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that approximately 75 homeless clients will receive assistance under the Emergency Shelter Program Component. Through the Rapid Re-housing Program Component, approximately 8 homeless households will be assisted with permanent housing and stabilization services.
	Location Description	All services will be provided within the City of Pasadena.

	Planned Activities	The Emergency Solutions Grant (ESG) Program will provide financial support to local emergency shelters by assisting with costs related to shelter operations and essential services. Funds expended towards Emergency Shelter and Street Outreach Program Components are not to exceed the greater of 60% of the annual ESG Program allocation or the amount of Program Year 2010 grant funds committed for homeless assistance activities, as described in 24 CFR 576.100. The City committed $60,000 of ESG funds to homeless assistance activities in Program Year 2010, and anticipates utilizing funds in the amount of 60% of the annual ESG Program allocation, $83,057.40, towards Emergency Shelter activities during Program Year 2018. Rapid re-housing and stabilization services will be provided through financial assistance in the form of deposits, rent, and utility payments. Approximately $44,989.42 will be used to support rapid re-housing activities. Program administration costs are limited to 7.5% of the Program Year 2018 ESG allocation. The City plans to utilize the full 7.5% allowed, $10,382.18, towards administration costs.
7	**Project Name**	HOME Program Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: $54,428
	Description	The Community Development Department has the primary responsibility for planning, organizing, monitoring and administering the City's Home Investment Partnerships (HOME) Program activities. In addition, the Community Development Department is responsible for developing and implementing required procedures to ensure City compliance with specific U.S. Department of Housing and Urban Development (HUD) and other federal regulations.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	The Community Development is located at:

	Planned Activities	HOME Program funds will be used to support full-time staff and administrative costs associated with the administration, monitoring and oversight of the HOME Program including contracting, compliance, training, grant management and fiscal related activities. Program administration costs are limited to 10% of the Program Year 2018 HOME allocation.
8	**Project Name**	Housing Rehabilitation Services Program
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: $304,856
	Description	Housing rehabilitation will be provided to income-eligible households that own and occupy a single-family home within the City of Pasadena. If rehabilitation is not considered cost reasonable, the City may offer to provide demolition and reconstruction of the existing single-family home. Participation in the demolition and reconstruction process is on a voluntary basis of the homeowner. In addition, an environmental review, lead-based paint assessment, and a historical preservation consultation is required for all housing rehabilitation projects. Temporary relocation and storage is provided, as necessary, to participants of the Housing Rehabilitation Services Program. The City as PJ, does not anticipate limiting beneficiaries through preferences, rather the City will rely on assisting clients through the determination of income-eligibility. Amount funded includes $239,855.60 of HOME funds and $65,000 of anticipated Program Income.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that a minimum of two income-eligible households will be assisted.
	Location Description	The Housing Rehabilitation Services Program will be administered directly by the City of Pasadena Community Development Department, located at: City of Pasadena City Hall 1149 Ellsworth Drive Pasadena, TX 77506 (713) 475-7294 CommDev@ci.pasadena.tx.us

	Planned Activities	It is planned to assist at least two eligible households with rehabilitation services. Households must be income-eligible, single-family and owner-occupied. Rehabilitation may consist of minor or moderate repairs; depending on the severity of the home's condition, cost reasonableness, demolition and reconstruction of the existing home may be proposed.
9	**Project Name**	CHDO Housing Set Aside
	Target Area	Citywide
	Goals Supported	Homeownership
	Needs Addressed	Affordable Housing
	Funding	HOME: $250,000
	Description	The City is currently in the process of identifying and certifying a Community Housing Development Organization (CHDO) Project. Activity will commence after selection and certification has been completed and is finalized.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that five income eligible households will be assisted.
	Location Description	Not applicable.
	Planned Activities	It is anticipated that five affordable housing units will be developed and then sold to program-eligible, first time homebuyer households. The City as PJ, does not anticipate limiting beneficiaries through preferences, rather the City will rely on assisting clients through the determination of income-eligibility.

AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Generally, the CDBG, HOME and ESG programs benefit the entire City of Pasadena in accordance with program requirements of each grant.

The CDBG Low/Mod Income Target Area includes all of the concentrated low-income census tracts within the Pasadena City limits. Approximately 63% ($1,036,674.82) of the anticipated 2018 allocation of CDBG funds will be utilized to benefit this geographic area. Projects and programs that are counted in the calculation for the percentage of funds include the Wafer Street Paving and Drainage Improvements Project. Please see the map, titled City of Pasadena 2018 Program Year CDBG Projects and Programs, found in the Unique Appendices section.

Approximately 63% ($1,036,674.82) of the 2018 allocation of CDBG funds will be utilized to benefit geographic areas with higher minority percentages. Please refer to the map, titled *City of Pasadena North/South Estimated Minority (Other than White) Concentration of Low-to-Moderate Income Target Area*, included in the Unique Appendices section. The remainder of funds will be utilized to benefit client-based activities that are available to any income-eligible resident of Pasadena, regardless of whether they reside within a low-income census tract, such as the Transportation Rides Program and Sarah's House.

The boundaries of the geographic area coincide with the boundaries of the census tracts which have been identified through examination of the 2010 U.S. Census Data as having median incomes below 80 percent of the area median income. These tracts are located primarily in the Northern parts of the City and include census tract numbers 3212, 3216, 3219, 3220, 3221, 3222, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3241, 3242, 3416, 3421, 3422, 3423, 3424 and 3425. In general, the CDBG Low/Mod Target Area is bound by State Highway 225 in the north and the corporate limits to the west. The eastern boundary begins at the intersection of Highway 225 and Louisiana, south to Red Bluff, southeast to Fairmont, proceed north to Spencer to Preston, Preston south to Vista, then west to Allen Genoa then Shaver, west towards Allen Genoa, northwest to Shaver, then Shaver to north Allendale and proceed west on Allendale to the western corporate limits. The majority of the target area is residential with a mix of commercial properties and parts of the target area are located adjacent to refineries.

Area-based CDBG investments are allocated geographically within the target areas delineated in the target area map, while beneficiary-based investments are allocated city-wide.

At this time the City is not requesting approval of a Neighborhood Revitalization Strategy Area.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Low/Mod Income Tracts	63
Citywide	15

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Pasadena Community Development Department solicits competitive applications for the receipt and use of CDBG, HOME, and ESG Program funds to address specific objectives and priority needs. The City does not prescribe a specific percentage of funding to target areas. However, the City has identified target areas within the corporate limits that have 51% or greater low- to moderate-income populations. Additionally, areas within the target area that possess aging infrastructure are prioritized for improvements. During Program Year 2018, one public facilities improvement project will be funded through CDBG. Please refer to the attached maps, within the Unique Appendices section, with census tracts and block group numbers, and the associated chart with related data.

Discussion

The City of Pasadena is mindful of the location of services and seeks to ensure equitable distribution of funding to serve families in need across the City. Although the CDBG Low/Mod Income Target Area is the primary service area, additional target areas will be identified. Target areas are identified based on income determination data and revitalization efforts needed. The City allocates funding based on priorities identified in its 2018-2022 Five Year Consolidated Plan and proposals submitted in its annual application process.

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

Affordable housing activities undertaken by the City of Pasadena will primarily address the needs of non-homeless and special needs households. Various programs will provide these households with rental assistance, new units or rehabilitated units. The City's affordable housing goals and projects are detailed below.

One Year Goals for the Number of Households to be Supported	
Homeless	8
Non-Homeless	4
Special-Needs	0
Total	12

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	8
The Production of New Units	2
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	12

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

The City will strive to utilize all three funding sources to best provide affordable housing opportunities throughout the community. Funds provided by CDBG will support affordable housing with Housing Rehabilitation Program Administration. The HOME Program will support affordable housing by providing housing rehabilitation and/or reconstruction services and homebuyer opportunities to eligible low-income households. The ESG Program will provide housing opportunities to homeless households through the facilitation of the Rapid Re-housing Program Component administered by subrecipient agencies.

AP-60 PUBLIC HOUSING – 91.220(H)

Introduction

The City of Pasadena strives to ensure that all residents have decent and affordable housing. This goal is facilitated through the Pasadena Housing Department's Housing Choice Voucher (HCV) Program (TX440).

Actions planned during the next year to address the needs to public housing

The City of Pasadena's Housing Program is a voucher program only. The City of Pasadena does not own nor does it administer a Public Housing Program. However, for the Housing Choice Voucher Program, the City of Pasadena plans to continue to assist and administer the allocated 1,079 voucher participants with their rental assistance within the Housing Choice Voucher HUD requirements, in accordance with 24 CFR 982, during the next year while maintaining a High Performer PHA Rating with the U.S. Department of Housing and Urban Development (HUD) in the Section Eight Management Assessment Program (SEMAP) report in management of the program.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The City of Pasadena does not own, nor does it administer a Public Housing Program for residents. However, the City of Pasadena encourages families to achieve self-sufficiency and homeownership through the Family Self Sufficiency Program, available to current Housing Choice Voucher Program participants.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable.

Discussion

While the City of Pasadena does not administer a Public Housing Program, eligible residents are provided housing vouchers through the Housing Choice Voucher Program. The goal of this program is to promote participants to achieve self-sufficiency and obtain homeownership.

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)

Introduction

The City upholds a strong partnership with the Coalition for the Homeless Houston/ Harris County and with other members of the Houston/ Harris County Continuum of Care (CoC) to align priorities and funding to address the needs of residents experiencing or at-risk of homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Pasadena does not currently fund Street Outreach through the Emergency Solutions Grant (ESG) Program. However, homeless service providers within the area network with mainstream resources including, but not limited to, medical facilities, financial institutions, housing providers, law enforcement, childcare facilities and education systems, to help spread awareness and assess needs of homeless individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Pasadena plans to provide financial support to local emergency shelters to assist homeless women, children and victims of domestic violence and sexual abuse. Through case management, multiple services are provided to each homeless individual or family upon entry into the program to assess further needs, such as child care, transportation, counseling and support groups, legal aide, medical services and education services to promote self-sufficiency.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Rapid re-housing assistance will be supported through use of ESG funds to provide rental, utility, and/or financial assistance. Homeless individuals or families will receive case management to ensure effective transitioning from shelter to independent living. Clients will also receive supportive services to promote self-sufficiency to assist in achieving the goal of permanent housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely

low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

In efforts to coordinate with continuum-wide goals, the City of Pasadena does not plan to provide ESG funds for Homelessness Prevention activities, but will instead support rapid re-housing goals.

Discussion

The City will continue to build an even stronger partnership with the Coalition for the Homeless and other ESG grantees within the Continuum to develop community wide strategies to end and prevent homelessness throughout the community. The City's priorities will continue to evolve and align with the continuum-wide goals to address priority needs.

AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)

Introduction:

The City of Pasadena believes the most significant barriers to affordable housing in Pasadena to be non-profit capacity for affordable housing, economic market conditions for low-income homebuyers, and reduction in federal assistance.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Pasadena has reviewed the public policies to determine their impact on affordable housing. The City found that there are no policies that contribute to the concentration of racial/ethnic minorities, and no city building codes or ordinances that limit the development or improvement of affordable housing in Pasadena.

Discussion:

The City of Pasadena has developed specific goals and objectives to address the housing needs of low-income populations within the City's jurisdiction. These housing goals are aimed at creating the opportunity for adequate, affordable, accessible housing for low-income households through the elimination of lead-based paint hazards, encouragement of homeownership, minor home repairs, rehabilitation of single family dwellings, provisions of rental assistance, new construction and development of partnerships.

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Introduction:

Many homeowners, particularly elderly and/or disabled homeowners, cannot afford to maintain or repair their homes. The Community Development Department is committed to assisting these low-income homeowners repair and rehabilitate their deteriorating homes.

Actions planned to address obstacles to meeting underserved needs

The underserved population includes low- to moderate-income (LMI) households that have a member that is elderly, disabled, is a child, has a disability, or has a medical condition that limits the quality of life. Underserved persons also include individuals experiencing homelessness or victims of domestic violence. Characteristics of the underserved population may include households with fixed incomes, unemployment or underemployment, residing in aging housing stock, language barriers, and physical limitations to access necessary services.

To address obstacles to meeting underserved needs, the Community Development Department will leverage resources by partnering with housing and service organizations to provide permanent supportive housing assistance to homeless individuals. Additionally, the City has adopted the Section 3 Plan to promote employment and contract opportunities to low-income residents. The Community Development Department will also strive to make housing and services available to the underserved by supporting transportation services to elderly and/or disabled persons and rapid re-housing activities to target homeless individuals and those who are victims of domestic violence.

The Community Development Department is continuously advertising services to the underserved. Translated material is available to persons with limited English proficiency, to assist non-English speaking residents to become aware of programming and services available. Various methods of outreach are being explored to promote community involvement and enhanced communication with residents who have a disability or underserved need.

Actions planned to foster and maintain affordable housing

The City of Pasadena plans to foster and maintain affordable housing by providing housing rehabilitation services and developing or rehabilitating affordable housing for homebuyer opportunities.

Actions planned to reduce lead-based paint hazards

The City continues to take actions to ensure that all housing programs meet the lead-based paint and disclosure provisions required under Title X. Plans to address lead-based paint hazards include:

- Continued distribution of the "*Protect Your Family from Lead in Your Home*" pamphlet to program participants and interested parties;
- Continued inspection for potential lead hazard for all houses which receive HUD funds for rehabilitation and households receiving rapid re-housing assistance;
- Continued treatment of identified lead-based paint hazards;
- Training and certification for staff supervising work on projects which require lead-based paint reduction

activities; and,

- Enforcement of requirements for lead-based paint inspections by firms performing risk assessments for the City of Pasadena to include a copy of certification to perform risk assessments, copies of risk assessor's state/EPA certification license, copy of analytical laboratory EPA recognition, and copy of risk assessment firm's radiation safety license or registration.

Actions planned to reduce the number of poverty-level families

The City of Pasadena plans to reduce the number of poverty-level families through the coordination of efforts among City departments and local businesses and service providers. To assist families achieve financial stability, the City of Pasadena Housing Department administers the Family Self-Sufficiency Program to current Housing Choice Voucher (HCV) residents. Additionally rapid re-housing activities will assist households in obtaining self-sufficiency and permanent housing. By collaborating with local agencies, additional resources may be secured and duplicated efforts may be reduced.

Actions planned to develop institutional structure

Internally, the City of Pasadena Community Development Department works in conjunction with other City departments including, but not limited to, the City Controller's Office, Planning, Housing, Purchasing and Public Works. The City's current structure highlights commitment to ensuring that all functions perform in a concerted manner to guarantee an efficient and effective use of public and private resources with maximum output in the form of accomplishments. Underlying this effort is the recognized need to maintain a high level of coordination on projects involving other City departments and/or outside agencies.

The City of Pasadena Community Development Department will address gaps and improve institutional structure using the following strategies:

- Discover, work with, and financially support community housing development organizations (CHDOs) to develop or rehabilitate affordable housing within the community;
- Use high level communication and project coordination among City departments and support the City's efforts to revitalize and/or stabilize low- and moderate-income neighborhoods; and
- Reduce and/or alleviate gaps in services and expedite the delivery of community development services to eligible residents.

Actions planned to enhance coordination between public and private housing and social service agencies

The promotion of community development and the leveraging of resources to maximize program outcomes are the ultimate goals between the City of Pasadena Community Development Department and its partners in the public and private housing and social service sectors. Coordination with the Coalition for the Homeless Houston/Harris County, Continuum of Care (CoC), Community Development Advisory Board, and various City departments will continue to expand opportunity and enhance services provided throughout the community.

Discussion:

While continuously refining its program strategies, the City of Pasadena Community Development Department will address obstacles to meet underserved needs, like poverty, and foster affordable housing by enhancing coordination and developing greater collaboration with local providers and surrounding communities.

PROGRAM SPECIFIC REQUIREMENTS

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L)(1,2,4)

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use and included in projects to be carried out.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**0**

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	77.74%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Pasadena is not utilizing other forms of investment beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture Provisions:

The City of Pasadena will enforce the Recapture Provisions in cases where HOME funds are provided as a direct subsidy to a homebuyer. Recaptured funds as a result of property being sold, rented, or vacated within the affordability period must be used for HOME eligible projects. Recaptured funds are not considered program income and cannot be used for planning and administrative costs. *Direct HOME subsidy* is the entire amount of HOME assistance that enabled the homebuyer to purchase the home. The direct subsidy includes down payment assistance, closing cost, rehabilitation costs or other HOME assistance provided directly to the homebuyer or homeowner.

The HOME rule limits recapture to available net proceeds. Therefore, the City can only recapture what is available from net proceeds. Net proceeds is the sales price minus superior loan repayment (other than HOME funds) and any closing costs. The City of Pasadena will reduce the amount of direct HOME subsidy on a prorate basis for the time the original homebuyer has owned and occupied the home, measured against the required affordability period.

Resale Provisions:

Resale provisions ensure that the HOME-assisted units remain affordable throughout the entire affordability period. The Resale Provisions are used in cases where HOME funding is provided directly to a developer to reduce development costs, thereby, making the price of the home affordable to the buyer. Referred to as "development subsidy", these funds are not repaid by the developer to the City, but remain with the property for the length of the affordability period. Specific examples where resale provisions would be used include:

- Funds are provided to developers for acquisition and development of property or to acquire affordable ownership units;
- Funds are provided for site preparation or improvement, including demolition; and,
- Funds are provided for construction materials and labor.

The City of Pasadena will administer its resale provisions by ensuring that if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer with a fair return on investment. It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his or her investment

because the home sold for less or the same price as the original purchase price.

All HOME-assisted units "designated as affordable units" shall meet the following criteria:

- The subsequent purchaser must be low-income as defined by HOME and occupy the home as the principal residence;
- The sales price must be affordable to the subsequent purchaser. Affordable is defined as limiting the principal, interest, taxes and insurance (PITI) amount to no more that 30% of the new purchaser's household monthly income;
- Under no circumstances may the "affordable" sales price exceed 95% of the median purchase price for the area; and,
- The City of Pasadena's definition of reasonable range of low-income homebuyers are families between 60 to 80 percent of area median income.

Recapture or resale provisions must be detailed and outlined in accordance with 24 CFR 92.254 in marketing brochures, written agreements, and all legal documents with homebuyers. Recapture or resale provisions may be used within a project, but not both. Combining provisions to create hybrids is not allowed.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Affordability for homeownership projects undertaken using the recapture provision shall be ensured through the use of real estate lien notes and/or restrictive covenants outlining the City's recapture provisions. Homeownership projects undertaken using the resale provision shall use deed restrictions, covenants running with the land, or other similar mechanisms per 92.254(a)(5)(i)(A) to ensure the resale requirements are met. The period of affordability specified in the mortgage will be the minimum period for the project as specified above. The period of affordability is based on the total amount of HOME funds invested in the housing project.

Recapture and Resale Provisions, adopted by the City of Pasadena, are included within Appendix III, *Unique Appendices*.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Pasadena does not anticipate using HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Written Standards for providing ESG assistance are included within the *Unique Appendices.*

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Continuum of Care (CoC) has established a centralized and coordinated assessment system that meets HUD requirements and is in process of fully implementing the system. In January 2014, a soft roll-out or Phase I of this system was implemented. This system began full implementation January 2015. In February 2013, the four jurisdictions, the Coalition, and the Corporation for Supportive Housing gathered together to discuss strategies around the ESG Program and coordinated access integration. Plans continue to develop around implementation of coordinated access and specifically the utilization of rapid re-housing.

ESG homelessness prevention and rapid re-housing programs use common assessments and eligibility criteria, and clients may access homeless prevention or rapid re-housing services at any point in the system. In order to target the systems limited homelessness prevention resources to those who are most at-risk of homelessness, in addition to HUD's eligibility criteria, local risk factors for homelessness were used to develop a common assessment. In order to monitor the tool's effectiveness, the CoC tracks clients who are deemed ineligible for homelessness prevention services to see if they can access shelter or homeless services. Rapid re-housing programs target four high need population groups that would benefit from the model.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Pasadena releases a public notice as notification of fund availability to solicit ESG Program eligible projects. The Community Development Department then reviews and evaluates the proposed applications based on completion of the application, program eligibility, and capacity and effectiveness of the organizations serving the community. The Community Development Advisory Board, which consists of representatives appointed by the Mayor and approved by City Council, evaluates the proposed applications and provides funding recommendations for the upcoming program year. The final approval of funding rests with the City of Pasadena City Council.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

In an effort to remain in compliance with the homeless participation requirement in 24 CFR 576.405(a), the

City of Pasadena remains active within the Coalition for the Homeless and seeks guidance from the Consumer Representatives (previous homeless individuals) which currently hold a position on the Steering Committee. The Community Development Department also makes every effort to attend all seminars and trainings that are provided by the Coalition for Homeless. Through contracts, the City of Pasadena also requires subrecipients to hold at least one chair for a previously homeless individual on their Board of Directors.

The City has ensured at least one agency funded through ESG has a homeless or formerly homeless individual in a position to offer recommendations on policies and services funded under ESG. The City also consults with formerly homeless individuals through subrecipient agencies and takes their input into consideration in the development of the City's Annual Action Plan. At this time, the City does not have a previously homeless representative on the Community Development Advisory Board.

5. Describe performance standards for evaluating ESG.

An executed contract between the City of Pasadena and the subrecipient is required for all activities funded by HUD allocations, prior to project implementation and expenditure of funds. The contract document will provide the basis for all expenditures, monitoring of project production, timeliness, and compliance.

In addition to delineating the basic standards and regulations in effect for the particular funding source, the contract will set forth responsibilities and procedures for each party, establish performance and product measures, and specify monitoring review schedules and compliance terms. The contract ensures that the program is implemented and completed in a time and cost effective manner, and in accordance with all applicable statutory requirements.

The City of Pasadena will continue to partner with the Coalition for the Homeless and other ESG grantees within the Continuum to end and prevent homelessness. As the program regulations change, the City will update program policies as appropriate to ensure an effective program is operating within compliance. The City is constantly seeking to improve the ESG program and maximize both the quality and quantity of services provided to the City’s homeless and those who are at risk of becoming homeless.

Appendix I
Citizen Participation

PUBLIC NOTICE
City of Pasadena
Community Development
Citizen Review Public Hearings

The City of Pasadena is committed to providing opportunities for its citizens to participate in an advisory role in the planning, implementation and assessment of programs administered through the Community Development Department. Citizen participation is essential for a viable program.

The Community Development Department would like to extend an invitation to all residents, businesses, service providers and local non-profits within the City of Pasadena to attend a Citizen Review Public Hearing. We would like to hear your experiences in our program, interests in becoming a part of our program and what services you feel would benefit our community throughout the upcoming Program Year 2018.

Public hearings will be held by the City of Pasadena Community Development Department:

City Hall - Multipurpose Room (#236)
1149 Ellsworth Dr.
Pasadena, TX 77506

January 31, 2018
10:00 – 11:00 a.m. and 2:00 – 3:00 p.m.

The public is encouraged to attend the hearings and/or submit written comments. Please submit all written comments to the following:

Community Development Department
ATTN: Citizen Review
P.O. Box 672, Pasadena,
TX 77501

E-Mail: CommDev@ci.pasadena.tx.us
Phone: (713) 475-7294
Fax: (713) 475-7037

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled hearing date. The City will provide assistance and/or translations for all non-English speaking residents, with requests made to the Community Development Department.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294. También, un traductor en Español estará presente durante la audiencia pública a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
Ciudad de Pasadena
Desarrollo Comunitario
Audiencias Públicas para Evaluación del Ciudadano

La Ciudad de Pasadena está comprometida a proveer oportunidades a sus ciudadanos a participar en una función de asesoramiento en la planificación, implementación y evaluación de programas administrados por el Departamento de Desarrollo Comunitario. La participación ciudadana es esencial para un programa viable.

El Departamento de Desarrollo Comunitario le gustaría extender una invitación a todos los residentes, negocios, prestadores de servicios y organizaciones locales sin fines de lucro dentro de la Ciudad de Pasadena para asistir a una Audiencia Pública para Evaluación del Ciudadano. Nos gustaría escuchar sus experiencias con nuestro programa, interés en formar parte de nuestro programa y qué servicios sienten beneficiaría a nuestra comunidad a lo largo del próximo programa en el año 2018.

Audiencias Públicas se llevaran a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

Alcaldia Municipal - Sala de Juntas Multiusos (Numero de Cuarto 236)
1149 Ellsworth Dr.
Pasadena, TX 77506

Enero 31, 2018
10:00 – 11:00 a.m. y 2:00 – 3:00 p.m.

Se alienta al público a asistir a las audiencias o presentar observaciones por escrito. Por favor, envíe los comentarios por escrito al siguiente:

Departamento de Desarrollo Comunitario
ATN: Evaluación del Ciudadano
P.O. Box 672
Pasadena, TX 77501

Correo Electrónico:
CommDev@ci.pasadena.tx.us
Teléfono: (713) 475-7294
Fax: (713) 475-7037

De acuerdo con el Acta Americana de Des habilidad, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. La Ciudad ofrecerá asistencia y/o traducciones para todos los residentes que no hablen inglés, peticiones se pueden realizar con el Departamento de Desarrollo Comunitario por lo menos 24 horas antes.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294.

HC MEDIA GROUP
HEARST newspapers

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS:

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personall appeared, the Newspaper Representative at the HOUSTON CHRONICLE, a daily newspaper published i Harris County, Texas, and generally circulated in the Counties of: HARRIS, TRINITY, WALKER, GRIMES POLK, SAN JACINTO, WASHINGTON, MONTGOMERY, LIBERTY, AUSTIN, WALLER, CHAMBERS, COLORADO, BRAZORIA, FORT BEND, GALVESTON, WHARTON, JACKSON, and MATAGORDA and that the publication, of which the annexed herein, or attached to, is a true and correct copy, was publishe to-wit:

CITY OF PASADENA/COMMUNIT 0000160639 HC058760321
RAN A LEGAL NOTICE
SIZE BEING: 3 x102 L

Product	Date	Class	Page
CNPC-Pasadena Citizen	Jan 14 2018	Legal Notices	

Victoria Bond & IR Clerk
NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 20th Day of January A.D. 2018

VERONICA M TYRONE 7163357 NOTARY PUBLIC STATE OF TEXAS EXPIRES FEB. 10, 2020

Veronica M Tyrone
Notary Public in and for the State of Texas

LEGALS

LEGALS

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LEGALS

LEGALS

LEGALS

NOTICE
City of Pasadena
Community Development
Citizen Needs Public Hearings

The City of Pasadena is committed to providing opportunities for its citizens to participate in the planning and in the preparation, implementation and assessment of proposed activities funded through the Community Development Block Grant. Citizen participation is essential for a viable program.

The Community Development Department would like to extend an invitation to all residents, businesses, and local organizations within the City of Pasadena to attend a Citizen Needs Public Hearing. We would like to hear your comments in our effort to identify community development and housing needs you feel would benefit our community throughout the upcoming Program Year 2018.

Public hearings will be held by the City of Pasadena Community Development Department:

City Hall - Conference Room [illegible]
Pasadena, TX 77506

January 23, 2018
10:00 – 11:00 a.m. and 2:00 – 3:00 p.m.

The public is encouraged to attend the hearings and/or submit written comments. Please submit all written comments to the following:

Community Development Department
[illegible]
Pasadena, TX 77506

[illegible]
Fax: [illegible]

In compliance with the American Disabilities Act, individuals needing special accommodations, including auxiliary aids or services, should notify the Community Development Department at [illegible] at least 48 hours in advance of the meeting. For hearing impaired persons, TDD 1-800-[illegible] is available. Individuals who require auxiliary aids or services should contact the City Secretary's Office at [illegible] at least 48 hours before the meeting so that appropriate arrangements can be made.

Para obtener esta información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7364. También, un traductor en Español estará presente durante la audiencia pública a celebrarse en por lo menos 24 horas antes.

AVISO DE PÚBLICO
Ciudad de Pasadena
Departamento de Desarrollo Comunitario
Audiencias Públicas para Necesidades del Ciudadano

La Ciudad de Pasadena está comprometida a proveer oportunidades a sus ciudadanos a participar en las fases de la planificación, implementación y evaluación de actividades propuestas financiadas por el Departamento de Desarrollo Comunitario. La participación ciudadana es esencial para un programa viable.

El Departamento de Desarrollo Comunitario le gustaría extender una invitación a todos los residentes de la Ciudad, propietarios de negocios y organizaciones locales dentro de [illegible] a una Audiencia Pública de Necesidades del Ciudadano. Nos gustaría escuchar sus comentarios para ayudar a identificar [illegible] desarrollo comunitario y necesidades de vivienda que usted sienta beneficiarían a nuestra comunidad a lo largo del próximo programa en el año 2018.

Audiencias Públicas se llevarán a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

Abatello Municipal - Sala de Juntas Multiusos (Número de Cuarto 2308)
[illegible]
Pasadena, TX 77506

Enero 23, 2018
10:00 – 11:00 a.m. y 2:00 – 3:00 p.m.

Se alienta al público a asistir a las audiencias y presentar observaciones por escrito. Por favor, envíe los comentarios por escrito al siguiente:

Departamento de Desarrollo Comunitario
[illegible]
Pasadena, TX 77503

Darren Rodríguez
[illegible]
Fax: [illegible]

De acuerdo con el Acta Americanos de Dos Inhabilidad, individuos que necesitan alojamientos especiales, incluyendo ayudas auxiliares o servicios, deben notificar al Departamento de Desarrollo Comunitario al [illegible] por lo menos 48 horas de antelación a la reunión. Para personas con problemas de audición, TDD 1-800-[illegible] está disponible. Las personas que requieren ayudas auxiliares o servicios deben ponerse en contacto con el Departamento de Desarrollo Comunitario por lo menos 24 horas antes.

Para obtener esta información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7364.

Legal Notice

The following properties are overgrown with high grass, weeds and/or have an accumulation of rubbish, nuisance, debris, boards, trash, junk, abandoned vehicles, parts of vehicles or any unsightly or unsanitary matter which is dangerous to the public health, safety and welfare of the property owners or lessee have to contact the owner, please call Code Enforcement at (713) 697-7664.

Residential Property:

1. 2313 Huntsmanville, 77503
2. [illegible] Place
3. [illegible]
4. 2329 W Main St, 77506

LEGALS

LEGALS

[illegible] Academy (K-7)
[illegible]
[illegible]
[illegible]

It is the policy of Pasadena ISD to provide opportunities to protect the rights of persons to participate in public meetings, and to be informed of the time, place, and subject matter of public meetings. Persons with disabilities who have special communication or accommodation needs are encouraged to attend. Auditorium is wheelchair accessible. Requests for auditory interpretation services should be made 48 hours in advance of the meeting by calling [illegible].

PS 1/14/18

[illegible]
CITY OF SOUTH HOUSTON

South Houston's Zoning Board of Adjustments will hold a Public Hearing on Tuesday, January 23, 2018, to consider a variance for [illegible] located at 1023 Dallas Street, South Houston, Texas, at 7 p.m.

PS 1/14/18

Teresa Brown, Chairperson
Zoning Board of Adjustments

[illegible]
CITY OF SOUTH HOUSTON

The City of South Houston will hold a Public Hearing on Tuesday, January 23, 2018, to consider a variance for [illegible] located at 1023 Dallas Street, South Houston, Texas, at 7 p.m. The meeting will be held in City Council Chambers at 1017 Dallas Street, South Houston, Texas.

PS 1/14/18

Lena Anna, City Secretary
City of South Houston, Texas

LEGALS

LEGALS

[illegible]
[illegible]

The City of Pasadena, Texas intends to purchase and invites you to submit a sealed bid for:

Power Stapler, Water Wells and Tower

Sealed bids in compliance with the standard by the City of Pasadena, [illegible] will be received by the City of Pasadena, Texas, [illegible] Pasadena, Texas, 77506 until [illegible] at which time they will be publicly opened and read aloud. Bids received after the above time will not be considered. [illegible] 1149 Ellsworth Dr, Suite 227, City of Pasadena, TX 77506

Invitations for Bids (Documents) may be obtained at the Purchasing Department, [illegible] Pasadena, Texas, 77506, (713) 475-5400.

Bids may be either mailed or hand delivered to the City Secretary's Office, [illegible] Pasadena, TX 77506. Bids received after the above time will be returned to the bidder unopened.

The City Council reserves the right to waive any informalities or technicalities and to accept or reject any or all bids or parts of bids deemed to be in the best interest of the City. [illegible] Bidders are required to comply with all applicable laws and ordinances of the City, County, State and Federal Governments.

Each bidder is to be responsible for [illegible] and shall be responsible to ensure that the bid is received in the City Secretary's Office before the time set for the bid opening. The City is not responsible for any bids delivered to any other City office and not to the bid opening.

Published in the Pasadena Citizen & on the City of Pasadena Website

Publish: January 14, 2018 & January 21, 2018

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Sport Talk

By Charles Preston

ACROSS

1 Father, in Britain
50 Leisure's opposite
51 French pal
26 Deceive
27 Participating
28 Celebrates

Citizen Review Public Hearing
January 31, 2018 at 10:00 a.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Kayla Coberley	x4994	Community Development	KCoberley@ci.pasadena.tx.us
Sara Rogers	713-475-4910	Community Development	SMZavala@ci.pasadena.tx.us
Melissa Quijano	x4894	Housing Community Development	mquijano@ci.pasadena.tx.us
Pat Van Houte	713-475-1506	C.tz.	

Citizen Review Public Hearing
January 31, 2018 at 2:00 p.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Sara Rogers	713-475-4910	Community Dev.	SMZavala@ci.pasadena.tx.us

COMMUNITY DEVELOPMENT
Pasadena, Texas

Needs Assessment Survey

The City of Pasadena Community Development Department is conducting a resident survey to identify community needs and priorities for the expenditure of federal funds from the U.S. Department of Housing and Urban Development (HUD). These funds can be used for housing and community development projects. The Community Development Department wants you to have a voice in how the City invests this money. Please assist us by considering the needs of your community and ranking the following priorities as low, medium or high; please add any needs not listed on the survey. The survey results will be one tool used to develop the 2018-2022 Consolidated Plan, a strategic plan that aligns resources with needs.

	Low	Med	High
HOUSING			
Residential Rehabilitation			
Homeownership Assistance			
Housing for Disabled			
Senior Housing			
Large Family Housing			
Veteran Housing			
Fair Housing			
Lead-Based Paint Test/Abatement			
Residential Historic Preservation			
Affordable Rental Housing			
Energy Efficiency Improvements			
COMMUNITY FACILITIES			
Senior Centers			
Youth Centers			
Child Care Centers			
Park & Recreational Facilities			
Health Care Facilities			
Community Centers			
Fire Stations & Equipment			
INFRASTRUCTURE			
Drainage Improvement (Flooding)			
Water/Sewer Improvement			
Street Improvement			
Sidewalk Improvement			
Street Lighting			
OTHER NEEDS			
Other _____			
Other _____			

TELL US...

What is your zip code? _____

Do you represent an organization? If so, which one?

_____

	Low	Med	High
COMMUNITY SERVICES			
Senior Activities			
Youth Activities			
Child Care Services			
Transportation Services			
Anti-Crime Programs			
Health Services			
Mental Health Services			
Legal Services			
Educational Services			
NEIGHBORHOOD SERVICES			
Trash & Debris Removal			
Graffiti Removal			
Tree Planting			
Parking Facilities			
Clean-Up of Abandoned Building & Lots			
SPECIAL NEEDS SERVICES			
Centers/Services for Disabled			
Accessibility Improvement			
Domestic Violence Services			
Substance Abuse Services			
Homeless Shelter/Services			
HIV/AIDS/Services			
Neglected/Abused Children Services			
BUSINESS & JOBS			
Start-Up Business Assistance			
Small Business Loans			
Job Creation/Retention			
Employment Training			
Commercial/Industrial Rehabilitation			
Façade Improvements			
Business Mentoring			

THANK YOU for completing the resident survey. Please return the completed survey form to:

Mail
Community Development Department
P.O. Box 672
Pasadena, TX 77501-0672

OR

Email
CommDev@ci.pasadena.tx.us

OR

Fax
713-475-7037

COMMUNITY DEVELOPMENT
Pasadena, Texas

Encuesta de evaluacion de necesidades

El Departamento de Desarrollo Comunitario de la Ciudad de Pasadena está llevando a cabo una encuesta entre residentes para identificar las necesidades y prioridades para el gasto de fondos federales del Departamento de Vivienda y Desarrollo Urbano (HUD) de EE. UU. Estos fondos pueden usarse para proyectos de vivienda y desarrollo comunitario. El Departamento de Desarrollo de la Comunidad quiere que tenga voz en cómo la Ciudad invierte este dinero. Ayúdenos a considerar las necesidades de su comunidad y clasificar las siguientes prioridades como baja, media o alta; por favor agregue cualquier necesidad que no esté incluida en la encuesta. Los resultados de la encuesta serán una herramienta utilizada para desarrollar el Plan Consolidado 2018-2022, un plan estratégico que alinea los recursos con las necesidades.

	Bajo	Med	Alto
ALOJAMIENTO			
Rehabilitación residencial			
Asistencia para la propiedad de vivienda			
Vivienda para discapacitados			
Vivienda para personas mayores			
Vivienda familiar grande			
Vivienda de Veteranos			
Vivienda Justa			
Prueba / reducción de pintura a base de plomo			
Residencia Histórica Residencial			
Vivienda de alquiler asequible			
Mejoras en la eficiencia energética			
INSTALACIONES COMUNITARIAS			
Centros juveniles			
Centros de cuidado infantil			
Instalaciones de parques y recreativas			
Centros medicos			
Centros comunitarios			
Estaciones de bomberos y equipo			
INFRAESTRUCTURA			
Mejora del drenaje (Inundación)			
Mejora del agua / alcantarillado			
Mejora de la calle			
Mejora de la acera			
Alumbrado público			
OTRAS NECESIDADES			
Otro _____			
Otro _____			

DIGANOS...

Cual es su codigo postal? _____

Representa a una organizacion? Y si es asi, cual?

_____

	Bajo	Med	Alto
SERVICIOS COMUNITARIOS			
Actividades para mayores			
Actividades para juveniles			
Servicios de cuidado infantil			
Servicios de transporte			
Programas contra la delincuencia			
Servicios de salud			
Servicios de salud mental			
Servicios jurídicos			
Servicios educativos			
SERVICIOS VECINOS			
Plantación de árboles			
Eliminación de basura y escombros			
Eliminacion de Graffiti			
Facilidades de estacionamiento			
Limpieza de edificios abandonados y lotes			
SERVICIOS DE NECESIDADES ESPECIALES			
Centros / servicios para descapasitados			
Mejora de accesibilidad			
Servicios de violencia domestica			
Servicios de abuso de substancias			
Refugio / Servicios para personas sin hogar			
VIH / SIDA / Servicios			
Servicios para ninos desatendidos / abusados			
NEGOCIOS Y TRABAJOS			
Asistencia de negocios en marcha			
Prestamos para pequenas empresas			
Creacion de empleo / Retencion			
Entrenamiento de empleo			
Rehabilitación Comercial / Industrial			
Mejoras de fechadas			
Tutoria de negocios			

GRACIAS por completar la encuesta de residentes. Por favor, devuelva el formulario de encuesta completo a:
Correo: **Community Development Department P.O Box 672, Pasadena, TX 77501-0672 OR** ***Email:*** CommDev@ci.pasadena.tx.us

PUBLIC NOTICE
2018 CDBG/HOME/ESG CONSOLIDATED PROGRAM
NONPROFIT/SUBRECIPIENT PLANNING AND APPLICATION PROCESS

The City of Pasadena expects to receive approximately $2,090,848 in federal grants for 2018: Community Development Block Grant (CDBG) Program ($1,549,042), HOME Investment Partnerships (HOME) Program ($399,771), and Emergency Solutions Grant (ESG) Program ($142,035).

The City of Pasadena Community Development Department will begin the planning and development process for the 2018 CDBG/HOME/ESG Consolidated Program Year. Funding will be prioritized for the benefit of primarily the low- to moderate-income population within the City of Pasadena. Each project will produce outcomes that provide an impact to the community's needs as outlined in the 2018-2022 Five Year Consolidated Plan.

Priority funding areas include:

- Adult Basic Education Services such as GED/ESL Courses, Language Proficiency Courses, Employment Training or Workforce Preparation;
- Health Services, Substance Abuse Prevention;
- Child Care Services;
- Special Needs Services, such as Transportation of Elderly/Disabled Persons, Senior Adult Programs, Meals on Wheels, or Youth Care Services;
- Affordable Housing Activities, such as the development of Affordable Housing, First-Time Homebuyer Assistance Programs, Housing Rehabilitation, Homeownership Counseling Services, and Community Housing Development Organizations (CHDO);
- Public Facilities and Improvement Activities, such as Public Facilities, Infrastructure, or Neighborhood Centers within the eligible Low-Income Target Area;
- Homeless Assistance, such as Supportive Services for homeless individuals, Domestic Violence Victims, Child Care, and Employment Preparation to transition homeless individuals to self-sufficiency.

Priority funding areas may be subject to change based upon public input.

The Community Development Department will distribute and provide an overview of the application packet during the workshops scheduled as follows:

CDBG/HOME/ESG Application Workshops	**Location:**
Friday, March 2, 2018	**City of Pasadena Council Chambers**
Workshop #1: 10:00 A.M.	**1149 Ellsworth Dr.**
Workshop #2: 3:00 P.M.	**Pasadena, TX, 77506**

All non-profits, subrecipients, City Departments and other organizations interested in applying for grant funds must register for and attend ONE of the MANDATORY workshops scheduled above. Applications will NOT be accepted by agencies not in attendance. To register for one of the above mentioned workshops, contact the Community Development Office at (713) 475-7294 or CommDev@ci.pasadena.tx.us.

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled workshop date. A Spanish speaker will be present during the workshop upon 24 hour request.

Para obtener más información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, un traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
PROGRAMA CONSOLIDADO 2018 DE CDBG/HOME/ESG
PLANIFICACION Y PROCESO DE APLICACIÓN PARA ORGANIZACIONES SIN FINES DE LUCRO/SUB-BENEFICIARIOS

La Ciudad de Pasadena espera recibir aproximadamente $2,090,848 en subsidios federales para el año 2018: Programa de Subvención de Desarrollo Comunitario (CDBG) ($1,549,042), Programa de Sociedades de Inversión (HOME) ($399,771) y Programa de Concesión de Soluciones de Emergencia (ESG) ($142,035).

El Departamento de Desarrollo Comunitario de la Ciudad de Pasadena comenzará el proceso de planificación y desarrollo para el Programa Consolidado del año 2018 CDBG/HOME/ESG. Fondos serán priorizados en beneficio a los residentes de bajos a moderados ingresos dentro de la ciudad de Pasadena. Cada proyecto va a producir los resultados que proporcionan un impacto a las necesidades de la comunidad como se indica en el Plan Consolidado de Cinco Años 2018-2022.

Prioridades de financiamiento incluyen:

- Servicios de educación básica para adultos como cursos de GED/ESL, cursos para dominio del idioma, entrenamiento laboral o preparación de mano de obra
- Servicios de salud, prevención de abuso de sustancias;
- Servicios de cuidado infantil;
- Servicios de necesidad especial, como transportación a personas ancianas/deshabilitadas, programas de adultos para personas mayores, comidas sobre ruedas, o servicios de atención para la juventud;
- Actividades de vivienda asequible, como el desarrollo de vivienda económica, programa de asistencia para compradores de vivienda por primera vez, rehabilitación de viviendas, servicios de asesoría para dueños de casas, y Organización de Desarrollo de Vivienda Comunitaria (CHDO);
- Instalaciones públicas y actividades para mejoría, como servicios públicos, infraestructura, o centros comunitarios dentro de la zona de bajos ingresos elegible;
- Asistencia a personas sin hogar, como servicios de apoyo para individuos sin hogar, víctimas de violencia doméstica, cuidado infantil, y preparación laboral para ayudar a personas sin hogar ser autosuficientes.

  *** Las áreas de financiación prioritarias pueden estar sujetas a cambios en función de los comentarios del público.**

El Departamento de Desarrollo Comunitario distribuirá y proporcionara una visión general del paquete de aplicación en los talleres programados siguientes:

Talleres de Aplicación CDBG/HOME/ESG	**Localización:**
Viernes, Marzo 2, 2018	**Camara de Consejo de la Ciudad de Pasadena**
Taller #1: 10:00 A.M.	**1149 Ellsworth Dr.**
Taller #2: 3:00 P.M.	**Pasadena, TX 77506**

Toda agencia sin fines de lucro, sub-beneficiarios, Departamentos Municipales y otras organizaciones interesadas en aplicar para fondos debe registrarse y asistir a UNO de los talleres OBLIGATORIOS programados. Aplicaciones NO serán aceptadas por agencias que no asistan a unos de los talleres. Para inscribirse a uno de los talleres mencionados, comuníquese con la Oficina de Desarrollo Comunitario al (713) 475-7294 o por correo electrónico a CommDev@ci.pasadena.tx.us.

De acuerdo con el Acta Americana de Des habilidad, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo

menos 24 horas antes de la fecha programada para la audiencia. También, un traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.
Para obtener más información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294.

HC MEDIA GROUP

HEARST corporation

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS:

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personall appeared, the Newspaper Representative at the HOUSTON CHRONICLE, a daily newspaper published i Harris County, Texas, and generally circulated in the Counties of: HARRIS, TRINITY, WALKER, GRIMES POLK, SAN JACINTO, WASHINGTON, MONTGOMERY, LIBERTY, AUSTIN, WALLER, CHAMBERS, COLORADO, BRAZORIA, FORT BEND, GALVESTON, WHARTON, JACKSON, and MATAGORDA and that the publication, of which the annexed herein, or attached to, is a true and correct copy, was publishe to-wit:

CITY OF PASADENA/COMMUNIT 0000162874 HC058760321
RAN A LEGAL NOTICE
SIZE BEING: 6 x10.00 l (60.00l)

Product	Date	Class	Page
CNPC-Pasadena Citizen	Feb 11 2018	Legal Notices	
CNPC-Pasadena Citizen	Feb 14 2018	Legal Notices	

Victoria Band

NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 14th Day of February A.D. 2018

VERONICA M TYRONE 7163357 NOTARY PUBLIC STATE OF TEXAS EXPIRES FEB. 10, 2020

Notary Public in and for the State of Texas

LEGAL NOTICES LEGAL NOTICES LEGAL NOTICES LEGAL NOTICES LEGAL NOTICES LEGAL NOTICES

PUBLIC NOTICE
2018 CDBG/HOME/ESG CONSOLIDATED PROGRAM
NONPROFIT/SUBRECIPIENT PLANNING AND APPLICATION PROCESS

The City of Pasadena expects to receive approximately $2,000,845 in federal grants for 2018: Community Development Block Grant (CDBG) Program ($1,549,043), HOME Investment Partnerships (HOME) Program ($309,771), and Emergency Solutions Grant (ESG) Program ($142,031).

The City of Pasadena Community Development Department will begin the planning and development process for the 2018 CDBG/HOME/ESG Consolidated Program Year. Funding will be prioritized for the benefit of primarily the low- to moderate-income population within the City of Pasadena. Each project will produce outcomes that provide an impact on the community's needs as outlined in the 2018-2022 Five Year Consolidated Plan.

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- Adult Basic Education Services such as GED/ESL Courses, Language Proficiency Courses, Employment Training or Workforce Preparation;
- Health Services, Substance Abuse Prevention;
- Child Care Services;
- Special Needs Services, such as Transportation of Elderly/Disabled Persons, Senior Adult Programs, Meals on Wheels, or Youth Care Services;
- Affordable Housing Activities, such as the development of Affordable Housing, First-Time Homebuyer Assistance Programs, Housing Rehabilitation, Homeownership Counseling Services, and Community Housing Development Organizations (CHDO);
- Public Facilities and Improvement Activities, such as Public Facilities, Infrastructure, or Neighborhood Centers within the eligible Low-Income Target Area;
- Homeless Assistance, such as Supportive Services for homeless individuals, Domestic Violence Victims, Child Care, and Employment Preparation to transition homeless individuals to self-sufficiency.

**Priority funding areas may be subject to change based upon public input.*

The Community Development Department will distribute and provide an overview of the application packet during the workshops scheduled as follows:

CDBG/HOME/ESG Application Workshop	Location
Friday, March 2, 2018	City of Pasadena Council Chambers
Workshop #1: 10:00 A.M.	1149 Ellsworth Dr.
Workshop #2: 3:00 P.M.	Pasadena, TX 77506

All non-profit, subrecipients, City Departments and other organizations interested in applying for grant funds must register for and attend ONE of the MANDATORY workshops scheduled above. Applications will NOT be accepted by agencies not in attendance. To register for one of the above mentioned workshops, contact the Community Development Office at (713) 475-7294 or CommDev@ci.pasadena.tx.us.

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled workshop date. A Spanish speaker will be present during the workshop upon 24 hour request.

Para obtener esta información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, un traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
PROGRAMA CONSOLIDADO 2018 DE CDBG/HOME/ESG
PLANIFICACION Y PROCESO DE APLICACIÓN PARA ORGANIZACIONES SIN FINES DE LUCRO/SUB-BENEFICIARIOS

La Ciudad de Pasadena espera recibir aproximadamente $2,000,845 en subsidios federales para el año 2018: Programa de Subvención de Desarrollo Comunitario (CDBG) ($1,549,043), Programa de Sociedades de Inversión (HOME) ($309,771) y Programa de Concesión de Soluciones de Emergencia (ESG) ($142,031).

El Departamento de Desarrollo Comunitario de la Ciudad de Pasadena comenzará el proceso de planificación y desarrollo para el Programa Consolidado del año 2018 CDBG/HOME/ESG. Fondos serán priorizados en beneficio a los residentes de bajos a moderados ingresos dentro de la ciudad de Pasadena. Cada proyecto va a producir los resultados que proporcionan un impacto a las necesidades de la comunidad como se indica en el Plan Consolidado de Cinco Años 2018-2022

Prioridades de financiamiento incluyen:
- Servicios de educación básica para adultos como cursos de GED/ESL, cursos para dominio del idioma, entrenamiento laboral o preparación de mano de obra
- Servicios de salud, prevención de abuso de sustancias
- Servicios de cuidado infantil
- Servicios de necesidad especial, como transportación a personas incapacitadas/discapacitadas, programas de adultos para personas mayores, comidas sobre ruedas, o servicios de atención para la juventud
- Actividades de vivienda asequible, como el desarrollo de vivienda asequible, programa de asistencia para compradores de vivienda por primera vez, rehabilitación de viviendas, servicios de consejo para dueños de casa, y Organización de Desarrollo de Vivienda Comunitario (CHDO);
- Instalaciones públicas y actividades para mejoras, como servicios públicos, infraestructura, o centros comunitarios dentro de la zona de bajos ingresos elegibles
- Asistencia a personas sin hogar, como servicios de apoyo para individuos sin hogar, víctimas de violencia doméstica, cuidado infantil, y preparación laboral para ayudar a personas sin hogar ser autosuficientes.

* Las áreas de financiación prioritarias pueden estar sujetos a cambios en función de los comentarios del público.

El Departamento de Desarrollo Comunitario distribuirá y proporcionará una visión general del paquete de aplicación en los talleres programados siguientes:

Talleres de Aplicación CDBG/HOME/ESG	Localización
Viernes, Marzo 2, 2018	Cámara de Consejo de la Ciudad de Pasadena
Taller #1: 10:00 A.M.	1149 Ellsworth Dr.
Taller #2: 3:00 P.M.	Pasadena, TX 77506

Todas agencias sin fines de lucro, sub-beneficiarios, Departamentos Municipales y otras organizaciones interesadas en aplicar para fondos deben registrarse y asistir a UNO de los talleres OBLIGATORIOS programados. Aplicaciones NO serán aceptadas por agencias que no asistan a uno de los talleres. Para inscribirse a uno de los talleres mencionados, comuníquese con la Oficina de Desarrollo Comunitario al (713) 475-7294 o por correo electrónico a CommDev@ci.pasadena.tx.us.

De acuerdo con el Acta Americana de Discapacidades, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. También, un traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.

Para obtener esta información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294.

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281-487-2234

NOTICE OF INTENT TO HOLD ELECTIONS WITHOUT THE USE OF ELECTRONIC VOTING SYSTEM

To the registered voters of:

Harris County Municipal Utility District No. 16, Harris County Municipal Utility District, Clear Creek Public Utility District, Harris County Municipal Utility District No. 22, Harris County Municipal Utility District No. 63, Harris County Municipal Utility District No. 64, Harris County Municipal Utility District No. 65, Harris County Municipal Utility District No. 144, Harris County Municipal Utility District No. 153, Harris County Municipal Utility District No. 233, Lake Municipal Utility District, Lamata Woods Public Utility District, Lamata Road Utility District, Northwestern Municipal Utility District, Southwest Harris County Municipal Utility District No. 20, Southwest Harris County Municipal Utility District No. 28, Waller County Fresh Water Supply District No. 2, Waller County Municipal Utility District No. 2, West Harris County Municipal Utility District No. 4, West Harris

Elinda Hand
c/o Bruce A. Wallace, L.L.P.
5300 Memorial, Suite 500, Houston, Texas 77007

El infrascrito, Sr. Elinda Hand, escribe notificar una elección(es) donde Distrito(s) del(cual) es(son) ordenado el público el el informe se celebrará en esta tarde del 7th de enero de la elección.

THÔNG BÁO Ý ĐỊNH TỔ CHỨC BẦU CỬ
không sử dụng
HỆ THỐNG BỎ PHIẾU ĐIỆN TỬ

Gửi các cử tri có tên ghi danh là điều sau:
Cơ Quan Điều Vụ Tiện Ích Thôn Phố số 16 Quận Harris, Cơ Quan Điều Vụ Tiện Ích Thành Phố Bang Clear, Cơ Quan Điều Vụ Tiện Ích Thành Phố Bang Clear, Cơ Quan Điều Vụ Tiện Ích số 22 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 63 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 64 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 65 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 144 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 153 Quận Harris, Cơ Quan Điều Vụ Tiện Ích số 233 Quận Harris, Cơ Quan Điều Vụ Tiện Ích Hồ Thôn Phố số 16 Quận Harris, Cơ Quan Điều Vụ Tiện Ích Thôn Phố Lamata Woods Quận Harris, Cơ Quan Điều Vụ Tiện Ích Đường Lamata Quận Harris, Cơ Quan Điều Vụ Tiện Ích Tây Bắc Quận Harris, Cơ Quan Điều Vụ Tiện Ích Tây Nam Quận Harris số 20, Cơ Quan Điều Vụ Tiện Ích Tây Nam Quận Harris số 28, Cơ Quan Điều Vụ Tiện Ích Nước Ngọt Thành Phố Bang Waller số 2, Cơ Quan Điều Vụ Tiện Ích Thành Phố Bang Waller số 2, Cơ Quan Điều Vụ Tiện Ích Tây Quận Harris số 4, Cơ Quan Điều Vụ Tiện Ích Tây Quận Harris

VEGA CONSERVATION ENVIRONMENTAL QUALITY
NOTICE OF [illegible]
PERMIT NO. [illegible]

PUBLIC NOTICE
2018 CDBG/HOME/ESG CONSOLIDATED PROGRAM
NONPROFIT/SUBRECIPIENT PLANNING AND APPLICATION PROCESS

The City of Pasadena expects to receive approximately $3,000,000 in federal grants for 2018: Community Development Block Grant (CDBG) Program ($1,545,045), HOME Investment Partnerships (HOME) Program ($500,777), and Emergency Solutions Grant (ESG) Program ($142,000).

The City of Pasadena Community Development Department will begin the planning and development process for the 2018 CDBG/HOME/ESG Consolidated Program Year. Funding will be prioritized for the benefit of primarily the low- to moderate-income population within the City of Pasadena. Each project will produce outcomes that provide an impact to the community's needs as outlined in the 2018-2022 Five Year Consolidated Plan.

Priority funding areas include:
- Adult Basic Education Services such as GED/ESL Courses, Language Proficiency Courses, Employment Training or Workforce Preparation;
- Health Services, Substance Abuse Prevention;
- Child Care Services;
- Special Needs Services, such as Transportation of Elderly/Disabled Persons, Senior Adult Programs, Meals on Wheels, or Youth Care Services;
- Affordable Housing Activities, such as the development of Affordable Housing, First-Time Homebuyer Assistance Programs, Housing Rehabilitation, Homeownership Counseling Services, and Community Housing Development Organizations (CHDO);
- Public Facilities and Improvement Activities, such as Public Facilities, Infrastructure, or Neighborhood Centers within the eligible Low-Income Target Area;
- Homeless Assistance, such as Supportive Services for homeless individuals, Domestic Violence Victims, Child Care, and Employment Preparation to transition homeless individuals to self-sufficiency.

*Priority funding areas may be subject to change based upon public input.

The Community Development Department will distribute and provide an overview of the application packet during the workshops scheduled as follows:

CDBG/HOME/ESG Application Workshops	Location
Friday, March 2, 2018	City of Pasadena Council Chambers
Workshop #1: 10:00 A.M.	1149 Ellsworth Dr.
Workshop #2: 2:00 P.M.	Pasadena, TX 77506

All non-profit, subrecipients, City Departments and other organizations interested in applying for grant funds must register for and attend ONE of the MANDATORY workshops scheduled above. Applications will NOT be accepted by agencies not in attendance. To register for one of the above mentioned workshops, contact the Community Development Office at (713) 475-7294 or Councilor@pasadenatx.gov.

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communication aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled workshop date. A Spanish speaker will be present during the workshop upon 24 hour request.

Para obtener más información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, se traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
PROGRAMA CONSOLIDADO 2018 DE CDBG/HOME/ESG
PLANIFICACION Y PROCESO DE APLICACIÓN PARA ORGANIZACIONES SIN FINES DE LUCRO/SUB-BENEFICIARIOS

La Ciudad de Pasadena espera recibir aproximadamente $3,000,000 en subsidios federales para el año 2018: Programa de Subvención de Desarrollo Comunitario (CDBG) ($1,545,045), Programa de Asociados de Inversión (HOME) ($500,777) y Programa de Concesión de Soluciones de Emergencia (ESG) ($142,000).

El Departamento de Desarrollo Comunitario de la Ciudad de Pasadena comenzará el proceso de planificación y desarrollo para el Programa Consolidado del año 2018 CDBG/HOME/ESG. Fondos serán priorizados en beneficio a los residentes de bajos a moderados ingresos dentro de la ciudad de Pasadena. Cada proyecto va a producir los resultados que proporcionan un impacto a las necesidades de la comunidad como se indica en el Plan Consolidado de Cinco Años 2018-2022.

Prioridades de financiamiento incluyen:
- Servicios de educación básica para adultos como cursos de GED/ESL, cursos para dominio del idioma, entrenamiento laboral o preparación de cursos de oficio
- Servicios de salud, prevención de abuso de sustancias;
- Servicios de cuidado infantil;
- Servicios de necesidad especial, como transportación a personas incapacitadas/ancianas, programas de adultos para personas mayores, comidas sobre ruedas, o servicios de cuidado para la juventud;
- Actividades de vivienda asequible, como el desarrollo de vivienda asequible, programas de asistencia para compradores de vivienda por primera vez, rehabilitación de vivienda, servicios de consejo para dueños de casa, y Organizaciones de Desarrollo de Vivienda Comunitaria (CHDO);
- Instalaciones públicas y actividades para mejora, como servicios públicos, infraestructura, o centros comunitarios dentro de la zona de bajos ingresos elegible;
- Asistencia a personas sin hogar, como servicios de apoyo para individuos sin hogar, víctimas de violencia doméstica, cuidado infantil, y preparación laboral para ayudar a personas sin hogar ser autosuficientes.

* Las áreas de financiación prioritarias pueden estar sujetas a cambios en función de los comentarios del público.

El Departamento de Desarrollo Comunitario distribuirá y proporcionará una visión general del paquete de aplicación en los talleres programados siguientes:

Talleres de Aplicación CDBG/HOME/ESG	Localización
Viernes, Marzo 2, 2018	Cámara de Concejales de la Ciudad de Pasadena
Taller #1: 10:00 A.M.	1149 Ellsworth Dr.
Taller #2: 2:00 P.M.	Pasadena, TX 77506

Todas agencias sin fines de lucro, sub-beneficiarios, Departamentos Municipales y otras organizaciones interesadas en aplicar para fondos debe registrarse y asistir a UNO de los talleres OBLIGATORIOS programados. Aplicaciones NO serán aceptadas por agencias que no asistan a uno de los talleres. Para inscribirse a uno de los talleres mencionados, comuníquese con la Oficina de Desarrollo Comunitario al (713) 475-7294 o por correo electrónico a Councilor@pasadenatx.gov.

De acuerdo con el Acta Americana de Discapacidad, individuos que necesiten acomodaciones especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. También, un traductor en Español estará presente durante el taller a petición de por lo menos 24 horas antes.

Para obtener más información sobre estos programas, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294.

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #1: 10:00 AM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
1.	Kayla Coberley	COP	X4994	KCoberley@ ci.pasadena.tx.us	Kayla Coberley
2.	Monica Martinez	COP	X7294	MaMartinez2@ ci.pasadena.tx.us	
3.	Sara Rogers	COP	X4910	SMZavala@ ci.pasadena.tx.us	Sara Rogers
4.	Stacey Rd7	COP	X2073	Srodriguez @ ci.pasadena.tx.us	
5.	Ron Williams	Southeast Texas HFC	2814844663	Rwilliams@ sethfc.com	
6.	Sylvia Cernosek	Sarahs House			
7.	Karen Bubing	Sarah's House			Karen J Bubing

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #1: 10:00 AM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
8.	Larry - Cernosek	Sarah's Home	832-655-5738	LCwrecker@comcast.net	Larry Cernosek
9.	Millie Edwards	Sarah's House	713.475.1480	emillie74@yahoo.com	Millie Edwards
10.	LouAnn Nolan	MJSC/MuseumRides	713-475-0175	lnolan@ci.pasadena.tx.us	L. Nolan
11.	LUCY TURFF	PASADENA HERITAGE PARK + MUSEUM	PASADENA HISTORICAL SOC. 713-472-0305 PASADENA HERITAGE PARK & MUSEUM	pasadenazedna@peoplepc.com	
12.	Jesse Sanchez	Transportation Rides Program	713-[illegible]-0175	jsanchez@ci.pasadena.tx.us	Jesse Sanchez
13.	Marie Estrada	CUP/PW	713-475-4817	MEstrada@ci.pasadena.tx.us	
14.	Ana Espinoza	CUP/PW	713-475-4955	aespinoza@ci.pasadena.tx.us	Ana Espinoza

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #1: 10:00 AM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
15.	Mike Maki	PARD	713.475.7048		
16.	Bonny Redus	HAUCDC	281 [illegible]	Hauc B.Redus	
17.	Curtis Wilson	HAUCDC	281-849-1550	c.wilson@haucdc.org	Curtis Wilson
18.	Selina Beller	City of Pasadena	713-475-7221	sbeller@ci.pasadena.tx.us	
19.	Jan Wheeler	jan@joyandhope	7138519792	jan@joyandhope.org	Jwheeler
20.	Becky Kyles	The Bridge	713-472-0753	rKyles@tbotw.org	RKyles

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #1: 10:00 AM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
21.	Melissa Quijano	City of Pasadena	713.475.4894	mquijano@ci.pasadena.tx.us	
22.	Angela Garcia	C.O.P.	713.475.7051	angarcia@ci.pasadena.tx.us	
23.					
24.					
25.					
26.					
27.					

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #2: 3:00 PM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
1.	Kayla Coberley	COP	x4994	KCoberley@ Ci.pasadena.tx.us	Kayla Coberley
2.	Monica Martinez	COP	x7294	mamartinez@ Ci.pasadena.txus	
3.	Sara Rogers	COP	x4910	SMZavala@ ci.pasadena.txus	Sara Rogers
4.	Stacey Rodriguez	CD	x2073	srodriguez@ ci.pasadena.tx.us	
5.	Angela Garcia	COP	x7051	angarcia@ ci.pasadena.tx.us	
6.	Melissa Quyano	COP	4894	mquyano@ ci.pasadena.tx.us	
7.	Ben Mont	The Bridge	409-996-8275	bmontin@tbotw.org	Ben Mont

COMMUNITY DEVELOPMENT
Pasadena, Texas

City of Pasadena Community Development

CDBG/HOME/ESG Application Workshop

Friday, March 2, 2018 – Workshop #2: 3:00 PM

	Contact Name (Please Print)	Agency (Please Print)	Phone Number	Preferred E-mail	Signature
8.	Michelle Solazar-Martinez	Baker Ripley	713-669-5328	msmartinez@bakerripley.org	
9.	Kelley Howell	Strawberry Rx	(713) 740-9033	Strawberry Rx @SBCglobal.net	
10.	Samantha Coats	The Bridge	(281) 787-5662	Coats.Samantha@gmail.com	Samantha Coats
11.	Yendi Herrera	North Pasadena Community Outreach	(847)668-2798 713)473-6300	npcotx@gmail.com	
12.					
13.					
14.					

PUBLIC NOTICE
City of Pasadena
Community Development
Citizen Review Public Hearings

The City of Pasadena is committed to providing opportunities for its citizens to participate in an advisory role in the planning, implementation and assessment of programs administered through the Community Development Department. Citizen participation is essential for a viable program.

The Community Development Department would like to extend an invitation to all residents, businesses, service providers and local non-profits within the City of Pasadena to attend a Citizen Review Public Hearing. We would like to hear your experiences in our program, interests in becoming a part of our program and what services you feel would benefit our community throughout the upcoming Program Years 2018-2022.

Public hearings will be held by the City of Pasadena Community Development Department:

City Hall - Multipurpose Room (#236)
1149 Ellsworth Dr.
Pasadena, TX 77506

April 12, 2018
10:00 – 11:00 a.m. and 2:00 – 3:00 p.m.

The public is encouraged to attend the hearings and/or submit written comments. Please submit all written comments to the following:

Community Development Department
ATTN: Citizen Review
P.O. Box 672, Pasadena,
TX 77501

E-Mail: CommDev@ci.pasadena.tx.us
Phone: (713) 475-7294
Fax: (713) 475-7037

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled hearing date. The City will provide assistance and/or translations for all non-English speaking residents, with requests made to the Community Development Department.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294. También, un traductor en Español estará presente durante la audiencia pública a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
Ciudad de Pasadena
Desarrollo Comunitario
Audiencias Públicas para Evaluación del Ciudadano

La Ciudad de Pasadena está comprometida a proveer oportunidades a sus ciudadanos a participar en una función de asesoramiento en la planificación, implementación y evaluación de programas administrados por el Departamento de Desarrollo Comunitario. La participación ciudadana es esencial para un programa viable.

El Departamento de Desarrollo Comunitario le gustaría extender una invitación a todos los residentes, negocios, prestadores de servicios y organizaciones locales sin fines de lucro dentro de la Ciudad de Pasadena para asistir a una Audiencia Pública para Evaluación del Ciudadano. Nos gustaría escuchar sus experiencias en nuestro programa, los intereses de formar parte de nuestro programa y los servicios que considera que beneficiarían a nuestra comunidad a lo largo de los próximos Años del Programa 2018-2022.

Audiencias Públicas se llevaran a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

Alcaldia Municipal - Sala de Juntas Multiusos (Numero de Cuarto 236)
1149 Ellsworth Dr.
Pasadena, TX 77506

Abril 12, 2018
10:00 – 11:00 a.m. y 2:00 – 3:00 p.m.

Se alienta al público a asistir a las audiencias o presentar observaciones por escrito. Por favor, envíe los comentarios por escrito al siguiente:

Departamento de Desarrollo Comunitario
ATN: Evaluación del Ciudadano
P.O. Box 672
Pasadena, TX 77501

Correo Electrónico:
CommDev@ci.pasadena.tx.us
Teléfono: (713) 475-7294
Fax: (713) 475-7037

De acuerdo con el Acta Americana de Des habilidad, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. La Ciudad ofrecerá asistencia y/o traducciones para todos los residentes que no hablen inglés, peticiones se pueden realizar con el Departamento de Desarrollo Comunitario por lo menos 24 horas antes.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294.

HC MEDIA GROUP
HEARST

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS:

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personall appeared, the Newspaper Representative at the HOUSTON CHRONICLE, a daily newspaper published i Harris County, Texas, and generally circulated in the Counties of: HARRIS, TRINITY, WALKER, GRIMES POLK, SAN JACINTO, WASHINGTON, MONTGOMERY, LIBERTY, AUSTIN, WALLER, CHAMBERS, COLORADO, BRAZORIA, FORT BEND, GALVESTON, WHARTON, JACKSON, and MATAGORDA and that the publication, of which the annexed herein, or attached to, is a true and correct copy, was publishe to-wit:

CITY OF PASADENA/COMMUNIT 0000165976 HC058760321
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SIZE BEING: 3 x88 L

Product	Date	Class	Page
CNPC-Pasadena Citizen	Mar 25 2018	Legal Notices	

Victoria Bond A/R Clerk
NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 31st Day of March A.D. 2018

CHARLES E WALICHOWSKI NOTARY PUBLIC STATE OF TEXAS EXPIRES MAY 19, 2018

Charles E Walichowski
Notary Public in and for the State of Texas

LEGALS

LEGAL NOTICES

PUBLIC NOTICE
City of Pasadena
Community Development
Citizen Review Public Hearings

The City of Pasadena is committed to providing opportunities for its citizens to participate in an advisory role in the planning, implementation and assessment of programs administered through the Community Development Department. Citizen participation is essential for a viable program.

The Community Development Department would like to extend an invitation to all residents, businesses, service providers and local non-profits within the City of Pasadena to attend a Citizen Review Public Hearing. We would like to hear your experiences in our programs, interests in becoming a part of our program and what services you feel would benefit our community throughout the upcoming Program Years 2018-2022.

Public hearings will be held by the City of Pasadena Community Development Department:

City Hall - Multipurpose Room (#236)
1149 Ellsworth Dr.
Pasadena, TX 77506

April 12, 2018
10:00 - 11:00 a.m. and 2:00 - 3:00 p.m.

The public is encouraged to attend the hearings and/or submit written comments. Please submit all written comments to the following:

Community Development Department
ATTN: Citizen Review
P.O. Box 672, Pasadena, TX 77501

E-Mail: CommDev@pasadenatx.gov
Phone: (713) 475-7294
Fax: (713) 475-7037

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2988 (TDD) or 1-800-735-2989 (VOICE), at least 24 hours in advance of scheduled hearing date. The City will provide assistance and/or translations for all non-English speaking residents, with requests made to the Community Development Department.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294. También, un traductor en Español estará presente durante la audiencia pública a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
Ciudad de Pasadena
Desarrollo Comunitario
Audiencias Públicas para Evaluación del Ciudadano

La Ciudad de Pasadena está comprometida a proveer oportunidades a sus ciudadanos a participar en una función de asesoramiento en la planificación, implementación y evaluación de los programas administrados por el Departamento de Desarrollo Comunitario. La participación ciudadana es esencial para un programa viable.

El Departamento de Desarrollo Comunitario le gustaría extender una invitación a todos los residentes, negocios, proveedores de servicios y organizaciones locales sin fines de lucro dentro de la Ciudad de Pasadena para asistir a una Audiencia Pública para Evaluación del Ciudadano. Nos gustaría escuchar sus experiencias en nuestros programas, los intereses de formar parte de nuestro programa y los servicios que considera que beneficiarían a nuestra comunidad a lo largo de los próximos Años del Programa 2018-2022.

Audiencias Públicas se llevarán a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

Alcaldía Municipal - Sala de Juntas Multiusos (Número de Cuarto 236)
1149 Ellsworth Dr,
Pasadena, TX 77506

Abril 12, 2018
10:00 - 11:00 a.m. y 2:00 - 3:00 p.m.

Se alienta al público a asistir a las audiencias o presentar observaciones por escrito. Por favor, envíe los comentarios por escrito al siguiente:

Departamento de Desarrollo Comunitario
ATTN: Proyecto del Ciudadano
P.O. Box 672
Pasadena, TX 77501

Correo Electrónico
CommDev@pasadenatx.gov
Teléfono: (713) 475-7294
Fax: (713) 475-7037

De acuerdo con el Acta Americana de Dos habilidad, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294, o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2988 (TDD) o 1-800-735-2989 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. La Ciudad ofrecerá asistencia y/o traducciones para todos los residentes que no hablen inglés, peticiones se pueden realizar con el Departamento de Desarrollo Comunitario por lo menos 24 horas antes.

Para obtener más información sobre estos programas, puede contactar al Departamento de Desarrollo Comunitario al (713) 475-7294.

Legal Notice

REQUEST OF PROPOSAL
PROPOSER NO. 18-006

The City of Pasadena, Texas intends to purchase and invites you to submit a sealed Proposal for:

Campbell Hall Renovations and Repair

Sealed Proposers in duplicate will be received by the City of Pasadena, Texas on or before 2:00 p.m. CST, Monday, April 2, 2018 in the Office of the City Secretary, 1149 Ellsworth Dr., Suite 200, Pasadena, Texas 77506. **Proposals will be publicly opened and read on Tuesday, April 3, 2018 at 2:00 p.m.** in Room 236, 2nd floor, City Hall, 1149 Ellsworth Dr., Pasadena, TX 77506.

Request for Proposal documents may be obtained via the Internet by contacting **Demand Star.com** or from the City of Pasadena Purchasing Department web page at **www.pasadenatx.gov**. If you do not have internet access, you may obtain the documents by contacting the Purchasing Office at 1149 Ellsworth Dr., Pasadena, Texas, 77506, (713) 475-5532.

Proposals may be either mailed or hand delivered to the City Secretary's Office, 1149 Ellsworth Dr., Suite 200, Pasadena, TX 77506. Any Proposal received after the above stated time will be returned to the Proposer unopened.

The City Council reserves the right to waive any informalities or minor irregularities; reject any and all Proposals which are incomplete, conditional, obscure, or which contain additions not allowed for; accept or reject any Proposal in whole or in part with or without cause; and accept the Proposal which best serves the City.

A pre-submittal conference will be conducted on **Tuesday, March 27, 2018 at 10:00 A.M.** at Campbell Hall, located at 7600 Redbluff, Pasadena, TX 77501 to answer questions regarding the Proposer requirements. All prospective Proposer are encouraged to attend. Non-attendance on the part of a Proposer shall not relieve the Proposer of any responsibility for adherence to the provisions of this proposal packages or any addenda hereto.

CAUTION: It is the Proposer's responsibility to ensure that Proposals are received in the City Secretary's Office prior to the date and time specified above. Receipt of a Proposer/proposal in any other City office does not satisfy this requirement.

Published in the Pasadena Citizen & on the City of Pasadena Website

Publish: March 18, 2018 & March 25, 2018

NOTICE TO BIDDERS

Sealed proposal, addressed to the CITY OF PASADENA, TEXAS, for the following:

SYCAMORE WELL REHABILITATION PROJECT
CIP # W088

For the CITY OF PASADENA, TEXAS, hereinafter called "OWNER" will be received at the office of the CITY SECRETARY, 1149 Ellsworth Drive, 2nd Floor, Pasadena, Texas until **2:00 p.m.**, the day of **THURSDAY, APRIL 5, 2018**, and then will be publicly opened and read aloud on **TUESDAY, APRIL 10, 2018** at **2:00 p.m.** at 1149 Ellsworth Drive, 2nd Floor Suite 236. Any bid received after the closing time will be returned unopened.

Plans and specifications are available from the Public Works Department, currently located at 1149 Ellsworth Drive, 5th Floor, Pasadena, Texas, 77506 at no charge.

No bids may be withdrawn after the scheduled closing time for receiving of bids, for at least thirty (30) days.

The "OWNER" reserves the right to reject any and/or all bids and to waive formalities.

Publish: **MARCH 18, 2018 & MARCH 25, 2018**

MANDATORY PRE-BID MEETINGS – BIDDERS ARE REQUIRED TO ATTEND BOTH PRE-BID MEETINGS:

Tuesday, MARCH 27, 2018 at 11:00 a.m.
Thursday, MARCH 29, 2018 at 11:00 a.m.

Conference Room, 1149 Ellsworth Drive, 5th Floor, Pasadena, Texas 77506

Legal Notice

NOTICE TO PROPOSERS
PROPOSAL NO. 18-008

The City of Pasadena, Texas intends to purchase and invites you to submit a sealed Proposal for:

Emergency Debris Removal

Sealed Proposals in duplicate will be received by the City of Pasadena, Texas on or before 2:00 p.m. CST, Monday, April 2, 2018 in the Office of the City Secretary, 1149 Ellsworth Dr., Suite 200, Pasadena, Texas 77506. **Proposals will be publicly opened and read on Tuesday, April 3, 2018 at 2:00 p.m.** in Room 236, 2nd floor, City Hall, 1149 Ellsworth Dr., Pasadena, TX 77506.

Invitation for Proposals documents may be obtained via the Internet by contacting **Demand Star.com** or from the City of Pasadena Purchasing Department web page at **www.pasadenatx.gov**. If you do not have internet access, you may obtain the documents by contacting the Purchasing Office at 1149 Ellsworth Dr., Pasadena, Texas, 77506, (713) 475-5532.

Proposals may be either mailed or hand delivered to the City Secretary's Office, 1149 Ellsworth Dr., Suite 200, Pasadena, TX 77506. Any Proposals received after the above stated time will be returned to the Proposer unopened.

The City Council reserves the right to waive any informalities or minor irregularities; reject any and all Proposals/proposals which are incomplete, conditional, obscure, or which contain additions not allowed for; accept or reject any Proposals/proposal in whole or in part with or without cause; and accept the Proposal/proposal which best serves the City.

CAUTION: It is the Proposer's/proposer's responsibility to ensure that Proposals/proposals are received in the City Secretary's Office prior to the date and time specified above. Receipt of a Proposal/proposal in any other City office does not satisfy this requirement.

Published in the Pasadena Citizen & on the City of Pasadena Website

Publish: March 18, 2018 & March 25, 2018

The following vacant property has accumulation or growth of high grass, weeds, rubbish, carrion flies, brush and debris and / or stagnant water. These violations must be removed or remedied from the entire property. If you are the owner or know how to contact the owner, please contact the Pasadena Health Department at 713-475-5529.

1. 4825 Cedar Rd., Lt 2 Blk 25 El Jardin Sec 1, Seabrook, Tx 77586
2. 0 Cedar Rd., Lt 3 Blk 25 El Jardin Sec 1, Seabrook, TX 77586
3. 4823 Cedar Rd., Lt 4 Blk 25 El Jardin Sec 1, Seabrook, TX 77586
4. 2838 Raspberry Ln, Lt 29 Blk 5 Fairview Manor Sec 2, Pasadena, TX 77502

NOTICE TO BIDDERS

Sealed proposal, addressed to the CITY OF PASADENA, TEXAS, for the following:

PANSY STREET PAVING, DRAINAGE AND UTILITIES IMPROVEMENT PROJECT
CIP # S048

For the CITY OF PASADENA, TEXAS, hereinafter called "OWNER" will be received at the office of the CITY SECRETARY, 1149 Ellsworth Drive, 2nd Floor, Pasadena, Texas until **2:00 p.m.**, the day of **THURSDAY, APRIL 5, 2018**, and then will be publicly opened and read aloud on **TUESDAY, APRIL 10, 2018** at **2:00 p.m.** at 1149 Ellsworth Drive, 2nd Floor Suite 236. Any bid received after the closing time will be returned unopened.

Plans and specifications may be procured from the Public Works Department, currently located at 1149 Ellsworth Drive, 5th Floor, Pasadena, Texas, 77506 for a charge of $150.00 per set, checks payable to City of Pasadena.

No bids may be withdrawn after the scheduled closing time for receiving of bids, for at least thirty (30) days.

The "OWNER" reserves the right to reject any and/or all bids and to waive formalities.

Publish: **MARCH 25, 2018 & APRIL 1, 2018**

MANDATORY PRE-BID MEETINGS – BIDDERS ARE REQUIRED TO ATTEND BOTH PRE-BID MEETINGS:

Tuesday, APRIL 3, 2018 at 10:00 a.m.
Thursday, APRIL 5, 2018 at 10:00 a.m.

Conference Room, 1149 Ellsworth Drive, 5th Floor, Pasadena, Texas 77506

NOTICE TO BIDDERS

Sealed proposals, addressed to the PASADENA SECOND CENTURY CORPORATION d/b/a PASADENA ECONOMIC DEVELOPMENT CORPORATION, for the following:

UTILITY DEVELOPMENT PROJECT
CIP # W088

For the PASADENA SECOND CENTURY CORPORATION d/b/a PASADENA ECONOMIC DEVELOPMENT CORPORATION, hereinafter called "OWNER" will be received at the office of the CITY SECRETARY, 1149 Ellsworth Drive, 2nd Floor, Pasadena, Texas until **2:00 P.M.**, the day of **Monday, April 9, 2018**, and then will be publicly opened and read aloud on **Tuesday, April 10, 2018** at **2:00 P.M.** at 1149 Ellsworth Drive, 2nd Floor Suite 236. Any bid received after the closing time will be returned unopened.

Plans and specifications are available from the Public Works Department, currently located at 1149 Ellsworth Drive, 5th Floor, Pasadena, Texas, 77506 at no charge.

No bids may be withdrawn after the scheduled closing time for receiving of bids, for at least thirty (30) days.

The "OWNER" reserves the right to reject any and/or all bids and to waive formalities.

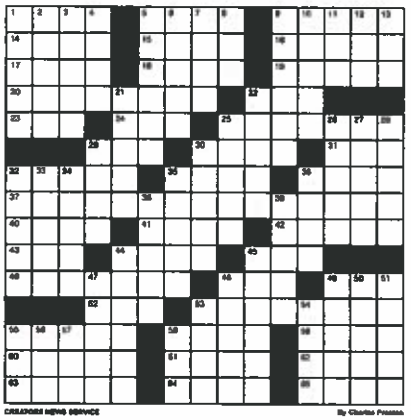
Publish: **MARCH 18, 2018 AND MARCH 25, 2018**

MANDATORY PRE-BID MEETINGS – BIDDERS ARE REQUIRED TO ATTEND BOTH PRE-BID MEETINGS:

TUESDAY, MARCH 27, 2018 at 10:00 A.M.
THURSDAY, MARCH 29, 2018 at 10:00 A.M.

Conference Room, 1149 Ellsworth Drive, Fifth Floor, Pasadena, Texas 77506

Marine Life



CREATORS NEWS SERVICE — By Charles Preston

ACROSS

1 Jason's ship
5 Feel pain
9 Idaho's capital
14 Aviary resident
15 Lure
16 Activist actor
17 Away from the wind
18 Hawaiian city
19 Stair part
20 First commercially successful steamboat
22 Malt beverage
23 Understanding
24 Mine output
25 First cup-winning yacht
29 Possessive pronoun
30 Room or pen
31 Avuncular nickname
32 Heidi's creator
35 The south of France
36 Seaweed
37 Bogart-Hepburn conveyance
40 Aspirations
41 Feedbag contents
42 Extreme
43 Diminutive noun ending
44 Night prowlers
45 Free from
46 Heyerdahl's craft
48 One of the Three Stooges
49 Greek letter
52 Owns
53 Captain Nemo's submarine
55 Woodland deity
58 Clark Kent's fellow employee
59 SA tree
60 Radolence
61 Green Gables girl
62 Ugandan dictator
63 Instrument of 55 Across
64 Tare
65 1492 vessel

DOWN

1 Startle, with take
2 Lunar depression
3 Envy's color
4 River of central Europe
5 Detests
6 Captain Queeg's mutinous ship
7 Weapon handle
8 DDE's command
9 Whiskey ingredient
10 Willow
11 Power people
12 Notice
13 Stray
21 Theme
22 Speedily: arch.
25 Acting father and son
26 Cay
27 Basketball player
28 Iowa community
28 Security packets?
30 Early inhabitants of Britain
32 Host of *Unsolved Mysteries*
33 S.S. Van Dyne's detective Vance
34 Arab republic
35 Home of the Dolphins
36 ___ *Lang Syne*
38 Chess pieces
39 Hushed
44 Royal adornments
45 Alerted
47 Aromatic herb
48 1898 American battleship
49 Oily resin
50 Shroud of ___
51 Yoga position
53 Not a soul
54 Russian czar
55 Enervate
56 Greek shipping magnate
57 Acme
58 Order's sidekick

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HOUSTON COMMUNITY NEWSPAPERS & HERALD GROUP
A Division of the Houston Chronicle

Citizen Review Public Hearing
April 12, 2018 at 10:00 a.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Sara Rogers	713-475-4910	Community Development	SMZavala@ci.pasadena.tx.us
Kayla Coberley	x 4994	Community Development	Kcoberley@ci.pasadena.tx.us

Citizen Review Public Hearing
April 12, 2018 at 2:00 p.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Sara Rogers	713-475-4910	Community Development	SMZavala@ci.pasadena.tx.us
Kayla Coberley	x4994	community Development	KCoberley@ci.pasadena.tx.us

COMMUNITY DEVELOPMENT
Pasadena, Texas

Needs Assessment Survey

The City of Pasadena Community Development Department is conducting a resident survey to identify community needs and priorities for th expenditure of federal funds from the U.S. Department of Housing and Urban Development (HUD). These funds can be used for housing an community development projects. The Community Development Department wants you to have a voice in how the City invests this money. Pleas assist us by considering the needs of your community and ranking the following priorities as low, medium or high; please add any needs not liste on the survey. The survey results will be one tool used to develop the 2018-2022 Consolidated Plan, a strategic plan that aligns resources with need

	Low	Med	High
HOUSING			
Residential Rehabilitation			
Homeownership Assistance			
Housing for Disabled			
Senior Housing			
Large Family Housing			
Veteran Housing			
Fair Housing			
Lead-Based Paint Test/Abatement			
Residential Historic Preservation			
Affordable Rental Housing			
Energy Efficiency Improvements			
COMMUNITY FACILITIES			
Senior Centers			
Youth Centers			
Child Care Centers			
Park & Recreational Facilities			
Health Care Facilities			
Community Centers			
Fire Stations & Equipment			
INFRASTRUCTURE			
Drainage Improvement (Flooding)			
Water/Sewer Improvement			
Street Improvement			
Sidewalk Improvement			
Street Lighting			
OTHER NEEDS			
Other _____			
Other _____			

TELL US...

What is your zip code? _____

Do you represent an organization? If so, which one?

_____

	Low	Med	High
COMMUNITY SERVICES			
Senior Activities			
Youth Activities			
Child Care Services			
Transportation Services			
Anti-Crime Programs			
Health Services			
Mental Health Services			
Legal Services			
Educational Services			
NEIGHBORHOOD SERVICES			
Trash & Debris Removal			
Graffiti Removal			
Tree Planting			
Parking Facilities			
Clean-Up of Abandoned Building & Lots			
SPECIAL NEEDS SERVICES			
Centers/Services for Disabled			
Accessibility Improvement			
Domestic Violence Services			
Substance Abuse Services			
Homeless Shelter/Services			
HIV/AIDS/Services			
Neglected/Abused Children Services			
BUSINESS & JOBS			
Start-Up Business Assistance			
Small Business Loans			
Job Creation/Retention			
Employment Training			
Commercial/Industrial Rehabilitation			
Façade Improvements			
Business Mentoring			

THANK YOU for completing the resident survey. Please return the completed survey form to:

Mail **Community Development Department**
P.O. Box 672
Pasadena, TX 77501-0672

OR

Email CommDev@ci.pasadena.tx.us

OR

Fax **713-475-7037**

COMMUNITY DEVELOPMENT
Pasadena, Texas

Encuesta de evaluacion de necesidades

El Departamento de Desarrollo Comunitario de la Ciudad de Pasadena está llevando a cabo una encuesta entre residentes para identificar las necesidades y prioridades para el gasto de fondos federales del Departamento de Vivienda y Desarrollo Urbano (HUD) de EE. UU. Estos fondos pueden usarse para proyectos de vivienda y desarrollo comunitario. El Departamento de Desarrollo de la Comunidad quiere que tenga voz en cóm la Ciudad invierte este dinero. Ayúdenos a considerar las necesidades de su comunidad y clasificar las siguientes prioridades como baja, media o alta; por favor agregue cualquier necesidad que no esté incluida en la encuesta. Los resultados de la encuesta serán una herramienta utilizada para desarrollar el Plan Consolidado 2018-2022, un plan estratégico que alinea los recursos con las necesidades.

	Bajo	Med	Alto
ALOJAMIENTO			
Rehabilitación residencial			
Asistencia para la propiedad de vivienda			
Vivienda para discapacitados			
Vivienda para personas mayores			
Vivienda familiar grande			
Vivienda de Veteranos			
Vivienda Justa			
Prueba / reducción de pintura a base de plomo			
Residencia Histórica Residencial			
Vivienda de alquiler asequible			
Mejoras en la eficiencia energética			
INSTALACIONES COMUNITARIAS			
Centros juveniles			
Centros de cuidado infantil			
Instalaciones de parques y recreativas			
Centros medicos			
Centros comunitarios			
Estaciones de bomberos y equipo			
INFRAESTRUCTURA			
Mejora del drenaje (Inundación)			
Mejora del agua / alcantarillado			
Mejora de la calle			
Mejora de la acera			
Alumbrado público			
OTRAS NECESIDADES			
Otro _____			
Otro _____			

DIGANOS...

Cual es su codigo postal? _____

Representa a una organizacion? Y si es asi, cual?

_____

	Bajo	Med	Alto
SERVICIOS COMUNITARIOS			
Actividades para mayores			
Actividades para juveniles			
Servicios de cuidado infantil			
Servicios de transporte			
Programas contra la delincuencia			
Servicios de salud			
Servicios de salud mental			
Servicios jurídicos			
Servicios educativos			
SERVICIOS VECINOS			
Plantación de árboles			
Eliminación de basura y escombros			
Eliminacion de Graffiti			
Facilidades de estacionamiento			
Limpieza de edificios abandonados y lotes			
SERVICIOS DE NECESIDADES ESPECIALES			
Centros / servicios para descapasitados			
Mejora de accesibilidad			
Servicios de violencia domestica			
Servicios de abuso de substancias			
Refugio / Servicios para personas sin hogar			
VIH / SIDA / Servicios			
Servicios para ninos desatendidos / abusados			
NEGOCIOS Y TRABAJOS			
Asistencia de negocios en marcha			
Prestamos para pequenas empresas			
Creacion de empleo / Retencion			
Entrenamiento de empleo			
Rehabilitación Comercial / Industrial			
Mejoras de fechadas			
Tutoria de negocios			

GRACIAS por completar la encuesta de residentes. Por favor, devuelva el formulario de encuesta completo a:
Correo: **Community Development Department P.O Box 672, Pasadena, TX 77501-0672 OR** ***Email:*** CommDev@ci.pasadena.tx.us

PUBLIC NOTICE
City of Pasadena

Proposed Five Year Consolidated Plan (2018 - 2022)
Proposed Annual Action Plan (2018)
Citizen Review Public Hearings

Five Year Consolidated Plan

The 2018 – 2022 Consolidated Plan represents the City of Pasadena's vision for improving the quality of life in Pasadena, particularly in the low- and moderate-income areas. It provides useful information about current conditions within the city, and identifies its strengths and weaknesses on community and economic development issues. The Consolidated Plan also explains the long-term goals and objectives for improving the infrastructure, housing, quality of life of financially challenged residents, and states its specific plans for making improvements throughout the next five years.

Annual Action Plan

The City of Pasadena is expected to receive $2,335,129 in federal grants for program year 2018: Community Development Block Grant (CDBG) $1,652,416; Home Investment Partnerships Program (HOME) $544,284 and Emergency Solutions Grant (ESG) Program $138,429. The City is projecting to receive $65,000.00 in Program Income through loan repayments under the HOME Housing Rehabilitation Program.

Community Development Objectives for the 2018-2022 Consolidated Plan

The 2018-2022 Consolidated Plan represents the City's ambition to improve the quality of life for residents, primarily in the low-income areas of Pasadena. As required by HUD, each activity is linked to one of three federal program objectives: 1) decent housing, 2) suitable living environments, or 3) economic development. Each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability. The City hopes to achieve these objectives and outcomes in the five year period through the activities listed below:

- Rehabilitate degrading infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents;
- Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low-income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts;
- Reduce homelessness by providing supportive services through local shelters and non-profit agencies;
- Strengthen neighborhoods by investing in public service activities benefiting the community, including those with special needs; and
- Ensure fair housing choice opportunities to all residents of Pasadena.

In order to address these needs, the City of Pasadena has developed goals and measurable outcomes in housing, rapid re-housing, emergency shelter, public facility improvements and public services.

The City is committed to the proper implementation of a balanced Community Development Program that maximizes benefit to low-income persons both directly and through the improvements of their neighborhoods. By providing decent housing, suitable living environments and supportive services, the City of Pasadena intends to improve our low-income neighborhoods and provide our citizens with the needed resources to assist them in breaking both generational and circumstantial poverty.

The following specific projects and activities are proposed to be funded which will address the community needs identified above.

2018 Community Development Block Grant (CDBG) $1,652,416

	Allocations
Public Facilities & Improvements	
A. Wafer Street Paving and Drainage Improvements Project	$1,036,674.82
Public Services	
A. Transportation Services for Elderly and Disabled Persons	$185,257.98
B. Sarah's House Operational Services	$ 62,604.42
Program Administration	
A. CDBG Program Administration	$330,483.20
B. Housing Rehabilitation Administration	$ 37,395.58

2018 Home Investment Partnerships Program (HOME) $544,284

Housing Rehabilitation Services	**$239,855.60**
Community Housing Development Organization (CHDO) Set Aside	
A. To Be Determined	$250,000.00
HOME Program Administration	
A. HOME Program Administration	$54,428.40

2018 Emergency Solutions Grants (ESG) $138,429

Program	
A. Rapid Re-housing	$44,989.42
B. Emergency Shelter	$83,057.40
Administration	
A. ESG Program Administration	$10,382.18

2018 *Anticipated* Program Income

HOME	**Estimated Revenue**
Housing Rehabilitation Loan Repayments	$65,000.00

We would like to encourage participation from residents, local non-profit organizations and businesses within the City of Pasadena. Public hearings will be held by the City of Pasadena Community Development Department:

City Hall – Multipurpose Room (#236)
1149 Ellsworth Dr.
Pasadena, TX 77506
June 18, 2018
10:00 a.m. – 11:00 p.m. and 2:00 p.m. – 3:00 p.m.

Citizens may request a copy of the proposed 2018-2022 Consolidated Plan and the 2018 Annual Action Plan by contacting the City of Pasadena Community Development Department at 713-475-7294. If a Spanish translation of the proposed document is requested, please allow a 24 hour notice for processing. A copy of the plan will also be posted on the City of Pasadena website at www.ci.pasadena.tx.us and hard copies will be made available for review at:

City of Pasadena City Hall - Community Development Department
1149 Ellsworth, Fifth Floor
Pasadena, Texas 77506

City of Pasadena City Hall - City Secretary
1149 Ellsworth, Second Floor
Pasadena, Texas 77506

City of Pasadena Main Public Library
1201 Jeff Ginn Memorial Dr.
Pasadena, Texas 77506

City of Pasadena Fairmont Library
4330 Fairmont Pkwy.
Pasadena, Texas 77504

The public is encouraged to attend the hearings and/or submit written comments. The 30 day comment period will begin **June 4, 2018** and end **July 3, 2018**. All comments must be received by the Community Development Department, P.O. Box 672, Pasadena, TX 77501 or via email at CommDev@ci.pasadena.tx.us no later than 4:00 p.m. on **July 3, 2018** for consideration of the Community Development Advisory Board.

In compliance with the American Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled hearing date. The City will provide assistance and/or translations for all non-English speaking residents, with requests made to the Community Development Department.

Para obtener una copia de este aviso o cualquier otro material mencionado en español, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, un traductor en español estará presente durante la audiencia pública a petición de por lo menos 24 horas antes.

AVISO PÚBLICO
Ciudad de Pasadena

Plan Consolidado Propuesto de Cinco Años (2018 - 2022)
Plan de Acción Anual Propuesto (2018)
Revisión Ciudadana Audiencias Públicas

Plan Consolidado de Cinco Años

El Plan Consolidado 2018 – 2022 representa la visión de la Ciudad de Pasadena para mejorar la calidad de vida en Pasadena, particularmente en las áreas de ingresos bajos y moderados. Proporciona información útil de las condiciones actuales en la Ciudad, e identifica las fortalezas y debilidades en cuestiones sobre la comunidad y desarrollo económico. El plan consolidado también explica las metas y objetivos para mejorar la infraestructura, alojamiento, calidad de vida para residentes desafiados financieramente, y declara planes específicos para hacer mejoras entre los siguientes cinco años.

Plan de Acción Anual

La Ciudad de Pasadena anticipa recibir $2,335,129 en fondos Federales para el Año de Programa 2018: Community Development Block Grant (CDBG) $1,652,416; Home Investment Partnerships Program (HOME) $544,284; y Emergency Solutions Grant (ESG) Program $138,429. La Cuidad está proyectando recibir $65,000.00 en Ingresos de Programa; a través de reembolsos de préstamos de rehabilitación de vivienda bajo HOME Housing Rehabilitation Program.

Objetivos de Desarrollo Comunitario para el Plan Consolidado 2018 – 2022

El Plan Consolidado 2018 – 2022 representa la ambición de la Ciudad para mejorar la calidad de vida para los residentes, ante todo las áreas de bajos ingresos de Pasadena. Según lo requerido por HUD, cada actividad está vinculada a uno de tres objetivos de programas federales: 1) alojamiento decente, 2) ambientes de vida adecuados, o 3) desarrollo económico. Cada objetivo es emparejado con uno de tres resultados: 1) disponibilidad / accesibilidad, 2) asequibilidad, o 3) sostenibilidad. La Ciudad espera lograr estos objetivos entre un periodo de cinco años a través de las actividades enumeradas a continuación:

- Rehabilitar infraestructura degradante para mejorar la movilidad y reducir las condiciones peligrosas para los residentes de Pasadena;
- Desarrollar y mantener un suministro adecuado de viviendas seguras, sanitarias y decentes que sean asequibles y accesibles para los residentes dentro de las pautas de ingresos moderados utilizando fondos CDBG y HOME para ayudar con los esfuerzos de rehabilitación de la vivienda;
- Reducir la falta de vivienda brindando servicios de apoyo a través de refugios locales y agencias sin fines de lucro;
- Fortalecer los vecindarios mediante la inversión en actividades de servicio público que beneficien a la comunidad, incluidos aquellos con necesidades especiales;
- Asegurar oportunidades de elección de vivienda justa para todos los residentes de Pasadena.

Para abordar estas necesidades, la Ciudad de Pasadena ha desarrollado metas y resultados mensurables en la vivienda justa.

La Ciudad está comprometida a la implementación adecuada de un programa de Desarrollo Comunitario equilibrado que maximiza el beneficio a personas de bajos ingresos directamente y a través de las mejoras de sus barrios. Al proporcionar viviendas dignas, entornos de vida adecuados y servicios de apoyo, la Ciudad de Pasadena tiene la intención de mejorar nuestros barrios de bajos ingresos y proporcionar a nuestros ciudadanos los recursos necesarios para ayudarles a romper la pobreza generacional y circunstancial.

Se proponen financiar los siguientes proyectos y actividades específicos que abordarán las necesidades de la comunidad identificadas anteriormente.

2018 Community Development Block Grant (CDBG) $1,652,416

	Asignaciones
Facilidades y Mejorías Públicas	
A. Proyecto de Mejoras de Pavimentación y Drenaje en la calle Wafer	$1,036,674.82
Servicios Públicos	
A. Servicios de Transportación para Ancianos y Personas Discapacitadas	$185,257.98
B. Servicios de Operaciones de Sarah's House	$62,604.42
Administración Del Programa	
A. CDBG Administración del Programa	$330,483.20

B. Administración de Rehabilitación de Viviendas $37,395.58

2018 Programa de asociación de inversión en el hogar (HOME) $544,284

Servicios de Rehabilitación de Viviendas **$239,855.60**

Community Housing Development Organization (CHDO) – Dejar a un lado
A. Por Ser Determinado $250,000.00
HOME Administración Del Programa
A. HOME Administración del Programa $54,428.40

2018 Emergency Solutions Grant (ESG) $138,429

Programa
A. Vivienda Rápida $44,989.42
B. Refugio de Emergencia $83,057.40
Administración
A. ESG Administración del Programa $10,382.18

2018 – Ingresos de Programa *Anticipados*

HOME	**Ingresos Estimados**
Reembolsos de Préstamos de Rehabilitación de Vivienda	$65,000.00

Se anima la participación de los residentes, organizaciones sin fines de lucro locales y negocios dentro de la Ciudad de Pasadena. Las audiencias públicas se llevarán a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

Sala de usos múltiples del ayuntamiento (#236)
City Hall – Multipurpose Room (#236)
1149 Ellsworth Dr.
Pasadena, TX 77506
Junio 18, 2018
10:00 a.m. - 11:00 a.m. y 2:00 p.m. – 3:00 p.m.

Los ciudadanos pueden solicitar una copia del plan consolidado 2018-2022 propuesto y también una copia del Plan de Acción Anual del 2018 contactando al Departamento de Desarrollo Comunitario de la Ciudad de Pasadena al 713-475-7294. Si se solicita una traducción al español del documento propuesto, por favor permita un aviso de 24 horas para su procesamiento. Una copia del plan también se publicará en el sitio web de la Ciudad de Pasadena en www.ci.pasadena.tx.us y copias estarán disponibles para revisión en:

Ciudad de Pasadena Edificio Municipal *Nuevo* – Departamento de Desarrollo Comunitario
1149 Ellsworth, Quinto Piso
Pasadena, Texas 77506

Ciudad de Pasadena – Secretaria de la Ciudad
1149 Ellsworth, Segundo Piso
Pasadena, Texas 77506

Ciudad de Pasadena – Biblioteca Central Pública
1201 Jeff Ginn Memorial Dr.
Pasadena, Texas 77506

Ciudad de Pasadena – Biblioteca en la Fairmont
4330 Fairmont Pkwy.
Pasadena, Texas 77504

Se alienta al público a asistir a las audiencias o presentar observaciones por escrito. El periodo para comentarios de 30 días comenzara **Junio 4, 2018** y se acabara **Julio 3, 2018**. Todos los comentarios deben ser enviados al Departamento de Desarrollo Comunitario, P.O. Box 672, Pasadena, TX 77501 o vía correo electrónico a CommDev@ci.pasadena.tx.us antes de las 4:00 p.m. del **Julio 3, 2018** para consideración del Consejo de Desarrollo Comunitario.

De acuerdo con el Acta Americana de Des habilidad, individuos que necesitan comodidades especiales (incluyendo ayudas y servicios comunicativos auxiliares) deben notificar al Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. La Ciudad ofrecerá asistencia y/o traducciones para todos los residentes que no hablen inglés, peticiones se pueden realizar con el Departamento de Desarrollo Comunitario

Para obtener una copia de este aviso o cualquier otro material mencionado en español, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, un traductor en español estará presente durante la audiencia pública a petición de por lo menos 24 horas antes.

HC MEDIA GROUP
HEARST corporation

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS:

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared, the Newspaper Representative at the HOUSTON CHRONICLE, a daily newspaper published in Harris County, Texas, and generally circulated in the Counties of: HARRIS, TRINITY, WALKER, GRIMES, POLK, SAN JACINTO, WASHINGTON, MONTGOMERY, LIBERTY, AUSTIN, WALLER, CHAMBERS, COLORADO, BRAZORIA, FORT BEND, GALVESTON, WHARTON, JACKSON, and MATAGORDA and that the publication, of which the annexed herein, or attached to, is a true and correct copy, was published to-wit:

CITY OF PASADENA/COMMUNIT 0000171309 HC058760321
RAN A LEGAL NOTICE
SIZE BEING: 6 x14.50 l (87.00l)

Product	Date	Class	Page
CNPC-Pasadena Citizen	Jun 03 2018	Legal Notices	

Victoria Bond AR Clerk
NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 3rd Day of June A.D. 2018

DELILAH METZGER 129823618 NOTARY PUBLIC STATE OF TEXAS EXPIRES MAY 19, 2022

Delilah Metzger
Notary Public in and for the State of Texas

LEGALS

LEGAL NOTICES

The following vacant property has accumulation or growth of high grass, weeds, rubbish, carrion filth, brush and debris and / or stagnant water. These violations must be removed or remedied from the entire property. If you are the owner or know how to contact the owner, please contact the Pasadena Health Department at 713-475-5629.

1. 3004 Lafferty Rd, TR 74C, Alta Vista Acres, Pasadena, TX 77502
2. 0 Westside Dr, TR 42A, Alta Vista Acres, Pasadena, TX 77502

LEGAL NOTICE

Pasadena Second Century Corporation
Pasadena, Texas
Advertisement for Bids

The Pasadena Second Century Corporation, a Type B economic development corporation, (the "PEDC") is accepting sealed bids for the sale of real property. Bids are to be addressed to the City Secretary's Office with the bid proposal name and bid proposal number marked on the outside of the envelope. Bids are to address the proposed use of the property and how the property will be financed or purchased. Late bids will be rejected as non-responsive. Bids will be publicly opened and read aloud on Tuesday, June 19, 2018 at 5:00 p.m. at 1149 Ellsworth Drive, 2nd Floor Suite 235, Pasadena, TX 77506. Bidders are invited to attend the sealed bid opening.

BID PROPOSAL NAME:	Munger Street Property/0.86 acre tracts of land
BID PROPOSAL NUMBER:	18-015
PROPERTY DESCRIPTION:	Being approximately 21,780 square feet or 0.50 acres of land and being all of Lots 22, 23 and 24 and the North ½ of Lot 21, Block 60 of the Townsite of Pasadena, an addition to the City of Pasadena, Harris County, Texas, and generally located at 102 Munger Street, Pasadena, Harris County, Texas (HCAD Property ID # 0282060000031).
DUE DATE/TIME:	Monday, June 18, 2018 at 4:00 p.m.
MAIL OR DELIVER TO:	Pasadena Second Century Corporation Attn: City Secretary's Office 1149 Ellsworth Drive, 2nd Floor Pasadena, Texas 77506

Invitation for Bids documents may be obtained via the Internet from the City of Pasadena Purchasing Department web page at www.ci.pasadena.tx.us or by contacting Purchasing@ci.pasadena.tx.us. If you do not have Internet access, you may obtain the documents by contacting the Economic Development Department at 1149 Ellsworth Dr., 4th Floor, Pasadena, Texas 77506, (713) 920-7987.

The PEDC reserves the right to reject any and all bids and to waive any informality in bids received, deemed to be in the best interest of the PEDC.

Published in the Pasadena Citizen June 3, 2018 and June 10, 2018

Sell Your Boat.



We can help you reach potential buyers.

Please Call 855-722-3900

LEGALS

BIDS & PROPOSALS

INVITATION TO BID

THE CITY OF SOUTH HOUSTON IS ACCEPTING SEALED BIDS FOR:

- CHLORINE (CL2) – ONE-TON CYLINDERS – (NEED APPROXIMATELY 60 TONS)
- BOILING BRIDGE (CL2) – ONE-TON CYLINDERS – (NEED APPROXIMATELY 60 TONS)
- CHLORINE (CL2) – 2000 CYLINDERS – (NEED APPROXIMATELY 400)
- NTH – 100-POUND PAILS (BUCKETS) – (NEED APPROXIMATELY 400)

(TO BE DELIVERED BY BOBTAIL TRUCK TO 200 MICHIGAN)

SEALED BIDS WILL BE RECEIVED BY THE CITY SECRETARY, CITY OF SOUTH HOUSTON, 1018 DALLAS STREET, SOUTH HOUSTON, TEXAS 77587, UNTIL 3 P.M., TUESDAY, JUNE 12, 2018. PLEASE MARK PLAINLY ON THE ENVELOPE "SEALED BID" AND SPECIFY ITEM ON WHICH YOU ARE BIDDING. BIDS WILL BE PUBLICLY OPENED TUESDAY, JUNE 12, 2018, AT THE 6:30 P.M. CITY COUNCIL MEETING. BIDS RECEIVED AFTER THE CLOSING TIME WILL BE RETURNED UNOPENED.

NO BIDS MAY BE WITHDRAWN FOR AT LEAST THIRTY (30) DAYS AFTER THE SCHEDULED CLOSING TIME FOR RECEIPT OF BIDS.

THE "CITY" RESERVES THE RIGHT TO REJECT ANY OR ALL BIDS AND TO WAIVE FORMALITIES.

CITY SECRETARY

FIRST PUBLICATION: JUNE 3, 2018
SECOND PUBLICATION: JUNE 10, 2018

PASADENA INDEPENDENT SCHOOL DISTRICT is soliciting RFPs for Oil Change and State Inspection Services, RFP #18R-025PO until 2:00 PM, Monday, June 25, 2018. Proposals will be submitted online in the Pasadena ISD eBid System. Vendors may login to view specifications and submit their response at the following link: https://pasadenaisd.ionwave.net .

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1. 115 W. Curtis Ave, LT 121 Pasadena Highlands, Pasadena, TX 77502
2. 120 Campbell Ave, LTS 100 & 101 Little Farms, Pasadena, TX 77502
3. 0 San Augustine, Tr 2 Abst 1107 WCRR CO Sec 2, Pasadena, TX 77503
4. 706 West Ave, Lt 2&3 Vince Heights Sec 3, Pasadena, TX 77502
5. 2716 E Southmore, Tr 6C-11 Blk 19 Setauna Gardens, Pasadena, TX 77502
6. 1114 Austin Ave, Lt 16 Blk 3 South Pasadena Villas, Pasadena, TX 77502
7. 1307 Townhouse Ln, All Units & Bldgs in (FKA "Southmore Townhomes) Southmore Condo

PUBLIC NOTICE
City of Pasadena
Proposed Five Year Consolidated Plan (2018 - 2022)
Proposed Annual Action Plan (2018)
Citizen Review Public Hearings
Five Year Consolidated Plan

The 2018 - 2022 Consolidated Plan represents the City of Pasadena's vision for improving the quality of life in Pasadena, particularly in the low- and moderate- income areas. It provides useful information about current conditions within the city, and identifies its strengths and weaknesses in community and economic development issues. The Consolidated Plan also explains the long-term goals and objectives for improving the infrastructure, housing, quality of life of financially challenged residents, and states its specific plans for making improvements throughout the next five years.

Annual Action Plan

The City of Pasadena is expected to receive $2,235,129 in federal grants for program year 2018: Community Development Block Grant (CDBG) $1,487,416; Home Investment Partnerships Program (HOME) $544,384 and Emergency Solutions Grant (ESG) Program $136,491. The City is projecting to receive $65,000.00 in Program Income through loan repayments under the HOME Housing Rehabilitation Program.

Community Development Objectives for the 2018-2022 Consolidated Plan

The 2018 - 2022 Consolidated Plan represents the City's ambition to improve the quality of life for residents, particularly in the low- income areas of Pasadena. As required by HUD, each activity is linked to one of three federal program objectives: 1) decent housing, 2) enhancing suitable living environments, or 3) economic development. If each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability. The City hopes to achieve these objectives and outcomes in the five year period through the activities listed below:

- Rehabilitate deteriorating infrastructure to improve mobility and reduce hazardous conditions for Pasadena residents;
- Develop and maintain an adequate supply of safe, sanitary and decent housing that are affordable and accessible to residents within low- income guidelines by utilizing CDBG and HOME funds to assist with housing rehabilitation efforts;
- Reduce homelessness by providing supportive services through local charity and non-profit agencies;
- Strengthen partnerships for investing in service projects benefiting the community, including those with special needs; and
- Ensure fair housing choice opportunities to all residents of Pasadena.

In order to address these needs, the City of Pasadena has developed goals and measurable outcomes in housing, rental re-housing, emergency shelter, public facility improvements and public services.
The City is committed to the proper implementation of a balanced Community Development Program that maximizes benefit to low- income persons both directly and through the improvements of their neighborhoods. By providing decent housing, suitable living environments and supportive services, the City of Pasadena intends to improve our low-income neighborhoods and provide our citizens with the needed resources to assist them in breaking both generational and circumstantial poverty.
The following specific projects and activities are proposed to be funded which will address the community needs identified above.

2018 Community Development Block Grant (CDBG) $1,487,416

Public Facilities & Improvements	**Allocations**
A. Water Street Paving and Drainage Improvements Project	$1,034,474.92
Public Services	
A. Transportation Services for Elderly and Disabled Persons	$105,257.90
B. Sarah's House Operational Services	$ 62,464.42
Program Administration	
A. CDBG Program Administration	$229,483.20
B. Housing Rehabilitation Administration	$ 57,391.36

2018 Home Investment Partnerships Program (HOME) $544,384

Housing Rehabilitation Services	$327,383.28
Community Housing Development Organization (CHDO) Set Aside	
A. To Be Determined	$250,000.00
HOME Program Administration	
A. HOME Program Administration	$54,438.40

2018 Emergency Solutions Grant (ESG) $136,491

Program	
A. Rapid Re-housing	$44,997.42
B. Emergency Shelter	$63,687.48
Administration	
A. ESG Program Administration	$10,202.18

2018 Anticipated Program Income

HOME	
Housing Rehabilitation Loan Repayments	$65,000.00

We would like to encourage participation from residents, local non-profit organizations and businesses within the City of Pasadena. Public hearings will be held by the City of Pasadena Community Development Department:

City Hall – Multipurpose Room (#234)
1149 Ellsworth Dr.
Pasadena, TX 77506
June 18, 2018
10:00 a.m. - 11:00 a.m. and 5:00 p.m. - 6:00 p.m.

Citizens may request a copy of the proposed 2018- 2022 Consolidated Plan and the 2018 Annual Action Plan by contacting the City of Pasadena Community Development Department at 713-475-7294. If a Spanish translation of the proposed document is requested, please allow a 24 hour notice for processing. A copy of the plan will also be posted on the City of Pasadena website at www.ci.pasadena.tx.us and hardcopies will be made available for review at:
City of Pasadena City Hall - Community Development Department
1149 Ellsworth, Fifth Floor
Pasadena, Texas 77506
City of Pasadena City Hall - City Secretary
1149 Ellsworth, Second Floor
Pasadena, Texas 77506
City of Pasadena Main Public Library
1201 Jeff Ellis Memorial Dr.
Pasadena, Texas 77506
City of Pasadena Fairmont Library
4330 Fairmont Pkwy.
Pasadena, Texas 77504
The public is encouraged to attend the hearings and/or submit written comments. The 30 day comment period will begin June 4, 2018 and end July 3, 2018. All comments must be received by the Community Development Department, P.O. Box 195, Pasadena, TX 77501 or via email at: anyn@ci.pasadena.tx.us no later than 4:00 p.m. on July 3, 2018 for consideration of the Community Development Advisory Board.
In compliance with the American with Disabilities Act, interpreters (including sign language interpreters) and services should notify the Community Development Department at (713) 475-7294 or may call the City of Pasadena through Relay Texas, 1-800-735-2989 (TDD) or 1-800-735-2988 (VOICE), at least 24 hours in advance of scheduled hearing date. The City will provide assistance and/or translations for all non- English speaking residents, with requests made to the Community Development Department.
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AVISO PUBLICO
Ciudad de Pasadena
Plan Consolidado Propuesto de Cinco Años (2018 - 2022)
Plan de Acción Anual Propuesto (2018)
Revisión Ciudadana Audiencias Públicas
Plan Consolidado de Cinco Años

El Plan Consolidado 2018 - 2022 representa la visión de la Ciudad de Pasadena para mejorar la calidad de vida de los residentes, particularmente en las áreas de ingresos bajos y moderados. Proporciona información útil de las condiciones actuales en la Ciudad, e identifica las fortalezas y debilidades en cuestiones sobre la comunidad y desarrollo económico. El plan consolidado también explica las metas y objetivos para mejorar la infraestructura, alojamiento, calidad de vida para residentes desafiados financier amente, y declara planes específicos para hacer mejoras entre los siguientes cinco años.

Plan de Acción Anual

La Ciudad de Pasadena anticipa recibir $2,235,129 en fondos Federales para el Año de Programa 2018: Community Development Block Grant (CDBG) $1,487,416; Home Investment Partnerships Program (HOME) $544,384; y Emergency Solutions Grant (ESG) Programa $136,491. La ciudad está proyectando recibir $65,000.00 en ingresos de Programa, a través de reembolsos de préstamos de rehabilitación de vivienda bajo HOME Housing Rehabilitation Program.

Objetivos de Desarrollo Comunitario para el Plan Consolidado 2018 - 2022

El Plan Consolidado 2018 - 2022 representa la ambición de la Ciudad para mejorar la calidad de vida para los residentes, en especial las áreas de ingresos bajos y moderados de Pasadena. Según lo requerido por HUD, cada actividad está vinculada a una de tres objetivos de programas federales: 1) alojamiento decente, 2) ambientes de vida adecuados, o 3) desarrollo económico. Cada objetivo es emparejado con uno de tres resultados: 1) disponibilidad / accesibilidad, 2) asequibilidad, o 3) sostenibilidad. La Ciudad espera lograr estos objetivos y resultados en cinco años a través de las actividades enumeradas a continuación:

- Rehabilitar infraestructura deteriorada para mejorar la movilidad y reducir las condiciones peligrosas para los residentes de Pasadena;
- Desarrollar y mantener un suministro adecuado de viviendas seguras, sanitarias y decentes que sean asequibles y accesibles para los residentes dentro de los límites de ingresos moderados utilizando fondos CDBG y HOME para ayudar con los esfuerzos de rehabilitación de la vivienda;
- Reducir la falta de vivienda bridgeando servicios de apoyo a través de refugios locales y agencias sin fines de lucro;
- Fortalecer las asociaciones mediante la inversión en actividades de servicio público para servicios a la comunidad, incluidos aquellos con necesidades especiales;
- Asegurar oportunidades de elección de vivienda justa para todos los residentes de Pasadena.

Para superar estas necesidades, la Ciudad de Pasadena ha desarrollado metas y resultados mensurables en la vivienda justa.
La Ciudad está comprometida a la implementación adecuada de un programa de Desarrollo Comunitario equilibrado que maximiza el beneficio a personas de bajos ingresos directamente y a través de los mejoras de sus barrios. Al proporcionar vivienda digna, entornos de vida adecuados, y servicios de apoyo, la Ciudad de Pasadena se esforzará por mejorar a nuestros residentes de bajos ingresos y romper ciclos a nuestras ciudadanos los recursos necesarios para ayudarlos a romper la pobreza generacional y circunstancial.
Se presenta financiar los siguientes proyectos y actividades específicos que abordan en las necesidades de la comunidad identificadas anteriormente.

2018 Community Development Block Grant (CDBG) $1,487,416

Facilidades y Mejoras Publicas	**Asignaciones**
A. Proyecto de Mejoras de Pavimentacion y Drenaje en la calle Water	$1,034,474.92
Servicios Publicos	
A. Servicios de Transportacion para Ancianos y Personas Discapacitadas	$105,257.90
B. Servicios de Operaciones de Sarah's House	$62,464.42
Administracion Del Programa	
A. CDBG Administracion del Programa	$229,483.20
B. Administracion de Rehabilitacion de Viviendas	$57,391.36

2018 Programa de asociación de inversión en el hogar (HOME) $544,384

Servicios de Rehabilitacion de Viviendas	$327,383.28
Community Housing Development Organization (CHDO) – Dejar a un lado	
A. Por ser Determinado	$250,000.00
HOME Administracion Del Programa	
A. HOME Administracion del Programa	$54,438.40

2018 Emergency Solutions Grant (ESG) $136,491

Programa	
A. Vivienda Rapida	$44,997.42
B. Refugio de Emergencia	$63,687.48
Administracion	
A. ESG Administracion del Programa	$10,202.18

2018 - Ingresos de Préstamos Anticipados

HOME	**Ingresos Estimados**
Reembolsos de Préstamos de Rehabilitacion de Vivienda	$65,000.00

Se anima la participación de los residentes, organizaciones sin fines de lucro locales y negocios dentro de la Ciudad de Pasadena. Las audiencias públicas se llevarán a cabo por el Departamento de Desarrollo Comunitario de la Ciudad de Pasadena:

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junio 18, 2018
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Ciudad de Pasadena- Edificio Municipal Nuevo – Departamento de Desarrollo Comunitario
1149 Ellsworth, Quinto Piso
Pasadena, Texas 77506
Ciudad de Pasadena – Secretaria de la Ciudad
1149 Ellsworth, Segundo Piso
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4330 Fairmont Pkwy.
Pasadena, Texas 77504
Se alienta al publico a asistir a las audiencias o presentar observaciones por escrito. El periodo para comentarios de 30 dias comenzara Junio 4, 2018 y se acabara Julio 3, 2018. Todos los comentarios deben ser enviados al Departamento de Desarrollo Comunitario, P.O. Box 672, Pasadena, TX 77501 o via correo electronico a anyn@ci.pasadena.tx.us antes de las 4:00 p.m. del Julio 3, 2018 para consideracion del Consejo de Desarrollo Comunitario.
De acuerdo con el Acta Americana de Discapacitados, individuos especiales que requieren intérpretes (incluyendo lenguaje de señales) y servicios comunicativos auxiliares) deberán/debe ser el Departamento de Desarrollo Comunitario al (713) 475-7294 o pueden llamar a la Ciudad de Pasadena por medio de Relay Texas, 1-800-735-2989 (TDD) o 1-800-735-2988 (VOZ), por lo menos 24 horas antes de la fecha programada para la audiencia. La Ciudad proveera asistencia y/o traducciones para todos los residentes que no hablan ingles, peticiones se pueden realizar con el Departamento de Desarrollo Comunitario.
Para obtener una copia de este aviso o cualquier otro material mencionado en espanol, puede contactar a la Oficina de Desarrollo Comunitario al (713) 475-7294. También, un traductor en espanol estara presente durante la audiencia publica a peticion de por lo menos 24 horas antes.

Proposed 2018-2022 Consolidated Plan and the 2018 Action Plan
Citizen Review Public Hearing
June 18, 2018 at 2:00 p.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Monica Martinez	ext. 7924	COP	mamartinez@ci.pasadena.tx.us
Pat Van Houte	713-475-1506		patvanhoute@yahoo.com
Kayla Coberley	x4994	COP	Kcoberley@ci.pasadena.tx.us
Sara Rogers	713-475-4910	C.O.P.	SMZavala@ci.pasadena.tx.us

Proposed 2018-2022 Consolidated Plan and 2018 Action Plan
Citizen Review Public Hearing
June 18, 2018 at 10:00 a.m.

Print Name	Phone Number	Citizen/Department/Agency /Other	Email
Monica Martinez	ext. 7524	C.O.P.	mamartinez@ci.pasadena.ca.us

COMMUNITY DEVELOPMENT
Pasadena, Texas

PUBLIC HEARING(S)

CITY HALL – MULTIPURPOSE ROOM (#236)

JUNE 18, 2018

2:00 – 3:00 P.M.

PROPOSED 2018-2022 CONSOLIDATED PLAN AND THE 2018 ACTION PLAN

CITIZEN COMMENT FORM

CITIZEN NAME: Pat Van Houte

CONTACT INFORMATION:
c. 713-907-0888

COMMENTS CONCERNING THE PROPOSED PLANS:
Need resources for minor (+moderate) home repair, especially roof repair.

The Community Development Department appreciates your participation in this process and will include all comments for consideration. If you have further questions, please contact our office at (713) 475-7294.

Pat Van Houte
Print Name

7-18-18
Date

Pat Van Houte
Signature

Appendix II
Ordinance

7-17-18 Agenda

AGENDA REQUEST

2D

☒ ORDINANCE ☐ RESOLUTION NO: 2018- 090

CAPTION: APPROVAL OF THE 2018-2022 CONSOLIDATED PLAN AND THE 2018 ACTION PLAN AUTHORIZING THE FILING OF AN APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR THE COMMUNITY DEVELOPMENT GRANT PROGRAMS: COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG), EMERGENCY SOLUTIONS GRANTS (ESG) AND THE HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME).

RECOMMENDATIONS & JUSTIFICATION: THE 2018-2022 CONSOLIDATED PLAN AND THE 2018 ACTION PLAN SERVE AS THE APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) FOR CDBG, ESG AND HOME PROGRAM FUNDS.

(IF ADDITIONAL SPACE IS REQUIRED, PLEASE ATTACH SECOND PAGE)

BUDGETED: ☐ COUNCIL DISTRICT(S) AFFECTED: A,B,C,D,E,F,G & H

REQUIRES APPROPRIATION: ☐

See attached Certification

	COUNCIL ACTION	
MELISSA QUIJANO COMMUNITY DEVELOPMENT DATE: 07/05/2018 REQUESTING PARTY (TYPED)	FIRST READING:	FINAL READING:
BUDGET DEPARTMENT	Deapoa MOTION	Bass MOTION
PURCHASING DEPARTMENT	Harrison SECOND	Schoenbein SECOND
APPROVED:		
CITY ATTORNEY	7-17-18 DATE	8-7-18 DATE
MAYOR	DEFERRED:	

ORDINANCE NO. 2018 - 090

AN ORDINANCE TO APPROVE THE 2018-2022 CONSOLIDATED PLAN AND THE 2018 ACTION PLAN, AND AUTHORIZE THE FILING OF AN APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR THE COMMUNITY DEVELOPMENT GRANT PROGRAMS: COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG), EMERGENCY SOLUTIONS GRANTS (ESG) AND THE HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME).

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) is authorized to implement program regulations;

WHEREAS, Pasadena City Council approval of the 2018-2022 Consolidated Plan and the 2018 Action Plan for federally funded programs and projects administered by the City of Pasadena is contingent upon written approval by HUD and/or any other authority with jurisdiction, of said plan(s);

WHEREAS, the City of Pasadena desires to participate as an Entitlement Community (CDBG and ESG) and as a Participating Jurisdiction (HOME) in these programs and to submit a total application to HUD in the amount of $2,335,129.00 to accomplish certain neighborhood and housing improvements, public infrastructure improvements, and provide public services;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF PASADENA:

SECTION 1. That the City of Pasadena desires to participate in the Community Development Block Grant (CDBG) Program ($1,652,416), the Home Investment Partnerships (HOME) Program ($544,284) and the Emergency Solutions Grants (ESG) Program ($138,429) as evidenced by the development of the 2018-2022 Consolidated Plan and the 2018 Action Plan by the Community Development Department of the City of Pasadena, TX. The 2018 Action Plan is year one of the 2018-2022 Five-Year Consolidated Plan, and gives priority to activities which will benefit the low- to moderate-income residents, homeless persons, and improve public infrastructure.

SECTION 2. That the 2018-2022 Consolidated Plan and the 2018 Action Plan entitled Exhibit "A", attached hereto and incorporated herein for all purposes, is hereby approved and adopted by the City Council.

SECTION 3. That the following City Officials are hereby designated as responsible officers for those applicable sections of the Programs as cited below:

(a) Community Development Manager - To prepare and file said 2018-2022 Consolidated Plan and the 2018 Action Plan and application, as well as provide such additional information and documentation as may be later required by HUD.

(b) City Controller or Assistant City Controller - To execute and file requisition of funds and act as authorized fiscal representative of the City.

(c) Director of Housing and Community Development- To prepare and execute those contracts as may be necessary in conjunction with the programs provided by the plan.

SECTION 4. That the Mayor of the City of Pasadena, TX is hereby designated as the authorized representative to enter into those necessary contracts with the U.S. Department of Housing and Urban Development (HUD) and is hereby directed to execute the 2018-2022 Consolidated Plan and the 2018 Action Plan and such certifications and assurances necessary to carry out the purposes of these programs.

SECTION 5. That the City Council officially determines that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law, Chapter 551, Texas Government Code; and that this meeting has been open to the public as required by law at all times during which this Ordinance and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further confirms such written notice and the contents and posting thereof.

PASSED ON FIRST READING by the City Council of the City of Pasadena, Texas in regular meeting in the City Hall this the 17th day of July, A.D., 2018.

APPROVED this the 17th day of July, A.D., 2018.

JEFF A. WAGNER, MAYOR
OF THE CITY OF PASADENA, TEXAS

ATTEST:

LINDA RORICK
CITY SECRETARY
CITY OF PASADENA, TEXAS

APPROVED AS TO FORM:

LEE CLARK
CITY ATTORNEY
CITY OF PASADENA, TEXAS

PASSED ON SECOND AND FINAL READING by the City Council of the City of Pasadena, Texas in regular meeting in the City Hall this the 7th day of August, A. D., 2018.

APPROVED this the 7th day of August, A.D., 2018.

JEFF A. WAGNER, MAYOR
OF THE CITY OF PASADENA, TEXAS

ATTEST:

LINDA RORICK
CITY SECRETARY
CITY OF PASADENA, TEXAS

APPROVED AS TO FORM:

LEE CLARK
CITY ATTORNEY
CITY OF PASADENA, TEXAS

DUE TO THE VOLUME OF EXHIBIT "A",

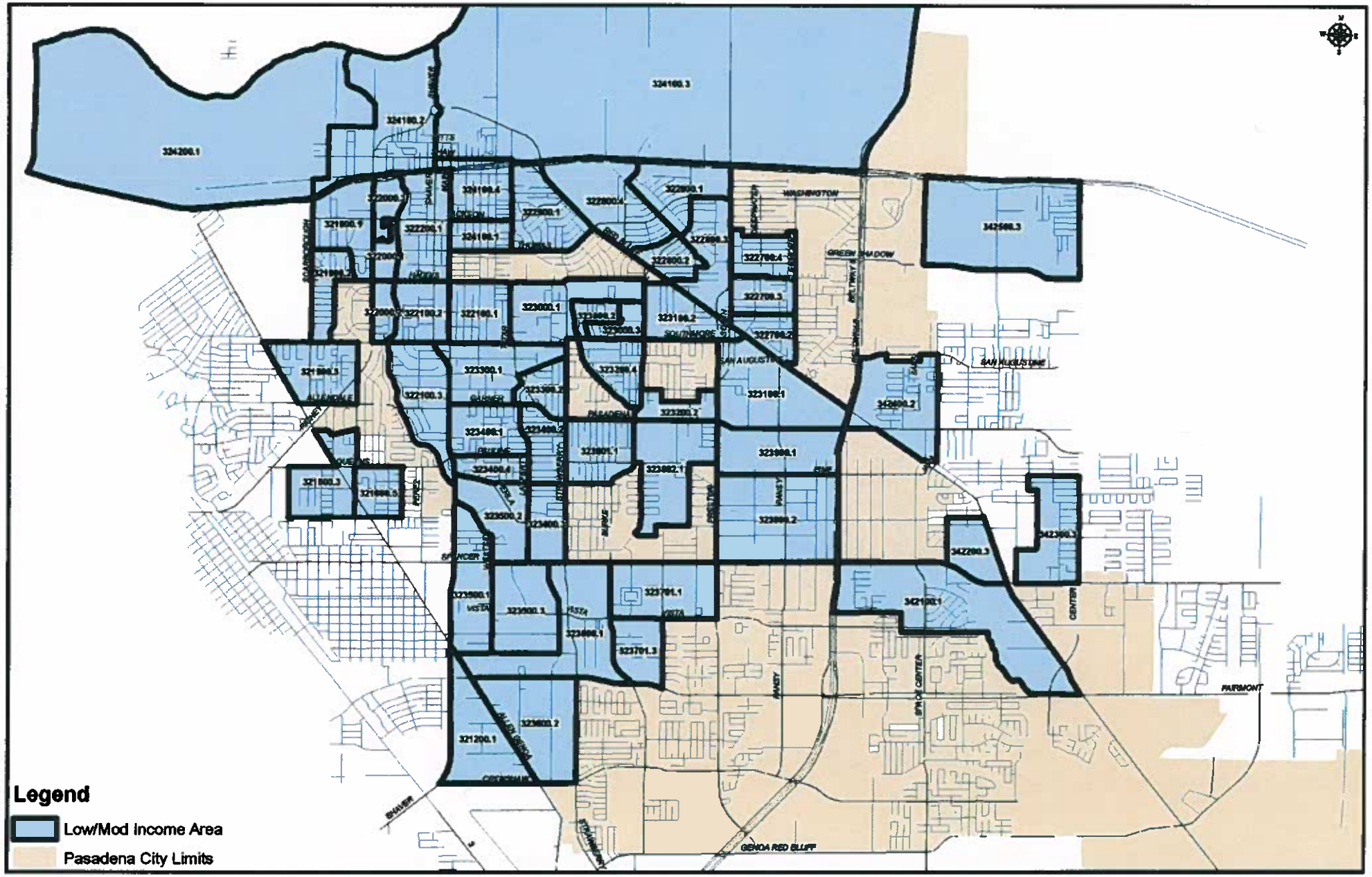
IT IS NOT ATTACHED; HOWEVER, IT IS

AVAILABLE FOR REVIEW IN THE CITY

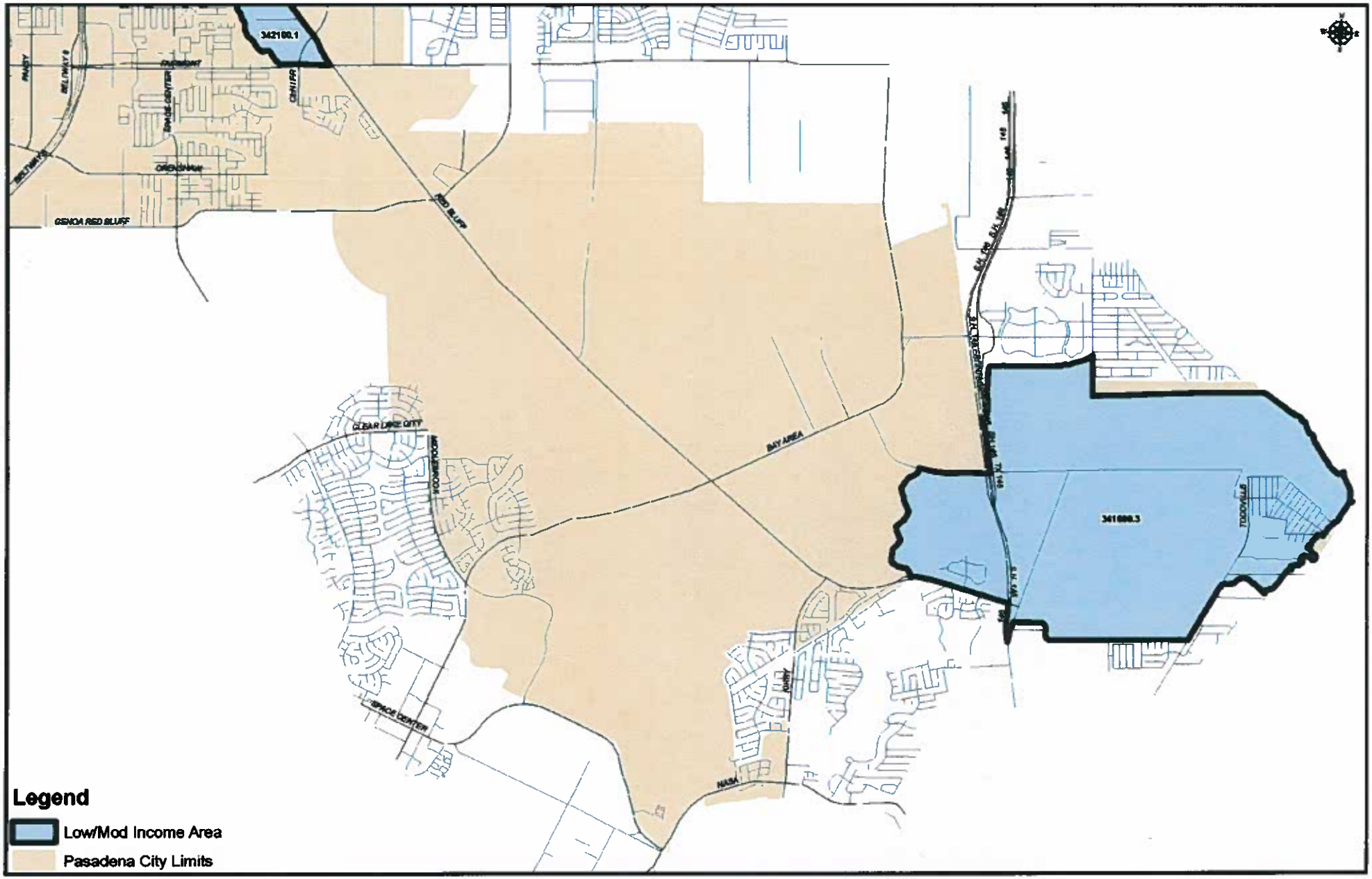
SECRETARY'S OFFICE

Appendix III
Unique Appendices

City of Pasadena
Low- to Moderate-Income Target Area Census Tracts & Block Group
Map A



City of Pasadena
Low- to Moderate-Income Target Area Census Tracts & Block Group
Map B



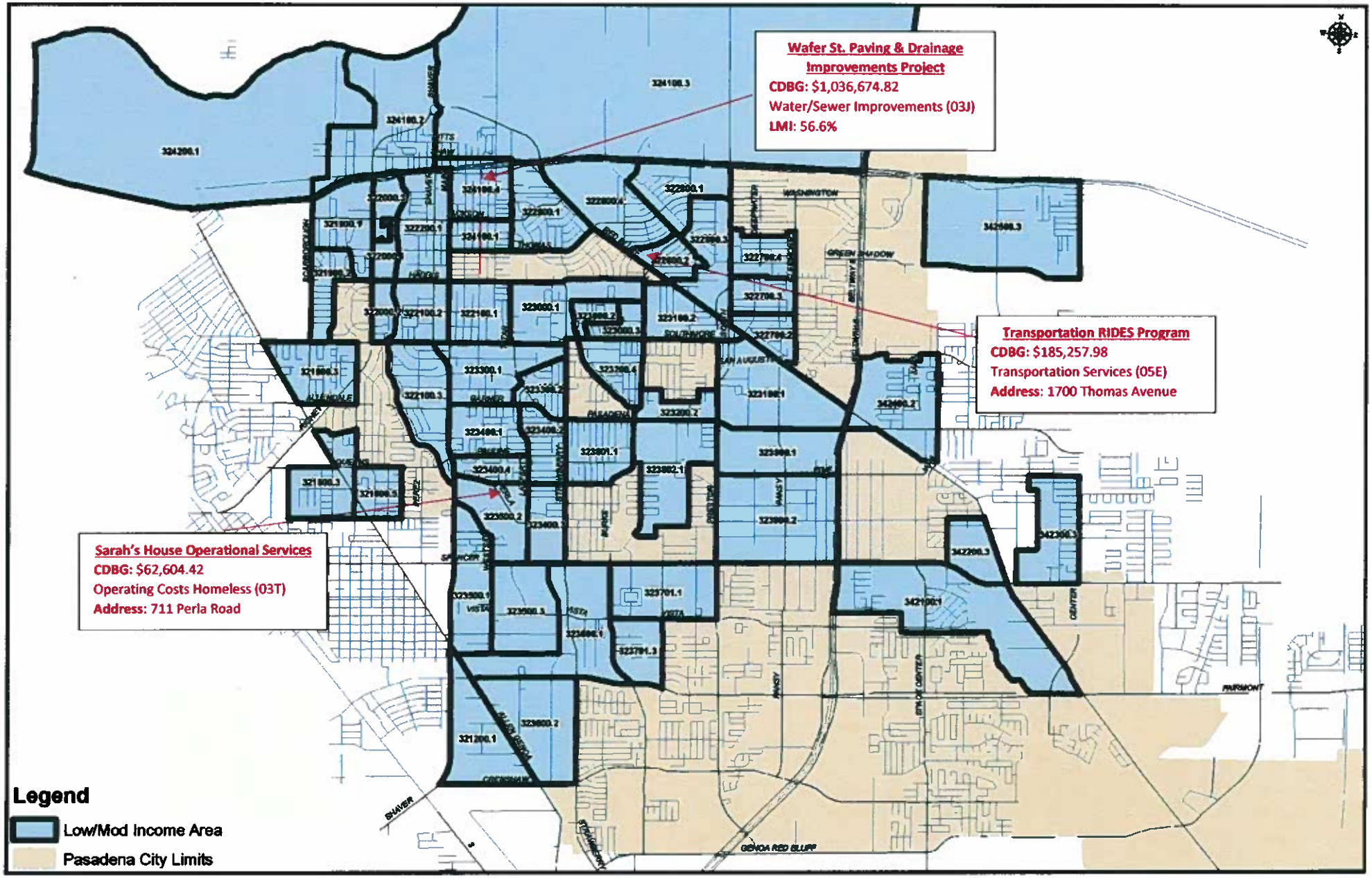
City of Pasadena, Texas
Program Year 2018

LMISD by Grantee - Summarized Block Group Data
Based on 2006-2010 American Community Survey

TRACT	BLKGRP	LOWMOD	LOWMODUNIV	LOWMODPCT
321200	1	2220	2660	83.46%
321600	1	515	1120	45.98%
321600	2	100	490	20.41%
321600	3	820	1570	52.23%
321600	4	740	1910	38.74%
321600	5	595	955	62.30%
321900	1	650	750	86.67%
321900	2	1615	2130	75.82%
321900	3	1080	1795	60.17%
321900	4	325	770	42.21%
322000	1	1460	1585	92.11%
322000	2	455	805	56.52%
322000	3	2230	2550	87.45%
322100	1	910	1335	68.16%
322100	2	670	1110	60.36%
322100	3	765	1150	66.52%
322200	1	840	1570	53.50%
322600	1	300	1510	19.87%
322600	2	695	2200	31.59%
322600	3	765	1610	47.52%
322700	1	1040	2810	37.01%
322700	2	1195	1400	85.36%
322700	3	590	1040	56.73%
322700	4	1240	1795	69.08%
322800	1	1325	1790	74.02%
322800	2	575	1100	52.27%
322800	3	880	1255	70.12%
322800	4	1510	2420	62.40%
322900	1	1230	1780	69.10%
322900	2	195	870	22.41%
322900	3	570	1405	40.57%
323000	1	2655	3385	78.43%
323000	2	640	955	67.02%
323000	3	1475	1720	85.76%
323100	1	565	860	65.70%
323100	2	1525	2150	70.93%
323200	1	560	1355	41.33%
323200	2	730	1220	59.84%
323200	3	215	525	40.95%
323200	4	785	1525	51.48%
323300	1	1405	2000	70.25%
323300	2	715	1310	54.58%
323400	1	2115	3300	64.09%
323400	2	1080	1945	55.53%
323400	3	1130	1285	87.94%
323400	4	845	1095	77.17%
323500	1	1890	2560	73.83%
323500	2	730	985	74.11%
323500	3	895	1380	64.86%
323600	1	1165	1525	76.39%
323600	2	705	1190	59.24%
323600	3	545	3705	14.71%
323600	4	520	1370	37.96%
323701	1	670	720	93.06%
323701	2	130	830	15.66%
323701	3	1245	2140	58.18%
323702	1	635	1975	32.15%
323702	2	620	1300	47.69%
323801	1	1605	2695	59.55%
323801	2	545	1280	42.58%
323802	1	2100	3385	62.04%
323802	2	690	1615	42.72%
323900	1	1490	1635	91.13%
323900	2	1395	1855	75.20%
324000	1	840	1975	42.53%
324000	2	1010	3700	27.30%
324100	1	930	1395	66.67%
324100	2	735	900	81.67%
324100	3	510	655	77.86%
324100	4	870	1445	60.21%
324100	5	600	1400	42.86%
324200	1	1050	1750	60.00%
340202	1	220	2765	7.96%
340203	1	0	2060	0.00%
340203	2	140	2100	6.67%
341202	1	400	1445	27.68%
341301	1	820	1915	42.82%
341400	1	50	1150	4.35%
341400	2	320	2225	14.38%
341400	3	440	1795	24.51%
341600	3	605	1145	52.84%
341700	1	80	780	10.26%
341700	2	490	1325	36.98%
341800	1	290	1260	23.02%
342001	1	215	2895	7.43%
342001	2	110	1855	5.93%
342001	3	430	2225	19.33%
342002	1	590	3350	17.61%
342100	1	940	1595	58.93%
342100	2	340	2585	13.15%
342200	1	850	1955	43.48%
342200	2	295	580	50.86%
342200	3	1465	2030	72.17%
342300	2	25	580	4.31%
342300	3	1960	3230	60.68%
342400	1	680	1450	46.90%
342400	2	1150	2075	55.42%
342500	1	950	2920	32.53%
342500	3	655	1210	54.13%
342900	1	425	990	42.93%
343000	1	710	1755	40.46%
343600	1	295	1325	22.26%
343700	3	480	1095	43.84%

https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-summarized-block-groups/

City of Pasadena 2018 Program Year CDBG Projects and Programs



JEFF A. WAGNER
MAYOR

2018 Public Improvement Project

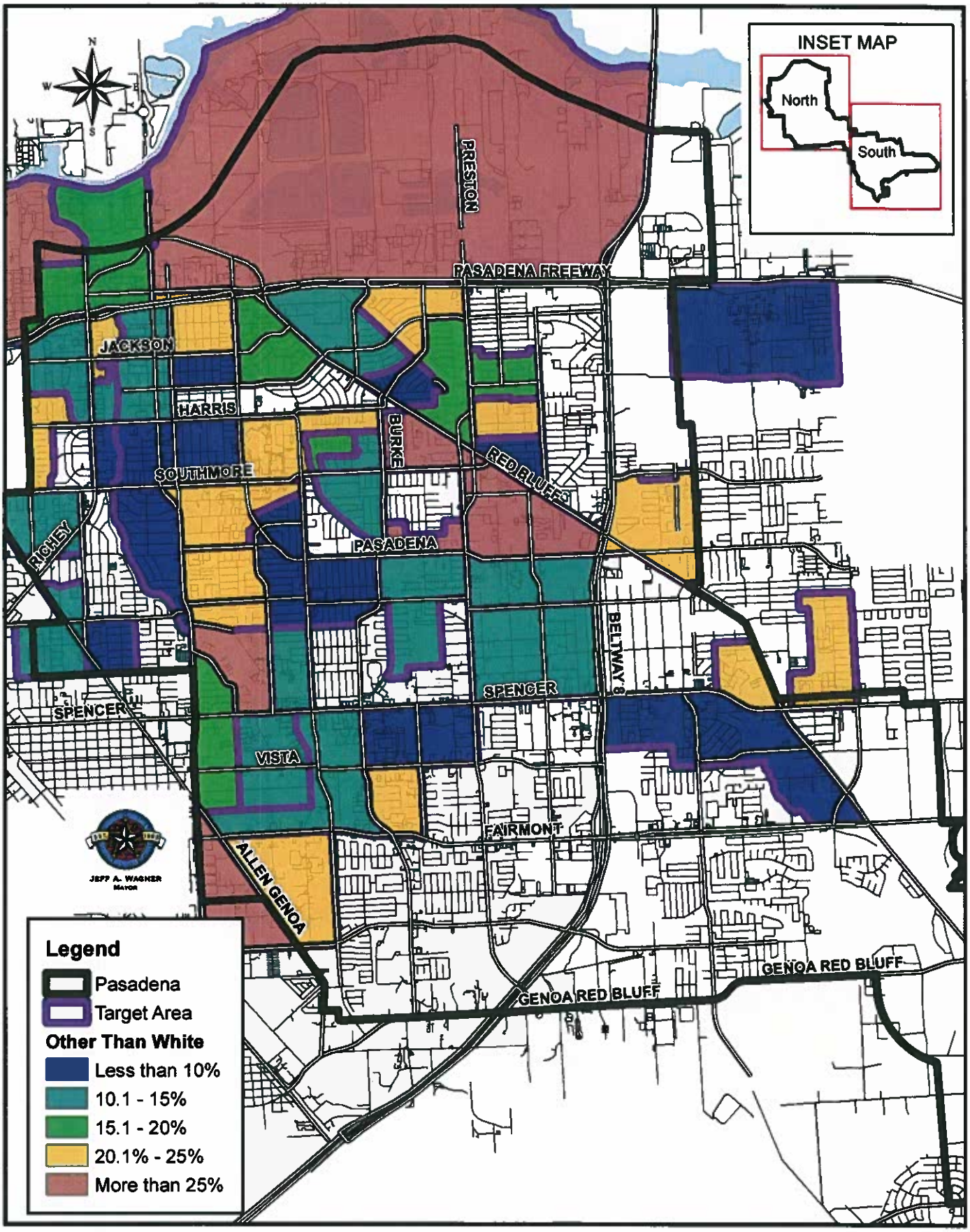
Wafer Street Paving and Drainage Improvements Project

Census Tract	Block Group	Low-Mod Income Population	% Low- Mod Income
324100	1	930	66.67%
324100	4	870	60.21%
324100	5	600	42.86%
Totals		**2400**	**56.60%**

LMISD by Grantee – Summarized Block Group Data
Based on the 2006-2010 American Community Survey
https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-summarized-block-groups

City of Pasadena - North

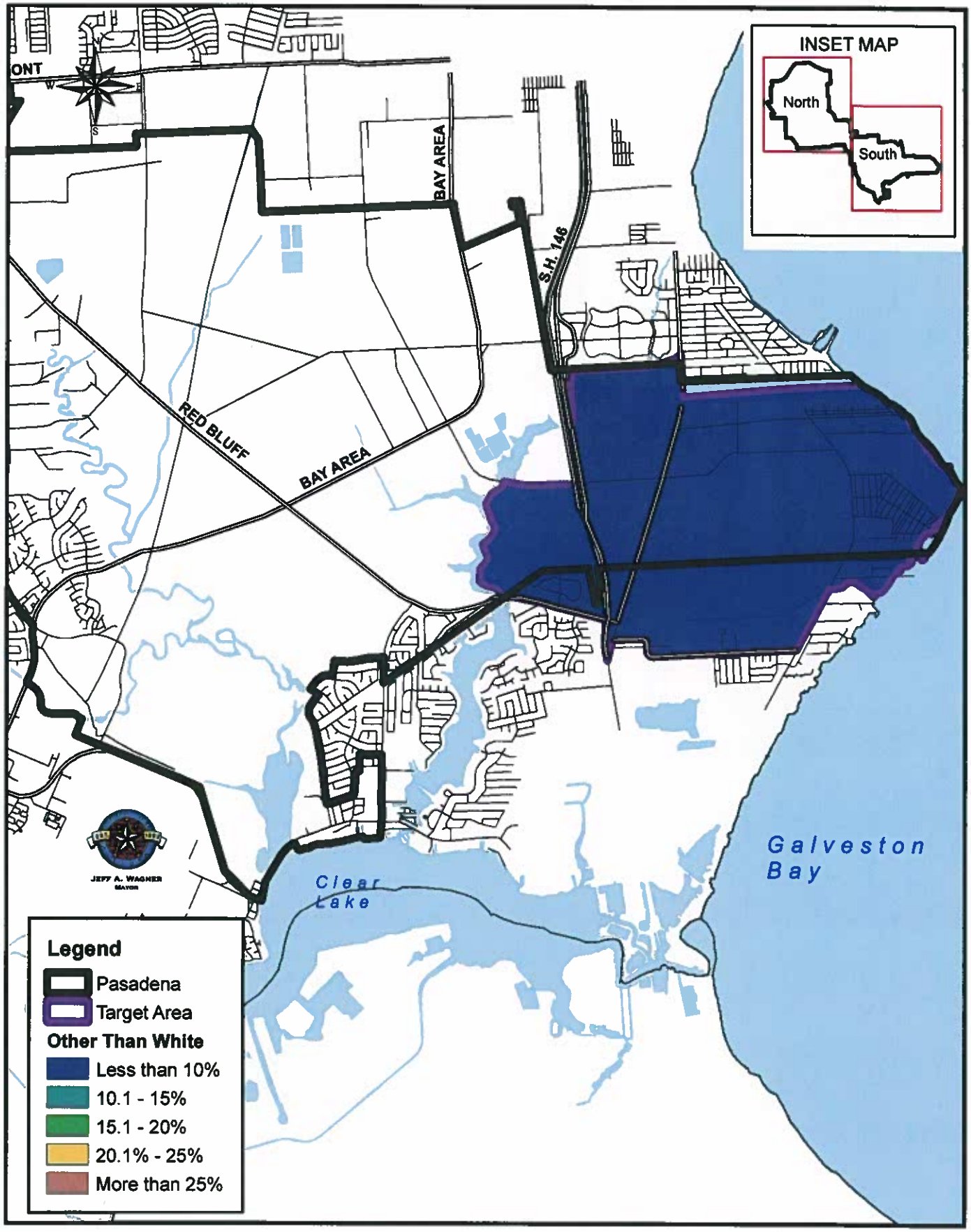
Estimated Minority (Other than White) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - South

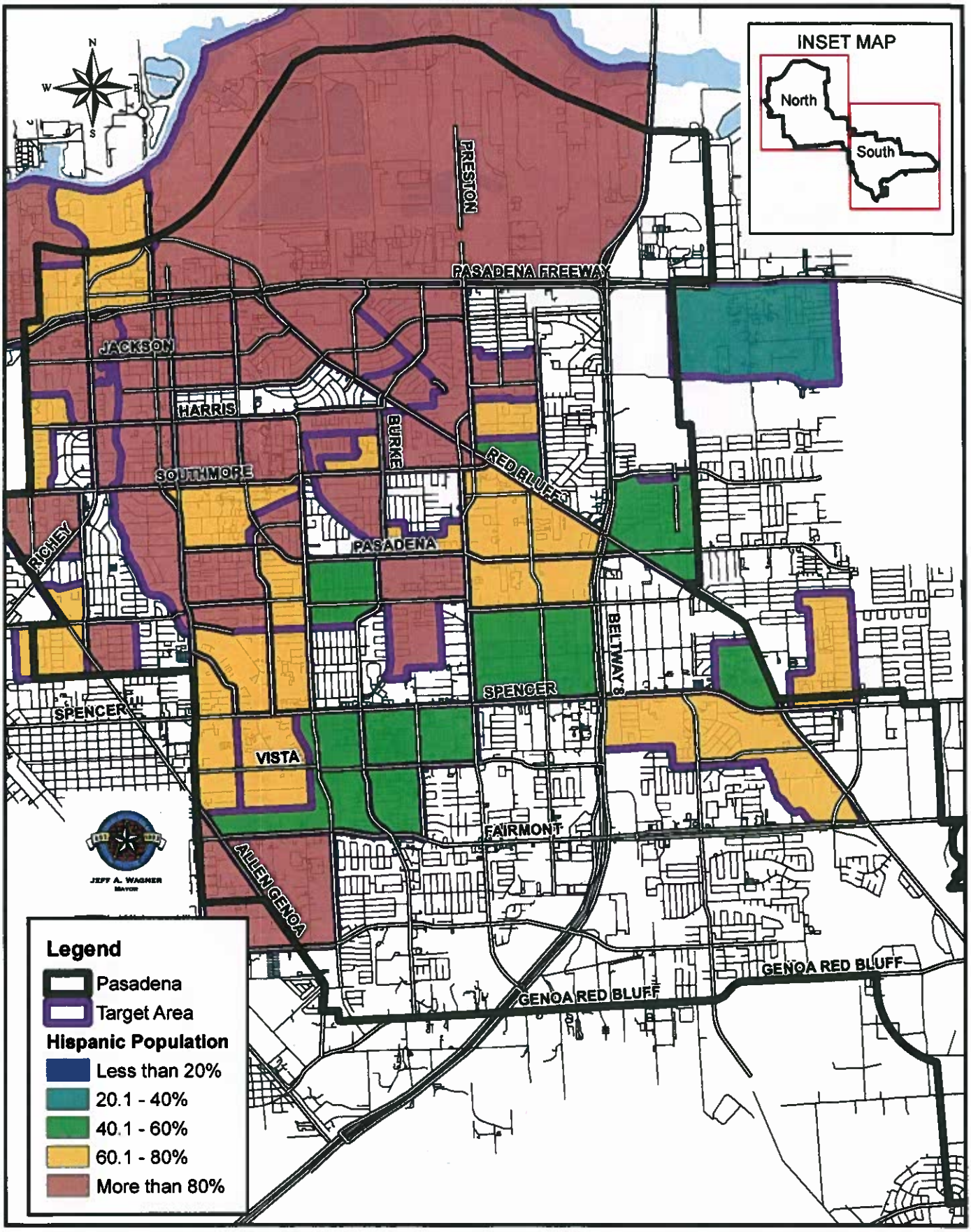
Estimated Minority (Other than White) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - North

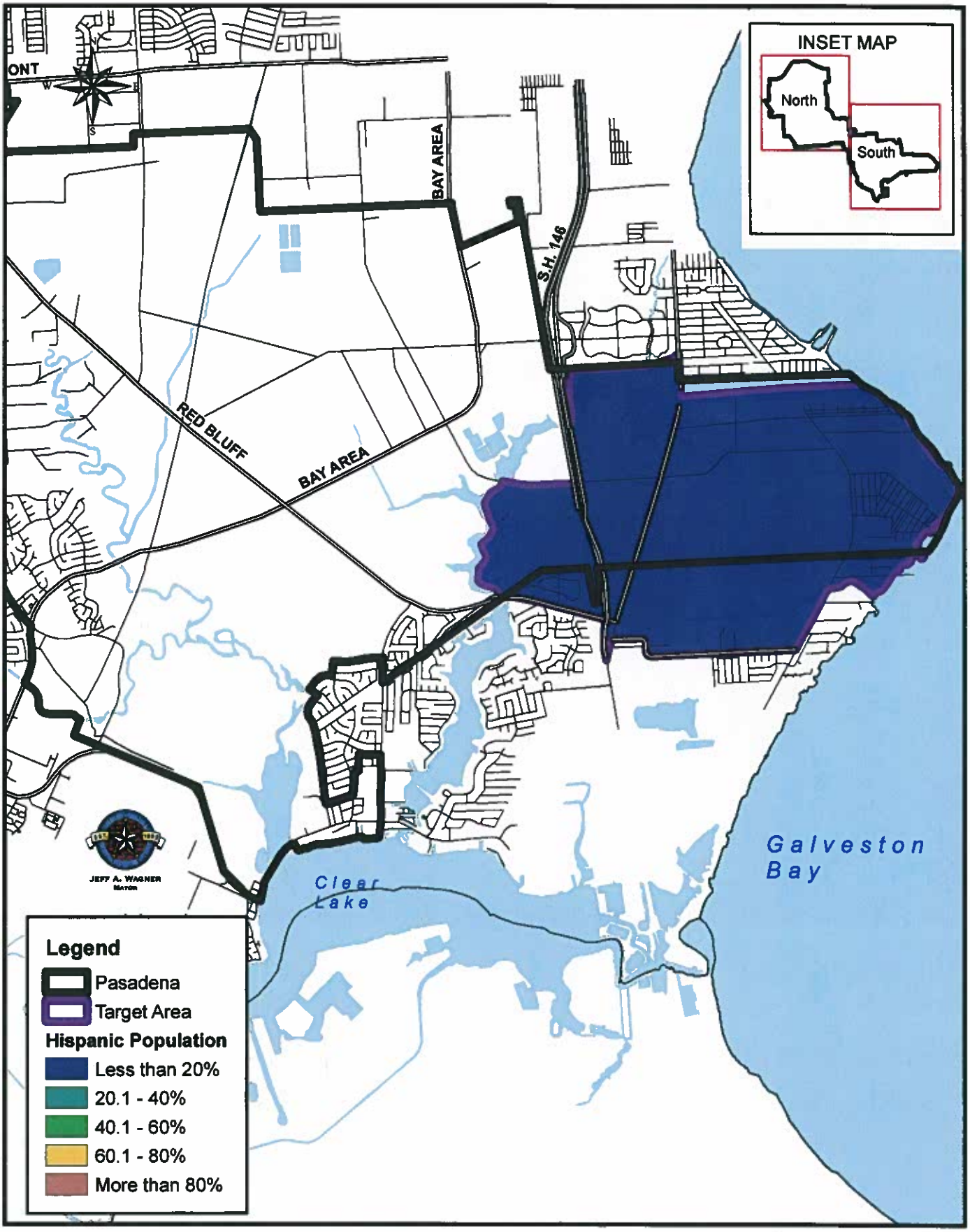
Estimated Minority (Hispanic) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - South

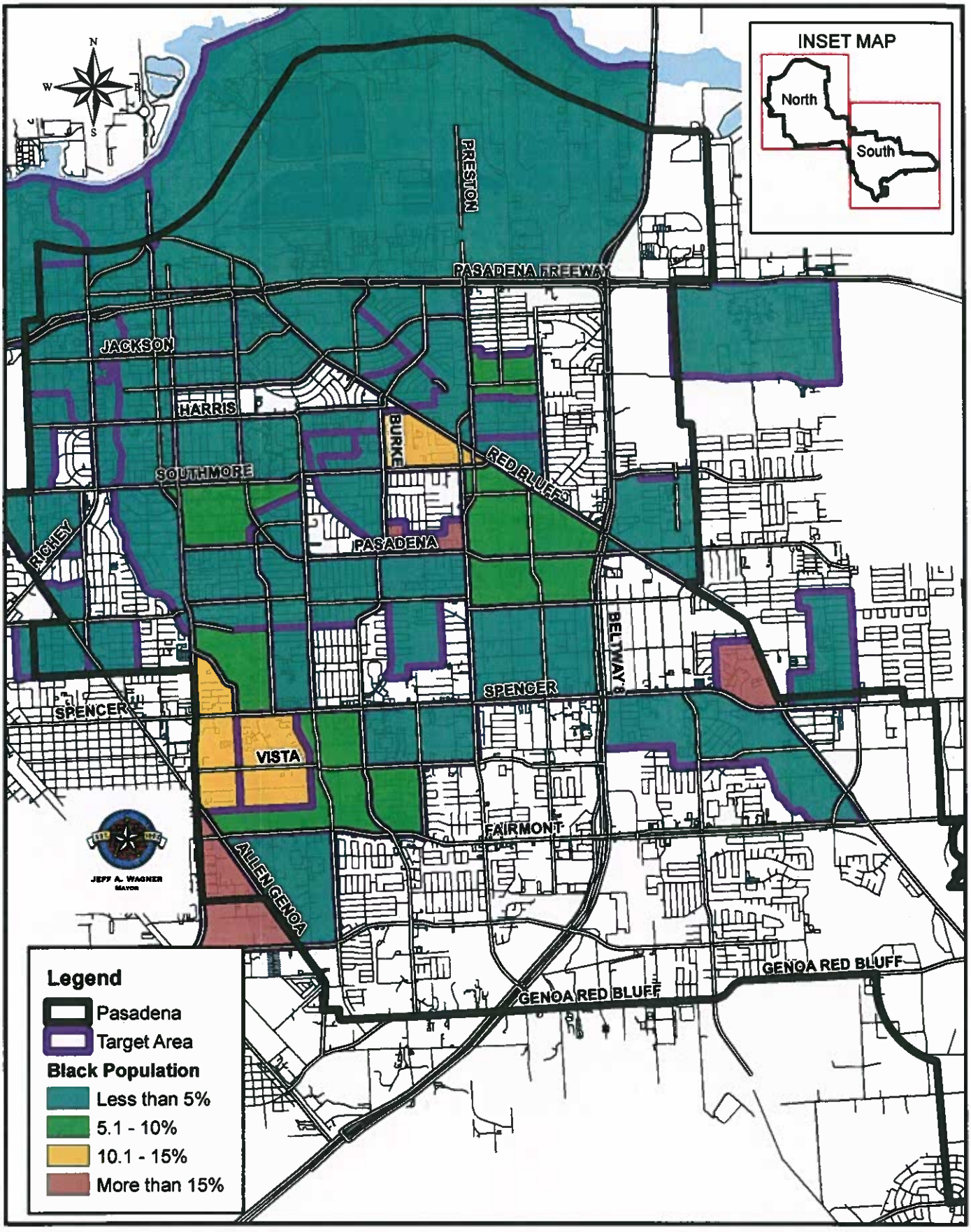
Estimated Minority (Hispanic) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - North

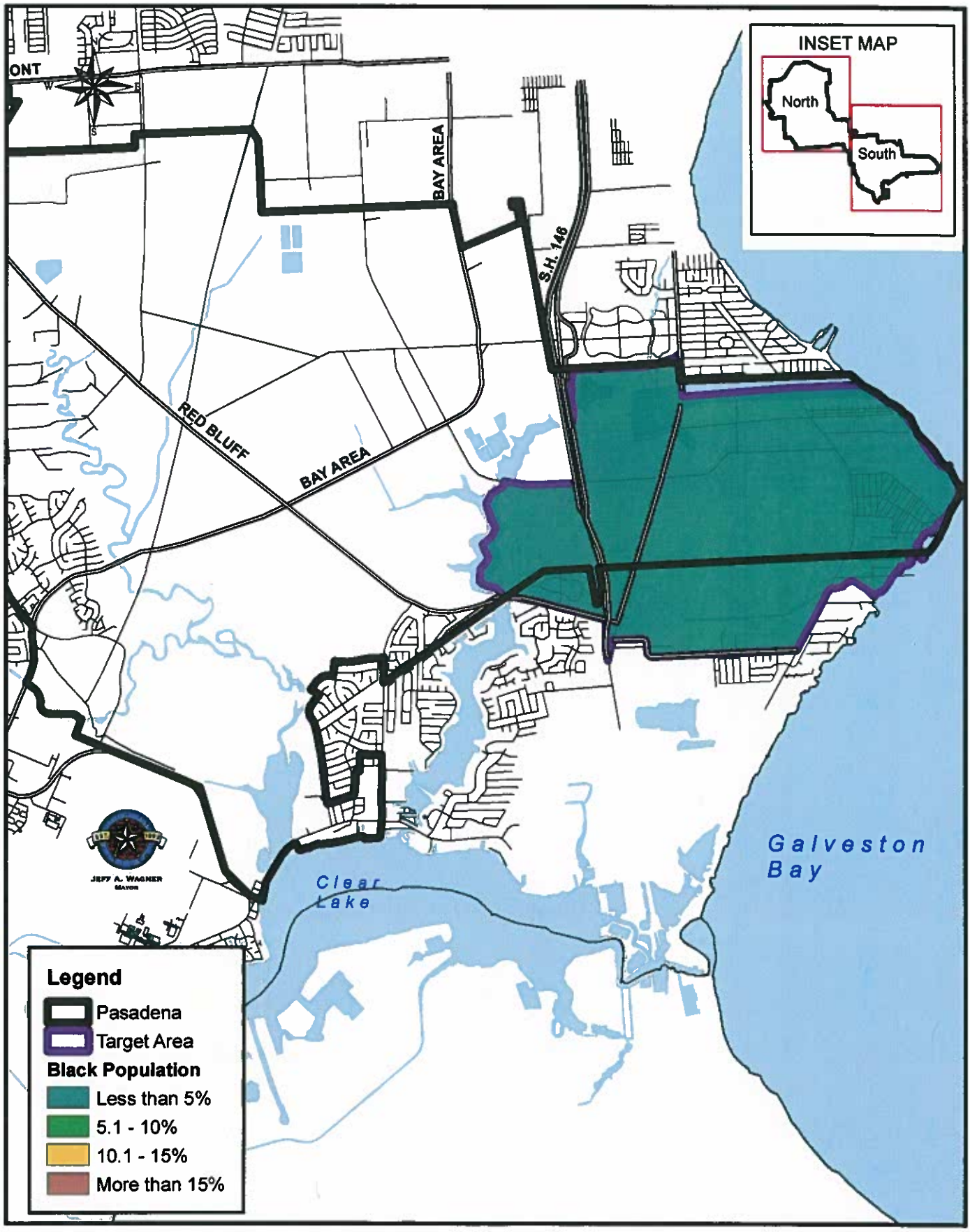
Estimated Minority (Black) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - South

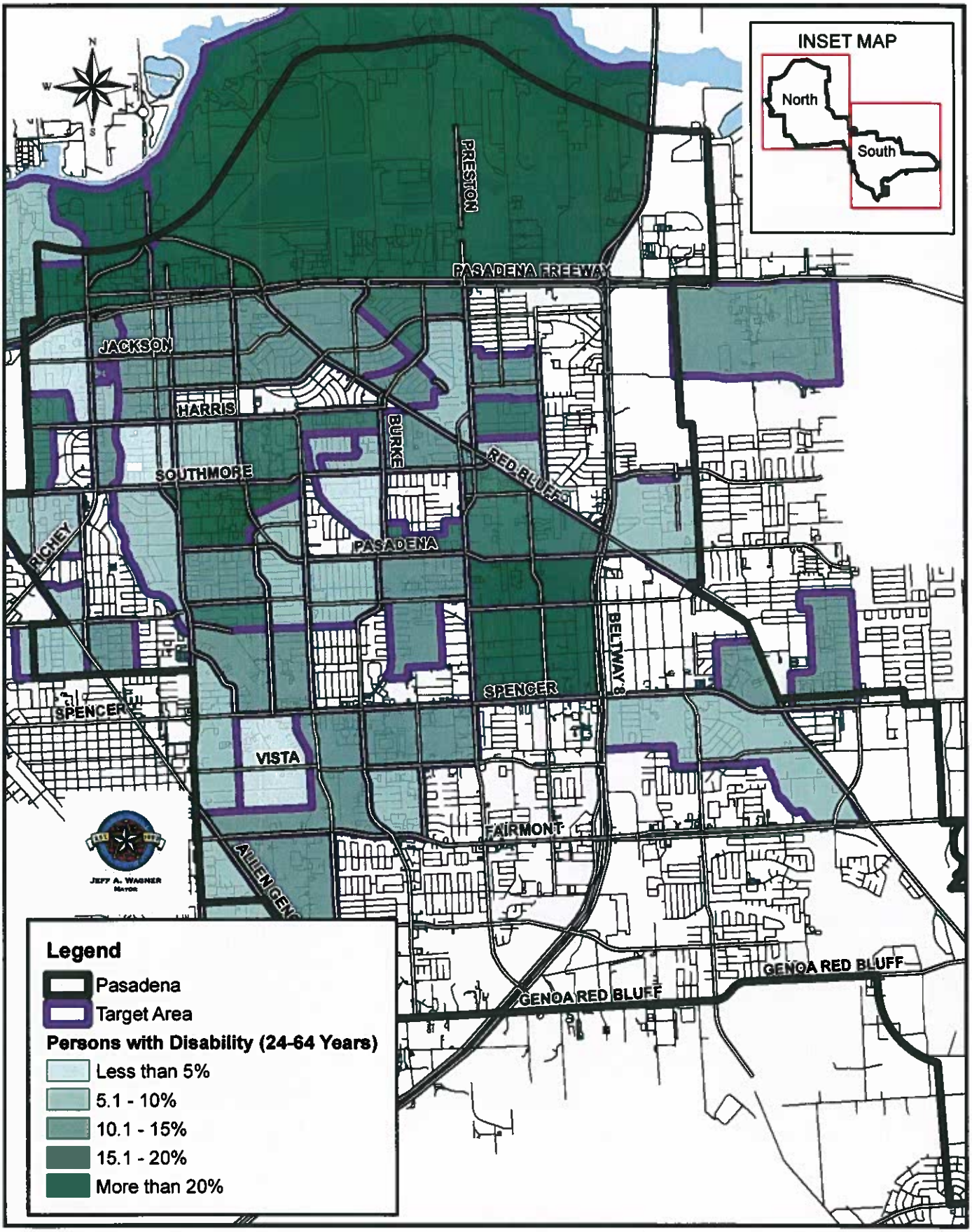
Estimated Minority (Black) Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - North

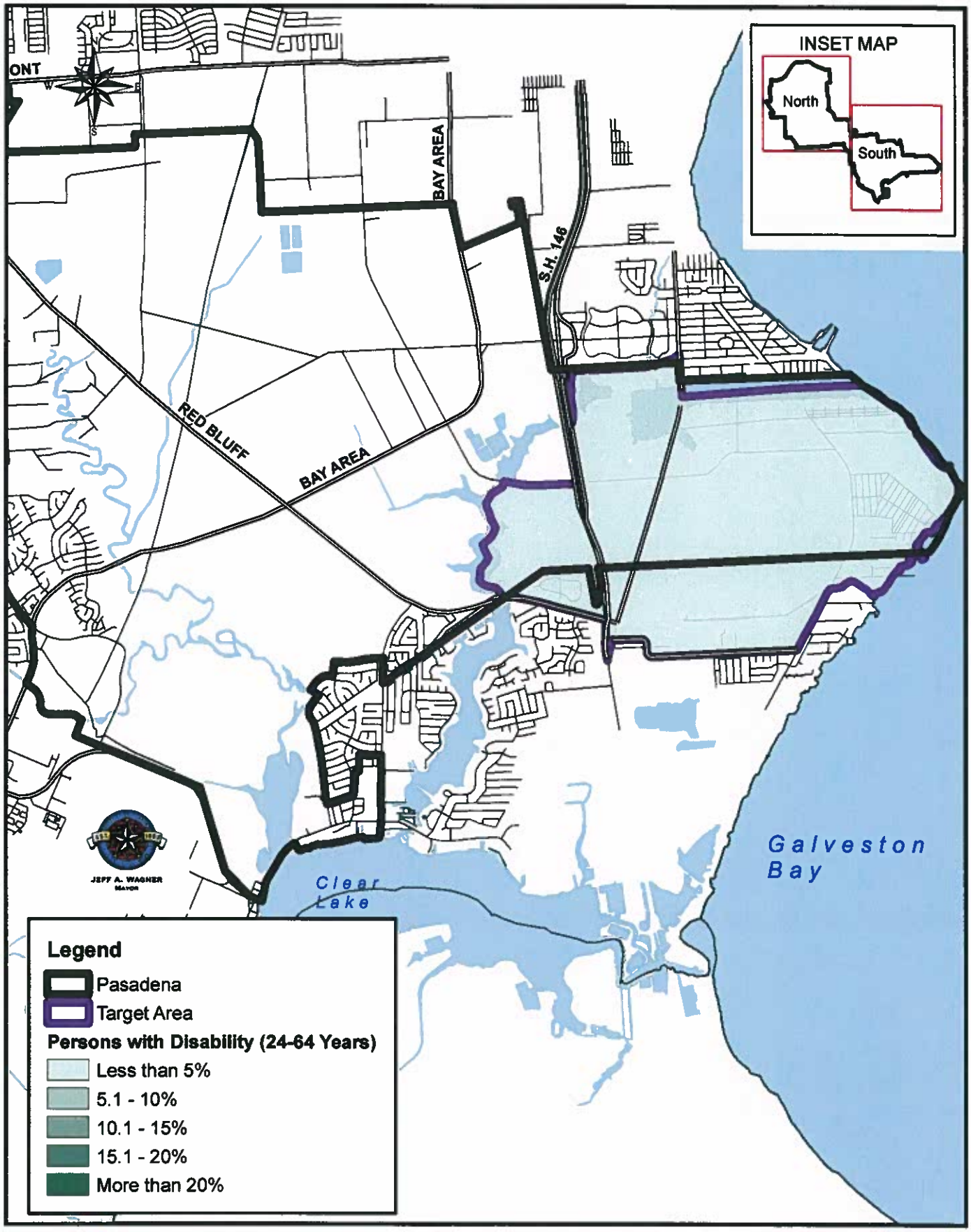
Estimated Disability Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

City of Pasadena - South

Estimated Disability Concentration of Low- to Moderate-Income Target Area



Source: U.S. Census ACS 2016-5yr

To be used by the City of Pasadena, Subrecipients and/or Community Housing Development Organizations (CHDO).

7.2.6 Resale and Recapture

24 CFR 92.254 (Notice: CPD 12-003) The purpose of this section is to provide the *resale* and *recapture* policies of the City of Pasadena Community Development Department.

Resale* or *Recapture
Is triggered when a homebuyer, homeowner or developer is assisted with HOME Investment Partnership Program funds and the homebuyer sells or transfers the assisted property, either voluntary or involuntary, during the established HOME period of affordability.

Eligible HOME Funded Activities
The City of Pasadena HOME Program funds are used to provide affordable housing by assisting homebuyers, homeowners, and developers. The forms of subsidy include acquisition, rehabilitation, or new construction of single-family housing to individual low-income homebuyers and/or homeowners. The HOME funds may be structured in a variety of ways, including low-interest, zero-interest, deferred payment loans, or grants.

The City of Pasadena shall determine, based upon the type of subsidy, form of ownership, and type of market in which the property is located, whether the period of affordability shall be enforced by either Resale or Recapture Provisions. The City of Pasadena will enforce the Recapture Provisions for the Housing Rehabilitation Services Program and First-Time Homebuyer Assistance Programs. For projects assisted with a development subsidy, the City will enforce the Resale Provisions.

Affordability Requirements of the HOME Program
The HOME-assisted requirements states that in order for homeownership housing to qualify as affordable it must:

- Be single-family, modest housing
- Be acquired by a low-income family as its principal residence
- Meet affordability requirements for a specific period of time as determined by the amount of assistance provided. Consistent with 24 CFR Part 92.254(a)(4), the following minimum period of affordability shall be enforced for homebuyer projects:

HOME Assistance Per Unit	Minimum Period of Affordability
Under $15,000	**5 years**
$15,000 to $40,000	**10 years**
Over $40,000	**15 years**

The City of Pasadena imposes a separate affordability period for the Housing Rehabilitation Services Program for income eligible, single-family, owner-occupied households. Please see section 7.5.2.3.

Enforcement of the Affordability Period

The resale or recapture policy is enforced through the use of a Written Agreement, and Deed of Trust signed by the homebuyer or homeowner at closing. The lien will specify:

- The length of the affordability period (based on the dollar amount of HOME funds invested in the unit; either 5,10,15 years);
- The home must remain the buyer's principal residence throughout the affordability period and list monitoring requirements;
- The conditions and obligations of the owner, should the owner wish to sell before the end of the affordability period.

The Resale or Recapture Provisions are triggered if any one of the following events occurs during the period of affordability:

- The Homebuyer/Homeowner sells, transfers or disposes of the property or home whether voluntarily or involuntarily.
- The Homebuyer/Homeowner fails to occupy the home as the principal residence;
- The Homebuyer refinances the first mortgage loan (if any) at which time the remaining principal balance is due and payable to the City of Pasadena, unless is lowers the monthly payment.
- For Homeowners assisted under the Housing Rehabilitation Services Program, if the last surviving Homeowner dies the imposed affordability period is extinguished.
- The Homebuyer/Homeowner violates any terms of any Agreements entered into with the City of Pasadena.

Period of Affordability under Resale Provisions

The HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the unit for the original and subsequent homebuyers. This option also ensures that the HOME-assisted unit remains affordable over the entire period of affordability even if unit is sold to a subsequent new homebuyer.

Period of Affordability under Recapture Provisions

The HOME rule states that the period of affordability is based on the direct HOME subsidy provided to the original homebuyer that enabled the original homebuyer to purchase the unit. If unit is sold there is no affordability requirements imposed on the subsequent new homebuyer.

Resale Provisions

HOME rule at 24 CFR 92.254(a)(5)(i) The City of Pasadena is required to ensure that when a HOME-assisted homebuyer sells his or her property, either voluntary or involuntary, during the affordability period, the property is sold to another low-income homebuyer who will use the property as his or her principal resident throughout the remainder of the affordability period. The original homebuyer must receive a fair return on investment and the property must be sold at a price that is affordable to a reasonable range of low-income buyers.

- Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.
- Resale provisions shall be required when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a developer, CHDO, Community Land Trust or other

similar entity maintains ownership of the HOME-assisted property to ensure its continued affordability in perpetuity.

- Resale provisions shall be required when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.
- Resale provisions shall be required when the HOME subsidy is provided in the form of a direct subsidy to develop the unit and HOME funds are not used lower the purchase price from fair market value to an affordable price.

Ensuring Long Term Affordability

The HOME rule at CFR 24 92.254(a)(3) requires the City of Pasadena HOME-assisted homebuyer housing be acquired by an eligible low-income family and the housing must be the principal residence of the family throughout the period of affordability. If the housing is transferred voluntary or involuntary or otherwise during the period of affordability, it must be made available for subsequent purchase only to a buyer whose family qualifies as low-income and will use the property as its principal residence.

Fair Return on Investment

The City of Pasadena HOME Program will administer its resale provisions by ensuring that if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment. Fair return is determined as follows:

- The original homebuyer's initial investment (Down payment assistance)
- Any capital improvements, documented with receipts provided by the homeowner, including but not limited to:
    - Any additions to the home such as a bedroom, bathroom, or garage
    - Replacement of heating, ventilation, and air conditioning systems
    - Accessibility improvements such as bathroom modifications for disabled or elderly, installation of wheel chair ramps and grab bars, any and all of which must have been paid for directly by the Owner and which were not installed through a federal, state, or locally-funded grant program
    - Outdoor improvements such as a new driveway, walkway, retaining wall or fence.
- The average change in the Consumer Price Index over the period of ownership as its standard index for fair return on investment.

(Down Payment + Capital Improvements) X Consumer Price Index = Fair Return

Down Payment + Capital Improvements + Fair Return = Total Return to the Original Homebuyer

It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his or her investment because the home sold for less or the same price as the original purchase price.

Affordability to a Range of Buyers

24 CFR 92.254 (a)(3) The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units "designated as affordable units" shall meet the following criteria:

- The subsequent purchaser must be low-income as defined by HOME and occupy the home as his/her new purchaser's primary residence for the remaining years of affordability period. (however, if the new purchaser receives direct assistance through a HOME-funded program, the affordability period will be recalculated according to the amount of assistance provided).
- The sales price must be affordable to the subsequent purchaser. Affordable is defined as limiting the principal, interest, taxes, and insurance (PITI) amount to no more than 30% of the new purchaser's household monthly income.
- Under no circumstances may the "affordable" sales price exceed 95% of the median purchase price for the area.
- The City of Pasadena's definition of reasonable range of low-income homebuyers are families between 60 to 80 percent of area median income.

$$\text{Maximum Permitted Sales Price} = \frac{\text{Initial Sales Price to Owner}}{\text{(Initial Area Median Income)}} \times \text{Resale Area Median Income}$$

- Initial Median Income is defined as the Area Median Income corresponding to a household size equivalent to 1.5 times the number of bedrooms in the Home at the time of the Owner's purchase of the Home rounded to the nearest whole number.
- Resale Area Median Income is defined as the Area Median Income corresponding to a household size equivalent to 1.5 times the number of bedrooms in the Home at the time of the Owner's Notice of Intent, rounded to the nearest whole number

Recapture Provisions

The Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to a homebuyer or homeowner. The City of Pasadena will recapture the HOME subsidy, subject to net proceeds, if the HOME recipient decides to sell the property within the period of affordability to anyone for whatever price the market will bear.

The sale of the property during the period of affordability triggers repayment of the *direct HOME subsidy*, subject to *net proceeds*, to the City of Pasadena that the buyer or owner received when he/she originally purchased the home.

Direct Subsidy

Direct HOME Subsidy is the entire amount of HOME assistance that enabled the homebuyer to buy the home. The direct subsidy includes down payment assistance, closing cost, rehabilitation costs or other HOME assistance provided directly to the homebuyer or homeowner.

Net Proceeds

Net proceeds is the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

Long Term Affordability

No requirements to subsequent new homebuyer

Reduction during the Affordability Period

The City of Pasadena will reduce the amount of direct HOME subsidy on a pro-rata basis for the time the original homebuyer has owned and occupied the home, measured against the required affordability period. To determine the pro-rata amount that will be recaptured by the City of Pasadena:

- Divide the number of years the original homebuyer occupied the home by the period of affordability.
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

Number of years homebuyer occupied home **X** **Total direct HOME subsidy** **=** **Recapture amount** **Period of affordability**

Note: The HOME rule limits recapture to available net proceeds, the City of Pasadena can only recapture what is available from net proceeds.

Appendix IV

Emergency Solutions Grants Program-Written Standards

CITY OF PASADENA
EMERGENCY SOLUTIONS GRANTS PROGRAM
WRITTEN STANDARDS

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INTRODUCTION

The City of Pasadena (THE CITY) has developed the following standards for providing assistance with Emergency Solutions Grants (ESG) funds as required by 24 CFR 576.400 (e). These standards were created in coordination with the Houston/Harris County Continuum of Care which includes Harris County, the City of Houston, Fort Bend County and the City of Pasadena, and Texas Department of Housing and Community Affairs funding within the CoC geographic area. They are in accordance with the interim rule for the Emergency Solutions Grants Program released by the U.S. Department of Housing and Urban Development on December 4, 2011 and the final rule for the definition of homelessness also released by the U.S. Department of Housing and Urban Development on December 4, 2011.

The City of Pasadena expects that the standards will adjust as the THE CITY gains more experience with and collects more data from services provided with the Emergency Solutions Grants program. The Standards serve as the guiding principles for funding programs.

STANDARDS APPLICABLE TO ALL PROGRAM COMPONENTS

ELIGIBLE ESG PROGRAM COMPONENTS

There are four (4) ESG Program Components:

1. Rapid Re-Housing
2. Emergency Shelter,
3. Homelessness Prevention and
4. Street Outreach.

Funds for ESG can be used to support any of the eligible components. The CoC gives priority to funding that supports securing housing options for homeless households and to support the expansion of rapid re-housing.

COORDINATING ASSESSMENT & SERVICES AMONG PROVIDERS

Designate staff members for CoC Provider Input forum: Each agency will assign two representatives to the input forum, where at least one member has decision making capacity for the program. CoC Provider Input Forums will meet quarterly, or more often as required by current CoC policies, where providers give and receive information regarding CoC strategies and policies.

Participate in any standardized training as designated by ESG funders and offered through CoC . The CoC will provide a vetted and standardized training curriculum for all housing stability case managers that will be available for all agencies providing case management for housing based services. The curriculum and standards will be developed as a part of and in partnership with the Continuum of Care Technical Assistance from the Department of Housing and Urban Development. This will focus on the requirements of maintaining stable housing and ensure access to mainstream resources that will provide ongoing, continued and necessary support for households to gain and maintain stable housing.

COORDINATING WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

The City of Pasadena expects that every agency that is funded through ESG will coordinate with and access mainstream and other targeted homeless resources. The City of Pasadena will evaluate performance of each provider based on the outcomes achieved toward housing models adopted through the CoC Steering Committee. These outcome measures will be used to evaluate program success annually. The City of Pasadena will use this and other performance metrics to guide funding decisions for ESG funded programs. Required outcomes for each intervention around accessing mainstream resources will match the outcomes approved by the CoC Steering Committee annually.

STANDARDS SPECIFIC TO EMERGENCY SHELTER

ELIGIBILITY: HOMELESS STATUS

Homeless clients entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3), or fleeing/attempting to flee domestic violence (Homeless Category 4).

For additional details related to the HUD definition of Homeless and applicability to each program component, see Appendix A and Appendix C.

ELIGIBILITY: INTAKE AND ASSESSMENT

Specific to Emergency Shelter,

- **Any new client entering into a shelter must also undergo a complete assessment to understand client needs and barriers and match the client to the most appropriate services provider.** The standard assessment accounts for length and frequency of homelessness, physical and mental health status, criminal history, veteran status, domestic violence experience, substance abuse conditions and employment history.

- **Clients will be prioritized within the emergency shelter system based on need, available resources, and geographic area.**
- Emergency shelters are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individuals or families with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.

ELIGIBILITY: PRIORITIZATION & REFERRAL POLICIES

Emergency shelters will prioritize individuals/families that:

- **Cannot be diverted; and**
- **Are literally homeless; and**
- **Can be safely accommodate in the shelter; and**
- **Not in need of emergency medical or psychiatric services or danger to self or others.**

Also note the following:

- **Emergency Shelters cannot discriminate per HUD regulations.**
- **There are no requirements related to ID, income or employment.**
- **Transgender placement based on gender self-identification.**

STANDARDS SPECIFIC TO HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

ELIGIBILITY: STATUS AS HOMELESS OR AT-RISK OF HOMELESSNESS

HOMELESSNESS PREVENTION

Individuals/families, who meet the HUD criteria for the following definitions, are eligible for Homelessness Prevention assistance:

- At Risk of Homelessness
- Homeless Category 2: Imminently at-risk of homelessness
- Homeless Category 3: Homeless under other federal statute and
- Homeless Category 4: Fleeing/attempting to flee DV (as long as the individuals/families fleeing or attempting to flee DV are **not** also literally homeless. If the individuals/families are also literally homeless they would actually qualify for rapid re-housing instead. See below.)

Additional eligibility requirements related to Homelessness Prevention include:

- **Proof of residence** within the City of Pasadena service area.
- **Total household income below 30 percent of Area Family Income** (AFI) for the area at initial assessment. Clients must provide documentation of household income, including documentation of unemployment and zero income affidavit for clients without income.

RAPID RE-HOUSING

Individuals/families, who meet the HUD criteria for the following definitions, are eligible for Rapid Re-Housing assistance:

- Homeless Category 1: Literally homeless
- Homeless Category 4: Fleeing/attempting to flee DV (as long as the individuals/families fleeing or attempting to flee DV are **also** literally homeless).

For additional details related to the HUD definition of Homeless and At Risk of Homelessness and applicability of these definitions to each program component, see Appendix A, B and C.

ELIGIBILITY: INTAKE AND ASSESSMENT

All clients must have an initial eligibility assessment and triage for appropriate housing by a specially trained housing assessor. All clients are assessed using housing triage tool in HMIS. The standard assessment accounts for length and frequency of homelessness, physical and mental health status, criminal history, veteran status, domestic violence experience, substance abuse conditions and employment history.

TARGETED POPULATIONS: CLIENT PRIORITIZATION

HOMELESSNESS PREVENTION

Note that all targeted individuals and families described below have to meet the minimum HUD requirements for eligibility to HP.

RAPID RE-HOUSING

The City of Pasadena may provide assistance to individuals who are currently homeless but not in need of permanent supportive housing as eligible for rapid re-housing. This can include, but is not limited to individuals and households who,

- are first time homeless;
- have few recent episodes of homelessness; or
- are part of a family that is homeless.

It should be noted, rapid re-housing funds are directed to individuals with income or work history and skills that indicate employability.

FINANCIAL ASSISTANCE

DURATION AND AMOUNT OF ASSISTANCE

- All clients are assessed to determine initial need and create a budget to outline planned need for assistance.
- Agencies cannot set organizational maximums or minimums but must rely on the CoC wide tools to determine household need.
- Through case management, client files are reviewed monthly to ensure that planned expenditures for the month validate financial assistance request.
- The City of Pasadena expects that households will receive the minimum amount of assistance necessary to stabilize in housing.

Clients cannot exceed 24 months of assistance in a 36 month period.

PARTICIPANT SHARE

Participant share will be determined by use of common assessment and budgeting tools. Clients will participate in the development of their individual housing plan with a case manager based on client goals and shared goals for achieving housing stability. Financial assistance is available for households with zero income.

HOUSING STABILIZATION AND RELOCATION RELATED ASSISTANCE AND SERVICES

REQUIRED SERVICES: CASE MANAGEMENT & CASE LOADS

Homelessness prevention clients must have an initial home visit when first approved for assistance and subsequent house visits with each recertification every three months. It is expected that case managers will conduct office visits with homelessness prevention clients between home visits, at least once per month. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

Case management includes home and office visits determined by client need and supported by the housing plan.

As required by the Continuum of Care Housing Models, case managers are expected to follow up with clients that have successfully exited rapid re-housing case management at a minimum of 30 days after exiting the program. Clients who remain in housing for 90 days after exiting rapid re-housing, identified through HMIS, are categorized as stably housed.

Case management staff must have an updated copy of the Rental Assistance Agreement and ensure that the fiscal agent is informed of any changes to the participant rent share as indicated in the Housing Stabilization Plan.

REQUIRED SERVICES: HOUSING LOCATION SERVICES

Any subrecipient of ESG assistance must also have a dedicated housing navigation and location specialist for households receiving rapid re-housing, rather than the expectation that clients must navigate the system on their own. This specialized position will be dedicated to finding appropriate housing and developing relationships with affordable housing providers. This process facilitated by this position ensures ESG clients have greater housing choice. Housing navigators for rapid re-housing may have expertise based on location and type of housing.

REQUIRED SERVICES: INSPECTION AND LANDLORD AGREEMENT

Any unit that receives financial assistance through rapid re-housing must pass a Housing Quality Standards Inspection as outlined in the ESG regulations. The inspections will be conducted by a qualified agency with expertise in inspection.

Any unit that receives rental assistance payments through rapid re-housing must have an agreement in place between the financial assistance fiscal intermediary and the property. The rental assistance agreement details the terms under which rental assistance will be provided.

INELIGIBLE SERVICES: CREDIT REPAIR AND LEGAL SERVICES

The City of Pasadena will not allow ESG funds to be used for credit repair and legal services to be eligible activities. The City of Pasadena has found limited access to this resource by clients and providers and will instead encourage the use of mainstream service providers and establish them as part of the system of providers with formal relationships.

OPTIONAL SERVICES: SECURITY/UTILITY DEPOSITS

Rental and utility deposits can be included in housing stabilization services as dictated by the housing stabilization plan. Rental and utility deposits can be included in lieu of or in combination with rental assistance for a unit.

Security deposits can cover up to two months of rent.

OPTIONAL SERVICES: RENTAL APPLICATION FEES

The City of Pasadena expects that rapid re-housing navigation and location specialists will work closely with housing providers and establish trusting relationships among landlords in a way that will encourage property owners and managers to waive application fees for rental properties. To that end, application fees can only be provided for one application at a time; but note that this only limits the number of applications that require application fees. Case managers and housing specialists can and should work with clients and landlords to process as many free applications as possible.

ELIGIBILITY: PERIODIC RE-CERTIFICATION

All case managers are required to re-certify clients based on the following schedule. At that time, a case manager may decide to extend, decrease or discontinue providing assistance.

Program Component	Schedule	Re-certification Criteria
Homelessness Prevention	Every 3 months	For both HP and RRH, to continue to receive assistance, clients must • be at or below 30% AFI AND • lack sufficient resources and support networks necessary to retain housing without ESG assistance. Families are required to provide information on income, assets greater than $5,000, deductions, and family composition during the annual recertification process.
Rapid Re-Housing	Annually	

STANDARDS SPECIFIC TO STREET OUTREACH

ELIGIBILITY: HOMELESS STATUS

Individuals/families who meet the HUD criteria for the following definitions are eligible for Street Outreach services:

- Homeless Category 1: Literally Homeless
- Homeless Category 4: Fleeing/attempting to flee DV (where the individuals/families also meet the criteria for Category 1)

In addition, individuals and families must be living on the streets or other places not meant for human habitation **and** be unwilling or unable to access services in an emergency shelter.

TARGET POPULATION

Although the homeless population is considered a vulnerable population, street outreach activities should target those who are extremely vulnerable including youth and chronically homeless persons.

Revised August 2017

ENGAGEMENT/COLLABORATION

The City of Pasadena requires that agencies conducting street outreach activities must engage with unsheltered homeless persons for the purpose of providing immediate support, intervention or connections with mainstream social service programs. The connection of any unsheltered person to an emergency shelter, supportive housing, and/or referral to social service agencies will serve as immediate support and intervention for housing stabilization or critical services.

Agencies are encouraged to use evidenced based practices for their street outreach efforts; including the Housing First Model that quickly connects individuals to permanent housing in the face of acute barriers to entry into housing programs. Additionally, the agencies will participate in the local Continuum of Care's Street Outreach Workgroup and utilize the Coordinated Access Assessment to identify barriers to housing.

ELIGIBILITY: INTAKE AND ASSESSMENT

The City of Pasadena requires that agencies conducting street outreach activities must provide individuals and families with an assessment and enter data into HMIS or a comparable database for DV providers. The City of Pasadena encourages providers to develop relationships with unsheltered homeless persons that will help connect them with emergency shelter and housing services primarily through a referral to Coordinated Access.

APPENDIX A: HUD DEFINITION FOR HOMELESS

HUD CRITERIA FOR DEFINING HOMELESS	**Category 1**	Literally Homeless	Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or • Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	Individual or family who will imminently lose their primary nighttime residence, provided that: • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; • Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	Any individual or family who: • Is fleeing, or is attempting to flee, domestic violence; • Has no other residence; and • Lacks the resources or support networks to obtain other permanent housing

APPENDIX B: HUD DEFINITION FOR AT RISK OF HOMELESSNESS

HUD CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	**Category 1**	Individuals and Families	An individual or family who: (i) Has an annual income below 30% of median family income for the area; AND (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND (iii) Meets one of the following conditions: A. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR B. Is living in the home of another because of economic hardship; OR C. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR D. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR E. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR F. Is exiting a publicly funded institution or system of care; OR G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

APPENDIX C: CROSS WALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS

Eligibility by Component	**Emergency Shelter**	Individuals and families defined as Homeless under the following categories are eligible for assistance in ES projects: • Category 1: Literally Homeless • Category 2: Imminent Risk of Homeless • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV
	Rapid Re-Housing	Individuals and families defined as Homeless under the following categories are eligible for assistance in RRH projects: • Category 1: Literally Homeless • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is also literally homeless)
	Homelessness Prevention	Individuals and families defined as Homeless under the following categories are eligible for assistance in HP projects: • Category 2: Imminent Risk of Homeless • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is NOT also literally homeless) Individuals and families who are defined as At Risk of Homelessness Additionally, HP projects must only serve individuals and families that have an annual income BELOW 30% AMI

APPENDIX D: ELIGIBILITY CRITERIA AND PRIORITIZATION TOOL FOR HOMELESSNESS PREVENTION SYSTEM

Eligibility Requirements

All potential clients will be screened for the following:

Income – Only households with income below 30% of the Area Median Income are eligible for Homelessness Prevention services (see Attachment A for income limits)

PLUS

Trigger Crisis – An event has occurred which is expected to result in housing loss within 30 days due to one of the listed reasons (see Attachment B for qualifying trigger crises)

PLUS

No resources or support network to prevent homelessness –No other options are possible for resolving this crisis. "But for this assistance" this household would become literally homeless—staying in a shelter, a car, or another place not meant for human habitation

OR

Unaccompanied children and youth who qualify as homeless under another Federal statute – See Runaway and Homeless Youth Act definition or Documentation for school district certification of homelessness (see Attachment C for other definitions of homelessness)

OR

Families with children or youth who qualify as homeless under another Federal statute –See Runaway and Homeless Youth Act definition or Documentation for school district certification of homelessness (see Attachment C for other definitions of homelessness)

APPENDIX E: EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

Emergency Transfers

[Insert name of ESG Subrecipient or Provider], ESG Provider, is concerned about the safety of its Program Participants who receive rental assistance, and such concern extends to the Program Participants who have experienced domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),[1] ESG Provider allows Program Participants who have experienced domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the Program Participant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.[2] The ability of ESG Provider to honor such request for Program Participants currently receiving assistance, however, may depend upon a preliminary determination that the Program Participant is or has experienced domestic violence, dating violence, sexual assault, or stalking, and on whether ESG Provider has another dwelling unit that is available and is safe to offer the Program Participant for temporary or more permanent occupancy.

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[1] Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

[2] Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

This plan identifies Program Participants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to Program Participants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Emergency Solutions Grants is in compliance with VAWA.

Eligibility for Emergency Transfers

A Program Participant who has experienced domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the Program Participant reasonably believes that there is a threat of imminent harm from further violence if the Program Participant remains within the same unit. If the Program Participant has experienced sexual assault, the Program Participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A Program Participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Program Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the Program Participant shall notify HP's management office and submit a written request for a transfer to **[ESG Subrecipient or Provider to insert location]**. ESG Provider will provide reasonable accommodations to this policy for individuals with disabilities. The Program Participant's written request for an emergency transfer should include either:

1. A statement expressing that the Program Participant reasonably believes that there is a threat of imminent harm from further violence if the Program Participant were to remain in the same dwelling unit assisted under the ESG Provider's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

ESG Provider must keep records of all requests and outcomes of such requests, which will be reported to the Texas Department of Housing and Community Affairs.

Confidentiality

The ESG Provider will keep confidential any information that the Program Participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the Program Participant gives ESG Provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the Program

Participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the Program Participant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Program Participants for more information about HP's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

ESG Provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. ESG Provider will, however, act as quickly as possible to move a Program Participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a Program Participant reasonably believes a proposed transfer would not be safe, the Program Participant may request a transfer to a different unit. If a unit is available, the transferred Program Participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the Program Participant has been transferred. ESG Provider may be unable to transfer a Program Participant to a particular unit if the Program Participant has not or cannot establish eligibility for that unit.

If ESG Provider has no safe and available units for which a Program Participant who needs an emergency is eligible, ESG Provider will assist the Program Participant in identifying other housing providers who may have safe and available units to which the Program Participant could move. At the Program Participant's request, ESG Provider will also assist Program

Participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

If ESG Provider assists through project-based rental assistance and if a Program Participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that Program Participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

For families receiving tenant-based rental assistance, the following actions will be taken for the non-transferring family member(s), if the family separates in order to effect an emergency transfer: **[ESG Subrecipient or Provider insert actions here].**

Safety and Security of Program Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the Program Participant is urged to take all reasonable precautions to be safe.

Program Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Program Participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at https://ohl.rainn.org/online/.

Program Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at https://www.victimsofcrime.org/our-programs/stalking-resource-center.

For questions regarding VAWA, and/or if you need to move due to domestic violence, dating violence, sexual assault, or stalking please contact the Texas Department of Housing and Community Affairs at 512-475-3800 or 800-475-3800 (Relay Texas 800-735-2989) for assistance in locating other available housing (note, this is not a domestic violence hotline. Depending on your location, the Department may also have a listing of local service providers and advocates who can help you move to a safe and available unit. For more information regarding housing and other laws that may protect or provide additional options for survivors, call the Texas Council on Family Violence Policy Team at: 1-800-525-1978.

Domestic Violence, Sexual Assault and Stalking Resources

To speak with an advocate and receive confidential support, information and referrals regarding domestic violence 24 hours a day, every day, contact the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also visit the Texas Council on Family Violence website for a listing or local domestic violence services providers: http://tcfv.org/service-directory/?wpbdp_view=all_listings.

For confidential support services and referral to a local sexual assault crisis center 24 hours a day, every day, contact RAINN: Rape, Abuse, & Incest National Network: Hotline: 1-800-656-HOPE. You may also visit the Texas Association Against Sexual Assault to find local crisis centers: http://taasa.org/crisis-center-locator/.

For information regarding stalking visit the National Center for Victims of Crime's Stalking Resource Center at https://www.victimsofcrime.org/our-programs/stalking-resource-center.

Victims of a variety of crimes my find referrals by contacting t the Victim Connect Resource Center, a project of the NCVC, through calling Victim Connect Helpline: 855-4-VICTIM (855-484-2846) or searching for local providers at http://victimconnect.org/get-help/connect-directory/.

Legal Resources

TexasLawHelp.org

www.texaslawhelp.org

TexasLawHelp.org is a website that provides free, reliable legal information on a variety of topics such as; family law, consumer protection and debt relief, health and benefits, employment law, housing, wills and life planning, and immigration. The website offers interactive and downloadable legal forms, self-help tools and videos on legal issues, and can assist in locating local free legal services.

Texas Advocacy Project, A VOICE

1.888. 343.4414

Advocates for Victims of Crime (A VOICE), a project of Texas Legal Services Center, provides free direct legal representation and referrals to victims of violent crime, and providing education about crime victim's rights and assistance with Crime Victims Compensation applications. Note: callers will most likely leave a message and their call will be returned by an attorney.

Legal Aid for Survivors of Sexual Assault (LASSA)

1-844-303-SAFE (7233)

The LASSA Hotline is answered by attorneys seven days a week. The Hotline attorneys provide sexual assault survivors with legal information and advice about legal issues that may arise following a sexual assault including crime victim's rights, housing, and safety planning.

Family Violence Legal Line

800-374-HOPE

Texas Advocacy Project. Offers the HOPE Line, Monday -Friday 9am-5pm, staffed by attorneys can help you with a variety of legal concerns related to domestic violence, sexual assault, and stalking.

Attachment A

30% Area Median Income (2018)

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
0 - 30%	$15,750	$18,000	$20,780	$25,100	$29,420	$33,740	$38,060	$42,380

Attachment B

Trigger Crisis

Will lose housing within 30 days due to one of the following:

___ Moved twice or more in the past 60 days

___ Living in the home of another person because of economic hardship

___ Notified that right to occupy their current housing or living situation will be terminated within 21 days after date of application

___ Living in hotel or motel and cost is not paid for by charitable organization or government program for low-income people

___ Living in SRO or efficiency where more than 2 people live; or in a larger housing unit with more than 2 people per room

___ Exiting a publicly funded institution or system of care

___ Exiting a publicly or privately funded inpatient substance abuse treatment program or transitional housing program

___ Living in rental housing that is being condemned by a government agency and tenants are being forced to move out

Attachment C

Other Definitions of Homelessness

- **Runaway and Homeless Youth Act (42 U.S.C 5701 et seq.)**

Runaway and Homeless Youth funding is administered by the Family and Youth Services Bureau within the Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS). Information about Runaway and Homeless Youth program grantees is available online at http://www2.ncfy.com/locate/index.htm.

- **Head Start Act (42 U.S.C. 9831 et seq.)**

Head Start funding is administered by the Office of Head Start (OHS) within ACF/HHS. A listing of Head Start programs, centers, and grantees is available online at http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices

- **Violence Against Women Act of 1994; subtitle N (42 U.S.C. 14043e et seq.)**

Violence Against Women Act established the Office on Violence Against Women (OVW) within the U.S. Department of Justice (DOJ). OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers one formula grant program and eleven discretionary grant programs, all of which were established under VAWA and subsequent legislation. More information about OVW is available online at http://www.ovw.usdoj.gov/.

- **Public Health Service Act; section 330 (42 U.S.C. 254b)**

The Public Health Service Act authorized the Health Center Program, which is administered by the Bureau of Primary Health Care within the Health Resources and Services Administration (HRSA) of HHS. Information about local Health Centers can be found online at http://bphc.hrsa.gov/index.html

- **Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)**

Food and Nutrition Act of 2008 relates to the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps. SNAP is administered by the U.S. Department of Agriculture (USDA). More information about SNAP can be found online at http://www.fns.usda.gov/snap/

- **Child Nutrition Act of 1966; section 17 (42 U.S.C. 1786)**

Child Nutrition Act of 1966 authorized numerous programs related to school lunches and breakfasts and funds for meals for needy students. For more information about these programs, contact the local School Department.

- **McKinney-Vento Act; subtitle B of title VII (42 U.S.C. 11431 et seq.)**

McKinney-Vento Act authorized the McKinney-Vento Education for Homeless Children and Youths Program, which is administered via the Office of Elementary and Secondary Education within the U.S. Department of Education. More information about this program is available online at http://www2.ed.gov/programs/homeless/index.html. Also, contact the local School Department.

Appendix V
Regional Analysis of Impediments to Fair Housing Choice

BBC RESEARCH & CONSULTING

Regional Analysis of Impediments to Fair Housing Choice

Harris County
City of Pasadena
City of Missouri City
City of Galveston
Harris County Housing Authority
Galveston Housing Authority

July 2, 2018

Regional Analysis of Impediments to Fair Housing Choice

Prepared for
Harris County
City of Pasadena
City of Missouri City
City of Galveston
Harris County Housing Authority
Galveston Housing Authority

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BBC RESEARCH & CONSULTING

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SECTION ES.

Executive Summary

EXECUTIVE SUMMARY

This section summarizes the main findings from the regional Analysis of Impediments to Fair Housing Choice (AI) conducted for Harris County, the City of Pasadena, the City of Missouri City, the City of Galveston, Harris County Housing Authority, and Galveston Housing Authority.

This Executive Summary provides background on the study, summarizes the analysis conducted for the study and then highlights key findings. It concludes by identifying impediments/barriers to fair housing choice and summarizing the regional and jurisdictional goals and strategies to address those barriers.

Study Background

In 2017, Harris County, Pasadena, Missouri City, and Galveston, along with the Harris County Housing Authority and the Galveston Housing Authority agreed to collaborate to fulfill a requirement by the U.S. Department of Housing and Urban Development (HUD) to analyze barriers to housing choice. This fair housing analysis is required of any city, county, and state receiving certain HUD funding, including such sources as Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). HUD encourages regional collaboration on these studies, recognizing that housing challenges do not end at jurisdictional borders—and that regional partnerships are key to addressing housing needs and sustaining economic growth.

The overall goal of the Regional AI approach is to help communities analyze challenges to fair housing choice and establish goals and priorities to address fair housing barriers. A secondary goal is to help communities move toward an economic opportunity philosophy when making planning and housing policy decisions.

How does economic opportunity relate to fair housing? Historically, housing policies and programs have focused on creating new units, with limited regard to location. This approach has shifted in recent years, as a result of legal challenges and research showing that where housing is located has a lasting effect on the economic outcomes of residents—and, consequently, the economic health of neighborhoods and entire communities.

Many studies have found long-term public savings related to improvements in housing stability and economic inclusion. For example:

- Dr. Raj Chetty's well known Equality of Opportunity research found economic gains for adults who moved out of high poverty neighborhoods when they were children. The gains were larger the earlier the children were when they moved.[1]

[1] http://www.equality-of-opportunity.org and http://www.equality-of-opportunity.org/images/mto_exec_summary.pdf

- A companion study on social mobility isolated the neighborhood factors that led to positive economic mobility for children: lower levels of segregation, lower levels of income inequality, high quality education, greater community involvement ("social capital"), and greater family stability.
- A 2016 study by the National Bureau of Economic Research (NBER) found positive economic and social outcomes for children raised in publicly subsidized housing, regardless of the poverty level of the neighborhood.[2] Another research project had a slightly different conclusion. A study by researchers at Johns Hopkins University found that when assisted housing is located in higher quality neighborhoods, children have better economic outcomes. The study also concluded that because low income African American children are more likely than low income white children to live in assisted housing, the location of assisted housing in poor quality neighborhoods has a disproportionate impact on African American children's long term economic growth.[3]

An economically inclusive approach to fair housing planning is also consistent with the "affirmatively furthering fair housing" clause in the Federal Fair Housing Act (FHA). The FHA requires that HUD programs and activities be administrated in a manner that affirmatively furthers the intent of the Act. Federal courts have interpreted this to mean doing more than simply not discriminating: The obligation also requires recipients of federal housing funds to take meaningful actions to overcome historic and current barriers to accessing economically stable communities.

"Home" encompasses a variety of factors—good neighbors, safe environments, quality schools, social services, jobs, and transportation—all of which affect the economic health of a neighborhood and its residents.

Jurisdiction v. region terminology. The "jurisdiction" as defined by the AI is the city or county or groups of cities and counties that receive HUD block grant funds directly from HUD. The cities and counties included in this AI are the City of Pasadena, the City of Missouri City, the City of Galveston, and Harris County (excluding Pasadena as well as Houston and Baytown, which are entitlement communities and will produce independent AIs), referred to throughout the report as the "Harris County Service Area".[4] Two housing authorities are also participating in the AI: Harris County Housing Authority (HCHA) and Galveston Housing Authority (GHA).

For the purposes of the AI, the "region" used in comparative analysis is the Core Based Statistical Area, or CBSA. CBSA boundaries are set by the U.S. Office of Management and Budget (OMB) and include both metropolitan and micropolitan (smaller consolidated cities) areas. By definition, a CBSA is county or group of counties with at least one urbanized area of 10,000 people or more and adjacent areas with a "high degree of social and economic integration."

[2] http://www.nber.org/papers/w19843.pdf

[3] https://jhu.pure.elsevier.com/en/publications/race-and-assisted-housing

[4] The Harris County service area consists of unincorporated Harris County and 12 small cities in the county that have signed cooperative agreements for inclusion in Harris County's application for funding: Deer Park, Galena Park, Humble, Jacinto City, Katy, La Porte, Morgan's Point, Seabrook, Shoreacres, South Houston, Tomball, and Webster.

The region that includes the participating jurisdictions for this AI is the "Houston-The Woodlands-Sugar Land CBSA" comprised of nine counties including and surrounding Harris County: Harris, Fort Bend, Montgomery, Brazoria, Galveston, Liberty, Waller, Chambers and Austin counties. This area is commonly referred to as the "Greater Houston Region" and may also be called "the region" throughout this document.

Fair Housing law and enforcement. The Federal Fair Housing Act (FFHA) was part of the federal Civil Rights Act of 1968. The original language in the FFHA prohibited discrimination in the sale, rental and financing of dwellings in housing-related transactions based on race, color, national origin and religion. The FFHA was amended 20 years later, in 1988, to prohibit discrimination on the basis of disability or familial status, and to require accessible units in multifamily developments built after 1991.

Developments exempted from the FFHA include: housing developments for seniors, housing strictly reserved for members of religious organizations or private clubs, and multifamily housing of four units or less with the owner occupying one unit.

The state of Texas has adopted Title 15, Fair Housing Practices, Chapter 301, Texas Property Code, also known as the Texas Fair Housing Act which promotes the ability of protected class residents to access low-poverty areas by prohibiting discrimination in housing based on race, ethnicity, nationality, family status, and disability. The Act mirrors the Federal Fair Housing Act (FFHA) and enables the state of Texas to enforce fair housing violations which obstruct access to low-poverty areas to residents based on these characteristics.

Organization of this AI. The research in the AI covered demographic patterns including racial and ethnic segregation and concentrated areas of poverty; housing patterns, including the provision of publicly assisted housing; land use regulations and zoning ordinances that affect the siting and types of housing; access to housing and community amenities by residents with disabilities; and enforcement of fair housing laws and fair housing resources in the region.

Following this Executive Summary, the report is organized around the following sections:

- Section I. Demographic Patterns
- Section II. Racially/Ethnically Concentrated Areas of Poverty
- Section III. Housing and Lending Analysis
- Section IV. Access to Opportunity
- Section V. Disability and Access
- Section VI. Publicly Assisted Housing
- Section VII. Community Engagement Findings
- Section VIII. Fair Housing Landscape
- Section IX. Fair Housing Goals

Community Participation Process

The community participation process for the regional AI provided multiple opportunities in various formats for residents and stakeholders to share their experience and opinions about fair housing choice and access to opportunity in the region. Outreach activities included resident and stakeholder engagement opportunities and were promoted by each of the participating jurisdictions and community partners.

Methods of engagement focused on creating opportunities to participate in whatever format residents preferred, from a survey available online and in a postage-paid mail format, pop up events where the study team engaged residents attending community events, open house public meetings and focus groups.

- ***Resident survey.*** A total of 5,889 residents of the region responded to the resident survey which was available in English, Spanish and Vietnamese. The survey was offered online and in postage-paid mail surveys distributed to residents by the jurisdictions and community partners.

- ***"Pop up" engagement events.*** At "pop up" engagement events, 269 residents participated in prioritization activities and more discussed their fair housing and access to opportunity experiences with the study team. HUD's AFFH-T maps of the region were available for residents to review and discuss. The "pop up" events serve to bring the AI community engagement process to residents attending other scheduled community events. Selected events were chosen because members of protected classes were the most likely attendees.

- ***Focus group with residents with disabilities.*** The Houston Center for Independent Living hosted a focus group with residents with disabilities on March 14, 2017. Sixteen residents with disabilities participated in the discussion which was conducted in English and American Sign Language (ASL) through the assistance of two ASL interpreters.

- ***Focus group with resident advisory board.*** GHA and HCHA both hosted a focus group with their respective Resident Advisory Boards to discuss residents' experiences with fair housing choice and access to opportunity.

- ***Community open house events.*** A total of 56 residents attended one of four community open house events at locations in Galveston, Pasadena, Missouri City and Harris County. The open house format included a scrolling presentation of results from the AI data and mapping analysis; interactive exercises related to fair housing, community development needs, priorities, and community perceptions; and open discussions with study team members and staff from the participating partners.

- ***Stakeholder consultation.*** Stakeholder consultation included a kickoff meeting with stakeholders, consultation on the resident survey content and stakeholder focus groups. Over 30 organizations were represented in the stakeholder engagement process.

Findings from this outreach, in addition to the quantitative analysis conducted for the study, were used in the formation of impediments and highest priority fair housing issues.

What are the key research findings from the fair housing analysis?

This portion of the Executive Summary highlights key research findings from the fair housing analysis, including resident and stakeholder input. A discussion of the implications of those findings in the form of fair housing issues is provided in the next subsection titled "What are the primary fair housing challenges in the Greater Houston Region? What factors contribute to the creation and/or persistence of those challenges?"

Demographics and presence of protected class populations. Figure ES-1 shows the total population in each jurisdiction along with demographic characteristics most relevant to the fair housing analysis.

- The region and the participating jurisdictions are all minority majority communities in which racial/ethnic groups other than non-Hispanic white comprise between 59 and 74 percent of all residents. About one quarter of residents in the region and in each participating jurisdiction were born outside the United States and between 8 and 22 percent of residents in each jurisdiction have limited English proficiency.

- About half of all households in the region are families with children. The proportion is slightly higher in the Harris County service area (55%) and Pasadena (54%) but slightly lower in Missouri City (48%) and Galveston (40%).

- Eleven percent of residents region-wide have some type of disability. Jurisdictions range from 7 percent in Missouri City to 15 percent in Galveston. The proportion with a disability is correlated to the age profile of residents in each jurisdiction.

Figure ES-1.
Current Demographics, Region and Jurisdictions

	Greater Houston Region	Harris County Service Area	Galveston	Missouri City	Pasadena
Total Population	**5,920,416**	**1,760,135**	**48,178**	**68,244**	**150,785**
Percent of Population:					
Non-Hispanic white (NHW)	40%	40%	41%	26%	33%
Racial/ethnic group other than NHW	60%	61%	59%	74%	67%
African American/Black	17%	16%	21%	40%	2%
Hispanic	35%	36%	33%	16%	62%
Asian or Pacific Islander	7%	7%	3%	16%	2%
Native American	0%	0%	0%	0%	0%
Other or Two or more Races	1%	2%	2%	2%	1%
Foreign-born	23%	22%	15%	25%	25%
Limited English Proficiency	16%	16%	8%	11%	22%
Families with children	51%	55%	40%	48%	54%
People with a disability	11%	9%	15%	7%	12%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families. Refer to the Data Documentation for details (www.hudexchange.info).

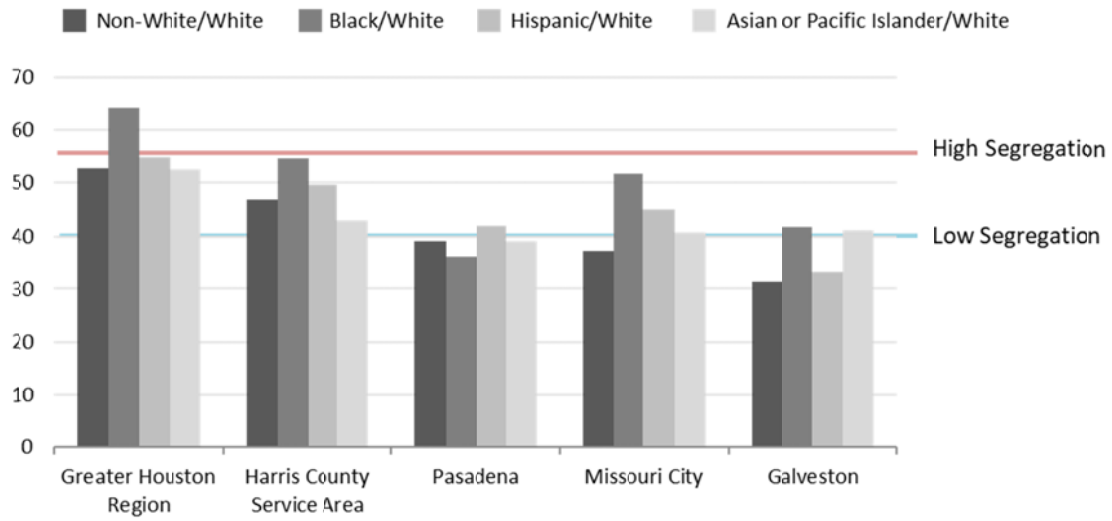
Source: Decennial Census and ACS from the HUD AFFH-T; and BBC Research & Consulting.

Segregation by race/ethnicity. The segregation analysis in this AI uses several different measures to evaluate concentration of specific protected class groups and segregation/integration by race and ethnicity.

Dissimilarity index. One of those segregation measures is a dissimilarity index, or DI, that is calculated and provided by HUD for each jurisdiction. The DI is a widely used measure of racial residential segregation and is designed to compare the distributions of two racial/ethnic groups. By definition, DI values range from 0 to 100—where 0 is perfect integration of those groups and 100 is complete segregation of those groups.

The DI data provided by HUD for the AI, shown in Figure ES-2, reveal that the participating jurisdictions are less segregated than the region overall. Even so, Harris County has "moderate" levels of segregation for all racial/ethnic groups as does Missouri City. Galveston and Pasadena have low to moderate levels of segregation, depending on the racial/ethnic group of focus.

Figure ES-2.
Dissimilarity Index as a Measure of Segregation



Note: "White" in this figure means non-Hispanic white. "Non-White" means any race/ethnicity other than non-Hispanic white. Dissimilarity index values less than 40 indicate "Low" segregation; values 40-54 indicate "Moderate" and values over 55 indicate "High" segregation.

Source: HUD AFFH-T.

Long term trends indicate that Hispanic segregation has increased over the past 25 years (except in Galveston) while black/white segregation, which is higher, has remained relatively constant (Harris County and Missouri City) or declined (Galveston and Pasadena).

In addition to the HUD-provided DI data above, this AI considers a finer grain of geographic detail in the segregation analysis by calculating the DI using block-level data instead of block group level (HUD data). Block groups tend to represent neighborhoods while blocks represent smaller areas within neighborhoods. The DI is generally higher when using blocks as the level of analysis, which means that while *neighborhoods* have low to moderate segregation, *blocks within those neighborhoods* have moderate to high segregation. At the block level, all jurisdictions have a DI that falls into the "high segregation" category for black/white segregation and all show

moderate segregation between minorities in general and non-Hispanic whites. The black/white DI value in Galveston (65) is the highest of the participating jurisdictions in this assessment.

Demographic mapping. HUD also provides extensive demographic maps to use in the segregation analysis for the AI. Key findings from the mapping analysis include:

- Individual jurisdiction maps affirm the findings of the dissimilarity index analysis and reveal clusters of African American residents and of Hispanic residents in each jurisdiction.
- Concentrations of residents by national origin—as measured by foreign born status—and by limited English proficiency were also evident.
    - In Harris County, there were clusters of Vietnamese communities in Southeastern and Southwestern Harris County outside of Houston. Those areas also had communities of Vietnamese and Chinese speakers.
    - In Pasadena, Mexican, El Savadoran, and Honduran immigrants are concentrated in North Pasadena in high poverty neighborhoods. Spanish speakers with limited English proficiency are also concentrated in these neighborhoods.
    - In Missouri City, Indian residents are clustered in Northwest Missouri City while Mexican and Nigerian residents are scattered throughout the city. African American residents have become less concentrated over the past 20 years.
    - Galveston's minority population resides in the more densely-populated downtown, while the less dense beach front areas are primarily non-Hispanic white. The same is true for limited English proficient populations and, to a lesser extent, Mexican immigrants.
- Some municipalities in the Harris County service area are underbounded, growing to the edge of dense minority neighborhoods—or in several cases around them—without annexing them. Annexation can impact infrastructure investments as well as access to government services for residents. Factors influencing annexation differ in each situation and may or may not constitute a fair housing concern. For example, it may not make financial sense to annex communities if they are older and lack adequate infrastructure. However, the very presence of these communities and their historical development could be due to racism/perceived racism (current or historic) driving settlement patterns.

Stakeholder perceptions. Stakeholders also identified many areas of segregation in the region and felt that HUD maps did not cover all areas of concern regarding areas of racial and ethnic concentrations of poverty. Stakeholders expressed specific concern related to individuals with disabilities and low-income families as well as African American segregation.

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs). A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood with a poverty rate of 40 percent and a racial and ethnic concentration (non-white populations of

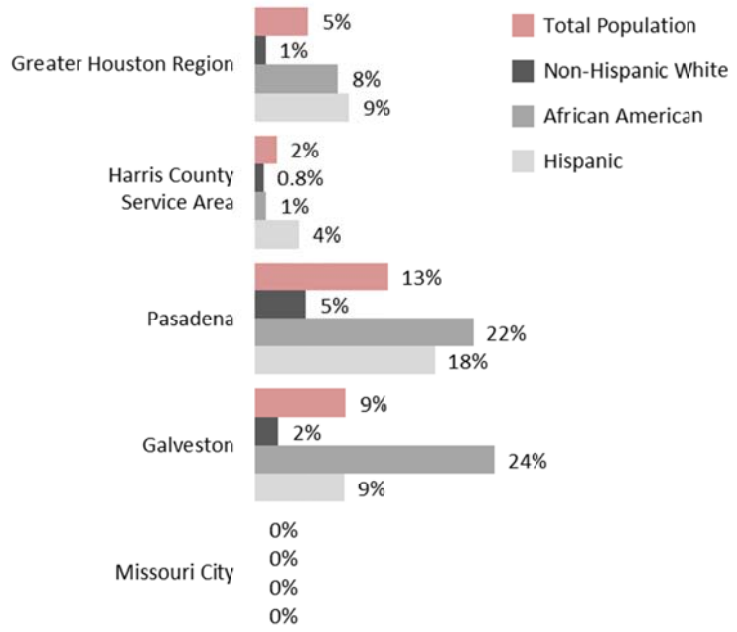
50% or more).[5] Households within R/ECAP Census tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges.

Altogether, 76 Census tracts in the Greater Houston region are R/ECAPs; 57 are located in Houston, four are in the City of Pasadena, nine are elsewhere in Harris County, two are in Galveston, one is elsewhere in Galveston County, two are located in Fort Bend County, and one is in Montgomery County. There are no R/ECAPs in Missouri City.

In the region as a whole, Hispanic and African American residents have the highest shares of residents living in R/ECAPs. Overall, 5 percent the region's population lives in R/ECAPs. As displayed in Figure ES-3, Pasadena has the highest proportion of total population living in R/ECAPs (13%) but Galveston has the highest proportion of any single racial/ethnic group living in R/ECAPs—24 percent of African American residents in Galveston are living in R/ECAPs.

Figure ES-3.
Percent of Population by Race/Ethnicity that are Living in R/ECAPs

Source:
HUD AFFH-T and BBC Research & Consulting.



In the Harris County service area, Hispanic residents are over-represented in R/ECAPs relative to their population distribution overall (75% of the R/ECAP population compared to 36% of the jurisdiction's population). African Americans residents, however, are underrepresented in R/ECAPs (8% of the R/ECAP population compared to 16%). Approximately one-fifth of the residents of R/ECAPs are immigrants, with the largest group (11.6%) from Mexico. Many of the Harris County service area R/ECAPs are in close proximity to interstates and other major highways, which may increase the health risks faced by R/ECAP residents.

[5] At the neighborhood level, 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 up to 14 percent of poverty have no noticeable effect on community opportunity. (The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline." In Nicolas P. Retsinas and Eric S. Belsky, eds., Revisiting Rental Housing: Policies, Programs, and Priorities. Washington, DC: Brookings Institution, 116–9).

In Pasadena, Hispanic residents, families with children and Mexican immigrants are all overrepresented in R/ECAPs relative to their city-wide distribution. Much of the city's publicly assisted housing is located in these neighborhoods as well.

Hispanic representation in Galveston's R/ECAPs is the same as their representation in the city overall; however African American representation in R/ECAPs (55%) is significantly higher than their representation in the city overall (21%). Families with children are somewhat overrepresented in R/ECAPs in Galveston as are residents from Guatemala.

Housing needs. Regional housing market trends indicate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000. In addition, displacement from Hurricane Harvey exacerbated an already tight rental market. In the context of this fair housing analysis, affordability concerns and housing needs are viewed through the perspective of disparities by protected class. Affordability can become a fair housing issue if/when protected class groups are disproportionately impacted by housing prices and problems. In addition, disparities in mortgage lending can exacerbate housing market challenges related to affordability and supply.

Income and tenure. In the Greater Houston Region and in the participating jurisdictions, Asian households and non-Hispanic white households have the highest median incomes while other minority groups have substantially lower median incomes. Among families, those without children have higher median incomes than those with children. These data suggest that non-Asian minority households along with families with children may be the most vulnerable to regional increases in housing costs.

Renters are usually the most vulnerable group to changes in housing costs. African Americans have the lowest homeownership rates region-wide (45%). The difference in ownership rates between non-Hispanic whites and African Americans is over 20 percentage points in each jurisdiction except Missouri City, where it is 10 percentage points. Hispanic households also have substantial disparities in ownership in the region overall and in the City of Pasadena.

Housing problems. "Housing problems" are defined by HUD as units having incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and households with cost burden greater than 30 percent. Figure ES-4 shows the percent of households (by race/ethnicity and type) experiencing any of those four housing problems.

In the region overall, just over one-third of all households have some type of housing problem. Rates are higher in Pasadena (39%) and Galveston (43%). African American and Hispanic households experience housing problems at higher rates that non-Hispanic whites in the region and in all participating jurisdictions. Large family households (five or more occupants) also experience housing problems at relatively high rates.

Figure ES-4. Percent of Households Experiencing Any of 4 Housing Problems

Source:
HUD AFFH-T.

Householder Race/Ethnicity or Household Type	Missouri City	Pasadena	Galveston	Harris County Service Area	Greater Houston Region
Total	**30%**	**39%**	**43%**	**34%**	**36%**
Race/Ethnicity					
Non-Hispanic White	23%	27%	36%	24%	25%
African American/Black	33%	52%	64%	45%	45%
Hispanic	40%	50%	46%	46%	47%
Asian or Pacific Islander	25%	17%	35%	34%	33%
Native American	50%	14%	30%	25%	31%
Other, Non-Hispanic	26%	32%	37%	35%	37%
Household Type and Size					
Family households, <5 people	26%	32%	36%	29%	29%
Family households, 5+ people	39%	60%	60%	48%	51%
Non-family households	36%	40%	48%	40%	40%

Resident respondents to the fair housing survey conducted for this AI highlighted the following housing and affordability needs:

- In general, renters experience or worry about housing challenges more than owners. A primary concern among renters (68%) is rent going up more than they can afford. Indeed, eviction due to being behind on the rent was a top reason for displacement among large families and African American residents.

- Lack of housing units suitable for large families and a lack of accessible housing options for people with disabilities.

- Members of protected classes and the lowest income households are more likely to experience housing challenges than residents of the region overall including affordability concerns about rent, property taxes, and home repairs.

- Hispanic renters and LEP households worry about retaliation if they request a repair from their landlord (particularly in Pasadena). Minority residents with a disability are worried if they request an accommodation for their disability their rent will increase or they will be evicted.

Stakeholders across the region indicate that a lack of affordable housing contributes to fair housing issues and that the region needs more affordable/workforce housing for both renters and owners. Stakeholders expressed concern about the condition of affordable housing that does exist and also had concerns about an apparent increase in absentee landlords.

Figure ES-5, on the following page, shows the housing challenges experienced by members of protected classes, according to survey results. As shown, members of protected classes and the lowest income households are more likely to experience housing challenges than residents of the region overall.

Figure ES-5.
Housing Challenges Experienced by Residents who are Members of Protected Classes, Income and Regional Residents

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	African American	Hispanic	Asian	Native American	Disability	Children Under 18	Large Family	LEP	Income <$25,000	Region
I worry about my rent going up to an amount I can't afford	79%	70%	-	68%	72%	77%	80%	81%	77%	68%
I want to buy a house but can't afford the down payment	67%	69%	-	69%	56%	68%	62%	47%	61%	56%
I worry about my home flooding in a natural disaster	35%	50%	49%	47%	47%	42%	39%	47%	34%	40%
I am concerned about being able to afford to pay my property taxes	45%	42%	23%	43%	41%	41%	40%	25%	50%	35%
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	58%	79%	-	64%	33%	25%	29%	-	27%	33%
I worry about being evicted	24%	20%	-	27%	22%	23%	24%	11%	24%	28%
I have Section 8 and I am worried my landlord will stop accepting Section 8	19%	71%	-	18%	24%	22%	18%	-	20%	27%
My landlord refuses to make repairs despite my requests	31%	30%	-	42%	32%	33%	33%	29%	31%	26%
I worry that if I request a repair it will result in a rent increase or eviction	23%	31%	-	42%	27%	26%	33%	48%	25%	22%
My home needs repairs that I cannot afford to make	44%	46%	23%	36%	51%	39%	49%	57%	66%	19%
I need housing assistance (voucher/public housing/rent assistance) but the waitlist is too long/closed	47%	14%	11%	18%	30%	31%	33%	8%	46%	17%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	30%	19%	-	38%	24%	28%	35%	10%	27%	9%
I have a felony/criminal record and cannot find a place to rent	10%	4%	-	12%	10%	7%	10%	5%	9%	6%
I worry about my home going into foreclosure	11%	11%	3%	5%	10%	10%	12%	19%	15%	5%
I worry about retaliation if I report harassment by my neighbors/building staff/landlord	13%	5%	7%	10%	11%	7%	4%	2%	12%	5%
I worry that my rental unit will be converted to a condo	3%	4%	-	11%	5%	2%	3%	7%	5%	3%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Mortgage lending. An analysis of Home Mortgage Disclosure Act (HMDA) data for the Greater Houston region reveal that non-Asian minority mortgage applicants have a harder time accessing capital than Asian and non-Hispanic white applicants. Figure ES-6 shows denial rates by combined racial/ethnic categories for each participating jurisdiction.

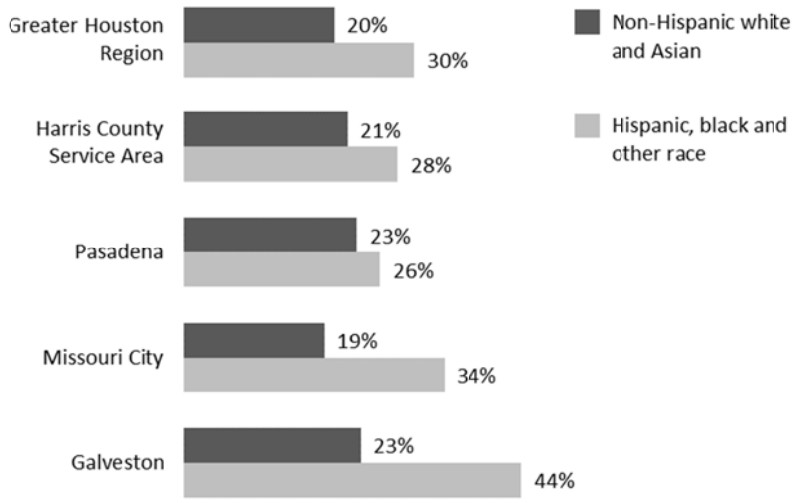
Figure ES-6.
Denial Rate by Race/Ethnicity, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



Higher denial rates persist for non-Asian minorities, even when controlling for income and loan application type (home purchase, home improvement and refinance loans). In addition, non-Asian minority borrowers who are successful in getting a loan are more likely to receive subprime (higher than average) interest rates on their loans.

Inability to access capital—even for home improvements and refinances—has a broad effect on a neighborhood. Racial and ethnic borrowers enter the mortgage lending market with disparities in wealth (due to historical discrimination and denial of economic opportunity) and, as such, are limited to purchasing older homes or homes in less than pristine condition. Lack of capital to make improvements has a negative and cumulative impact on neighborhoods and further discourages private investment. These types of market failures are where the public sector can play an effective role in stabilizing housing condition and broader neighborhoods.

Access to opportunity. The access to opportunity section of the AI expands the fair housing analysis to examine conditions that affect economic opportunity. To facilitate this analysis, HUD developed a series of indices that measure access to opportunity and allow comparison of indicators by race/ethnicity, income, and geography. HUD provides opportunity index values related to education, employment, transportation, low-poverty environments, and environmental health (e.g., air quality). Index values, by definition, range from 0 to 100 and can be interpreted simply as an opportunity "score" in which higher values are better (indicate greater access to opportunity).

In the Greater Houston Region overall, non-Hispanic white and Asian residents tend to live in higher income areas farther from industrial and commercial centers with better schools but fewer public transportation options. African American and Hispanic residents tend to live in

poorer areas which are closer to jobs and public transportation, but which have lower performing schools, less labor market engagement, and more air pollution.

Figure ES-7 provides a summary of each jurisdiction's most disadvantaged racial/ethnic groups as determined by disparities in the access to opportunity indices provided by HUD. The disparities shown in the figure focus on the population living in poverty, allowing a comparison of income-similar residents across racial/ethnic groups.

Figure ES-7.
Disparities in Opportunity Indices for the Population Living in Poverty

Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Env. Health Index
Greater Houston Region							
Most disadvantaged group	Hispanic	Black	Black	White	White	Black	Native
Disparity with most advantaged	-23.31	-23.77	-23.62	-7.92	-10.21	-5.93	-9.56
Second most disadvantaged group	Black	Hispanic	Hispanic	Black	Asian	Asian	Hispanic
Disparity with most advantaged	-22.97	-13.27	-20.87	-0.50	-0.80	-2.37	-9.35
Harris County Service Area							
Most disadvantaged group	Hispanic	Black	Hispanic	White	White	Native	Native
Disparity with most advantaged	-21.75	-19.73	-4.04	-6.20	-8.60	-4.17	-14.33
Second most disadvantaged group	Black	Hispanic	Native	Asian	Asian	Asian	Hispanic
Disparity with most advantaged	-17.27	-11.27	-13.03	-4.07	-4.83	-3.93	-9.30
Pasadena							
Most disadvantaged group	Native	Hispanic	Native	Native	White	Hispanic	Native
Disparity with most advantaged	-15.70	-8.08	-10.92	-4.53	-4.48	-19.38	-1.86
Second most disadvantaged group	Hispanic	Native	Hispanic	White	Black	Black	Asian
Disparity with most advantaged	-14.81	-7.77	-10.50	-3.37	-4.14	-18.92	-1.24
Missouri City							
Most disadvantaged group	Hispanic	Hispanic	Hispanic	White	White	Black	Asian
Disparity with most advantaged	-38.41	-21.63	-21.10	-2.95	-7.38	-23.04	-2.28
Second most disadvantaged group	Black	Black	Black	Asian	Black	White	Hispanic
Disparity with most advantaged	-18.49	-15.29	-7.86	-2.90	-4.43	-22.24	-1.59
Galveston							
Most disadvantaged group	Black	Hispanic	Black	White	Native	Native	Asian
Disparity with most advantaged	-17.43	-4.98	-28.14	-11.80	-9.49	-38.91	-3.44
Second most disadvantaged group	Hispanic	Black	Hispanic	Hispanic	White	Hispanic	Black
Disparity with most advantaged	-14.13	-4.09	-21.81	-8.79	-9.02	-7.98	-2.99

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: HUD AFFH-T.

Key issues raised by residents and stakeholders on access to opportunity include:

- There are differences in access to public services experienced by African American survey respondents; most of these are driven by the experience of African Americans living in Houston. However, results do suggest that investment in Galveston, Missouri City and Pasadena neighborhoods with sizeable African American populations are lacking when compared to other neighborhoods in these communities.

- Places with access to Metro have good access to transportation, including for people with disabilities. However, lack of participation in Metro (i.e., Pasadena, Missouri City) eliminates those communities as a place to live for residents with disabilities or lower income residents who rely on public transportation.

- Access to jobs was a significant concern among all stakeholders, but especially so for Galveston stakeholders. Galveston's tourist economy exacerbates employment challenges as many jobs are seasonal or have hours/wages cut in winter months.

Disability and access. Individuals with disabilities represent 10 percent of the total population of the Greater Houston Region. Galveston and Pasadena have a higher percentage of individuals with disabilities than the region (15% and 12% respectively), while the Harris County service area (9%) and Missouri City (7%) have a lower percentage.

Ambulatory difficulty is the most prevalent form of disability in the region and all participating jurisdictions followed by cognitive difficulty and independent living difficulty. Region-wide, people age 65 or older with a disability account for about one-third of all residents with a disability. For the most part, the geographic distribution of persons with disabilities mirrors the distribution of the general population.

Availability of accessible units. Though data on accessible units are limited, public input for the AI indicates a significant shortage of affordable, accessible units in the region. Participants in stakeholder focus groups identified a lack of accessible housing to be a significant challenge in the region. Resident survey respondents with a disability (or with a household member with a disability) also expressed challenges finding affordable, accessible housing. When asked to rate the relative ease of finding safe, quality housing that they could afford on a scale from 0 to 9, with 0 meaning "extremely difficult" and 9 meaning "extremely easy," one in three (33%) rated their experience "extremely difficult" (rating of 0) and 56 percent difficult (rating of 0 to 3). Participants in the focus group with residents with disabilities all had difficulty finding housing that met their accessibility needs that they could afford. Those with Section 8 vouchers faced even greater difficulties due to a lack of landlords willing to participate in the program.

These issues—limited supply of accessible units, including a lack of ADA-compliant accessible housing in the public and private housing markets, may explain why one in four households that include a member with a disability of any type are living in housing that does not meet that member's accessibility needs (according to survey results).

It should also be noted that residents who participated in a prioritization exercise at pop up community engagement events and the open house events identified "accessible housing for disabled persons/elderly" and "housing options for persons with severe mental illness" as the top priorities for housing in the region.

Housing challenges and accommodation requests. Figure ES-8 summarizes the AI survey results on housing challenges experienced by residents with disabilities by jurisdiction. Among those to whom the survey question applied, about two in five report that their landlord refused to make an accommodation for the household member with a disability. One in 10 had a landlord

refuse to accept a therapy/companion/emotional support animal and 7 percent had a landlord refuse a service animal.

Figure ES-8.
Housing Challenges Experienced by Residents with Disabilities

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	Galveston	Missouri City	Pasadena	Harris County Svc Area	Houston	Region
I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting	47%	57%	38%	26%	44%	37%
I can't afford the housing that has accessibility features (e.g., grab bars, ramps, location, size of unit, quiet) we need	8%	25%	29%	27%	42%	34%
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	35%	-	56%	34%	30%	34%
My landlord refused to make an accommodation for me or my household member's disability	-	-	10%	19%	22%	20%
My landlord refused to accept my therapy/companion/emotional support animal	-	-	6%	13%	8%	10%
My landlord refused to accept my service animal	-	-	6%	12%	1%	7%

Note: - Sample size too small to report.

Respondents could select Yes, No or Does Not Apply. The data shown are the percent with a housing challenge among those to whom the issue applies.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Access to opportunity. As noted earlier, the geographic distribution of persons with disabilities generally mirrors the distribution of the general population. As such, residents with disabilities do not have obvious disparities in access to opportunities than the population overall based on the HUD Access to Opportunity Indices. However, there are community assets and services that can have a disproportionate impact on people with disabilities based on their reliance on such services. Notably, accessible infrastructure, transportation options, and health access. People with disabilities may also face unique barriers to job access, depending on the type of disability.

- Survey results, discussions at events and the disability focus group revealed that residents with disabilities who rely on METRO and METROLift are generally very satisfied with the service. However, those residents are limited to living within service areas. Some residents reported that while buses are accessible, not all bus stops are accessible.

- Throughout the community engagement process, the sidewalk infrastructure in each of the participating jurisdictions was lacking in many neighborhoods or along key corridors—particularly in Missouri City and Galveston.

- Compared to other residents, those with disabilities are least likely to have convenient access to health care facilities (according to survey results); this is likely compounded by transportation challenges.

- Barriers to employment opportunities for residents with disabilities are: transportation, few employers willing to hire people with disabilities, a need for job coaching and counseling for people with disabilities, and need for reasonable accommodations (this is particularly challenging for those with hidden/discrete/cognitive or mental disabilities).

Publicly assisted housing. The two public housing authorities participating in this AI are the Harris County Housing Authority (HCHA), which serves all of Harris County excluding Houston, Pasadena, and Baytown; and the Galveston Housing Authority (GHA), which serves the City of Galveston. HCHA does not have any public housing units in its inventory but manages 3,903 housing choice vouchers (HCV) and 673 Veteran's Assistance (VASH) vouchers. The Galveston Housing Authority has served the City of Galveston since 1940 and currently operates 450 public housing units, 127 project-based Section 8 units, and 1,213 housing choice vouchers. GHA also administers 259 disaster recovery vouchers from Hurricane Ike and 35 VASH vouchers. GHA partnered with McCormack Baron Salazar to provide an additional 145 public housing units in mixed income communities. Both HCHA and GHA also work to assist qualified clients to obtain homeownership through Family Self Sufficiency and homeownership programs.

The publicly assisted housing analysis focuses on representation of racial and ethnic groups by housing program and patterns in location by program. All types of publicly supported housing—including HUD-funded programs as well as developments supported through the Low Income Housing Tax Credit, or LIHTC, program—are included. Figure ES-9 summarizes the publicly supported housing inventory in each jurisdiction by program.

Figure ES-9. Publicly Assisted Housing

Note:
HCV can be used in LIHTC and are therefore not necessarily additive.

Source:
HUD AFFH-T.

HUD Publicly Supported Programs	Harris County Service Area	Pasadena	Missouri City	Galveston
Public Housing	0	0	0	450
Project-based Section 8	1,860	335	0	192
Other Multifamily	527	76	0	0
HCV Program	7,631	1,079	187	1,275
Total HUD Assisted Units/Vouchers	**10,018**	**1,490**	**187**	**1,917**
Low Income Housing Tax Credit Units	**13,843**	**2,525**	**105**	**897**

HUD provides data on the racial and ethnic make-up of households assisted by housing authorities; these are shown below in Figure ES-10, along with the racial/ethnic make-up of all households earning less than 50 percent of AMI (households likely to be eligible for housing authority assistance). Disparities by race/ethnicity in program utilization relative to eligible households are evident in the region as well as in each jurisdiction. Generally, African American residents are overrepresented among housing program participants relative to their representation among all households earning less than 50 percent of Area Median Income (AMI). Conversely, Hispanic households tend to be underrepresented among program participants.

Disparities can be related to a number of factors including differences in household sizes that may or may not be sufficiently accommodated by housing programs, language or cultural barriers to accessing services, lack of effective affirmative marketing techniques employed by PHAs or LIHTC property managers, and/or general distrust of public agencies. In areas with recent and rapid increases in minority populations, waiting list lag times can also impact the demographic composition of program participants relative to income eligible households.

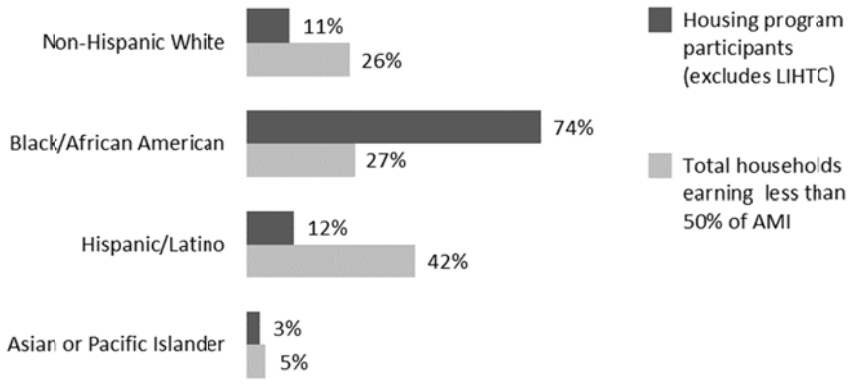
Figure ES-10. Publicly Supported Households by Race/Ethnicity, Greater Houston Region

Note:

Data include the following HUD programs: public housing, project based section 8, other multifamily, and HCV.

Source:

HUD AFFH-T and BBC Research & Consulting.



In most programs and jurisdictions, people with disabilities comprise a higher proportion of publicly supported housing residents than they do of the population at large. People living with a disability—particularly those who rely exclusively on income from Social Security Disability Insurance, or SSDI—may face more challenges than those without disabilities in accessing private market rental units (due to affordability and accessibility requirements).

In most of the participating jurisdictions (Harris County, Pasadena and Missouri City), Housing Choice Vouchers do the best of all of the HUD supported housing programs in accommodating families with children and/or households who need larger units. This indicates the PHA constructed units tend to have fewer bedrooms or perhaps are not considered family-oriented. In Galveston, however, the project based Section 8 program does the best in accommodating large households including families with children.

Patterns in location of publicly supported housing programs indicate that a relatively high proportion of location-specific housing program units (LIHTC, project based section 8 and other multifamily) are located in areas with high poverty. In Pasadena 61 percent of these units are in neighborhoods where poverty is 30 percent or higher. In Galveston 40 percent are in high poverty neighborhoods and in the Harris County service area 27 percent are in neighborhoods where poverty is 30 percent or higher.

Housing choice voucher holders are the least likely HUD program participants to live in R/ECAPs in the Harris County service area and in Pasadena. In Galveston, public housing residents are the least likely to live in R/ECAPs.

However, using housing choice vouchers can be a challenge for residents, according to resident survey results and stakeholder input. Significant proportions of residents with vouchers worry

that their landlord will stop accepting Section 8—this was particularly true of African Americans in Missouri City, Pasadena and Galveston; and Hispanics in all participating jurisdictions. Stakeholders also expressed concern about the lack of landlords willing to accept vouchers, particularly in high opportunity areas.

Residents also identified the lack of housing units suitable for large families available in publicly supported housing inventory.

Residents and stakeholders both identified NIMBYism as a barrier to locating multifamily and publicly supported housing in high opportunity areas. Support for multifamily development in general is tepid at best in most communities; it is lower for low income housing.

Two state-level policies related to publicly assisted housing impact residents ability to effectively utilize vouchers and access areas of high opportunity through LIHTC developments:

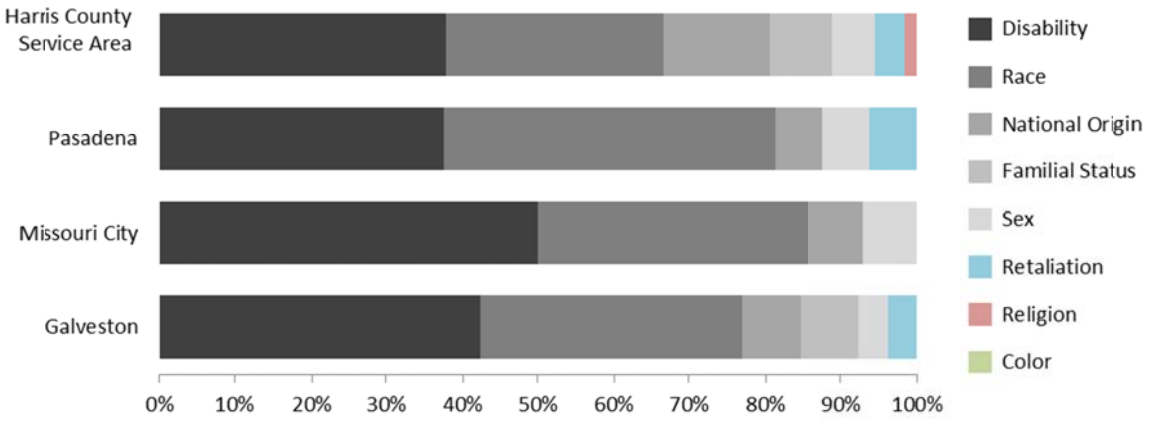
1. In 2015 the Texas state legislature passed a law barring cities from passing laws banning landlords from discrimination based on source-of-income. Both residents and stakeholders identified this as a barrier for voucher holders in finding housing—particularly in high opportunity areas.

2. Siting LIHTC developments in areas of high opportunity is hindered by the inclusion of "community support" and elected official approval of proposed LIHTC developments as part of the state scoring system that allocates LIHTC. This scoring mechanism for LIHTC applications has, in some cases, perpetuated NIMBYism and made it difficult to site LIHTC units in areas of high opportunity.

Fair Housing complaints. The study team analyzed fair housing complaint data for the period from January 1, 2012 through January 31, 2018 for the Greater Houston Region. In the region, 861 complaints were filed over the six-year period. As shown in Figure ES-11, disability was the most common basis for complaints in the Harris County service area (38%), Missouri City (50%), and Galveston (42%). However, in Pasadena, race accounted for the greatest share of complaints (44%).

Galveston had the highest number of complaints per capita by far with 5.25 complaints for every 10,000 people. All other participating jurisdictions had per capita complaints below the regional average of 1.45. A high incidence of complaints can be indicator of fair housing concerns but can also interpreted as a positive indicator of resident awareness of fair housing law. That is, when residents are aware of fair housing laws, they are more likely to report fair housing violations.

Figure ES-11.
Basis of Complaints for Participating Jurisdictions, January 1, 2012 through January 31, 2018



Source: HUD FHEO and BBC Research & Consulting.

Nearly half (46%) of the complaints filed region-wide ended in some type of resolution in favor of the complainant (conciliation, settlement or complaint withdrawn after resolution). Forty-four percent of all complaints resulted in a no cause determination, which occurs when HUD determines that there was no evidence of violation of the Federal Fair Housing Act.[6]

The most issues common cited among settled/conciliated complaints in both the region and the participating jurisdictions was "discriminatory terms, conditions, privileges, or services and facilities" followed by "discriminatory refusal to rent." "Failure to make reasonable accommodations" and "failure to permit reasonable modification" collectively represented just 2 percent of the settled complaints in the region and 4 percent of the settled complaints in the participating jurisdictions.

Overall, 8 percent of resident survey respondents felt they experienced discrimination when they looked for housing in the region. The proportion of residents who believe they experienced discrimination when looking for housing varies widely from 2 percent of those with household incomes of $100,000 or more to 26 percent of residents with Section 8 vouchers. Galveston residents are twice as likely as residents of the region overall to think they have experienced housing discrimination (17% versus 8%). Among protected classes, households which include a member with a disability (15%), respondents with Limited English Proficiency (a proxy for national origin) (15%), and African American residents (14%) are most likely to say they experienced housing discrimination.

Residents who think they experienced housing discrimination when looking for housing in the region had the opportunity to describe, in their own words, the reason for the discrimination. Overall, the greatest proportion of respondents identified the reason for the discrimination as

[6] The remaining nine percent of complaints were closed or dismissed for a variety of reasons, including complainant failed to cooperate or withdrew the complaint without resolution, complaint dismissed for lack of jurisdiction, FHAP judicial dismissal, and litigation ended with no discrimination found.

their or a household member's race or ethnicity (26%); income (11%); having a Section 8 voucher (10%); familial status, particularly having children (8%); and disability (5%). Focus group participants with a disability described discrimination as an *"every day issue"* and that residents with disabilities do not have equal opportunity in the region.

Stakeholders also mentioned the existence of discrimination in the region and indicated the populations most affected include LGBTQ, racial minorities, persons with disabilities, non-English speakers, and immigrants.

Zoning. The zoning, building, and subdivision codes and regulations, of Harris County and the cities of Missouri City, Pasadena, and Galveston were reviewed to identify potential barriers to fair housing choice and reasonable accommodation under the federal Fair Housing Amendments Act (FHAA) and the Americans with Disabilities Act (ADA). Primary findings and potential issues are summarized below:

- **No zoning in counties.** In the State of Texas counties are not granted zoning powers and have limited power to guide development and as a result, private deed restrictions and covenants usually govern land use and development. In the absence of zoning with its over-arching application of zone districts with accompanying use and density standards, it is difficult to identify discrepancies in how the language of private deed restrictions and covenants may be interpreted and enforced by the county. In addition, without zoning it may be difficult for a county to respond to the fair housing and accessibility needs of its residents.

- **Regulations of specific housing types by Texas statutes.** Texas state statutes regulate specific types of housing that are relevant to FHAA, including manufactured homes, assisted living facilities, boarding homes, convalescent and nursing homes, group homes, homeless shelters and community homes. The local codes reviewed in this analysis are generally inconsistent in the use of terms listed above related to group or congregate living facilities. This makes it difficult to know how these types of facilities are regulated in the zoning codes or other applicable local regulations, regardless of what they are called at the local level. Local zoning codes should be aligned with state statutes by specifically referencing all applicable state statutes, using the same or substantially similar terms for group and congregate living facilities, including definitions of these facilities, listing these facilities as uses, and identifying the zone districts where they are allowed.

- **Inconsistent terms and allowed uses in local codes.** The local codes are generally internally inconsistent in terminology for housing facilities with various levels of living assistance or care, many of which could include FHAA protected groups. This makes it unclear how such institutions, which appear to cover some FHAA protected groups, are treated by the zoning code.

- **Group homes are not a recognized use in local codes.** Although "group homes" are recognized and defined in Texas state statutes, none of the zoning codes reviewed or other land development regulations in the four communities covered by this analysis specifically include "group home" as a use. Local zoning codes should clearly include group homes as a use and generally should allow group homes in a broad range of zone districts, including at

least one (and preferably all) residential zone district. Where no zoning is adopted, an ordinance stating that group homes are allowed in residential areas would clarify that group home facilities for FHAA-protected persons are treated as residential uses.

- **Density may restrict housing choice.** Density can be an issue if zoning favors only large lot, low-density development or if other standards do not allow the mid- or high-density ranges set in specific zone districts. In the first case, housing choice is limited to higher-priced lots with single-family homes and in the second case the range of housing cannot be achieved resulting in fewer and higher cost housing than intended. Both of these situations directly affect persons with lower incomes and may disproportionately affect persons with disabilities and minorities since they usually make up a greater percentage of lower-income households.

- **Inclusionary zoning authority is limited.** The inclusionary zoning authority of Texas municipalities is limited by state statutes. However, Texas Local Government Code Section 214.905 authorizes municipalities to "create incentives, contract commitments, density bonuses, or other voluntary programs designed to increase the supply of moderate or lower-cost housing units."[7] Of the three municipalities in the analysis only Galveston incorporates an inclusionary housing incentive in its zoning code.

- **Lack of clear procedures for "reasonable accommodation."** None of the land development regulations reviewed contained a process to request a reasonable accommodation. In jurisdictions where a zoning code is adopted (namely Missouri City and Galveston), a reasonable accommodation request would defer to the variance procedure. Criteria for a variance approval, however, are based on the unique circumstances of *a building or site* and are not adequate to address reasonable accommodation requests which relate to unique circumstances of *an individual*. Another complication in taking reasonable accommodation requests through the variance process is that a public hearing is required which could raise concerns about unequal treatment. In Galveston exterior alterations to homes in a historic overlay district require a separate review process—this adds another layer of regulations/standards for some reasonable accommodations. In Harris County review and approval of a reasonable accommodation devolves to the adopted building and life/safety codes. However, it is unclear how review among these codes and any other codes that may affect development, such as the subdivision regulations, are coordinated for a reasonable accommodation request. The same is true for Pasadena.

What are the primary fair housing challenges in the Greater Houston Region? What factors contribute to the creation and/or persistence of those challenges?

The primary fair housing issues in the region and the contributing factors include:

[7] Inclusionary zoning is tool for local governments to encourage the creation of affordable housing units in conjunction with new development. Development incentives and/or density bonuses are established in the zoning code and are available to a developer in exchange for the developer providing affordable units.

- **Segregation persists.** Segregation does exist in the region and in each participating jurisdiction—by race, ethnicity, national origin and language. Segregation appears to be most severe for African American residents relative to non-Hispanic white residents.

  Contributing factors *to segregation include historical settlement patterns, distribution of attainable/affordable housing (both market-rate and publicly assisted housing), land use and zoning regulations, disparities in mortgage lending, and economic factors.*

- **Disparities in housing needs.** African American and Hispanic households experience housing problems at higher rates that non-Hispanic whites in the region and in all participating jurisdictions. Large family households also experience housing problems at relatively high rates. Non-Asian minorities also have a harder time accessing capital for home purchase loans, home improvement loans and refinances. Non-Asian minority borrowers who are successful in getting a loan are more likely to receive subprime (higher than average) interest rates on their loans.

  Contributing factors *to disparities in housing needs include lower homeownership rates among most minority groups, availability affordable units in a range of sizes, lack of private investments in specific neighborhoods, and lending discrimination.*

- **Disparities in access to opportunity.** In the region and in each jurisdiction, non-Hispanic white and Asian residents tend to live in higher income areas farther from industrial and commercial centers with better schools but fewer public transportation options. African American and Hispanic residents tend to live in poorer areas which are closer to jobs and public transportation, but which have lower performing schools, less labor market engagement, and more air pollution. Disparities persist even when comparing income-similar residents of different races/ethnicities.

  - Disparities in access are most striking when considering exposure to low poverty areas, employment access (labor market engagement and/or jobs proximity), and school quality.
  - Places with access to Metro have good access to transportation, including for people with disabilities. However, lack of participation in Metro (i.e., Pasadena, Missouri City) eliminates those communities as a place to live for residents with disabilities or lower income residents who rely on public transportation.
  - There are differences in access to public services experienced by African American survey respondents; most of these are driven by the experience of African Americans living in Houston. However, results do suggest that investment in Galveston, Missouri City and Pasadena neighborhoods with sizeable African American populations are lacking when compared to other neighborhoods in these communities.
  - Access to jobs was a significant concern among all stakeholders, but especially so among Galveston stakeholders. Job training was highlighted as a need for the disability population region-wide.

- Economic disinvestment in Pasadena and Missouri City is located in areas of minority concentration. In both communities, private investment has moved further from the downtown core where there is a higher proportion of Hispanic and African American residents toward outlying areas.

Contributing factors *to disparities in access to opportunity include availability of affordable units in a range of sizes, limited support for multifamily housing, NIMBYism, lack of private investments in specific neighborhoods, lending discrimination, land use and zoning laws, limited/lack of public transit in certain areas.*

- **Barriers to housing choice for people with disabilities.** There is a shortage of affordable accessible housing for those with mobility as well as sensory disabilities—in all participating communities. Difficulty finding landlords who accept vouchers or disability benefits as income amplifies the difficulty residents with disabilities face finding suitable affordable housing. In addition, renters with disabilities face barriers in requesting reasonable accommodations including landlords who refuse to accommodate requests and residents who worry that their request may result in retaliation and/or eviction. Owners with disabilities need repairs they cannot afford to make—particularly in Galveston and Pasadena. Access to opportunity could be improved for people with disabilities by improving accessible infrastructure (primarily missing/dilapidated sidewalks), increasing employment supports (coaching/training/counseling), and transit expansion into additional neighborhoods and communities.

  Contributing factors *include a lack of accessible, ADA-compliant housing across the region, (both market rate and affordable); a lack of landlords willing to accept Section 8 vouchers and disability income; a lack of information available to Section 8 voucher holders to help them find landlords who do participate in the voucher program; lack of fair housing knowledge/compliance among landlords; lack of public transportation in many neighborhoods; and sidewalks are missing or are dilapidated.*

- **Location and utilization of publicly assisted housing.** Disparities by race/ethnicity in program utilization relative to eligible households are evident in the region as well as in each jurisdiction. Generally, African American residents are overrepresented among housing program participants relative to their representation among all households earning less than 50 percent of Area Median Income (AMI). Conversely, Hispanic households tend to be underrepresented among program participants.

  Patterns in location of publicly supported housing programs indicate that a relatively high proportion of location-specific housing program units (LIHTC, project based section 8 and other multifamily) are located in areas with high poverty. Housing choice voucher holders are less likely than other program participants in Harris County (excluding entitlements) and in Pasadena to live in R/ECAPs. However, voucher holders expressed challenges accessing areas of high opportunity because landlords are unwilling to accept vouchers.

  Contributing factors *include lack of affordable housing in a range of unit sizes, NIMBYism, source of income discrimination, state Qualified Allocation Plan for LIHTC siting, land use and zoning regulations, and distrust of public institutions among immigrant populations.*

- **Lack of fair housing capacity.** Survey responses, focus group input, and complaint data indicate potential discrimination in the rental market. In addition, local land use and zoning policies could be more explicit in their compliance with fair housing laws and language.

    - Eight percent of resident survey respondents felt they experienced discrimination when they looked for housing in the region; rates are highest among households which include a member with a disability (15%), respondents with Limited English Proficiency (a proxy for national origin) (15%), and African American residents (14%).
    - Hispanic renters and LEP households worry about retaliation if they request a repair from their landlord (particularly in Pasadena). Minority residents with a disability are worried if they request an accommodation for their disability their rent will increase or they will be evicted.
    - Local land use codes are internally inconsistent and are inconsistent with state codes in their use of terms relating to specific housing types, including group homes. City and county policies are lack clear procedures for requesting reasonable accommodations.

    Contributing factors *include perceived and actual housing discrimination, lack of fair housing knowledge among landlords, and land use and zoning regulations.*

Goals and Strategies: How can those fair housing issues be addressed?

To address the fair housing challenges identified above, the participating partners will do the following:

Figure ES-12.
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

	REGIONAL FAIR HOUSING GOALS	FAIR HOUSING ISSUES/IMPEDIMENTS TO BE ADDRESSED BY GOAL	METRICS, MILESTONES, & TIMELINE	PARTICIPATING PARTNERS
1	**Improve regional collaboration in fair and affordable housing planning:** - Consider a regional housing strategy - Increase communication around priorities and developer incentives - Coordinated approach for promoting inclusivity and diversity of housing stock in all communities	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) The City of Houston and Harris County currently hold pipeline meetings for coordinating PSH units and ESG funders partners meet regularly to discuss cooperative strategies. Expand these meetings by inviting other jurisdictions to attend and expand discussion to include units for Very Low Income and Low Income Residents (2018-2019). 2) Formalize regional approach through a regional housing strategic plan that includes housing diversity and inclusivity as well as LIHTC development (2023) 3) Hold a regional affordable housing and access to opportunity symposium (2025)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
2	**Boost residents access to residential capital throgh partnerships with local lenders and by providing credit counseling and financial literacy classes.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity	1) Identify partnership opportunities with local lenders and collaborate on affirmative marketing and increasing access to residential capital for underserved residents (2019) 2) Provide and/or partner with local service providers to provide credit counseling and/or financial literacy classes. (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
3	**Continue to support fair housing outreach and education through:** - Fair housing training events and training - Fair housing materials in multiple languages and mediums - Landlord/tenant resources - Enhanced media outreach especially during Fair Housing Month each year - Materials available in languages other than English	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Fair housing training events and training (annually) 2) Fair housing materials in multiple languages and mediums (consistently available) 3) Landlord/tenant resources (consistently available) 4) Enhanced media outreach especially during Fair Housing Month each year (annually) 5) Materials available in languages other than English (consistently available)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
4	**Collaborate with local fair housing organizations to conduct regional fair housing testing as a tool for fair housing enforcement and to better understand private discrimination in the housing market.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Partner with regional and local fair housing organizations to evaluate feasibility and cost of testing efforts (2019). 2) Support fair housing testing efforts financially and/or through coordination/collaboration. (2022)	Harris County, Galveston, Missouri City, Pasadena
5	**Continue and strengthen regional transportation planning:**	Segregation; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Lack of Fair Housing Capacity		
	- Promote the benefits of transit to help reduce NIMBYism in outlying communities.		1) Strengthen ties with transportation agencies and work with METRO and H-GAC on outreach/education when possible (ongoing) 2) Identify opportunities to educate local political leaders on the economic benefits of transit and the need for transit connections. (ongoing)	Harris County, Galveston, Missouri City, GHA
	- Conduct further study and outreach to understand transit needs and potential strategies. Use this strategy to inform regional engagement.		1) Evaluate gaps in information related to transit (2018-2019) 2) Devise and implement outreach plan to fill infomration gaps (2020) 3) Development of transit strategy (2021)	HCHA
	- Increase access to transit resources for residents with disabilities with local service provider partnerships.		Maintain relationships with existing partners (Transportation RIDES Program), collaborate on future transportation related efforts in the City and provide funding to partners if/when possible (ongoing).	Pasadena
6	**Increase access to job training resources for residents with disabilities through existing partnerships with regional and local service providers and employers.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities	Maintain relationships with existing partners, collaborate on potential solutions, provide funding to partners if/when possible (ongoing).	Harris County, Galveston, Missouri City, Pasadena, GHA

Figure ES-12 (Continued).
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

	LOCAL FAIR HOUSING GOALS	FAIR HOUSING ISSUES/IMPEDIMENTS TO BE ADDRESSED BY GOAL	METRICS, MILESTONES, & TIMELINE	PARTICIPATING PARTNERS
1	**Expand the supply of affordable housing options, with a focus on extremely low income households and on larger affordable housing units (2- and 3-bedroom units or larger), and/or express support of affordable development (e.g., LIHTC).**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing	1) Continue to fund rental assistance and/or affordable housing development (ongoing) 2) Express support for affordable developments that include units with 2 or more bedrooms (ongoing) 3) Establish and/or maintain relationships with regional affordable housing developers to express support of affordable and/or LIHTC developments within jurisdiction (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
2	**Continue to assist low income homeowners, improve housing quality, and increase housing accessibility through housing rehabilitation, repair and accessibility grant programs.**	Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing	Continue to fund programs that stabilize low income homeowners, improve housing quality, and increase accessibility (ongoing).	Harris County, Galveston, Missouri City, Pasadena
3	**Develop community priorities for siting LIHTC developments (and/or other publicly assisted housing) and work to promote community support of such developments in high opportunity areas.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Identify optimal locations for LIHTC and evaluate potential barriers to LIHTC developmetn in those areas (2021) 2) Proactively conduct outreach and education in those areas to promote openness to LIHTC (2022) 3) Partner with LIHTC developers to assist with community outreach for specific development projects (ongoing)	Harris County, Missouri City, HCHA, GHA
4	**Develop policies and procedures that support balanced housing opportunities, including affordable/workforce housing (e.g., adopt an anti-NIMBY policy).**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Harris County should review its anti-NIMBY plan and update as necessary (2019) 2) Other jurisdictions should develop comparable policies (2019) 3) Circulate and promote policy as appropriate (2020-2025)	Harris County, Galveston, Missouri City, Pasadena, HCHA
5	**Promote economic investment (public and private) in distressed areas that have high minority concentrations:**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing		
	- Explore partnerships with lenders such as community development financial institutions (CDFIs) that serve the region to discuss potential partnership opportunities for 1) Developing the capacity of small businesses in distressed areas and 2) Are committed to helping transform distressed communities.		1) Identify CDFIs currently operating in jurisdiction and establish regular communication channels and/or meetings to discuss partnership opportunities (2020) 2) Evaluate the potential for leverage, acquisition, or other appropriate fund (2022)	Harris County, Missouri City
	- Identify areas where new construction of affordable housing could serve as an economic catalyst for revitalization. Use land banking as allowed under law to acquire such parcels for affordable housing development and/or advocate for the use of TRZ dollars for affordable housing in improvement districts		Work to identify opportunities and locations (2019-2021) If opportunities arise and as desired by jurisdiction, use land banking as allowed under to acquire strategic parcels (ongoing).	Harris County, Galveston, Missouri City, HCHA, GHA
	- Include affordable housing as a component of revitalization efforts and consider implementation of neighborhood-specific plans or a Comprehensive Plan that incorporates affordability planning		1) Build energy-efficient and location-efficient communities that are healthy, affordable and diverse. 2) Build communities that are affordable for very low income households without concentrating poverty.	HCHA
	- Prioritize City development incentives to support infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.		Review and create/adjust incentives as necessary (2022)	Galveston, Pasadena
6	**Continue to encourage housing choice voucher participants to use vouchers in high opportunity areas**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Maintain data and maps on areas with "high opportunity" characteristics, including quality schools, access to jobs, etc. (ongoing) 2) Continue programs and procedures to encourage use of vouchers in those areas (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA

Figure ES-12 (Continued).
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

7	**Incentivize landlord participation in HCV and other affordable housing programs through a multifamily rehabilitation and accessibility improvement program using HUD and other affordable housing and community development funds.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Continue to actively market HCV and other affordable housing program participation through property owner networks (ongoing) 2) Offer rehab incentives to encourage participation as funding allows (ongoing) 3) Continue to encourage HCV participants to use vouchers in high opportunity areas by offering higher payment standards of the FMR.	Harris County, Galveston, Missouri City, HCHA, GHA
8	**Review city/county policies for requesting a reasonable accommodation for fair housing compliance and evaluate improvements that could help affirmatively further fair housing for people with disabilities.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	Review development regulations for clarity on process to request reasonable accommodation and evaluate potential barriers, including applicability of variance process (2019) *Note: see Section VIII page 25 of this AI for additional details and examples.*	Harris County, Galveston, Missouri City, Pasadena
9	**Review zoning/land use/development regulations to ensure that a diversity of housing choices is allowable throughout residential districts.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Review density, lot size, building height, and lot coverage regulations; subdivision regulations; and parking requirements for barriers to density and affordability (2021) 2) For communities with zoning, evaluate district typologies for barriers to housing diversity (2021) *Note: see Section VIII pages 22-23 of this AI for additional details and examples.*	Harris County, Galveston, Missouri City, Pasadena
10	**Review zoning/land/development regulations use to improve consistency between local codes and state regulations of specific housing types impacting protected class populations.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Evaluate consistency and application of the following state-code terms in local regulations: "Manufactured Homes," "Assisted Living Facilities," "Boarding Home," "Convalescent and Nursing Homes," "Group Homes," Homeless Shelters," and "Community Homes." (2020) 2) Ensure that local codes explicitly reference state statutes related to the types of homes listed above (2020) *Note: see Section VIII pages 19-21 of this AI for additional details and examples.*	Galveston, Missouri City, Pasadena
11	**Consider incentives to promote accessibility and universal design to improve accessibility/adaptability in new construction.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Evaluate existing regulation to assess if/how it inhibits accessibility and universal design (2019) 2) Evaluate incentives (e.g., density bonuses, fee waivers, etc.) for developments that provide increased accessibility/adaptability. (2021)	Harris County, Galveston, Missouri City, Pasadena, HCHA

SECTION I.

Demographic Patterns

SECTION I.
Demographic Patterns

This section discusses demographic patterns in the study area, with a specific focus on the distribution of protected class populations throughout each participating jurisdiction and in the region overall. After brief notes on data sources and terminology, this section begins with a high-level regional demographic summary, which is followed by detailed demographic pattern and segregation analyses for each participating jurisdiction.

Methodology Notes

Data sources. Data from HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) are used throughout this section and the report as a whole to help describe demographic, socioeconomic, and housing characteristics as well as access to opportunity areas.[1] Those data focus on jurisdiction level, Census tract level, and block group level data. Where useful for more focused geographical analysis, this report also includes block level analysis to provide a closer view of neighborhood dynamics. As there are no post-Census 2010 block or block group level demographics available, Census block and block group data are from Census 2010. Additional data from national publicly available sources and from local data sources are also incorporated where possible. 0

Jurisdiction v. region terminology. The "jurisdiction" as defined by the AI is the city or county or groups of cities and counties that receive HUD block grant funds directly from HUD. The cities and counties included in this AI are the City of Pasadena, the City of Missouri City, the City of Galveston, and Harris County (excluding the cities of Houston and Baytown, which are entitlement communities and will produce independent AIs). The portion of Harris County included in this report referred to throughout the report as the "Harris County Service Area."[2]

Two housing authorities are also participating in the AI: Harris County Housing Authority (HCHA) and Galveston Housing Authority (GHA).

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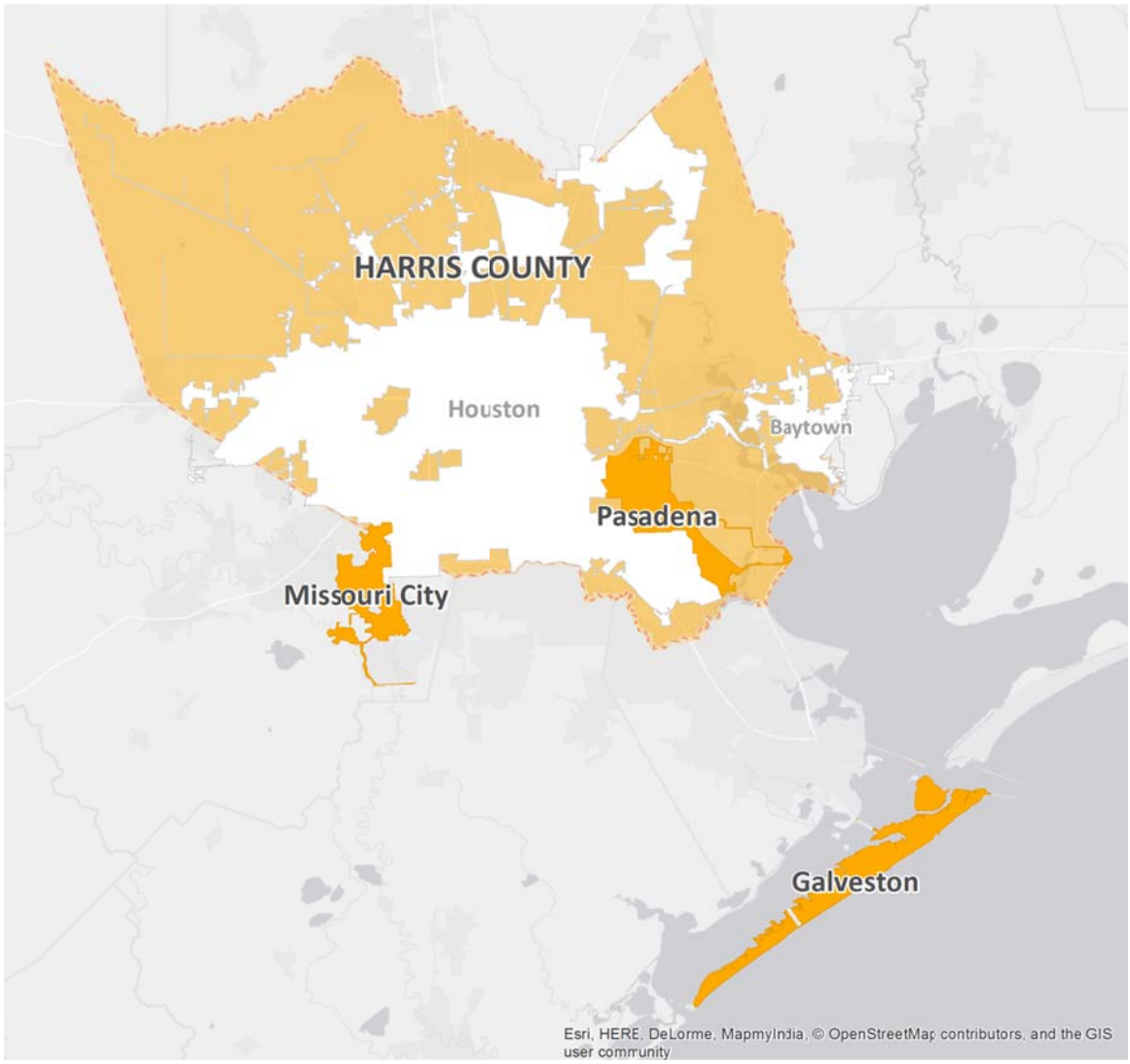
[1] For more information on the data documentation in the AFFH-T visit www.hudexchange.info/resource/4848/affh-data-documentation.

[2] The Harris County service area consists of unincorporated Harris County and the 12 small cities in the county that have signed cooperative agreements for inclusion in Harris County's application for funding. Harris County was designated an urban county by HUD for the Entitlement Program in 1975. In order to qualify for urban county status, a county must have a total population of 200,000 or more persons. An urban county's population consists of the total population of the unincorporated areas of the county and the various incorporated cities, towns and villages that sign cooperative agreements with the county. These 12 Cooperative Cities include: Deer Park, Galena Park, Humble, Jacinto City, Katy, La Porte, Morgan's Point, Seabrook, Shoreacres, South Houston, Tomball, and Webster. Because the populations of Houston, Pasadena, and Baytown are greater than 50,000, they are considered entitlement cities by HUD. These cities utilize their own community development resources and receive HUD funds and therefore are not within the Harris County service area.

For the purposes of the AI, the "region" used in comparative analysis is the Core Based Statistical Area, or CBSA. CBSA boundaries are set by the U.S. Office of Management and Budget (OMB) and include both metropolitan and micropolitan (smaller consolidated cities) areas. By definition, a CBSA is county or group of counties with at least one urbanized area of 10,000 people or more and adjacent areas with a "high degree of social and economic integration."

The region that includes the participating jurisdictions for this AI is the "Houston-The Woodlands-Sugar Land CBSA" comprised of nine counties including and surrounding Harris County: Harris, Fort Bend, Montgomery, Brazoria, Galveston, Liberty, Waller, Chambers and Austin counties. This area is commonly referred to as the "Greater Houston Region" and may also be called "the region" throughout this document. Figure I-1 shows jurisdictions participating in this regional fair housing study.

Figure I-1.
Participating Jurisdictions



Source: ESRI and BBC Research & Consulting.

Harris County is located in Texas' coastal plain, along the northern coast of the Gulf of Mexico. The County's urban area is dominated by the City of Houston. The City of Pasadena lies adjacent to Houston on its southeastern border within Harris County. Missouri City lies adjacent to Houston on its southwestern border, partially in Harris County but primarily in Fort Bend County. Lying one hour from the center of the City of Houston, Galveston is a coastal resort and port and the site of many vacation homes.

Regional Demographic Summary

Demographic patterns. The Greater Houston Region consists of about 5.9 million residents, 40 percent of whom identify as non-Hispanic white. Thirty-five percent are Hispanic, 17 percent are African American or black, 7 percent are Asian or Pacific Islander and 1 percent are two or more races. About 23 percent of the region's residents were born outside the United States and 16 percent have limited English proficiency.

About half of all households in the region are families with children. Eleven percent of the region's residents have at least one type of disability. Figure I-2 (on the following page) provides a demographic overview of the Greater Houston region and the participating jurisdictions for the AI.

The racial/ethnic distribution of Harris County, excluding CDBG entitlement areas of Houston and Pasadena, is very similar to the region overall. Galveston has a higher proportion of African American or black residents (21%) than the region, offset by a lower proportion of Asian residents (3%). Missouri City has the lowest proportion of residents that are non-Hispanic white (26%) and the highest proportion of both African American residents (40%) and Asian residents (16%). Pasadena also has a relatively low proportion of non-Hispanic white residents (33%). Pasadena's "minority" population consists primarily of Hispanic residents, who account for 62 percent of the overall population.

In both Pasadena and Missouri City, a quarter of all residents were born outside the United States (a proportion slightly higher than the region overall). However, the ability of those residents to speak English is quite different in the two communities. In Pasadena, 22 percent of the population has limited English proficiency, compared to 11 percent in Missouri City and 16 percent in the region overall.

Galveston is has the highest proportion of senior residents (13%), which relates to its relatively high proportion of residents with a disability (15%) and its lower proportion of households that are families with children.

Figure I-2. Current Demographics, Greater Houston Region and Participating Jurisdictions

Note:

All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

	Greater Houston Region		Harris County Service Area		Galveston		Missouri City		Pasadena	
	Number	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*
Race/Ethnicity										
White, Non-Hispanic	2,340,268	40%	698,130	40%	17,119	41%	19,437	26%	48,299	33%
Black, Non-Hispanic	996,221	17%	273,486	16%	8,599	21%	30,618	40%	2,869	2%
Hispanic	2,096,532	35%	641,215	36%	14,030	33%	12,225	16%	90,243	62%
Asian or Pacific Islander, Non-Hispanic	387,383	7%	115,853	7%	1,383	3%	11,842	16%	3,137	2%
Native American, Non-Hispanic	13,824	0%	4,113	0%	169	0%	158	0%	296	0%
Other or Two or more Races	86,435	1%	27,460	2%	646	2%	1,593	2%	1,124	1%
National Origin										
Foreign-born	1,350,399	23%	390,410	22%	7,065	15%	16,779	25%	37,160	25%
LEP										
Limited English Proficiency	947,540	16%	279,255	16%	3,954	8%	7,606	11%	32,755	22%
Sex										
Male	2,944,237	50%	868,373	49%	21,288	51%	36,255	48%	72,489	50%
Female	2,976,179	50%	891,762	51%	20,656	49%	39,620	52%	72,495	50%
Age										
Under 18	1,655,964	28%	537,920	31%	8,458	20%	20,694	27%	44,794	31%
18-64	3,757,464	63%	1,103,108	63%	27,916	67%	48,753	64%	88,826	61%
65+	506,988	9%	119,107	7%	5,570	13%	6,428	8%	12,364	8%
Family Type										
Families with children	748,699	51%	244,335	55%	3,729	40%	9,776	48%	19,141	54%
Age of People with Disabilities										
Total with Disabilities	562,590	11%	143,882	9%	6,220	15%	4,766	7%	16,143	12%
Age 5-17 with Disabilities	55,501	1%	16,815	1%	321	1%	523	1%	1,751	1%
Age 18-64 with Disabilities	310,640	6%	82,128	5%	3,298	8%	2,142	3%	9,025	7%
Age 65+ with Disabilities	196,449	4%	44,939	3%	2,601	6%	2,101	3%	5,367	4%

Demographic trends. Figure I-3 shows the trends in specified protected class populations for the Greater Houston Region and participating jurisdictions between 1990 and 2013. A summary of key observations from the figure are below:

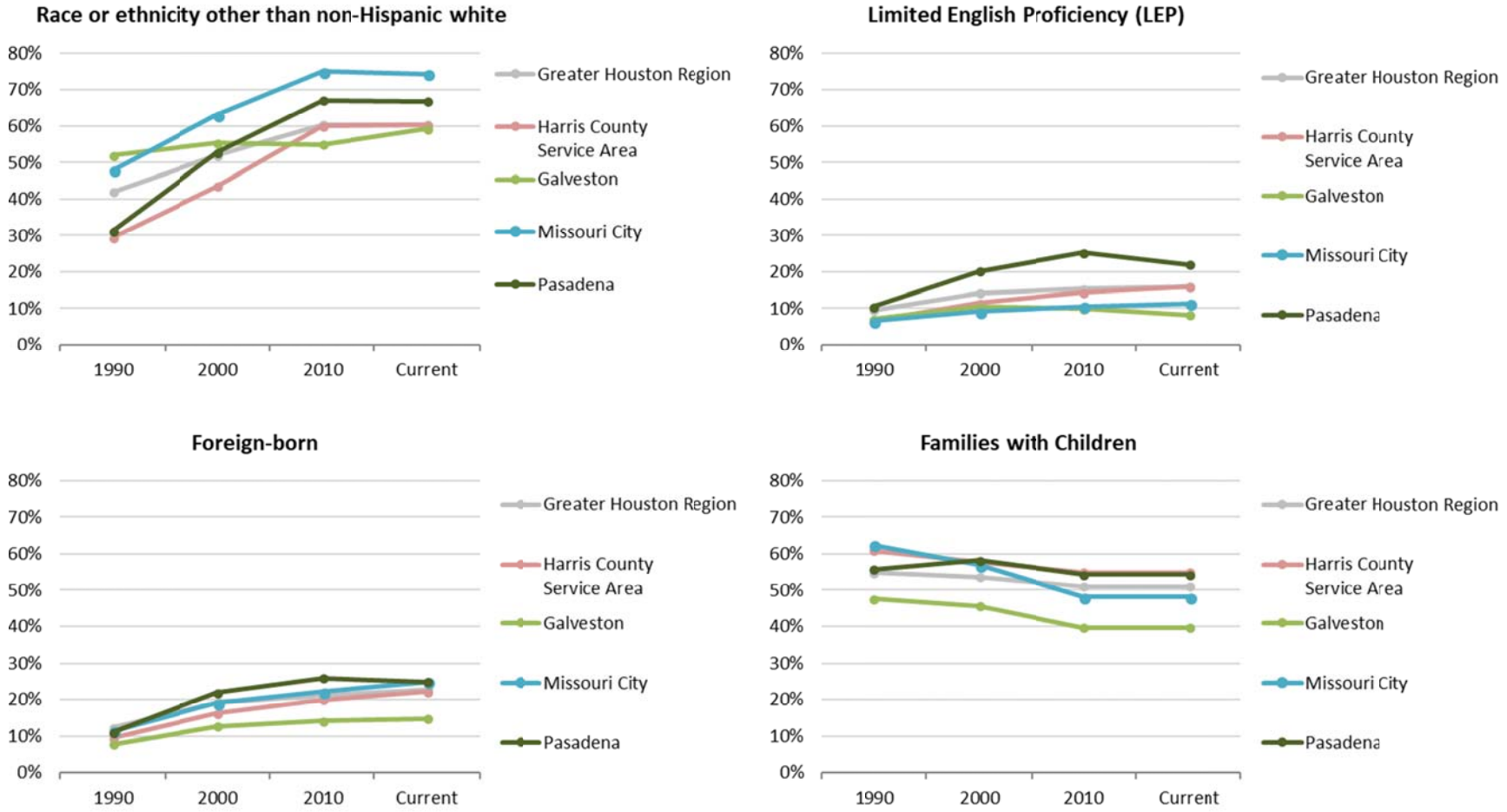
- In all jurisdictions, the proportion of the population that belongs to a racial/ethnic group other than non-Hispanic white increased between 1990 and 2013. That increase was smallest in Galveston, though it should be noted that Galveston started with the highest non-white population in 1990.

- Similarly, the proportion of residents that are foreign-born increased in all jurisdictions, with Galveston having the smallest increase.

- All jurisdictions except Galveston experienced an increase in the population with limited English proficiency between 1990 and 2013. The rate of increase was highest in Pasadena, particularly between 1990 and 2010.

- The proportion of households that consist of families with children decreased for all jurisdictions between 1990 and 2013, except in Pasadena where the proportion held relatively constant.

Figure I-3.
Demographic Trends, Greater Houston Region and Participating Jurisdictions



Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.
Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool; and BBC Research & Consulting.

Segregation levels and patterns. A recent report by the Manhattan institute shows that segregation in most American cities has been declining since a peak in the mid-twentieth century. At that time, both government policies and market forces contributed to neighborhood segregation. Policy reform, shifts in racial attitude, gentrification of urban areas and integration of suburbs have all contributed to the overall decline in segregation.[3] Even so, racial concentrations persist in many neighborhoods due to a multitude of reasons including historical denial of housing and segregation, neighborhood history, immigration patterns, economic mobility, and actual/perceived racism.

Racial and ethnic diversity is increasing in all four geographies assessed in this AI. However, diversity and residential integration are not the same. While ethnic/racial diversity grows, neighborhood integration lags behind for most groups.

This can be seen by assessing levels of integration as measured by the Dissimilarity Index. The Dissimilarity Index, or DI, is a widely used measure of racial residential segregation that captures the segregation dimension of evenness of distribution of *individual residents*. Specifically, the DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a city or county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

It is important to note that the DI that HUD provides for AI completion uses non-Hispanic white, residents as the primary comparison group. That is, all DI values compare a particular racial group's distribution in the city/county against the distribution of non-Hispanic white residents. Also, the HUD-provided data use Census tracts or block groups (depending on the data year) as the geographic unit of measurement in calculating the jurisdiction-wide DI. This geographic level generally equates to a neighborhood-level analysis of segregation.

The HUD data provided for the AI, shown in Figure I-4, reveal that the participating jurisdictions are less segregated than the region overall. Hispanic segregation seems to have increased over the past 25 years (except in Galveston); black/white segregation has remained relatively constant (Harris County and Missouri City) or declined (Galveston and Pasadena).

Harris County has "moderate" levels of segregation for all racial/ethnic groups as does Missouri City. Galveston and Pasadena have "low" or "moderate" levels of segregation, depending on the racial/ethnic group of focus. The Greater Houston region overall shows "high" segregation between African American residents and non-Hispanic white residents and shows "moderate" segregation between Hispanic and non-Hispanic white residents as well as between Asian and non-Hispanic white residents.

[3] https://www.manhattan-institute.org/html/cr_66.htm

Figure I-4.
Dissimilarity Index Trends, Greater Houston Region and Participating Jurisdictions

Racial/Ethnic Dissimilarity Index	Greater Houston Region				Harris County Service Area				Galveston			
	1990	2000	2010	Current	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	49.4	52.2	50.1	52.7	39.8	45.8	45.6	47.0	41.0	35.7	34.0	31.2
Black/White	65.2	65.3	60.7	64.2	52.5	57.0	53.2	54.6	56.6	48.6	41.4	41.8
Hispanic/White	47.6	53.3	52.5	54.7	38.0	46.9	48.5	49.7	34.7	35.8	36.3	33.1
Asian or Pac Isl/White	47.8	49.9	48.6	52.5	43.1	42.8	38.9	43.1	39.9	39.5	37.2	41.1

Racial/Ethnic Dissimilarity Index	Missouri City				Pasadena			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	36.6	41.8	41.8	37.4	31.8	38.8	42.7	39.2
Black/White	50.5	52.2	51.4	51.8	46.5	37.7	30.2	36.1
Hispanic/White	39.5	46.9	52.1	45.1	36.2	43.9	47.6	42.0
Asian or Pac Isl/White	31.1	35.6	37.9	40.8	33.8	31.5	33.4	39.2

Interpreting the index:

- 0-39 Low Segregation
- 40-54 Moderate
- 55-100 High

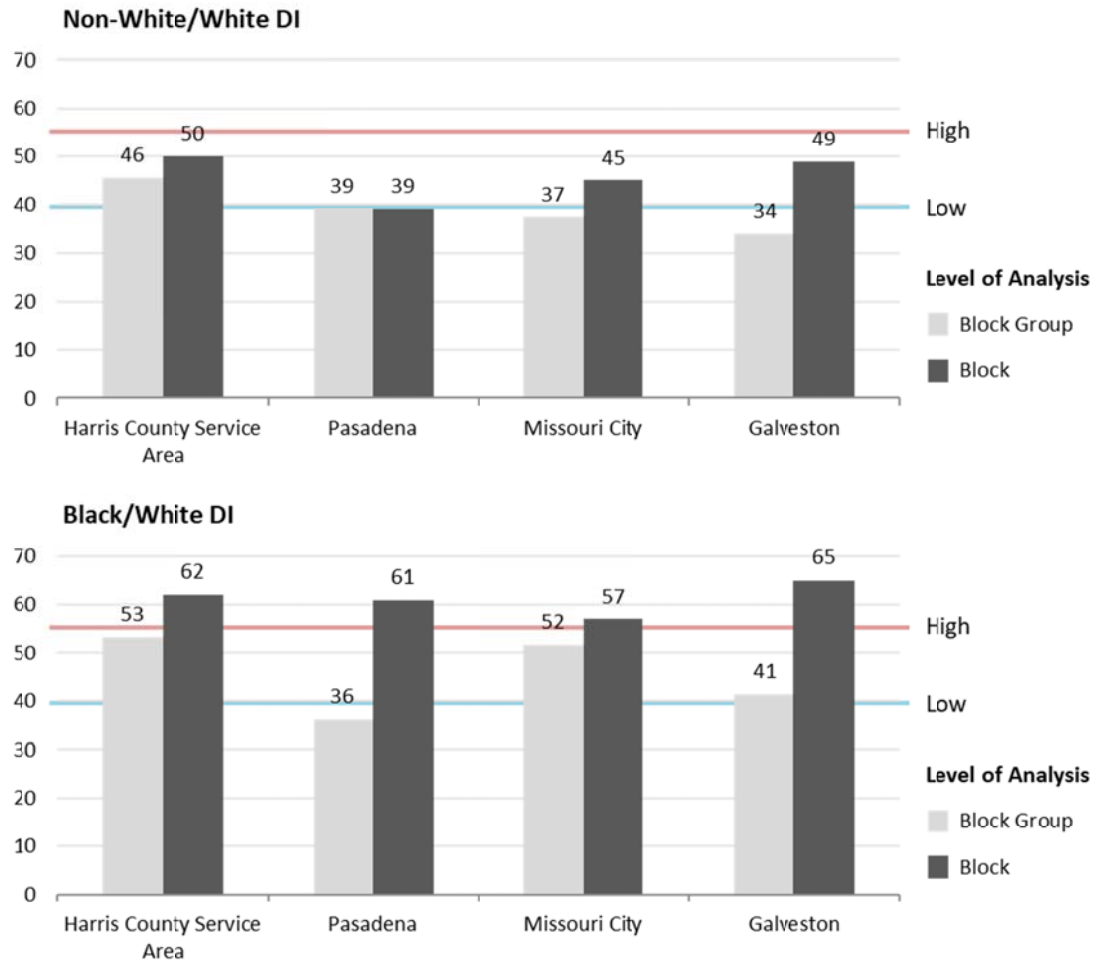
Note: Unit of analysis relies on Census tract data (1990, 2000, and current) and block group data (2010). "White" in this figure means non-Hispanic white. "Non-White" means any race/ethnicity other than non-Hispanic white.

Source: Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

In addition to the HUD-provided data above, this AI considers a finer grain of geographic detail in the segregation analysis by calculating the DI at the block-level. Blocks are relatively small and in some cases may include single multifamily developments or just a handful of households. Even so, an analysis at this level provides additional context for understanding segregation by looking within neighborhoods at possible segregation patterns. In other words, the Census tract and block group level analysis presented in Figure I-4 evaluates segregation *between* neighborhoods; and the analysis below, conducted at the block-level, evaluates segregation *within* neighborhoods on individual street blocks.

As shown in Figure I-5, the DI is generally higher when using blocks as the level of analysis. This means that while neighborhoods have low to moderate segregation, blocks within those neighborhoods have moderate to high segregation.

Figure I-5.
Block-Level Dissimilarity Index, Participating Jurisdictions, 2010



Note: "White" in this figure means non-Hispanic white. "Non-White" means any race/ethnicity other than non-Hispanic white.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool; 2010 Census and International Development Planning, LLC.

When evaluated at the block-level, Harris County excluding Houston's DI is high for black-white segregation (62) and moderate for white-minority segregation (50). Pasadena (61), Galveston (65), and Missouri City (57) also have high levels of white-black segregation. The persistence of high segregation of whites from blacks in all four of the locales is notable.

White-minority racial residential segregation in all three towns assessed are lower, ranging from 39 in Pasadena and 45 in Missouri City to 49 in Galveston. The differences in the white-black and white-minority dissimilarity indices suggest that Hispanics, Asians and other non-white residents are less segregated from whites than blacks. This relationship follows trends across the U.S. According to a 2015 study of the segregation of Hispanics relative to whites and blacks,

> *"It is not especially surprising that Hispanics – even today – are more segregated from blacks than from whites. After all, according to the 2010 decennial census, more than one half (53 percent) of Hispanics self-identified as white, and only a very small*

percentage (2.5 percent) identified as black (Ennis, Rios-Vargas, and Albert 2011). … Race clearly trumps ethnicity in the residential sorting process."[4]

The same study found declining Hispanic segregation across the U.S., but stated that Mexicans "are highly differentiated spatially, in part because of cultural differences and economic disparities." This is particularly pertinent as Mexicans are by far the largest group of Hispanics in all of the geographies assessed in this AI (discussed later in this section under the heading Country of Origin).

"The hope of improving race relations implied by declining Hispanic segregation and great ethnoracial inclusion is counterbalanced by persistently high levels of residential segregation among America's disadvantaged Hispanic and other minority populations."[5]

Additional details and additional measures of segregation, including hyper-segregation (where one racial or ethnic group comprises more than 75% of that neighborhood) are discussed in the jurisdiction-specific portions that follow.

Harris County Service Area

Harris County excluding Houston consists of 33 towns and cities, which range in size from 339 (Morgan's Point, 2010) to almost 150,000 (Pasadena, 2010). In 2010, over one third (34%) of Harris County excluding Houston was either a municipality or a Census Designated Place (CDP). Outside of these areas, Harris County excluding Houston is largely suburban or rural.

Demographics: race/ethnicity. The Harris County service area has a similar racial/ethnic distribution to the Greater Houston Region overall: 60 percent of residents belong to a racial/ethnic group other than non-Hispanic white, with Hispanic residents having the largest presence (36%) followed by African American residents (16%), and Asian residents (7%). Other racial/ethnic groups, including residents that identify as two or more races, comprise the remaining 2 percent of residents.

Figure I-6.
Race and Ethnicity, The Harris County service area, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

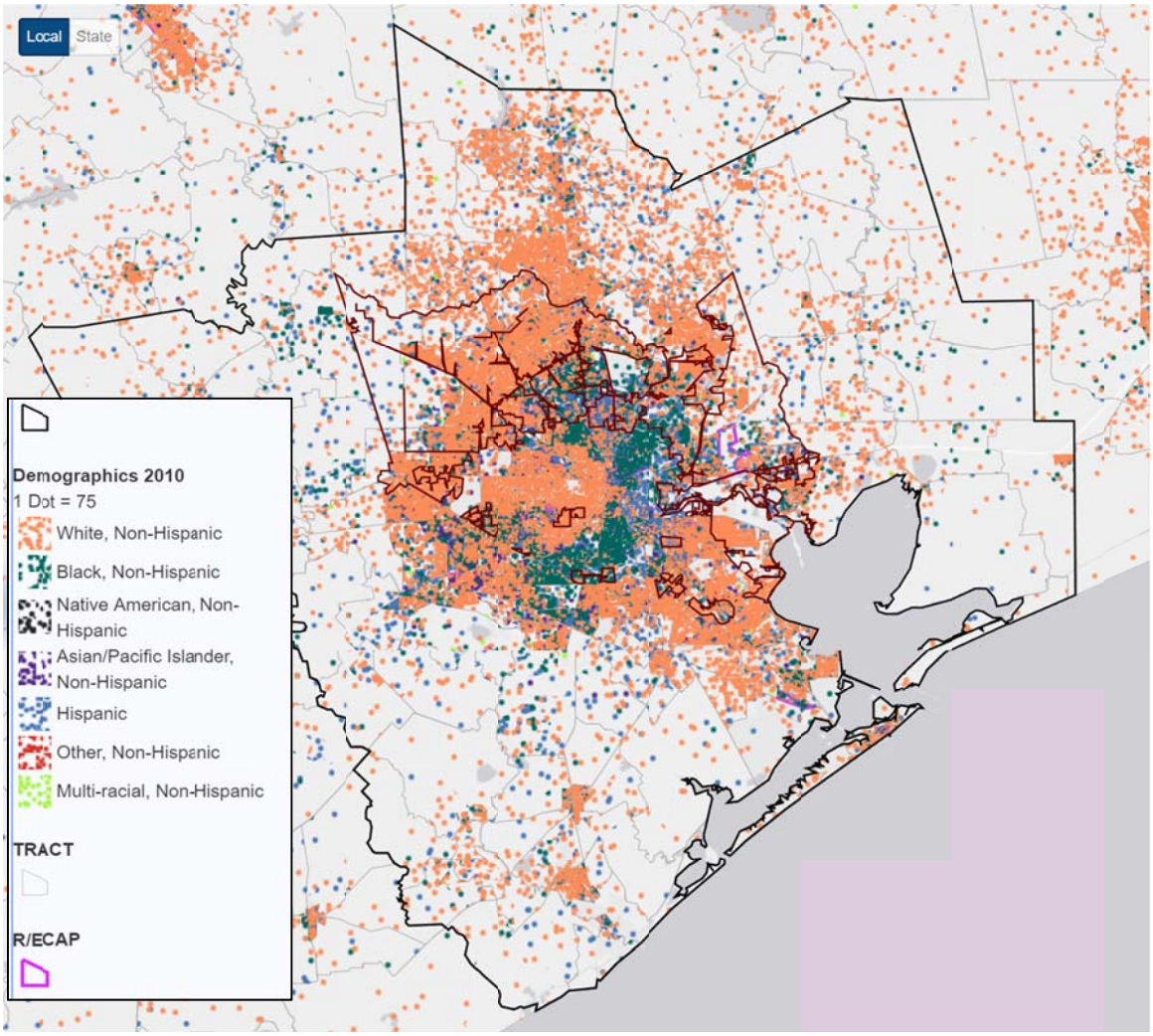
	Greater Houston Region		Harris County Service Area	
	Number	*Percent*	*Number*	*Percent*
White, Non-Hispanic	2,340,268	40%	698,130	40%
Black, Non-Hispanic	996,221	17%	273,486	16%
Hispanic	2,096,532	35%	641,215	36%
Asian or Pacific Islander, Non-Hispanic	387,383	7%	115,853	7%
Native American, Non-Hispanic	13,824	0%	4,113	0%
Other or Two or more Races	86,435	1%	27,460	2%

[4] Lichter, Daniel T., Domenico Parisi and Michael C. Taquino, "Spatial Assimilation in U.S. Cities and Communities? Emerging Patterns of Hispanic Segregation from Blacks and Whites," The Annals of the American Adademy, 2015. Page 54.

[5] Lichter, ibid.

Figure I-7 displays the geographic distribution of residents by race/ethnicity in 2010 (according to the HUD AFFH-T) for the Greater Houston Region and Harris County.

Figure I-7.
Race/Ethnicity, Greater Houston Region, 2010



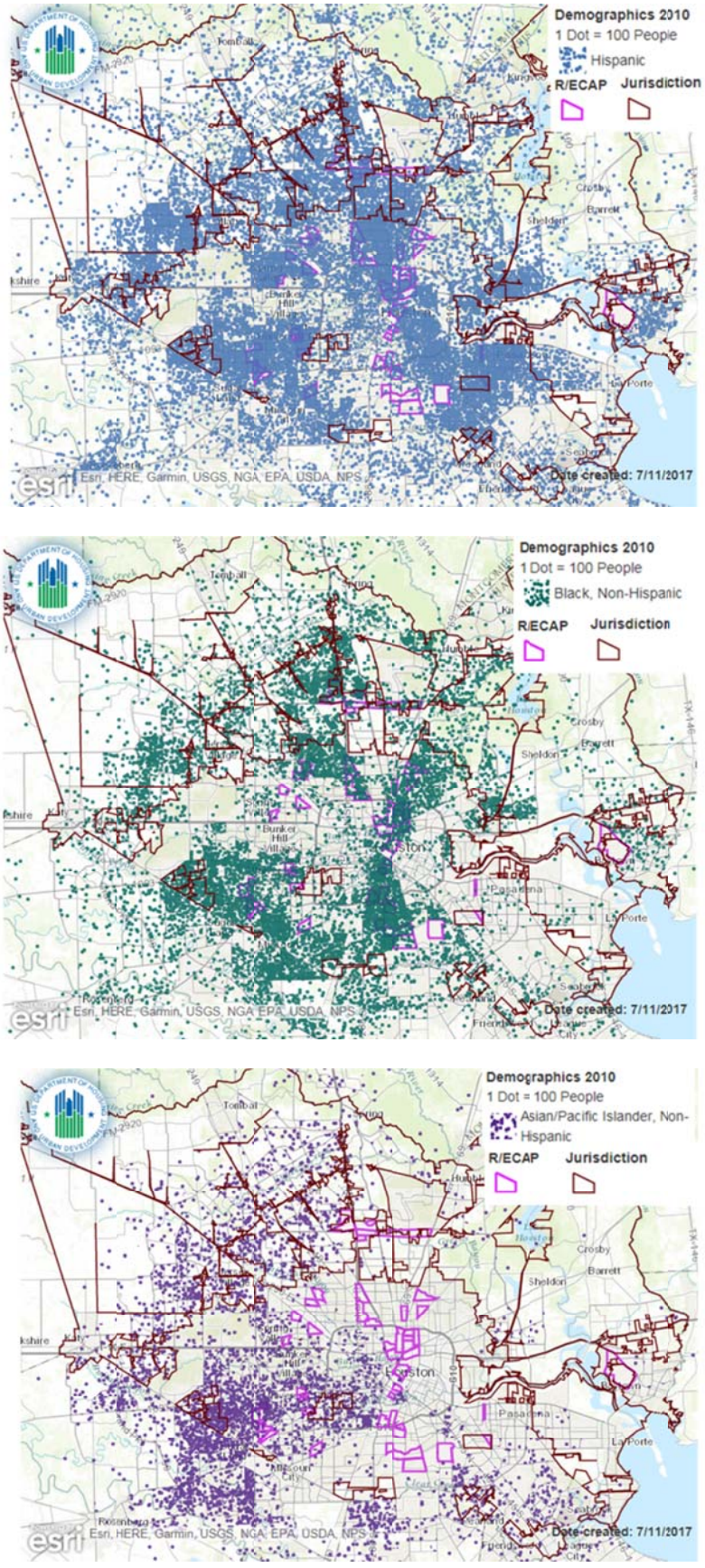
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure I-8, shows the same data as the previous map (race/ethnicity in Harris County in 2010) but provides a closer look at Harris County and separates the maps by individual race/ethnicity for additional clarity. Within the Harris County CDBG jurisdiction, there are clusters of African American residents in many neighborhoods that are inner ring suburbs to Houston—most notably in the northern and southwestern areas of the county. Asian residents have a disproportionately large presence in the southwestern portion of the county as well.

Figure I-8.
Race/Ethnicity by Individual Group, Harris County, 2010

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

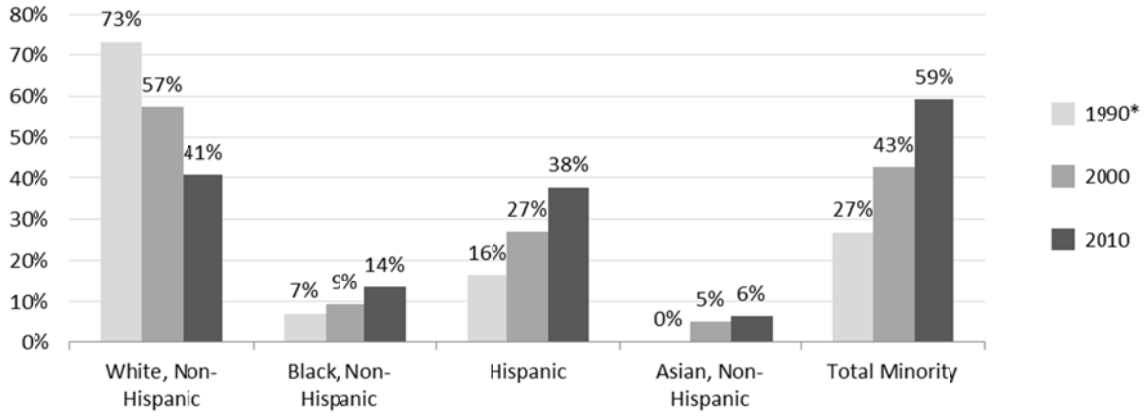


The population of Harris County excluding Houston grew by 68 percent from 1990 to 2010, increasing from 1,187,646 to 1,993,008. The racial/ethnic composition of Harris County excluding Houston changed significantly over that period, as shown in Figure I-9.

The percentage of non-Hispanic white residents in Harris County excluding Houston declined both as a percentage (from 73% in 1990 to 41% in 2010) of the whole and in absolute terms (from 869,770 in 1990 to 811,745 in 2010). Conversely, there were substantial increases in the minority population, particularly African American/black residents and Hispanic residents.

The Hispanic population increased from 16 percent of the population in 1990 to 27 percent in 2000 and 38 percent in 2010. The share of African American residents also increased, almost doubling from 7 percent in 1990 to 13 percent in 2010. In addition, the share accounted for by the Asian population grew from less than 1 percent in 1990 to 6 percent in 2010.

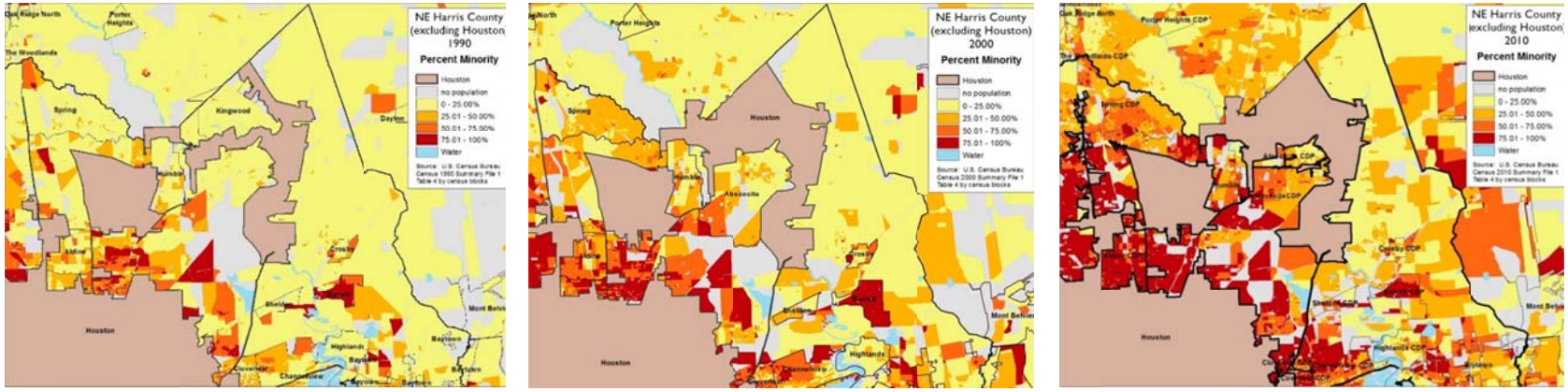
Figure I-9.
Race and Ethnicity, Harris County Service Area, 1990-2010



Source: * Texas Dept. of State, Health Services, Center for Health Statistics, and International Development and Planning LLC.

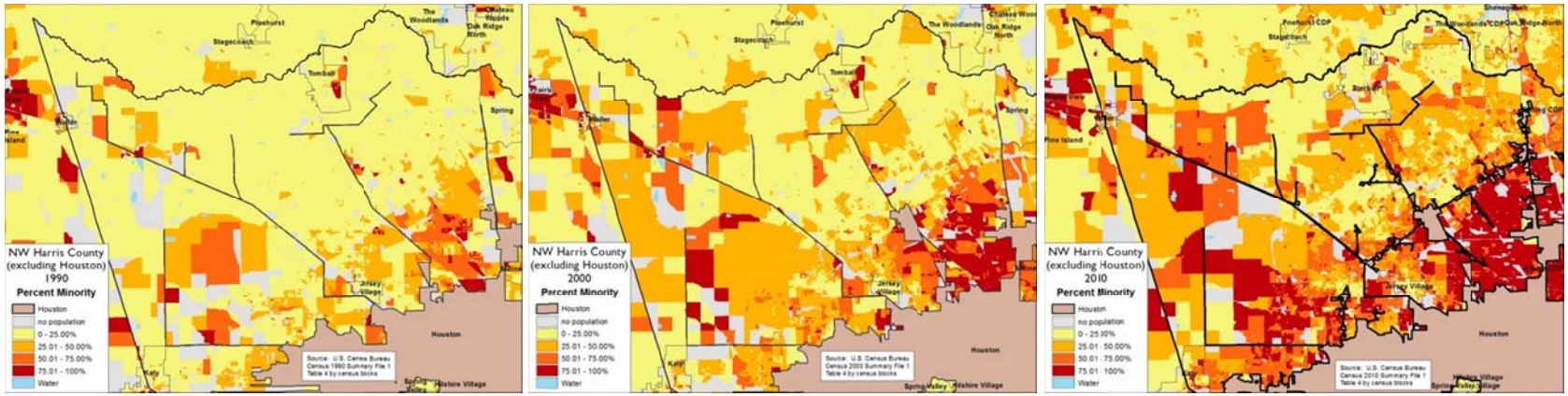
Figures I-10 through I-13 examine changes in race/ethnicity at the block-level for the Harris County jurisdiction. The progression in each figure clearly shows the increase in percent minority along Houston's borders.

Figure I-10.
Northeastern Harris County: Percent Minority 1990, 2000, and 2010



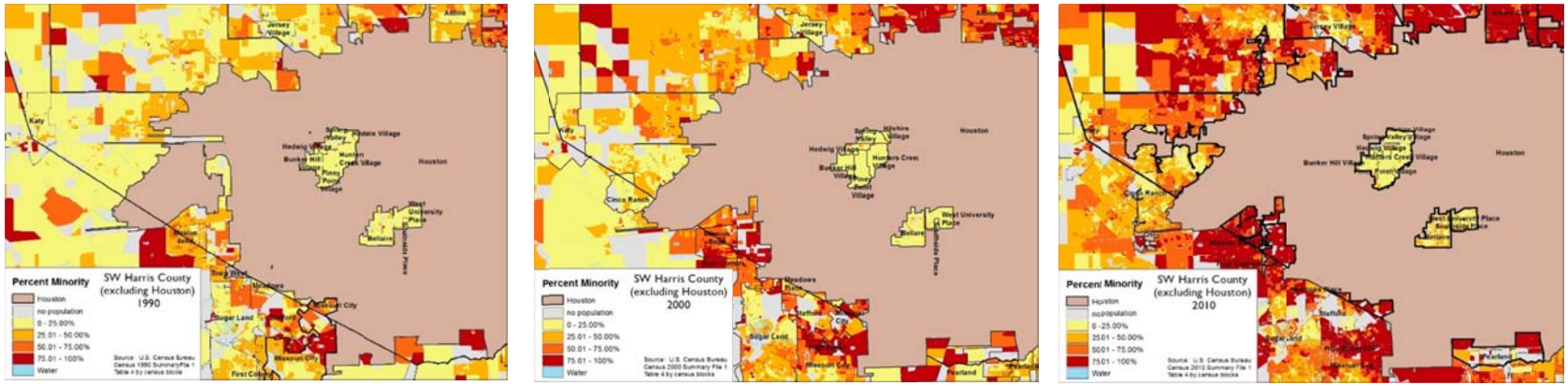
Source: Cedar Grove Institute for Sustainable Communities.

Figure I-11.
Northwestern Harris County: Percent Minority 1990, 2000, and 2010



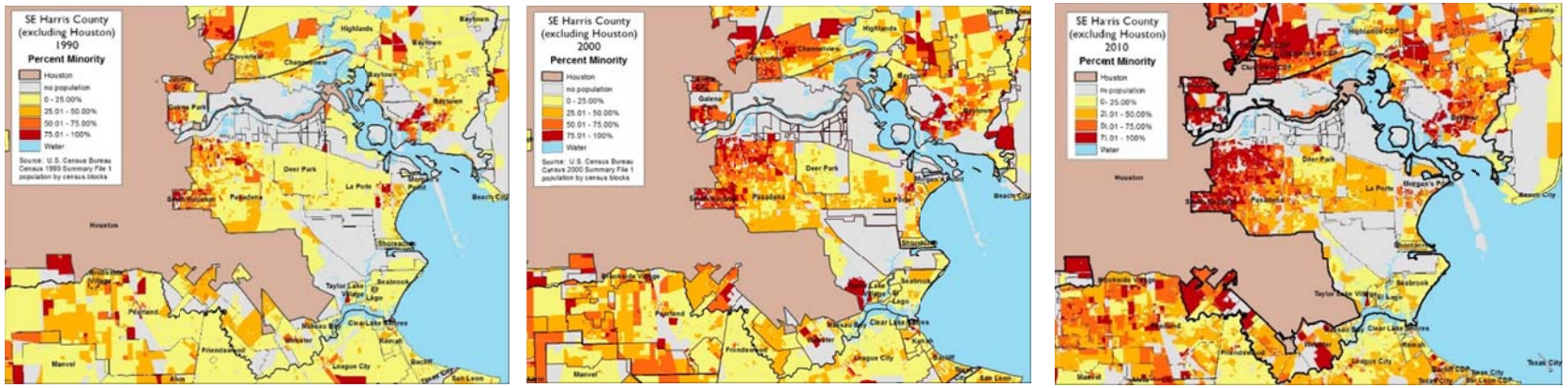
Source: Cedar Grove Institute for Sustainable Communities.

Figure I-12.
Southwestern Harris County: Percent Minority 1990, 2000, and 2010



Source: Cedar Grove Institute for Sustainable Communities.

Figure I-13.
Southeastern Harris County: Percent Minority 1990, 2000, and 2010



Source: Cedar Grove Institute for Sustainable Communities.

Demographics: country of origin. Fair housing laws protect individuals based on their national origin. The Harris County service area is extremely diverse, with over 300,000 residents from just the top 10 countries of origin. Figure I-14 shows the 10 largest countries of origin for immigrants in Harris County excluding the entitlement communities of Houston, Pasadena and part of Missouri City.

Mexico is by far the major country of origin, accounting for 10 percent of the population in the Harris County CDBG jurisdiction. The drop to the second largest country of origin—El Salvador (1.2%)—is substantial. Immigrants from Central and South America and Asia account for most of the other primary countries of origin.

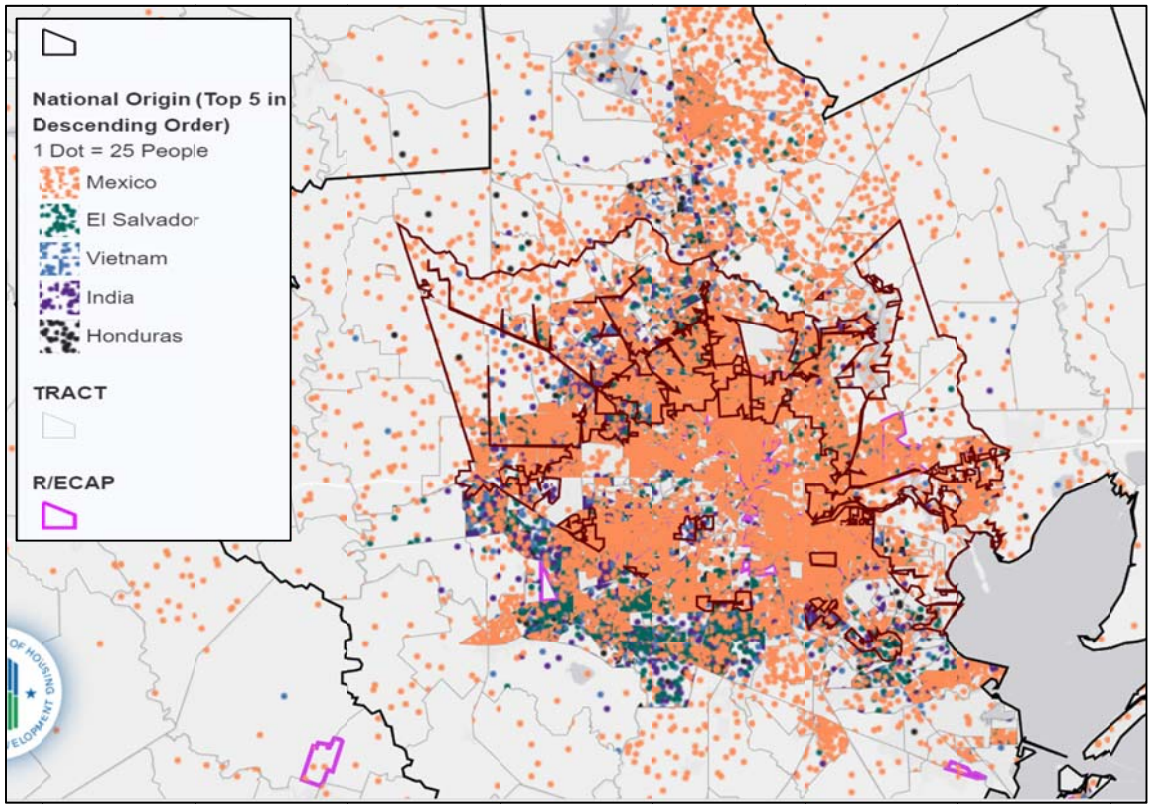
Figure I-14.
Country of Origin, Harris County Service Area, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Country of Origin	Population	Percent of Total Population
Mexico	174,547	10.5%
El Salvador	34,648	2.1%
Vietnam	31,711	1.9%
India	14,069	0.8%
Honduras	11,388	0.7%
Philippines	10,978	0.7%
Colombia	8,672	0.5%
Pakistan	7,386	0.4%
Guatemala	7,361	0.4%
China excl. Hong Kong &	6,259	0.4%

Figure I-15 shows the geographic distribution of Harris County residents by country of origin, using a dot density map from the HUD AFFH-T. While only 1.1 percent of the area population was born in Vietnam, note the clusters of Vietnamese communities in Southeastern and Southwestern Harris County outside of Houston.

Figure I-15.
National Origin, Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Demographics: limited English proficiency. Discrimination based on national origin can include an individual's ability to speak, read, or understand English. For instance, it is discriminatory when housing or housing assistance is not provided because of language barriers, whether it is because application materials are not translated or translated appropriately or because the landlord refuses to assist someone because of language differences. Insufficient or ineffective outreach can also be a violation of Fair Housing protections.

Figure I-16 shows the number of people who speak a language other than English at home and the percentage of them who speak English *less than well* for Harris County excluding Houston and Pasadena.

Spanish or Spanish Creole is by far the largest group who speak a language other than English at home. Close to half (46.5%) of those who speak Spanish or Spanish Creole at home speak English less than well. A majority (58.7%) who speak Vietnamese at home speak English less than very well. In all four locales in this assessment, a high percentage of those who speak Chinese at home speak English less than very well.

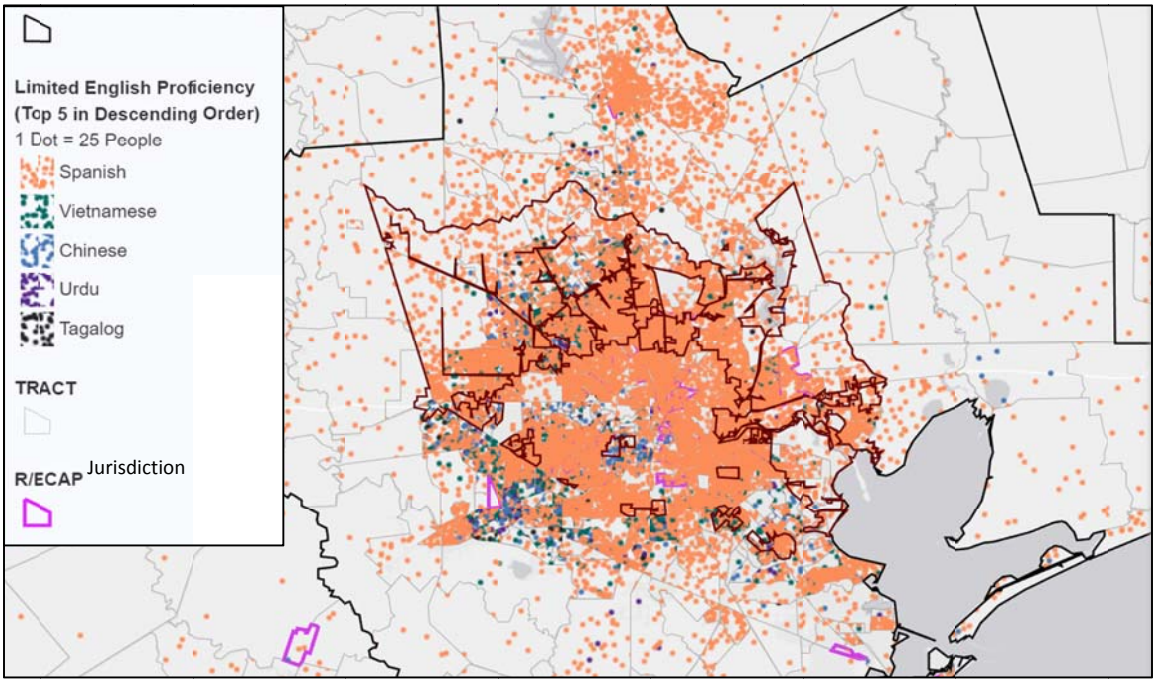
Figure I-16. Limited English Proficiency, Harris County Service Area

Source:
2013 5-year ACS.

Language Spoken at Home	Number of Speakers	Number that Speak English Less than Very Well	Percent that Speak English Less than Very Well
Any Language other than English	658,848	292,832	44.4%
Spanish or Spanish Creole	513,367	235,773	45.9%
Vietnamese	40,133	23,415	58.3%
Chinese	14,079	7,404	52.6%
Tagalog	10,323	2,574	24.9%
Urdu	9,531	2,572	27.0%
Korean	4,501	2,348	52.2%
Arabic	7,493	2,318	30.9%
Other Indic languages	5,735	1,717	29.9%
Hindi	5,899	1,490	25.3%
Other Asian languages	5,316	1,346	25.3%

Figure I-17 examines the geographic distribution of residents with limited English proficiency. Note the communities of Vietnamese and Chinese speakers in southern Harris County.

Figure I-17.
Limited English Proficiency, Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Segregation in Harris County. This section of the analysis focuses on racial/ethnic segregation in Harris County, excluding entitlements. The analysis uses two methods for evaluating segregation: the Dissimilarity Index and hyper-segregation. As mentioned in the Regional Demographic Summary, the dissimilarity index is evaluated at both the block group and block levels.

Dissimilarity index. As discussed previously, the dissimilarity index, or DI, is a widely used measure of racial residential segregation that captures the segregation dimension of evenness of distribution of individual residents. Figure I-18 (on the following page) shows the DI for the City of Houston, the Greater Houston Region as a whole, and The Harris County service area. These data are from the HUD AFFH-T and depict the DI as calculated from Census tract and block group level data. Current data for The Harris County service area indicate moderate levels of segregation between non-Hispanic whites and each individual racial/ethnic group (index values between 40 and 54).

While the 1990-2010 dissimilarity indices for Harris County excluding Houston have declined somewhat for black/white segregation, the picture is more complex for all race/ethnicities when the current situation is considered, and when the area as a whole is considered. HUD's Affirmatively Furthering Fair Housing mapping tool provides data that show:

- In both Houston and the Greater Houston Region, black/white segregation remains high (index value 55 or higher).

- In all three areas shown in the figure, Hispanic/white segregation has increased more than any other group since 1990.

- In all three areas shown in the figure, segregation for all groups relative to non-Hispanic whites has increased somewhat since 2010, although the increase in Harris County is less than for Houston or the region.

Figure I-18. Dissimilarity Index Trends: Houston, the Greater Houston Region, and the Harris County Service Area, 1990-2016

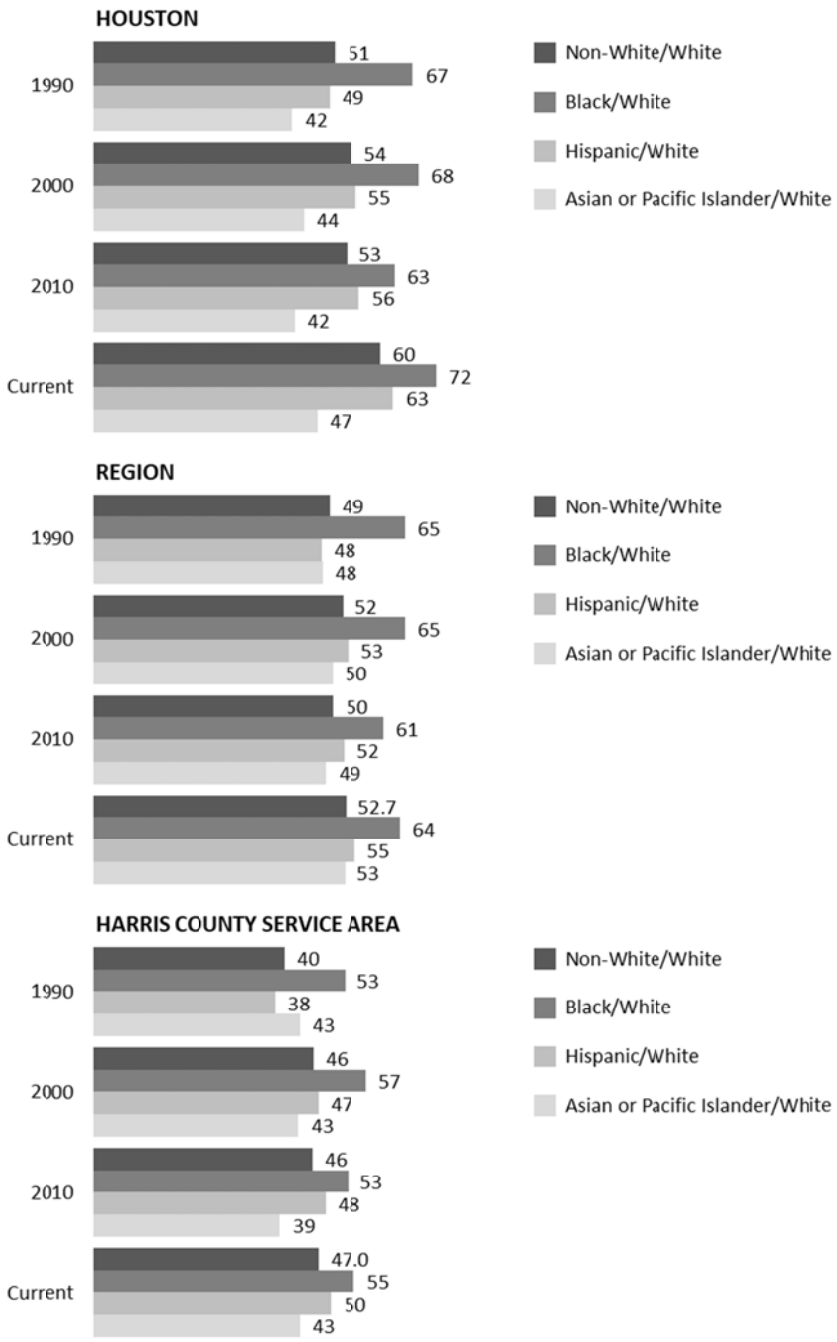
Note:

Refer to the Data Documentation for details (www.hudexchange.info).

Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

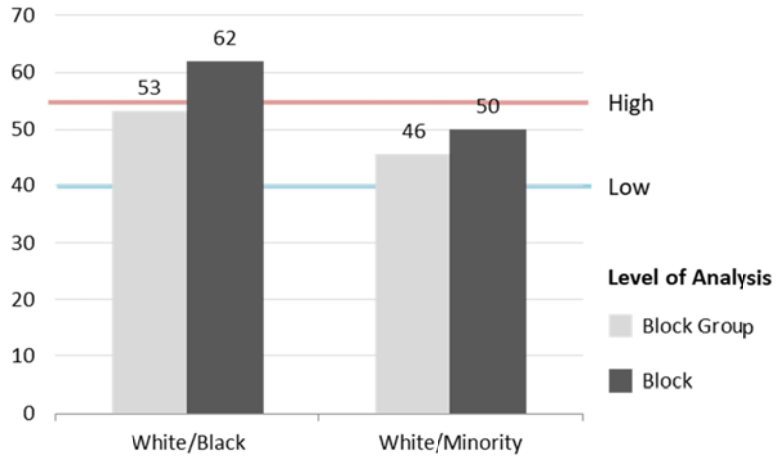


As discussed in the Regional Demographic Summary section, this report also evaluates the DI on a smaller geographic scale to evaluate segregation within neighborhoods (block-level analysis), not just among neighborhoods (block group and Census tract analysis from the AFFH-T). Figure I-19 compares the 2010 DI calculated at the block group level (same as shown in the previous figure) with a block-level analysis. Index values are shown for whites relative to blacks and whites relative to minorities for Harris County excluding Houston.

As illustrated by the figure, a smaller geographic scale indicates higher levels of segregation: a high index value of 62 for black/white segregation and a moderate index value of 50 for minority/white segregation.

Figure I-19.
Block-Level Dissimilarity Index, Harris County Excluding Houston, 2010

Source:
2010 Census and International Development and Planning, LLC.



Hyper-Segregation of Neighborhoods. Another method of assessing segregation is to identify neighborhoods where one racial or ethnic group comprises more than 75 percent of that neighborhood. Hyper-segregation is calculated here as the population living in Census blocks with more than five persons where the population is more than 75 percent of one racial or ethnic group. Equally important is how many neighborhoods have no residents of a particular subgroup. Figure I-20 compares the racial/ethnic distribution of the total population of Harris County excluding Houston, with the distribution of hyper-segregated neighborhoods.

Figure I-20.
Hyper-segregation of Neighborhoods, Harris County Excluding Houston, 2010

Racial/Ethnic Group	Percent of Total Population	Percent of Blocks that are ≥ 75% Specified Group	Percent of Blocks that are ≥ 90% Specified Group	Percent of Blocks with No Residents of the Specified Group
Non-Hispanic White	40.1%	22.4%	7.6%	4.9%
Minority	59.9%	33.9%	17.5%	3.3%
Hispanic	37.6%	15.0%	6.1%	7.5%
African American/Black	14.3%	1.6%	0.8%	39.1%
Asian	6.2%	0.1%	0.1%	52.3%

Source: 2010 Census and International Development and Planning, LLC.

Harris County excluding Houston is 40 percent non-Hispanic white. More than one in every five neighborhoods (22%) was hyper-segregated and predominantly white, while almost no neighborhoods (3%) had no white residents.

In Harris County excluding Houston, over one-third of blocks were hyper-segregated and predominantly minority. Almost one in five (17%) of the area's blocks were 90 percent or more minority. Few blocks (3.3%) had no minority residents.

Harris County excluding Houston is 38 percent Hispanic. Fifteen percent of its neighborhood blocks are hyper-segregated and predominantly Hispanic while 7.5 percent of its neighborhoods have no Hispanic residents. This indicates relatively high segregation for this group.

In Harris County excluding Houston, few neighborhoods were hyper-segregated and predominantly black. Only 1.6 percent of neighborhoods are more than 75 percent black. However, 39 percent of neighborhoods have no black residents, even though the population of this area is 14 percent black. This may indicate some type of residential exclusion or strong preferences among the black population to choose or avoid specific neighborhoods.

Similarly, only 0.1 percent of neighborhoods were hyper-segregated and predominantly Asian. Almost three fourths (72%) of neighborhoods were less than 5 percent Asian and more than half (52%) had no Asian residents, but this is not surprising in an area that is comprised of only 6 percent this group.

Municipal exclusion. The following analysis evaluates the extent to which minority neighborhoods may be excluded from municipalities based on patterns of annexation. Annexation determines what services are provided, what rules govern development of land, who can vote in city elections, what neighborhoods can form a utility district to self-finance improvements, and other important issues governing the daily lives of residents. According to Marsh et al. (2010),

> *"Municipalities create a local political geography that can institutionalize subordinate positions for minority groups. Most importantly, local governments determine which areas are incorporated into a municipality through annexation and which are excluded. Through these powers, local governments can diminish or deny minority political standing in local affairs, limit access to public services, and reduce the value of minority property. The boundaries are a component of racial residential segregation. Racially disparate application of local governments' power to shape local political geography creates barriers to equality…."*

Some municipalities in Harris County excluding Houston are underbounded, growing to the edge of dense minority neighborhoods—or in several cases around them—without annexing them. Some predominantly minority neighborhoods appear to be excluded by municipalities: some are sandwiched between two municipalities, while others may be completely surrounded by a single municipality, creating a "donut" effect.[6]

This segregation through densely-settled minority communities can most clearly be seen by the existence of predominantly minority Census Designated Places (CDPs).[7] A CDP is an unincorporated community that contains a mix of residential and commercial areas similar to

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[6] While maps appear to show predominantly-white donuts inside Houston, these are in fact municipalities (e.g. Bellaire, Spring Valley Village, etc.).

[7] According to the US Census, "Census Designated Places (CDPs) are the statistical counterparts of incorporated places, and are delineated to provide data for settled concentrations of population [emphasis added] that are identifiable by name but are not legally incorporated" https://www.census.gov/geo/reference/gtc/gtc_place.html, accessed 7/21/2017.

those found in an incorporated place of similar size. Because the City of Houston practices "limited" and "shoestring" annexation (annexation focusing on commercial/industrial areas and/or following major roads), the more residential areas of the predominantly-minority CDPs are less likely to be annexed.

In 2010, about one third (34%) of Harris County excluding Houston was either a municipality or a CDP, and one third (32%) of these densely-settled areas were CDPs, inhabited by 213,999 persons (2010). On average, these CDPs had a higher percentage minority population than did Harris County excluding Houston overall: While the municipalities in Harris County excluding Houston was 55 percent minority, its CDPs averaged 61 percent minority in 2010. This would have been higher if not for predominantly white communities such as those in Atascocita (65,844 residents, 47% minority), The Woodlands[8] (93,847 residents, 21% minority), and Cinco Ranch (18,274 residents who are 31% minority; 2,838 of whom reside in Harris County and are 30% minority). These predominantly white communities have municipal-quality infrastructure and services, including greenways, parks and libraries.

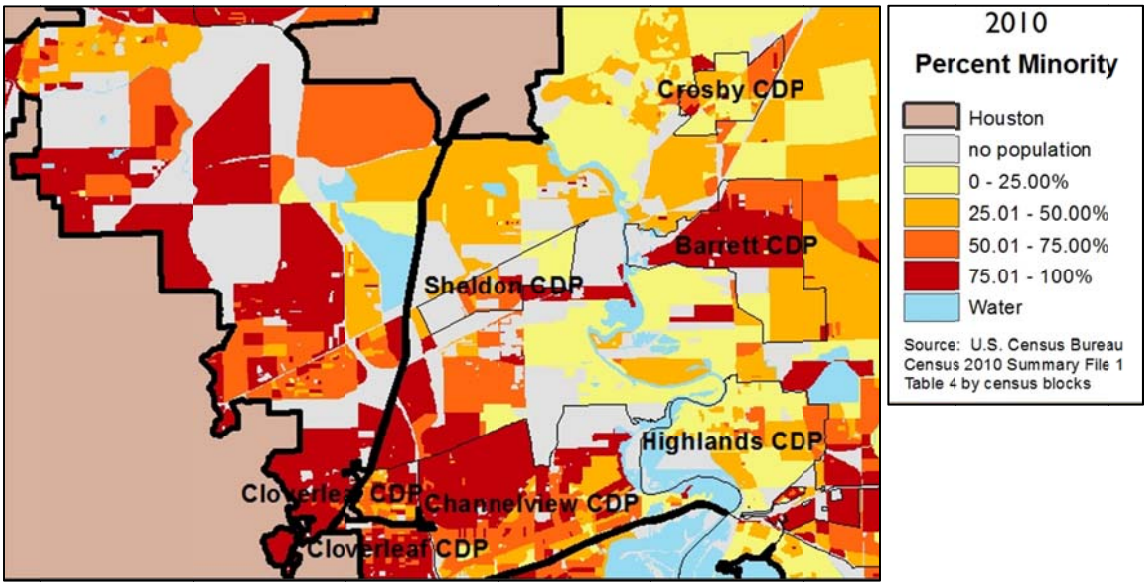
In contrast, there are large predominantly-minority CDPs such as Channelview (38,289 residents, 78% minority), Cloverleaf (22,942 residents, 80% minority) and Mission Bend (36,501 residents who are 86% minority; 12,416 of whom reside in Harris County and are 85% minority in Harris County).[9] Another example is Barrett (also named Barrett Station), which was founded by a former slave in 1889 and is 87 percent minority and 77 percent black (2010).

Figures I-21 through I-23 show the boundaries of the City of Houston along with CDPs that have a high proportion of minority residents.

[8] http://www.thewoodlands.com/ accessed 8/21/2017.

[9] Mission Bend is in the City of Houston's Extra-Territorial Jurisdiction (ETJ).

Figure I-21.
Excluded Minority Neighborhoods – Cloverleaf, Channelview and Barrett and Sheldon, 2010



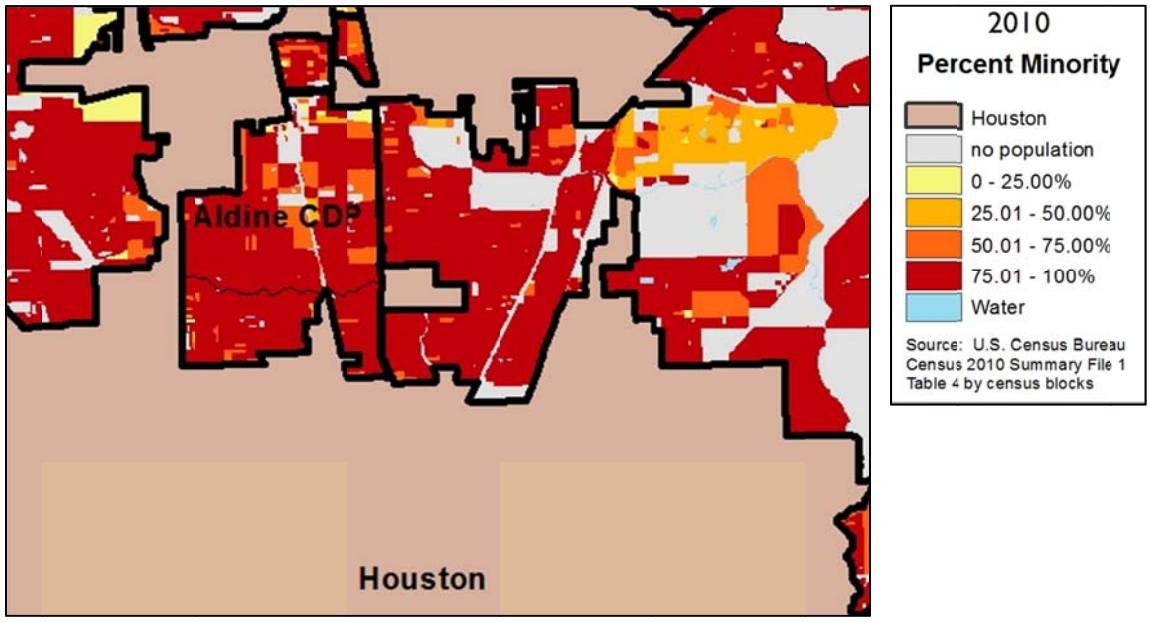
Source: Cedar Grove Institute for Sustainable Communities, Inc.

Figure I-22.
Excluded Communities: Mission Bend CDP, 2010



Source: Cedar Grove Institute for Sustainable Communities, Inc.

Figure I-23.
Excluded Minority Neighborhood – Aldine, 2010

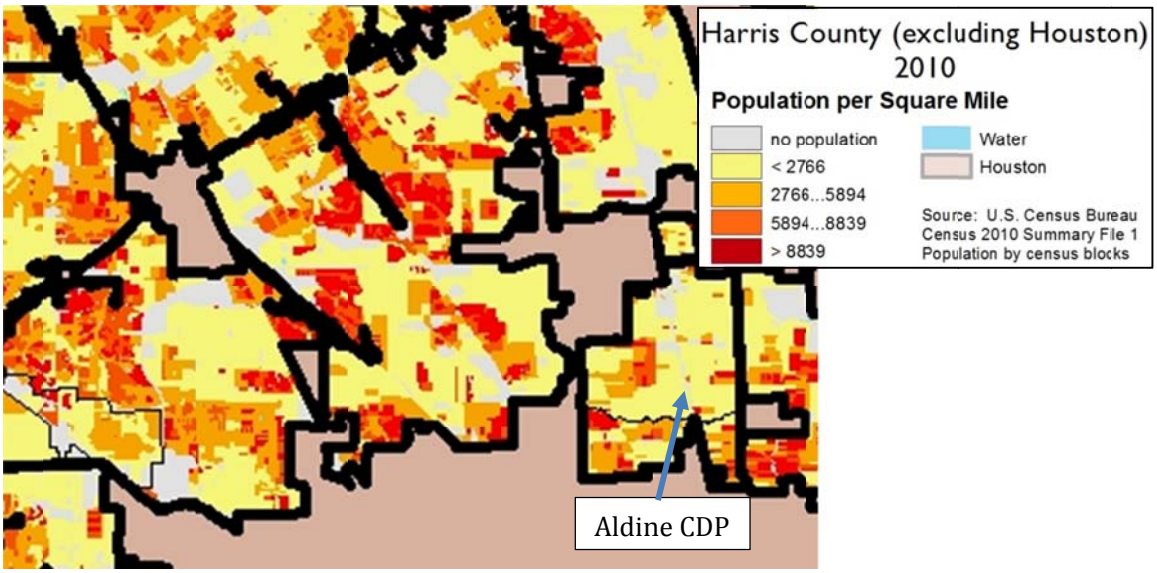


Source: Cedar Grove Institute for Sustainable Communities, Inc.

In addition to the predominantly minority CDPs, note the many predominantly minority non-CDP neighborhoods that border the City of Houston. For example, the Airline Improvement District (AID) is a predominantly-Hispanic four-square mile area ("roughly twice the size of Houston's Downtown"[10]) that lies just west of Aldine CDP. While it has not been designated a CDP, the area contains 16,000 residents and is as dense as much of Houston and many CDPs (see Figure I-24).

[10] Beard, Natalia, "Airline Market Mile: Inclusive Design for Growth," Cite: The Architecture and Design Review of Houston," Rice Design Alliance, July 22, 2014. Page 26. http://offcite.org/airline-market-mile-inclusive-design-for-growth/ accessed 8/30/2017.

Figure I-24.
Aldine CDP, 2010



Source: Cedar Grove Institute for Sustainable Communities, Inc.

The area lacks most basic urban amenities and other services that affect quality of life and asset accumulation, including sidewalks and stormwater infrastructure. The lack of sidewalks illustrates the issue that excluded communities often encounter; counties do not provide "urban" amenities even when county neighborhoods need them:

> *"In 2009, Harris County pledged $2.9 million to be spent on pedestrian improvements, a scheme that involved two new, signalized crosswalks on Airline and sidewalks on much-used streets. Harris County, however, does not view sidewalks favorably. The county has a policy of only installing sidewalks on new roads if a city or another source finances it. 'It's an expense that doesn't have to do with transportation,' Mark Seegers, a spokesman for Harris County commissioner Sylvia Garcia told the Houston Chronicle. 'The county does not do sidewalks; it's not what gets cars from point A to point B.' Subsequently, planned sidewalks from SWA will be financed by Airline Improvement District."*[11]

Most such excluded communities do not have improvement districts in place. In Texas, those which do—such as AID—generate revenue through a 1 percent retail sales tax within the boundaries of the District.[12] This revenue "remains in the community to pay for enhanced patrol services, graffiti and nuisance abatement, and infrastructure improvements." There are two primary challenges to using this method to obtain needed infrastructure: 1) Improvement districts are created by the Texas Legislature; and 2) Most areas do not have sufficient retail sales to raise all the funds needed. For example:

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[11] Sayer, Jason, "SWA's plan to integrate a mile-long informal market with nearby Houston," The Archetectural Newspaper, January 12, 2017. https://archpaper.com/2017/01/swa-airline-improvement-district/#gallery-0-slide-0 accessed 8/30/2017.

[12] Airline Improvement District, http://airlinedistrict.org/About_District.shtml accessed 8/30/2017.

"While the AID has been running for more than a decade, issues such as a lack of centralized water service, poor road and pedestrian infrastructure, and bayou flooding still hamper the area's development. In fact, 50 percent of the district's land lies within a floodplain—a problem that impacts water and sewage services as well as housing.

'There is no money dedicated to flood relief coming for another 50 years," said Kinder Baumgardner, managing principal at Dallas-based landscape architecture, planning, and urban design studio SWA. "As a result, all the major urban development that one would want to do is not going to happen until the flooding is dealt with.'"[13]

The Improvement District method of funding creates a Catch-22; According to a study reported in Rice University's Cite, "Given its need for major infrastructure improvements, the area is not ideal for market-rate development."[14] Moreover, retail taxes are constrained, as the community's retail enterprises are disproportionally mobile vendors and flea market stands – enterprises which are notably difficult to monitor and tax. According to Cite, "Out of the 400,000 square feet of retail space within AID, 46 percent is occupied by flea market vendors." The community is dependent upon the county and the Houston-Galveston Area Council (H-GAC) for grants to fund major projects, yet its status as an Improvement District makes it appear to be self-sufficient and may reduce its chances of obtaining such funds.

Pasadena

Pasadena is a majority-minority working-class suburb of Houston. Bordered by the Houston Ship Channel, it is host to many port-related activities as well as petroleum-related and other heavy industries. These economic drivers provide jobs for residents of Pasadena and the region.

Demographics: race/ethnicity. As discussed in the regional overview, Pasadena has the highest proportion of Hispanic residents among the communities participating the AI (62% in 2013 and 66% in 2016). One-third of the city's population is non-Hispanic white, 2 percent is Asian and another 2 percent is African American.

[13] Sayer, Jason, "SWA's plan to integrate a mile-long informal market with nearby Houston," *The Archetectural Newspaper,* January 12, 2017. https://archpaper.com/2017/01/swa-airline-improvement-district/#gallery-0-slide-0 accessed 8/30/2017.

[14] Beard, Ibid.

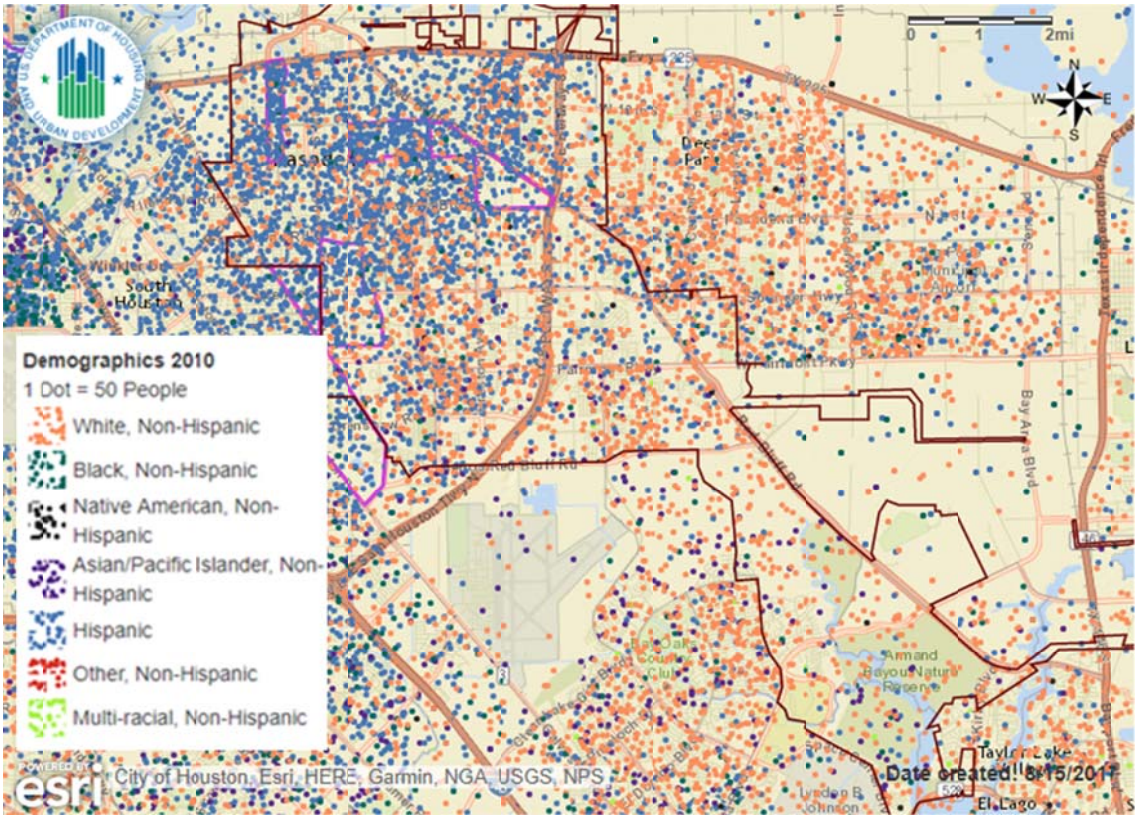
Figure I-25.
Race and Ethnicity, Pasadena, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	Greater Houston Region		Pasadena	
	Number	*Percent*	*Number*	*Percent*
White, Non-Hispanic	2,340,268	40%	48,299	33%
Black, Non-Hispanic	996,221	17%	2,869	2%
Hispanic	2,096,532	35%	90,243	62%
Asian or Pacific Islander, Non-Hispanic	387,383	7%	3,137	2%
Native American, Non-Hispanic	13,824	0%	296	0%
Other or Two or more Races	86,435	1%	1,124	1%

Figure I-26 displays the distribution of residents by race/ethnicity (according to the HUD AFFH-T). As evidenced by the map, Hispanic residents live throughout Pasadena but are clustered in the northwest portion of the city.

Figure I-26.
Race/Ethnicity, Pasadena, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

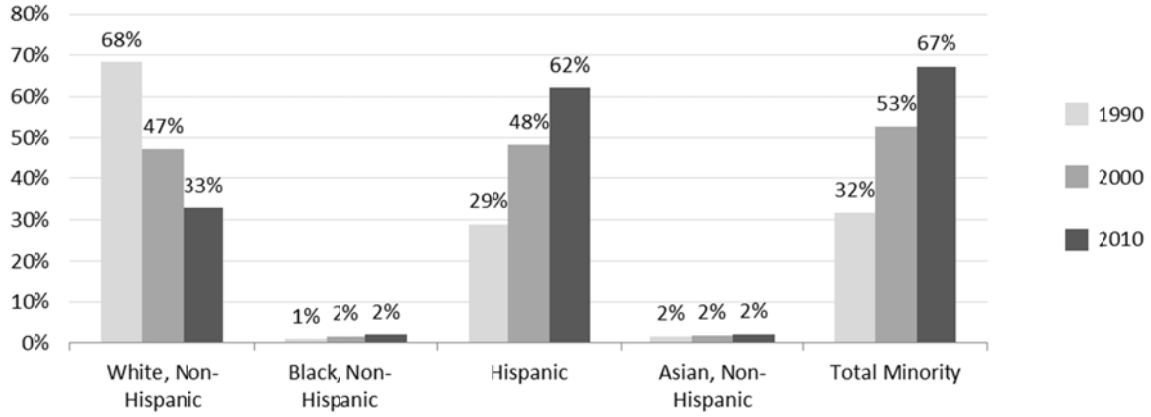
Pasadena's population grew from 120,037 in 1990 to 149,043 in 2010, a 24 percent increase; the city experienced additional growth between 2010 and 2016, reaching a population of 153,286 according to the ACS.

As the city's population grew, its racial/ethnic composition changed dramatically. In 1990, 68 percent of Pasadena's population was non-Hispanic white. By 2010, the proportion of non-

Hispanic white dropped to 33 percent. This decline was offset by an increase in the Hispanic population which accounted for 29 percent in 1990 and 62 percent in 2010. The city also has small and relatively stable African American and Asian populations, which accounted for about 4 percent of the population in both 2000 and 2010.

Overall, the percentage of minority residents in Pasadena more than doubled between 1990 and 2010 (from 32% in 1990 to 67% in 2010). Figure I-27 shows changes in the city's racial/ethnic distribution between 1990 and 2010.

Figure I-27.
Race and Ethnicity Trends, Pasadena, 1990-2010



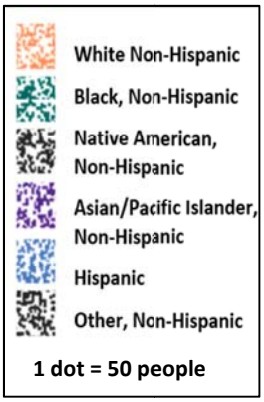
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

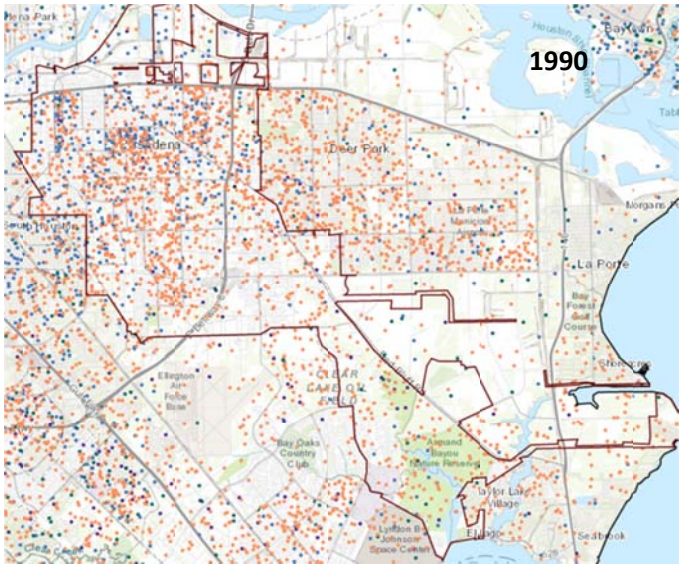
Figure I-28 maps the racial/ethnic changes by neighborhood in Pasadena. Note that the increase in diversity is primarily limited to Latinos and to specific neighborhoods—particularly in the northern section of the city. Though not shown in the maps, these demographics trends have continued and as of 2016 the city's minority population accounted for 72 percent of the total population.

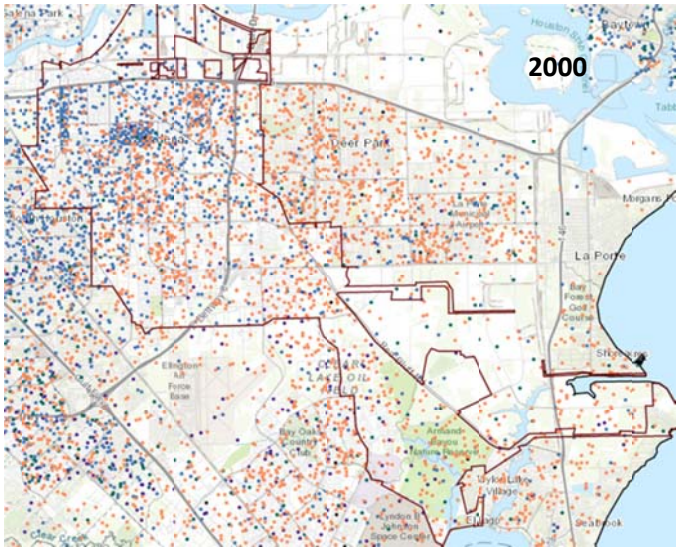
Figure I-28.
Race/Ethnicity, Pasadena, 1990, 2000, and 2010

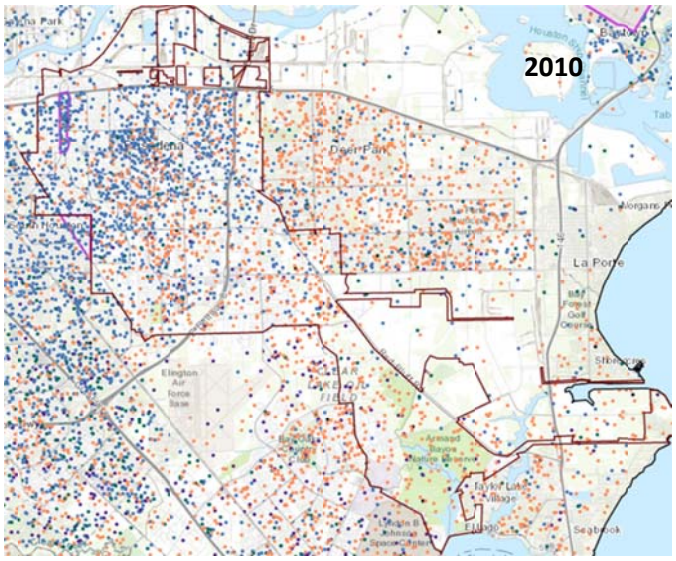
Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.









Demographics: country of origin. Twenty-five percent of Pasadena's total population was born in a country other than the United States. Figure I-29 displays the top 10 countries of origin for current Pasadena residents. Twenty-one percent of Pasadena residents are Mexican immigrants, compared to 11 percent in the Greater Houston Region. The high proportion of Mexican immigrants in Pasadena may be related to housing affordability/availability in the area.

Pasadena residents from El Salvador comprise the second largest country of origin in the city, accounting for 1.5 percent of all residents. No other single immigrant group is this large. All immigrants from other Central and South American countries represent just 2.5 percent of Pasadena residents. All Asian immigrants represent just 1.4 percent of Pasadena residents.

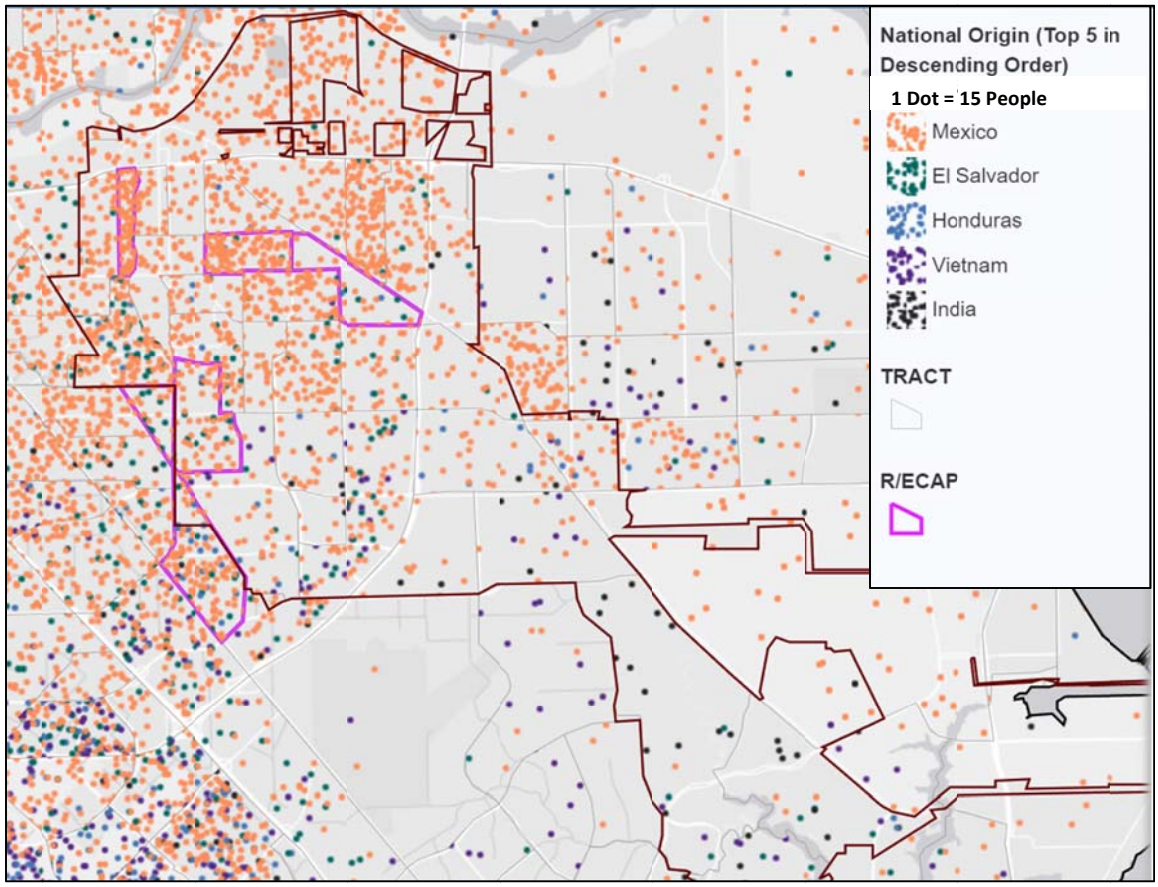
Figure I-29.
Country of Origin, Pasadena, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Country of Origin	Population	Percent of Total Population
Mexico	28,650	20.7%
El Salvador	2,053	1.5%
Honduras	1,140	0.8%
Vietnam	609	0.4%
India	608	0.4%
Guatemala	333	0.2%
Philippines	325	0.2%
Korea	233	0.2%
Cuba	220	0.2%
Germany	202	0.2%

The map in Figure I-30 illustrates the distribution of these groups throughout the city. Note that Mexican immigrants comprise the largest group of residents of Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs; discussed in detail in Section II of this AI), but El Savadoran and Honduran immigrants are also found in these neighborhoods.

Figure I-30.
National Origin, Pasadena



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Demographics: limited English proficiency. Figure I-31 shows the number of people who speak a language other than English at home and the percentage of them who speak English *less than well* for the City of Pasadena.

Spanish or Spanish Creole is by far the largest group who speak a language other than English at home and over half (51%) of those who speak Spanish or Spanish Creole at home speak English less than well. Though there are fewer Vietnamese speakers, a significant majority who speak Vietnamese at home speak English less than very well (76%). A high percentage of those who speak "Other Indic languages" at home speak English less than very well.

Figure I-31.
Limited English Proficiency, Pasadena, 2013

Note:

There are also relatively high numbers of residents that speak Tagalog (285), German (204), Hindi (167), and Gujarati (115) in their homes. However, relatively few of those residents speak English less than very well.

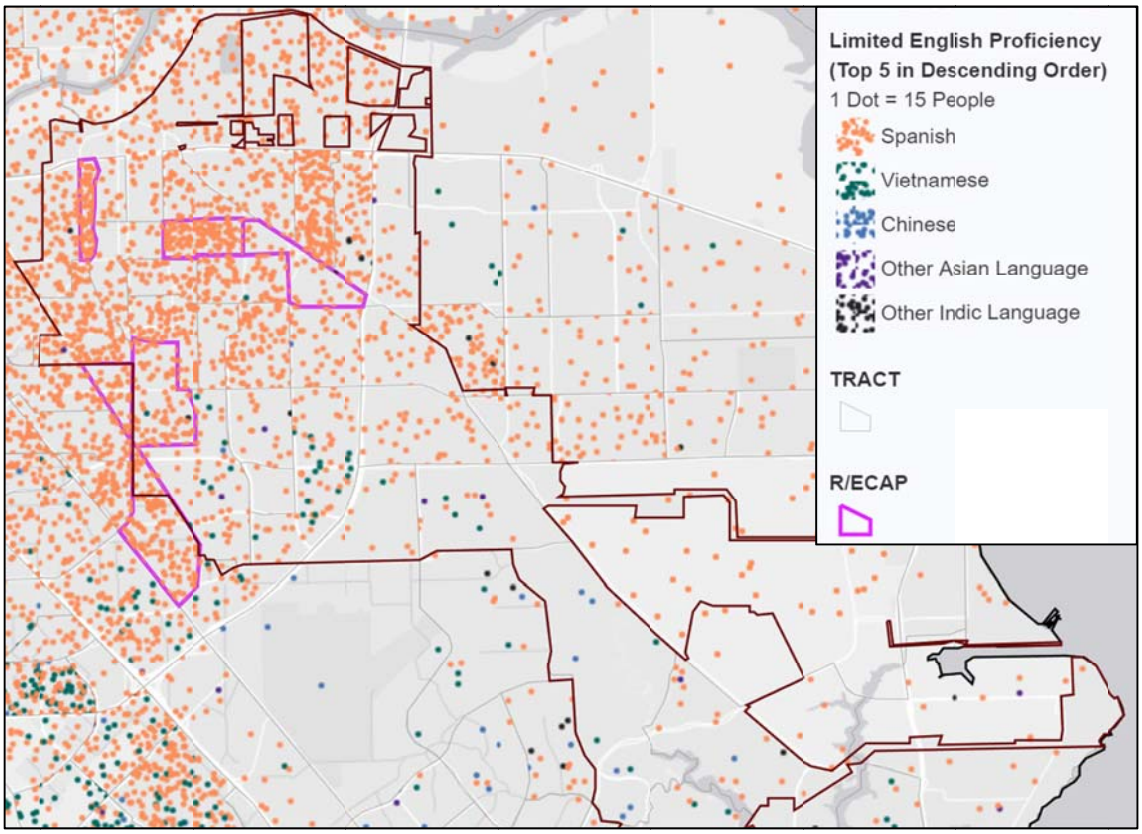
Source:

2013 5-year ACS.

Language Spoken at Home	Number of Speakers	Number that Speak English Less than Very Well	Percent that Speak English Less than Very Well
Any Language other than English	65,608	32,908	50%
Spanish or Spanish Creole	61,539	31,292	51%
Vietnamese	713	543	76%
Chinese	414	142	34%
Other Asian languages	385	135	35%
Other Indic languages	208	131	63%
Korean	269	121	45%
African languages	234	105	45%
Arabic	235	88	37%
French (incl. Patois, Cajun)	279	68	24%
Persian	122	61	50%

Figure I-32 examines the geographic distribution of residents with limited English proficiency. Not surprisingly, Spanish speakers who speak English less than very well are concentrated in the northern portion of the city. Limited English proficient residents who speak Vietnamese are more likely to live in Central Pasadena.

Figure I-32.
Limited English Proficiency, Pasadena



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Segregation in Pasadena. This section of the analysis focuses on racial/ethnic segregation in the City of Pasadena. The analysis uses two methods for evaluating segregation: the Dissimilarity Index and hyper-segregation. As mentioned in the Regional Demographic Summary, the dissimilarity index is evaluated at both the block group and block levels.

Dissimilarity index. As defined earlier in this section, the dissimilarity index, or DI, is a widely used measure of racial residential segregation that captures the segregation dimension of evenness of distribution of individual residents. Figure I-33 shows the DI for the Greater Houston Region as a whole, and the City of Pasadena. These data are from the HUD AFFH-T and depict the DI as calculated from Census tract and block group level data (depending on the year).

Current data for Pasadena indicate moderate levels of segregation between non-Hispanic white and Hispanic residents but low levels of segregation between non-Hispanic white and other racial/ethnic groups. Hispanic/white segregation increased between 1990 and 2010 in Pasadena but has moderated since that time.

Figure I-33.
Dissimilarity Index for the Greater Houston Region and City of Pasadena, 1990 – Present

Racial/Ethnic Dissimilarity Index	Greater Houston Region				Pasadena			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	49.4	52.2	50.1	52.7	31.8	38.8	42.7	39.2
Black/White	65.2	65.3	60.7	64.2	46.5	37.7	30.2	36.1
Hispanic/White	47.6	53.3	52.5	54.7	36.2	43.9	47.6	42.0
Asian or Pacific Islander/White	47.8	49.9	48.6	52.5	33.8	31.5	33.4	39.2
Interpreting the index:	0-39 Low		40-54 Mod		55-100 High			

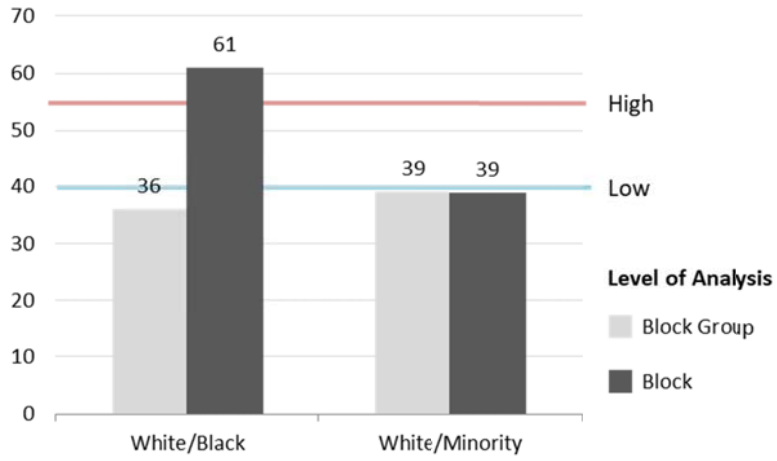
Source: Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

As discussed in the Regional Demographic summary section, this report also evaluates the DI on a smaller geographic scale to evaluate segregation within neighborhoods (block-level analysis), not just among neighborhoods (block group and Census tract analysis from the AFFH-T). Figure I-34 compares the 2010 the DI calculated at the block group level (same as shown in the previous figure) with a block-level analysis. Index values are shown for whites relative to blacks and whites relative to minorities for the City of Pasadena.

As illustrated by the figure, a smaller geographic scale indicates higher levels of segregation for African American residents relative to whites: a block level DI value of 61 compared to a block group level DI of 36. When considered as a group, "minority" resident segregation is lower and is consistent at 39 regardless of the geographic level of analysis.

Figure I-34.
Block-Level Dissimilarity Index, Pasadena, 2010

Source:
2010 Census and International Development and Planning, LLC.



Hyper-segregation of neighborhoods. Another method of assessing segregation is to identify neighborhoods where one racial or ethnic group comprises more than 75 percent of that neighborhood. Hyper-segregation is calculated here as the population living in Census blocks with more than five persons where the population is more than 75 percent of one racial or ethnic group. Equally important is how many neighborhoods have no residents of a particular subgroup. Figure I-35 compares the racial/ethnic distribution of the total population of Pasadena, with the distribution of hyper-segregated neighborhoods.

Figure I-35.
Hyper-Segregation by Census Block, Pasadena, 2010

Racial/Ethnic Group	Percent Population	Blocks ≥ 75 Percent This Group	Blocks ≥ 90 Percent This Group	Blocks No Residents This Group
Non-Hispanic White	32.7%	10.5%	3.2%	3.6%
Minority	67.3%	42.4%	15.3%	1.7%
Hispanic	62.2%	37.8%	12.8%	2.5%
Non-Hispanic Black	2.0%	0.0%	0.0%	71.1%
Asian	2.1%	0.1%	0.1%	73.6%

Source: 2010 Census and International Development and Planning, LLC.

The City of Pasadena is one-third (32.7%) white, yet more than 10 percent of neighborhoods are more than 75 percent white. Almost no neighborhoods (3.6%) had no white residents (non-Hispanic whites, Minority, and Hispanic individuals reside in nearly all Pasadena neighborhoods).

Approximately two-thirds of the City's residents belong to a racial/ethnic minority group. Over 40 percent (42.4%) of neighborhoods were hyper-segregated and predominantly minority. Approximately 15 percent of the area's neighborhoods were 90 percent or more minority. Very few neighborhoods (1.7%) had no minority residents.

The City's population is 62.2 percent Hispanic. Most of the residents who are minority are Hispanic (92.4% of the minority population). Over a third (37.8%) of its neighborhoods are

hyper-segregated and predominantly Hispanic, while 2.5 percent of its neighborhoods have no Hispanic residents.

The population of Harris County excluding Houston is 14.3 percent black, yet the City of Pasadena is only 2.0 percent black. This disparity may indicate historical exclusion (cultural or otherwise) of black residents in Pasadena.

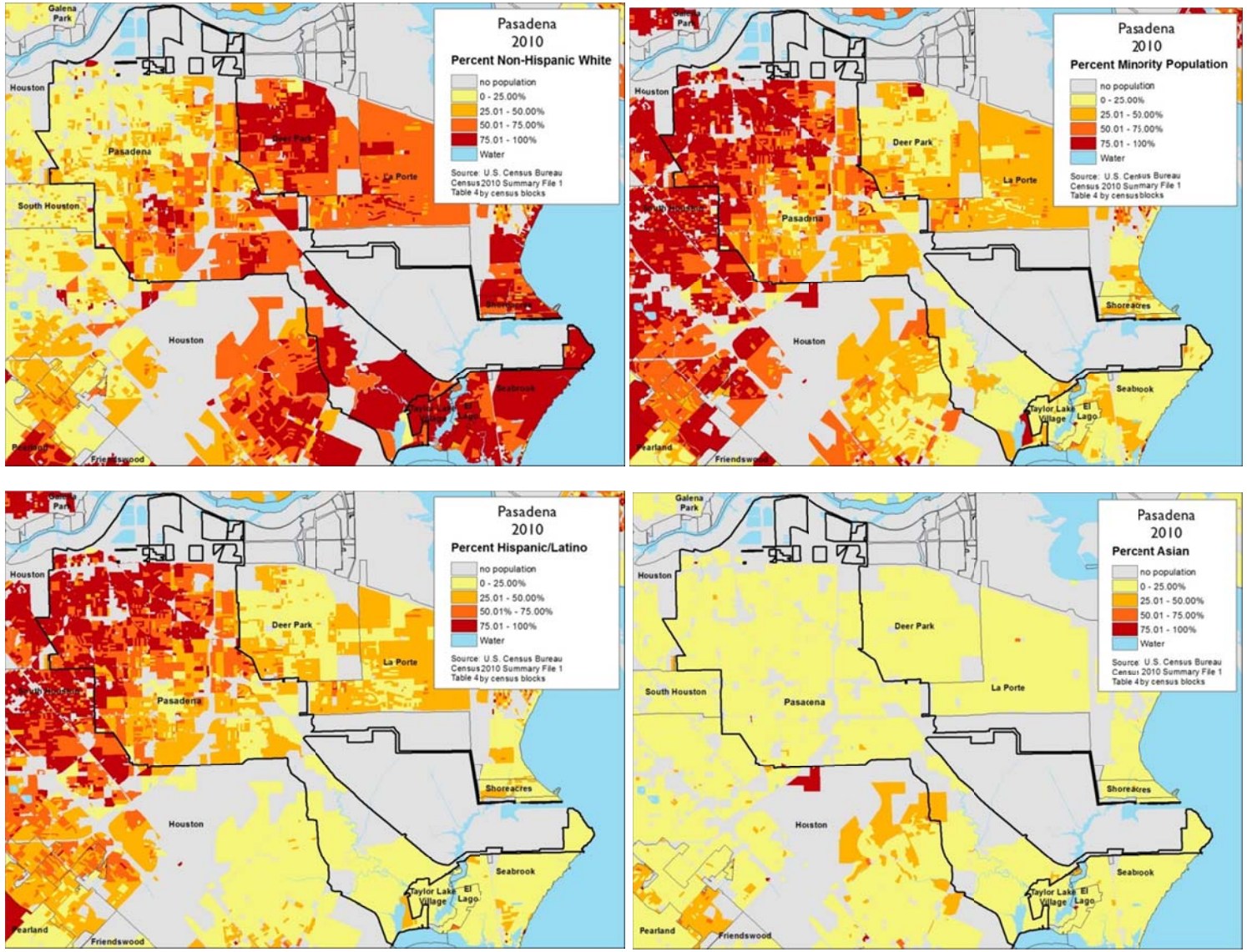
Only 0.1 percent of neighborhoods were hyper-segregated and predominantly Asian. Almost three-fourths (73.6%) of neighborhoods had no Asian residents, but this is not surprising in a city that is only 2.1 percent Asian.

Figure I-36 displays hyper-segregated neighborhoods by race/ethnicity in Pasadena.

Figure I-36. Hyper-Segregated Areas by Race/ Ethnicity, Pasadena, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc.



Municipal exclusion. The City of Pasadena abuts other municipalities on almost all sides and contains no "donut holes" or excluded Census Designated Places (CDPs).

Missouri City

Missouri City is a bedroom community for the City of Houston, located on Houston's Southbelt. In 1990, Missouri City had 36,715 residents. By 2010, the population had grown to 67,358, an increase of 84 percent. The Census Bureau estimates a 2016 population of 74,561, a moderate growth rate of approximately 1.8 percent annually.

Demographics: race/ethnicity. Missouri City is currently a majority-minority city and includes a diverse mix of racial/ethnic backgrounds. Forty percent of the city's population is African American or black, 16 percent is Hispanic and another 16 percent is Asian or Pacific Islander. Just 26 percent of the city's population identify as non-Hispanic white. Figure I-37 displays the current racial/ethnic distribution of the City and of the Greater Houston Region.

Figure I-37.
Race and Ethnicity,
Missouri City, 2013

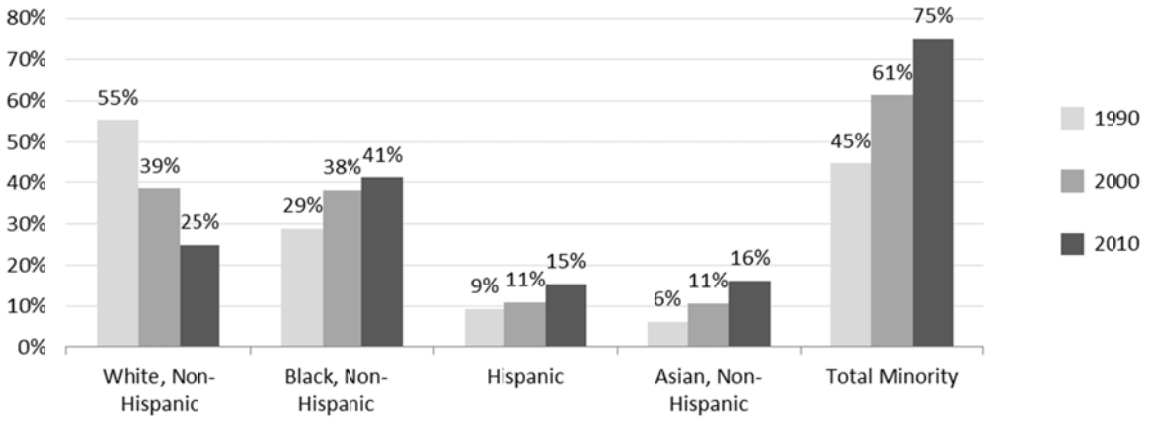
Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	Greater Houston Region		Missouri City	
	Number	*Percent*	*Number*	*Percent*
White, Non-Hispanic	2,340,268	40%	19,437	26%
Black, Non-Hispanic	996,221	17%	30,618	40%
Hispanic	2,096,532	35%	12,225	16%
Asian or Pacific Islander, Non-Hispanic	387,383	7%	11,842	16%
Native American, Non-Hispanic	13,824	0%	158	0%
Other or Two or more Races	86,435	1%	1,593	2%

Demographic changes between 1990 and 2010 reflect a decline in the non-Hispanic white population and an increase in other racial/ethnic groups as a percent of total population. Figure I-38 displays the changes in racial/ethnic composition of Missouri City between 1990 and 2010.

Non-Hispanic white residents accounted for 55 percent of Missouri City's population in 1990 but only 25 percent in 2010. The African American population comprised 41 percent of the city's population in 2010, up from 29 percent in 1990. In 2010, Asians were the third largest racial/ethnic group in Missouri City, accounting for 16 percent of the population, and Latinos accounted 15 percent of the population. African American and whites remain highly segregated.

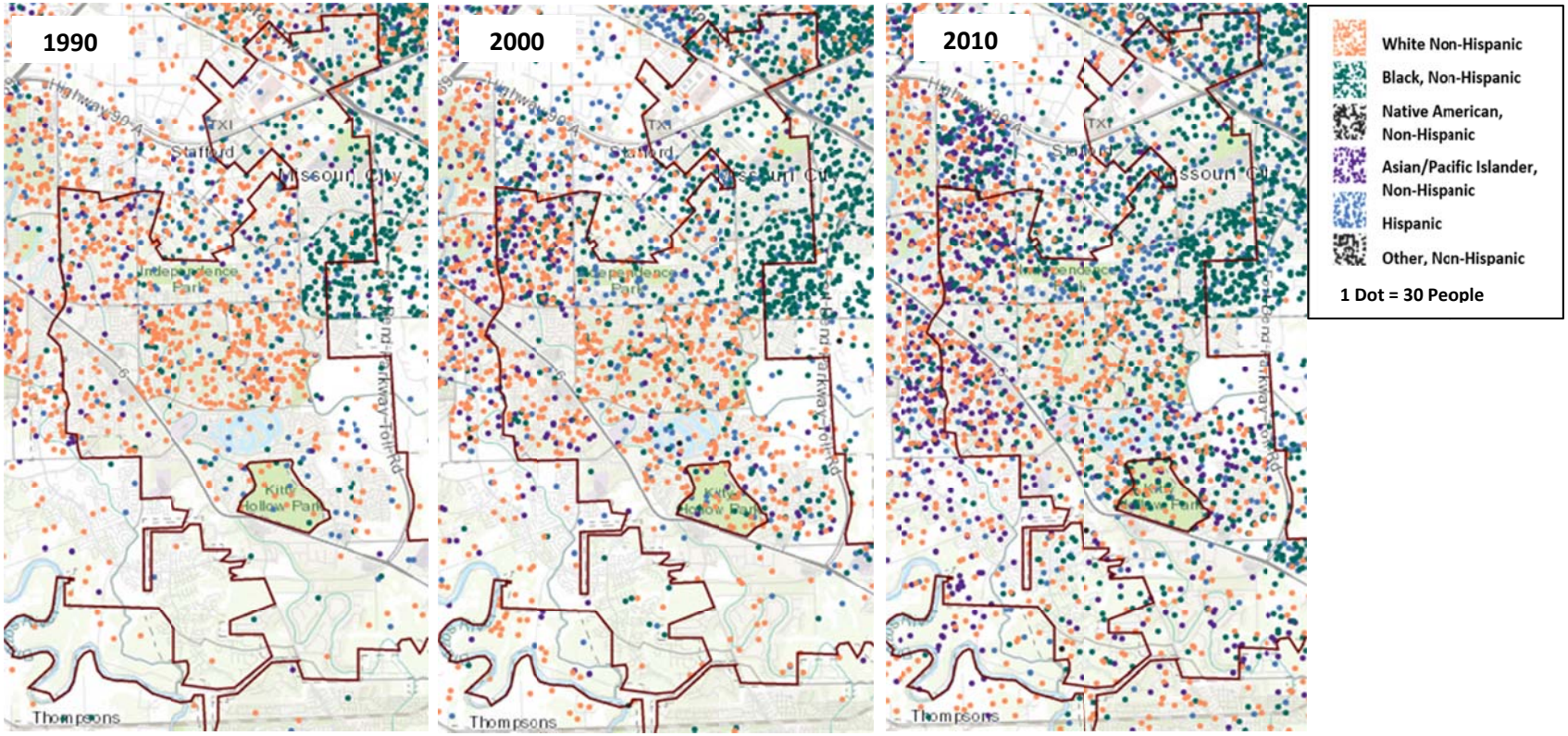
Figure I-38.
Race and Ethnicity Trends, Missouri City, 1990-2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure I-39 displays the demographic changes by neighborhood for the City of Missouri City. As shown in the map series, increases in the Asian resident population are most notable in West Missouri City and increases in the Hispanic resident population are most notable in Northeast Missouri City. African American residents became less concentrated in several neighborhoods and are now distributed throughout the northeast and central parts of the city.

Figure I-39.
Race and Ethnicity Trends, Missouri City, 1990, 2000, and 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Demographics: country of origin. Missouri City has a more complex composition of immigrants than the other jurisdictions in this analysis, with India identified as the country of origin for 4.7 percent of the population, Mexico identified as the country of origin for 3.8 percent of the population, Nigeria identified as the country of origin for 2.7 percent of the population, The Philippines identified as the country of origin for 1.7 percent, and China identified as the country of origin for 2.5 percent of the population (see Figure I-40 below).

Figure I-40.
Country of Origin, Missouri City, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Country of Origin	Population	Percent of Total Population
India	3,021	4.7%
Mexico	2,449	3.8%
Nigeria	1,756	2.7%
Philippines	1065	1.7%
China excl. Hong Kong & Taiwan	962	1.5%
Vietnam	492	0.8%
El Salvador	390	0.6%
Taiwan	390	0.6%
Hong Kong	350	0.5%
Germany	291	0.5%

Figure I-41 shows the geographic distribution of immigrant populations in Missouri City. Note that although Mexican immigrants are depicted by orange dots in all other National Origin maps produced by the AFFH Mapping Tool, in this case Mexican immigrants do not comprise the largest group of residents in Missouri City, so the color for the largest immigrant group is reserved for India.

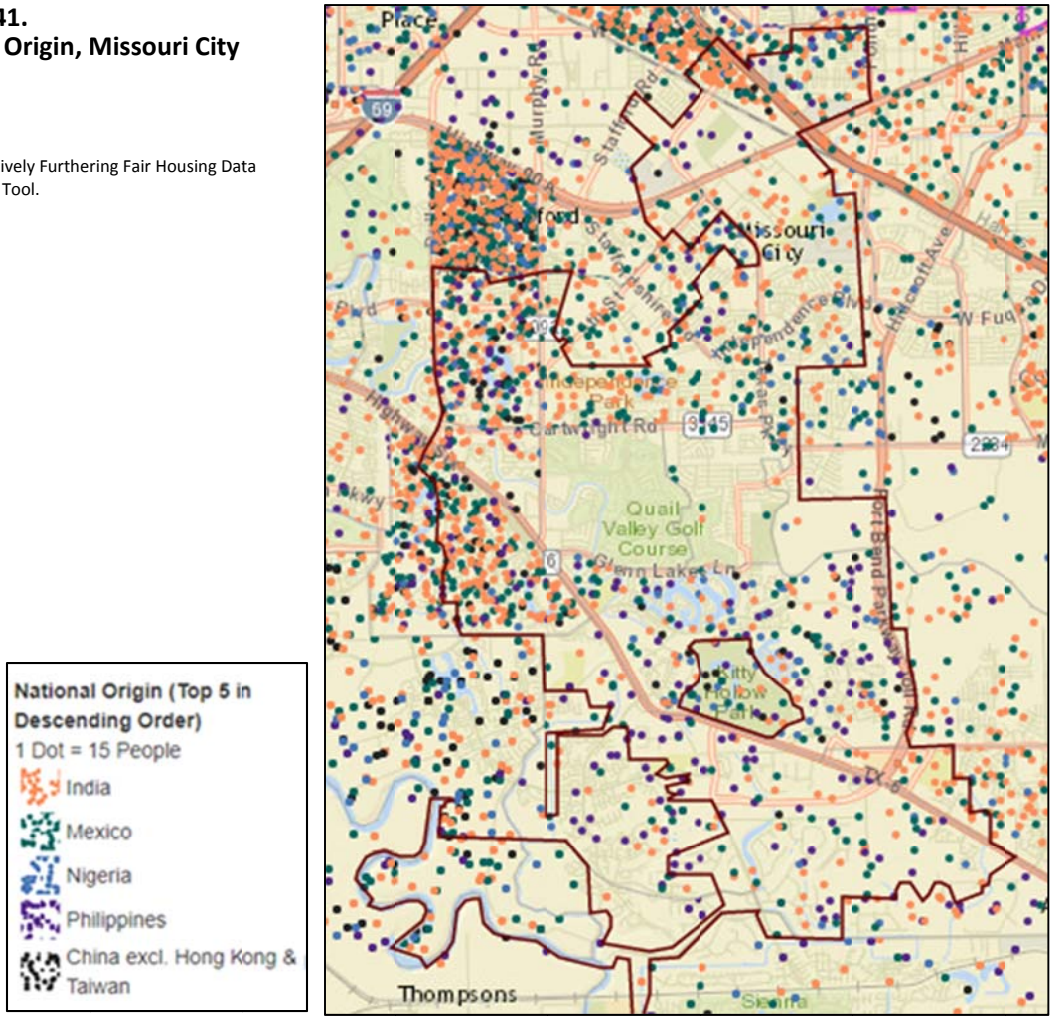
Indian residents are primarily concentrated in Northwest Missouri City while Mexican and Nigerian residents are scattered throughout the city. Pilipino residents are most likely to live in neighborhoods in Northwest or South Missouri City. The area with few identified immigrant residents is Quail Valley subdivision built around City-owned golf courses.[15]

[15] Quail Valley – Golf, Grille and Events, http://www.golfquailvalley.com/

Figure I-41.
National Origin, Missouri City

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.



Demographics: limited English proficiency. Figure I-42 shows the number of people who speak a language other than English at home and the percentage of them who speak English *less than well* for Missouri City. In Missouri City (as well as for the other all locales in this assessment), Spanish or Spanish Creole is the largest group who speak a language other than English at home. A substantial number of Missouri residents—nearly 5,000—speak Chinese or other Asian languages at home. A significant percentage who speak Chinese (43%) and Vietnamese (42%) at home speak English less than very well. Among residents speaking other Pacific Island languages at home, 72 percent speak English less than very well.

Figure I-42.
Limited English Proficiency, Missouri City, 2013

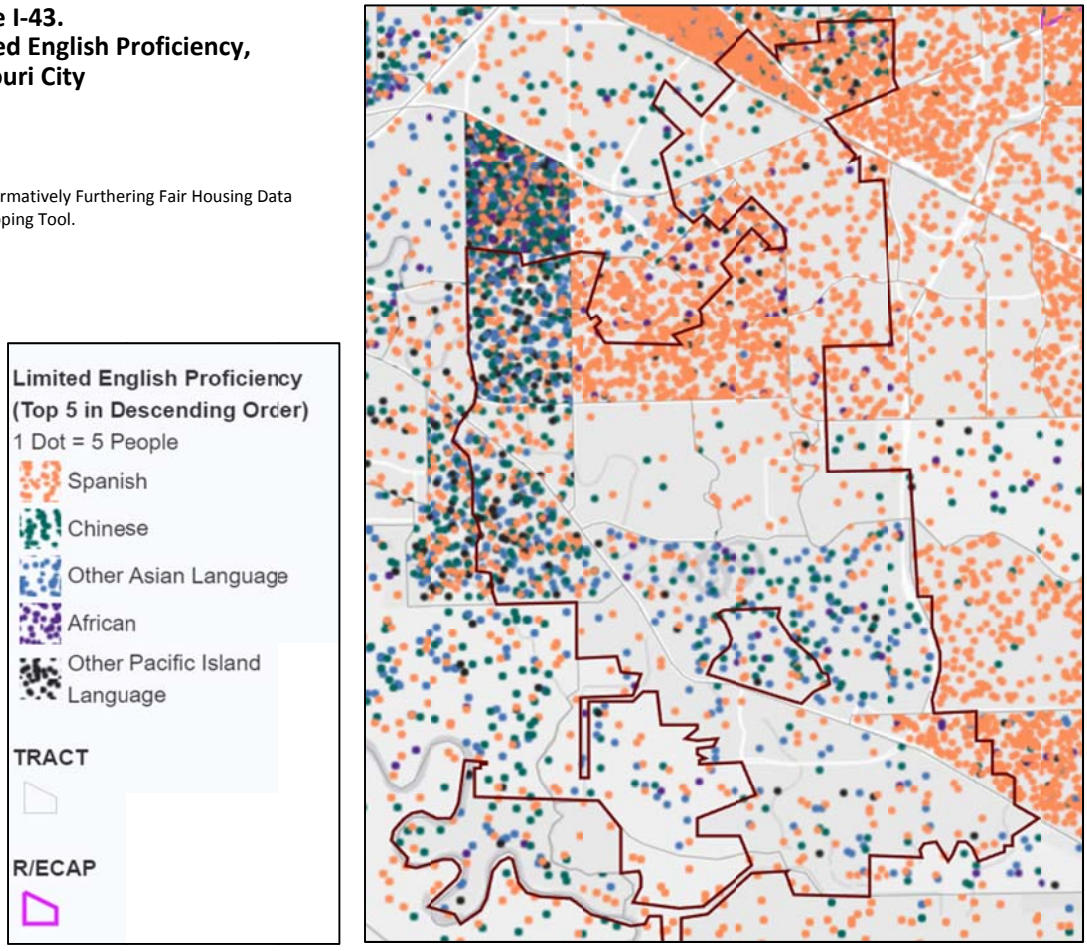
Source:
2013 5-year ACS.

Language Spoken at Home	Number of Speakers	Number that Speak English Less than Very Well	Percent that Speak English Less than Very Well
Any Language other than English	19,734	6,489	33%
Spanish or Spanish Creole	8,346	2,886	35%
Chinese	2,560	1,093	43%
Other Asian languages	2,402	705	29%
African languages	1,556	378	24%
Other Pacific Island languages	402	291	72%
Vietnamese	659	275	42%
Tagalog	858	181	21%
Other Indic languages	459	122	27%
Hindi	466	98	21%
Arabic	401	89	22%

Figure I-43 displays the geographic distribution of Missouri City residents who have limited English proficiency (speak English less than very well).

Figure I-43.
Limited English Proficiency, Missouri City

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.



Segregation in Missouri City. This section of the analysis focuses on racial/ethnic segregation in Missouri City. The analysis uses two methods for evaluating segregation: the Dissimilarity Index and hyper-segregation. As mentioned in the Regional Demographic Summary, the dissimilarity index is evaluated at both the block group and block levels.

Dissimilarity index. As defined earlier in this section, the dissimilarity index, or DI, is a widely used measure of racial residential segregation that captures the segregation dimension of evenness of distribution of individual residents. Figure I-44 shows the DI for the Greater Houston Region as a whole, and the City of Missouri City. These data are from the HUD AFFH-T and depict the DI as calculated from Census tract and block group level data (depending on the year).

Current data for Missouri City indicate moderate levels of segregation between non-Hispanic white and other racial/ethnic groups.

Figure I-44.
Dissimilarity Index for the Greater Houston Region and Missouri City, 1990 – Present

Racial/Ethnic Dissimilarity Index	Greater Houston Region				Missouri City			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	49.4	52.2	50.1	52.7	36.6	41.8	41.8	37.4
Black/White	65.2	65.3	60.7	64.2	50.5	52.2	51.4	51.8
Hispanic/White	47.6	53.3	52.5	54.7	39.5	46.9	52.1	45.1
Asian or Pacific Islander/White	47.8	49.9	48.6	52.5	31.1	35.6	37.9	40.8
Interpreting the index:	0-39 Low		40-54 Mod		55-100 High			

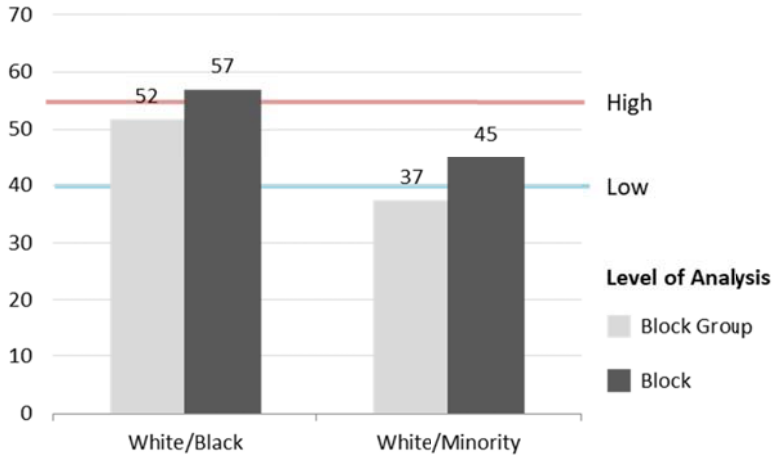
Source: Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

As discussed in the Regional Demographic summary section, this report also evaluates the DI on a smaller geographic scale to evaluate segregation within neighborhoods (block-level analysis), not just among neighborhoods (block group and Census tract analysis from the AFFH-T). Figure I-45 compares the 2010 DI calculated at the block group level (same as shown in the previous figure) with a block-level analysis. Index values are shown for whites relative to blacks and whites relative to minorities for the City of Missouri City.

As illustrated by the figure, a smaller geographic scale indicates higher levels of segregation: a high index value of 57 for black/white segregation and a moderate index value of 45 for minority/white segregation.

Figure I-45.
Block-Level Dissimilarity Index, Missouri City, 2010

Source:
2010 Census and International Development and Planning, LLC.



Hyper-Segregation of Neighborhoods. As explained previously in this section, assessment of neighborhoods where one racial or ethnic group comprises more than 75 percent of that neighborhood is another method of assessing segregation. Hyper-segregation is calculated here as the population living in Census blocks with more than five persons where the population is more than 75 percent of one racial or ethnic group. Equally important is how many neighborhoods have no or almost no residents of a particular subgroup. Figure I-46 compares the racial/ethnic distribution of the total population of Missouri City, with the distribution of hyper-segregated neighborhoods.

Missouri City has 564 populated blocks (2010). Of these, 536 had at least five residents. Over one-third of these 536 are hyper-segregated, based upon an assessment of blocks that are 90 percent or more minority or inhabited by no minority residents.

Figure I-46.
Hyper-Segregation of Neighborhoods, Missouri City, 2010

Racial/Ethnic Group	Percent Population	Blocks ≥ 75 Percent This Group	Blocks ≥ 90 Percent This Group	Blocks With No Residents This Group
Non-Hispanic White	24.9%	3.5%	0.6%	10.1%
Minority	75.1%	44.4%	33.4%	0.4%
Hispanic	15.3%	0.9%	0.2%	11.0%
Non-Hispanic Black	41.2%	17.0%	5.0%	4.5%
Asian	16.1%	0.1%	0.1%	52.3%

Source: 2010 Census and International Development and Planning, LLC.

Missouri City is 24.9 percent white, yet 10.1 percent of neighborhoods had no white residents.

In 2000, Missouri City was named a model city for middle-class African Americans by Black Entertainment Television. In 2010, the city was 41 percent black (more than any other city in the Houston area). However, 17 percent of neighborhoods were more than 75 percent black.

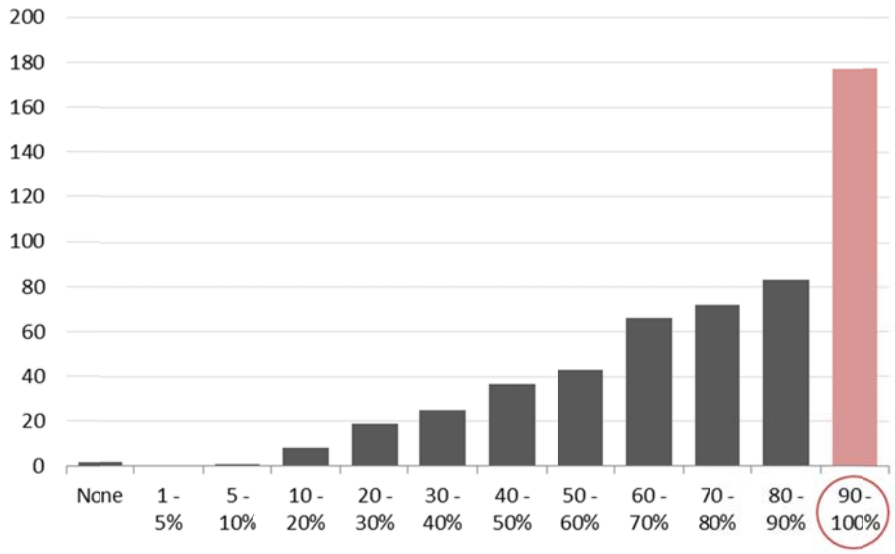
While the city is 75 percent minority, over one-third of the area's neighborhoods were 90 percent or more minority. Few neighborhoods (0.4%) had no minority residents. Figure I-47

illustrates the distribution of minority residents in the city's neighborhoods, and indicates a high level of white/minority segregation.

Figure I-47. Number of Neighborhoods by Percent Minority, Missouri City, 2010

Source:

2010 Census and International Development and Planning, LLC.



The area's population is 15.3 percent Hispanic. Almost no Missouri City neighborhoods are hyper-segregated and predominantly Hispanic, but 11 percent of its neighborhoods have no Hispanic residents.

The city is 41.2 percent non-Hispanic Black, while Fort Bend County is 21.5 percent black and Harris County is 19.7 percent black (2010). In Missouri City, 17 percent neighborhoods were hyper-segregated and predominantly black. Less than 5 percent (4.5%) of neighborhoods have no black residents.

Asians make up 16.1 percent of the City (2010). Almost no neighborhoods (0.1%) were hyper-segregated and predominantly Asian. Yet over half (52.3%) of neighborhoods had no Asian residents.

Figures II-48 through II-51 show hyper-segregated neighborhoods in Missouri City by race/ethnicity.

Figure I-48. Percent Minority, Missouri City, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc.

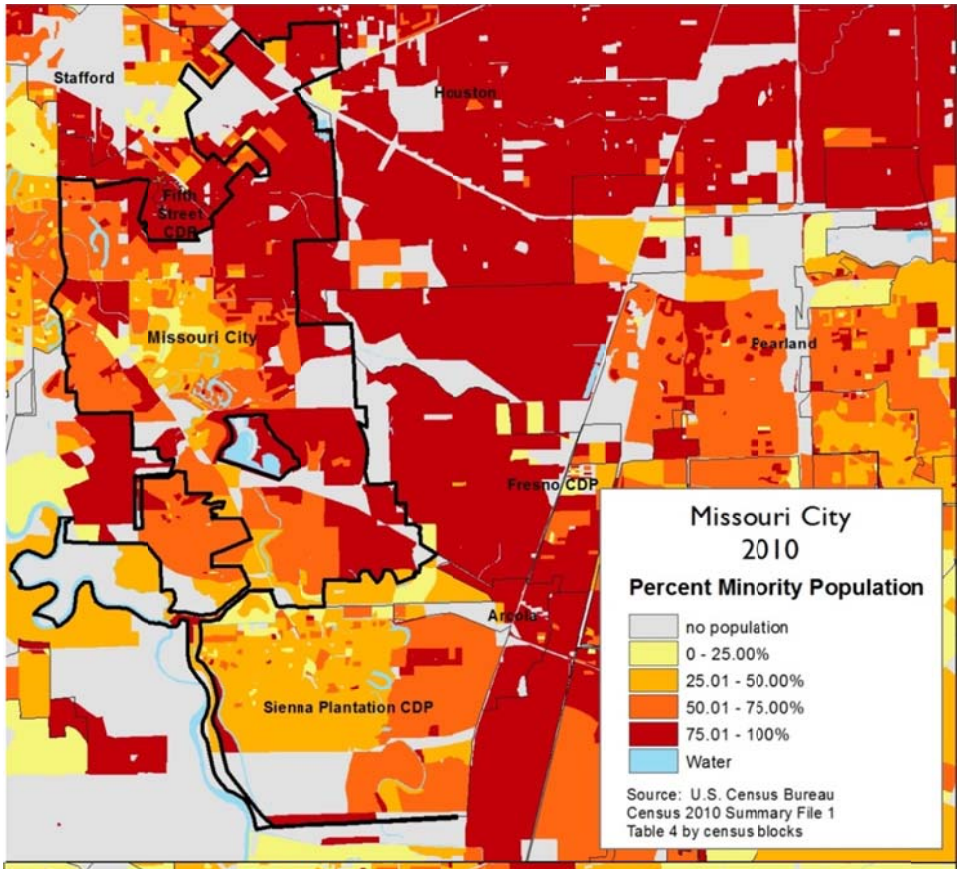


Figure I-49. Percent Hispanic, Missouri City, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc.

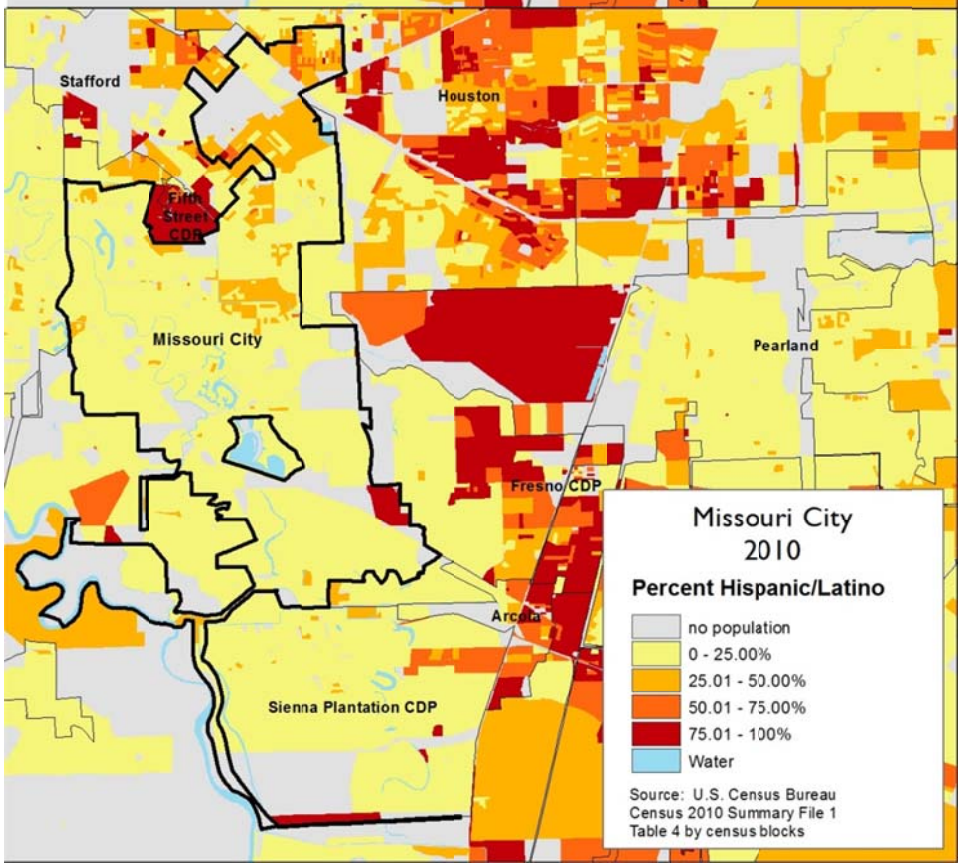


Figure I-50. Percent Black, Missouri City, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc.

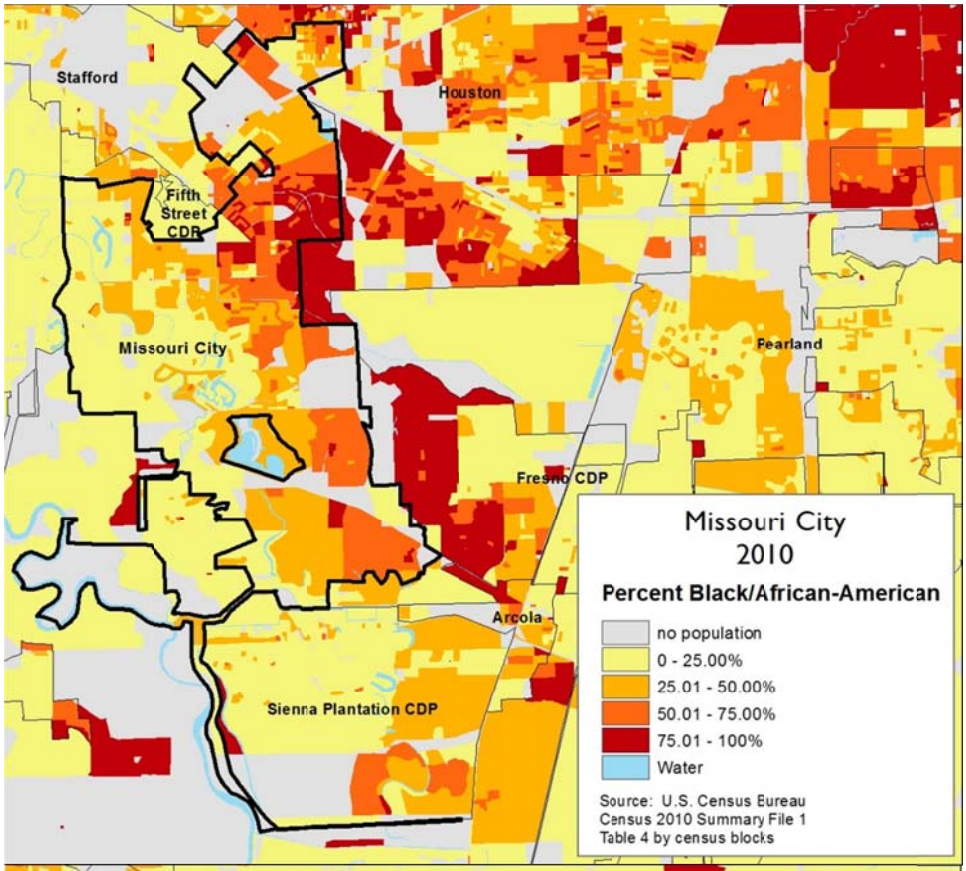
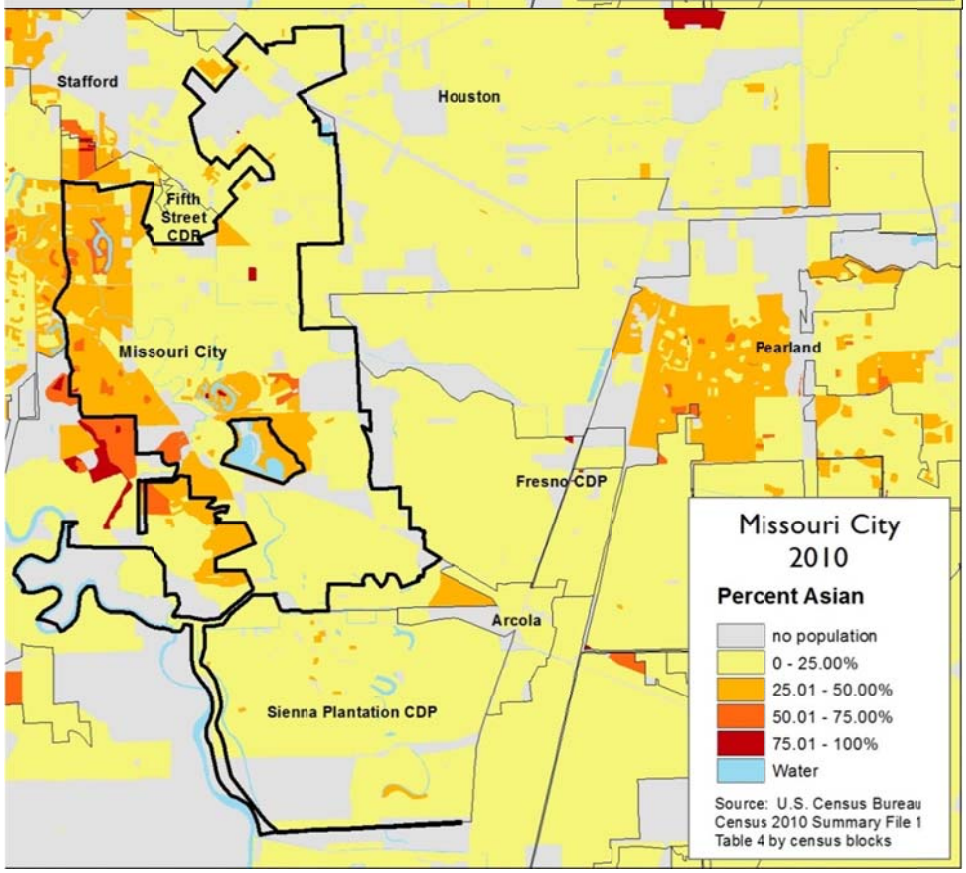


Figure I-51. Percent Asian, Missouri City, 2010

Source:

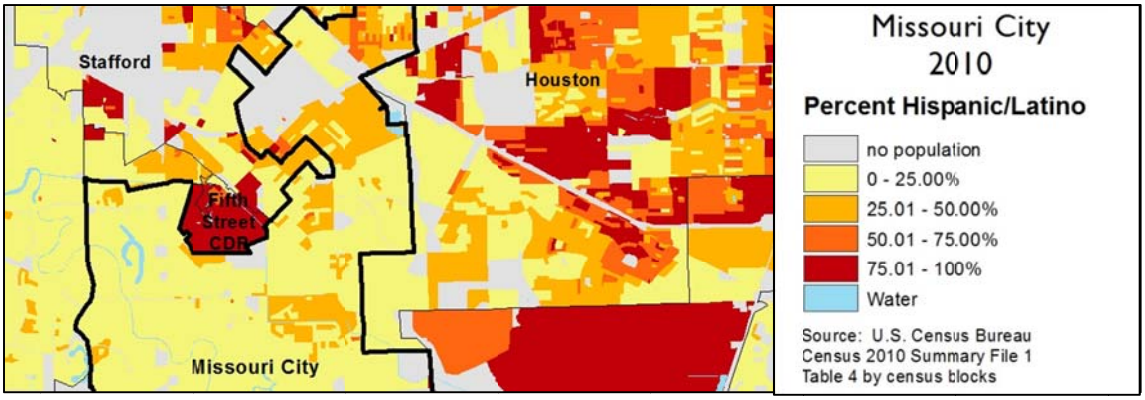
Cedar Grove Institute for Sustainable Communities, Inc.



Municipal exclusion. As earlier in this report, when predominantly-minority neighborhoods are excluded by municipalities, they are vulnerable to being under-served and under-represented by local government. This type of segregation through densely-settled minority communities can most clearly be seen by the existence and location of predominantly minority Census Designated Places (CDPs).[16]

Fifth Street CDP is a 94.8 percent Latino community of 2,486 residents (2010) that is surrounded by Missouri City on three sides. However, it is in the City of Stafford's Extra-Territorial Jurisdiction (ETJ), so Missouri City cannot annex it. However, for the economic and public health of the greater community, it is Missouri City's interest to advocate for Fifth Street residents' interests.

Figure I-52.
Excluded Minority Community, Missouri City, 2010



Source: Cedar Grove Institute for Sustainable Communities, Inc.

The only other CDP on Missouri City's border is Sienna Plantation, a predominantly-white non-Latino community with a median household income of $132,794 (ACS 2011-2015). Sienna Plantation is a master-planned community with full infrastructure and resources. It is in Missouri City's ETJ, and has a joint development agreement with the City that states terms for when annexation will occur.[17]

Galveston

The City of Galveston is a coastal resort community about one hour from the center of the City of Houston. The population of Galveston is about 42,000 residents—down from 60,000 in 1990 and 58,000 in 2000, largely due to displacement from Hurricanes Ike and Dolly in 2008.

Demographics: race/ethnicity. The racial/ethnic distribution of Galveston is similar to the Greater Houston region overall, though Galveston has a slightly higher proportion of African

[16] A CDP is an unincorporated community that contains a mix of residential and commercial areas similar to those found in an incorporated place of similar size. https://www.census.gov/geo/reference/gtc/gtc_place.html, accessed 7/21/2017.

[17] Hastings, Karen. "Sienna annexation won't be viable for about 16 years." *Houston Chronicle*. April 26, 2011. Retrieved on April 12, 2014.

American or black residents (21% in Galveston compared to 17% in the region). Galveston has a somewhat lower proportion of Hispanic and Asian residents relative to the region.

Figure I-53.
Race and Ethnicity, Galveston, 2013

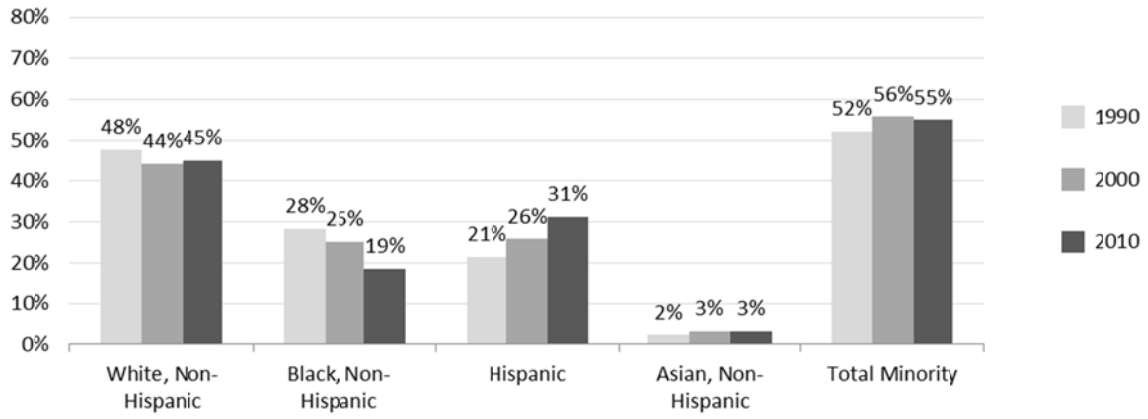
Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	Greater Houston Region		Galveston	
	Number	*Percent*	*Number*	*Percent*
White, Non-Hispanic	2,340,268	40%	17,119	41%
Black, Non-Hispanic	996,221	17%	8,599	21%
Hispanic	2,096,532	35%	14,030	33%
Asian or Pacific Islander, Non-Hispanic	387,383	7%	1,383	3%
Native American, Non-Hispanic	13,824	0%	169	0%
Other or Two or more Races	86,435	1%	646	2%

Galveston's population dropped from 59,862 in 1990 to 47,743 in 2010, a decline of 20 percent. Most of this loss came between 2000 (population 57,247) and 2010 (population 47,743), as a result of hurricane-related displacement/damage and economic challenges related to the Great Recession. The Census estimates an increase since that time, but not to the city's previous high.

Over this period, the white population declined slightly as a proportion of total population, from 48 percent of the city's population in 1990 to 45 percent in 2010. The proportion African American in Galveston dropped from 28 percent in 1990 to 19 percent in 2010, while the proportion Latino grew from 21 percent in 1990 to 31 percent in 2010.

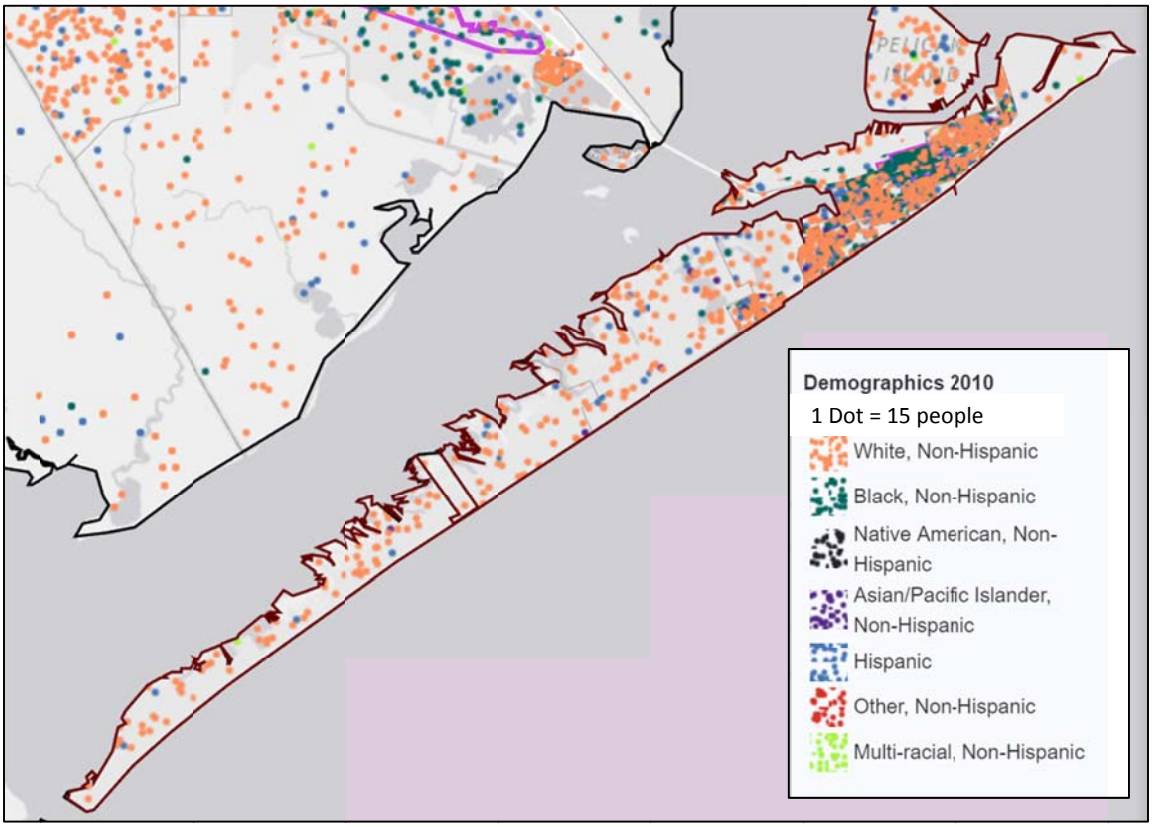
Figure I-54.
Race and Ethnicity Trends, Galveston, 1990-2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Most of the city's minority population reside in the more densely-populated downtown, while the less dense beach front areas are primarily non-Hispanic white (see Figure I-55).

Figure I-55.
Race and Ethnicity, Galveston, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Demographics: country of origin. Figure I-56 shows the 10 largest countries of origin for immigrants in Galveston. As in Harris County and Pasadena, Mexico is the country of origin for the highest percentage (6.1%) of residents in Galveston. El Salvador (1.4%) is second, with small numbers of residents from a range of countries of origin, mainly Central American, South American and Asian countries.

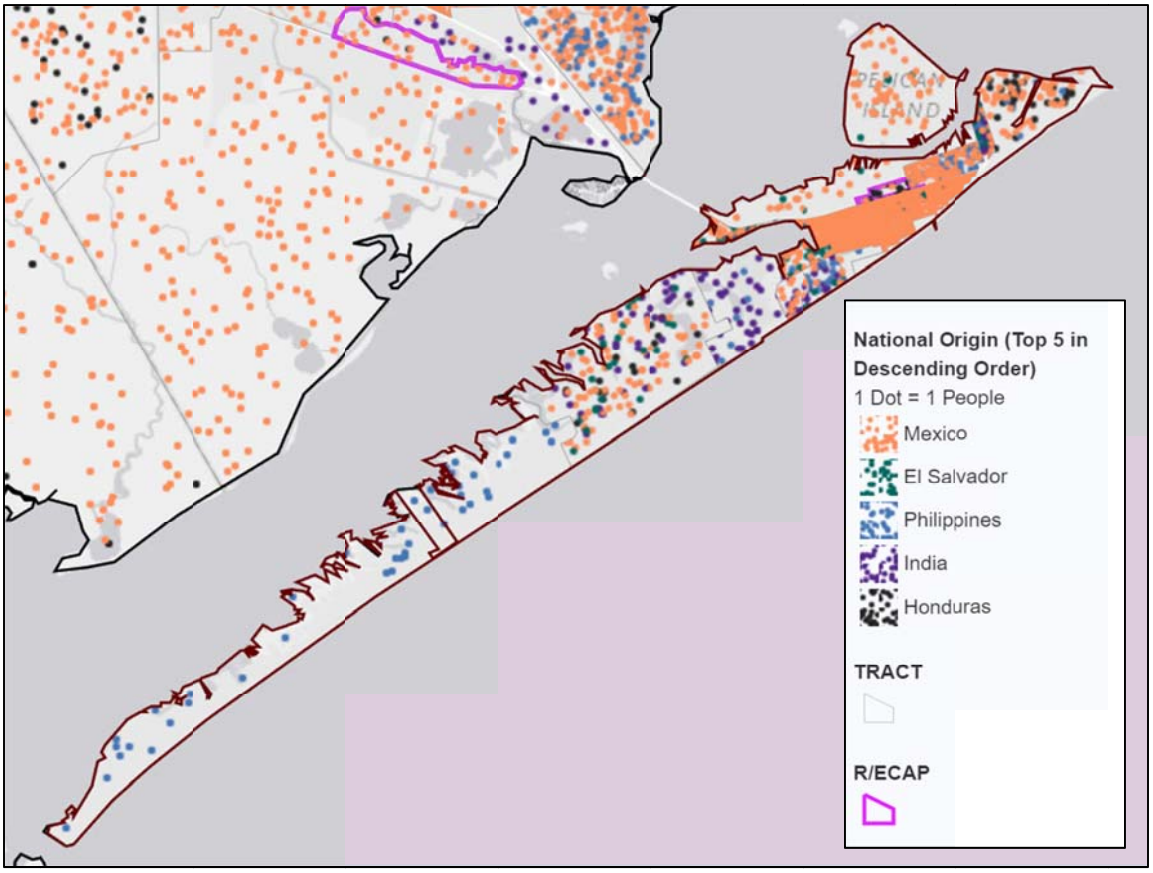
Figure I-56.
Country of Origin, Galveston, 2013

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Country of Origin	Population	Percent of Total Population
Mexico	2,795	6.1%
El Salvador	656	1.4%
Philippines	380	0.8%
India	325	0.7%
Honduras	236	0.5%
Guatemala	217	0.5%
China excl. Hong Kong & Taiwan	146	0.3%
Russia	146	0.3%
Cameroon	136	0.3%
Chile	134	0.3%

Figure I-57 shows the geographic distribution of residents by country of origin.

Figure I-57.
National Origin, Galveston, 2013



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool..

Demographics: limited English proficiency. Figure I-58 shows the number of people who speak a language other than English at home and the percentage of these who speak English *less than well*. In all Galveston (like Harris County-excluding-Houston, Missouri City and Pasadena), Spanish or Spanish Creole is by far the largest group who speak a language other than English at home. One-third of those who speak Spanish or Spanish Creole at home speak English less than well. In Galveston (as well as in the other three locales in this assessment), a high percentage (58.5%) of those who speak Chinese at home speak English less than very well.

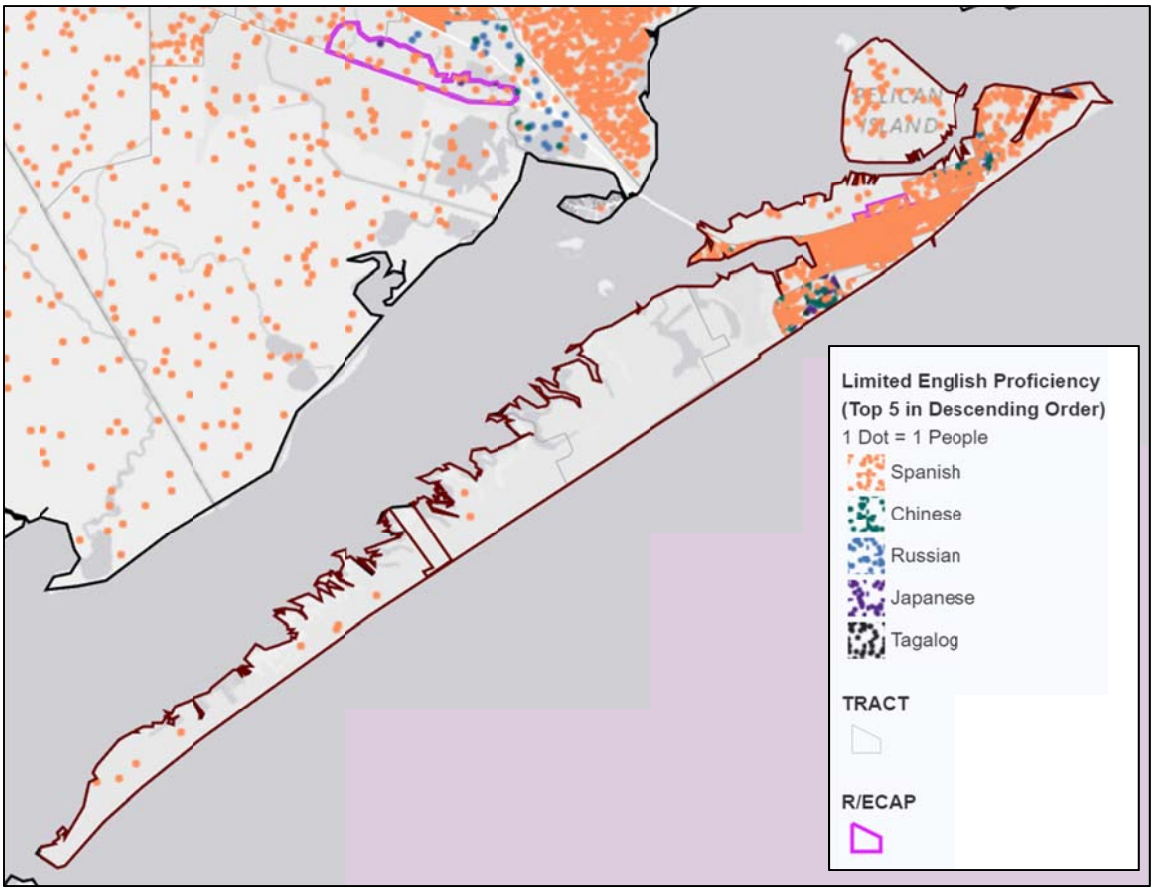
Figure I-58.
Limited English Proficiency, Galveston, 2013

Source:
2013 5-year ACS.

Language Spoken at Home	Number of Speakers	Number that Speak English Less than Very Well	Percent that Speak English Less than Very Well
Any Language other than English	13,041	3,947	30%
Spanish or Spanish Creole	10,425	3,414	33%
Chinese	236	138	58%
Russian	152	62	41%
Japanese	143	46	32%
Tagalog	289	44	15%
Vietnamese	99	35	35%
Other Slavic languages	58	28	48%
Korean	29	23	79%
Italian	172	22	13%
Other Indic languages	217	20	9%

Figure I-59 shows the geographic distribution of residents with limited English proficiency.

Figure I-59.
Limited English Proficiency, Galveston, 2013



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Segregation in Galveston. This section of the analysis focuses on racial/ethnic segregation in the City of Galveston. The analysis uses two methods for evaluating segregation: the Dissimilarity Index and hyper-segregation. As mentioned in the Regional Demographic Summary, the dissimilarity index is evaluated at both the block group and block levels.

Dissimilarity index. As defined earlier in this section, the dissimilarity index, or DI, is a widely used measure of racial residential segregation that captures the segregation dimension of evenness of distribution of individual residents. Figure I-60 shows the DI for the Greater Houston Region as a whole, and the City of Galveston. These data are from the HUD AFFH-T and depict the DI as calculated from Census tract and block group level data (depending on the year).

Current data for Galveston indicate moderate levels of segregation between non-Hispanic white and black residents as well as between non-Hispanic white and Asian residents. Black/white segregation and Hispanic/white segregation have decreased in Galveston since 1990 but Asian/white segregation has increased over time.

Figure I-60.
Dissimilarity Index for the Greater Houston Region and Galveston, 1990 – Present

Racial/Ethnic Dissimilarity Index	Greater Houston Region				Galveston			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	49.4	52.2	50.1	52.7	41.0	35.7	34.0	31.2
Black/White	65.2	65.3	60.7	64.2	56.6	48.6	41.4	41.8
Hispanic/White	47.6	53.3	52.5	54.7	34.7	35.8	36.3	33.1
Asian or Pacific Islander/White	47.8	49.9	48.6	52.5	39.9	39.5	37.2	41.1
Interpreting the index:	0-39 Low		40-54 Mod		55-100 High			

Source: Decennial Census and ACS from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

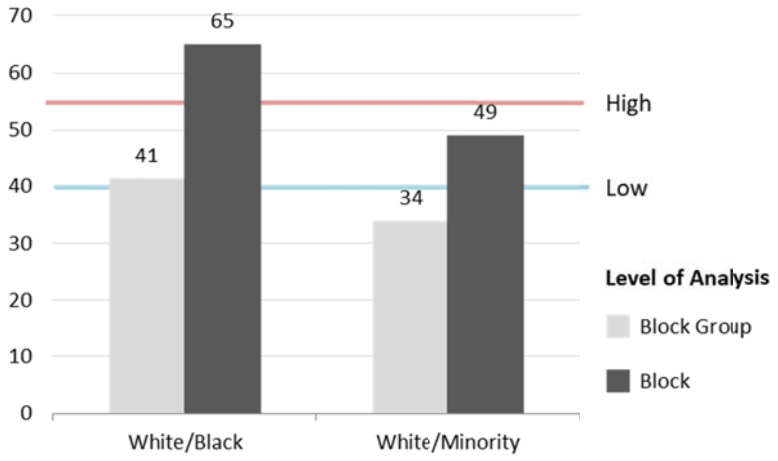
As discussed in the Regional Demographic summary section, this report also evaluates the DI on a smaller geographic scale to evaluate segregation within neighborhoods (block-level analysis), not just among neighborhoods (block group and Census tract analysis from the AFFH-T). Figure I-61 compares the 2010 DI calculated at the block group level (same as shown in the previous figure) with a block-level analysis. Index values are shown for whites relative to blacks and whites relative to minorities for the City of Galveston.

At the block level, Galveston has a white/black dissimilarity index value of 65, and a white-minority index value of 49. The black/white DI value in Galveston is the highest of the participating jurisdictions in this assessment.

The differences in the white-black and white-minority dissimilarity indices suggest that Hispanics, Asians and other non-white residents are less segregated from whites than blacks, in general.

Figure I-61.
Block-Level Dissimilarity Index, Galveston, 2010

Source:
2010 Census and International Development and Planning, LLC.



Hyper-Segregation of Neighborhoods. As explained previously, assessment of neighborhoods where one racial or ethnic group comprises more than 75 percent of that neighborhood is another method of assessing segregation. Hyper-segregation is calculated here as the population living in Census blocks with more than five persons where the population is more than 75 percent of one racial or ethnic group. Equally important is how many neighborhoods have no residents of a particular subgroup. Note that Galveston's total minority population is 55 percent.

Figure I-62 compares the racial/ethnic distribution of the total population of Galveston, with the distribution of hyper-segregated neighborhoods. The City has 1,723 populated Census blocks (2010). Of these, 1,590 had at least five residents. Almost one third (32.1%) of these neighborhoods were segregated and predominantly Hispanic.

Figure I-62.
Hyper-Segregation of Neighborhoods, Galveston, 2010

Racial/Ethnic Group	Percent Population	Blocks ≥ 75 Percent This Group	Blocks ≥ 90 Percent This Group	Blocks With No Residents This Group
Non-Hispanic White	45.0%	23.4%	10.9%	8.6%
Minority	55.0%	32.1%	16.9%	7.3%
Hispanic	31.3%	8.5%	2.3%	16.3%
Non-Hispanic Black	18.6%	4.7%	2.0%	40.0%
Asian	3.1%	0.1%	0.0%	83.4%

Source: 2010 Census and International Development and Planning, LLC.

Galveston's population is 45 percent white, yet 8.6 percent of neighborhoods had no white residents. The area's population is 31.3 percent Hispanic. Almost 10 percent (8.5%) of the city's neighborhoods are hyper-segregated and predominantly Hispanic, but 16.3 percent of its neighborhoods have no Hispanic residents.

The City's population is 18.6 percent non-Hispanic Black, yet 40 percent of the city's neighborhoods had no black residents. Asians make up 3.1 percent of the City (2010). Almost no neighborhoods (0.1%) were hyper-segregated and predominantly Asian.

Figures II-63 through II-66 map hyper-segregation by race/ethnicity in Galveston.

Figure I-63. Percent Minority, Galveston, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc. 2017.

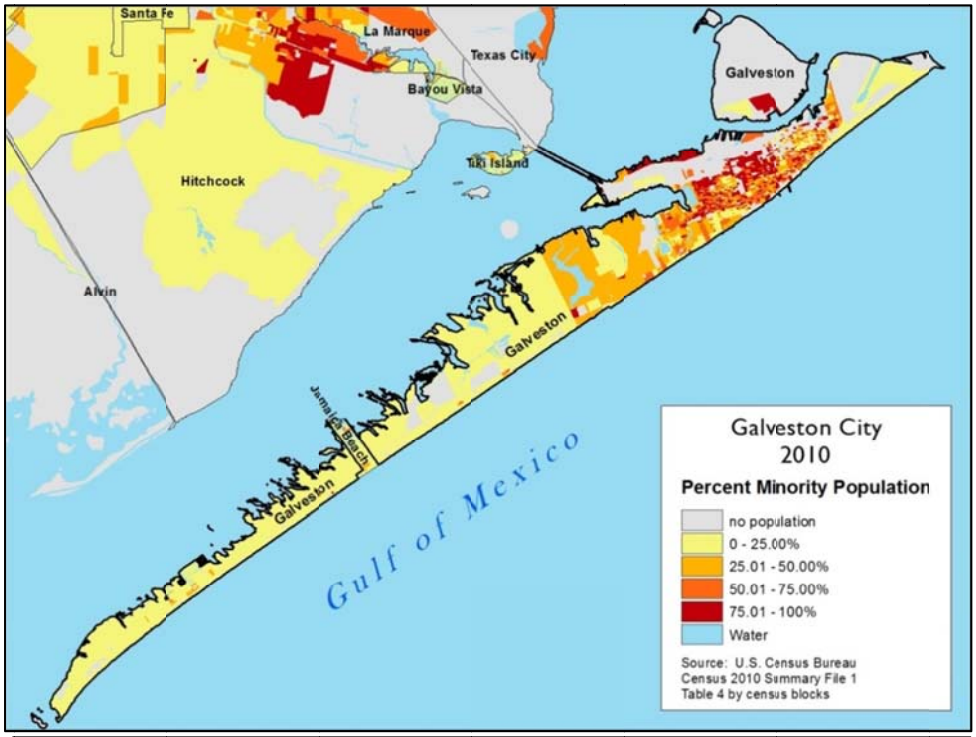


Figure I-64. Percent Hispanic, Galveston, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc. 2017.

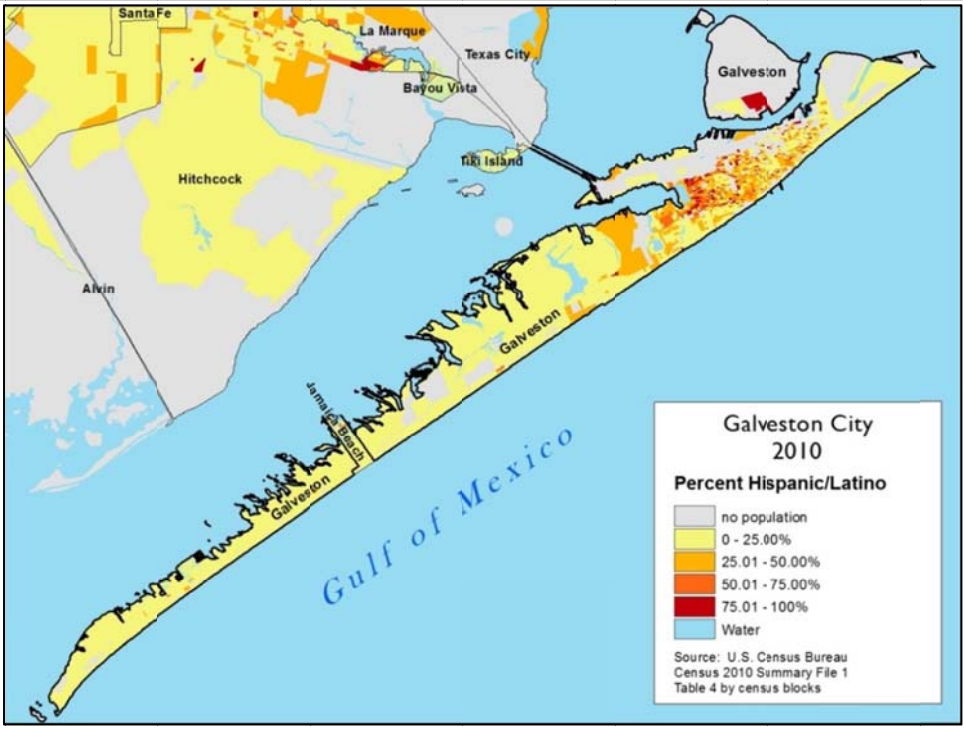


Figure I-65. Percent Black, Galveston, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc. 2017.

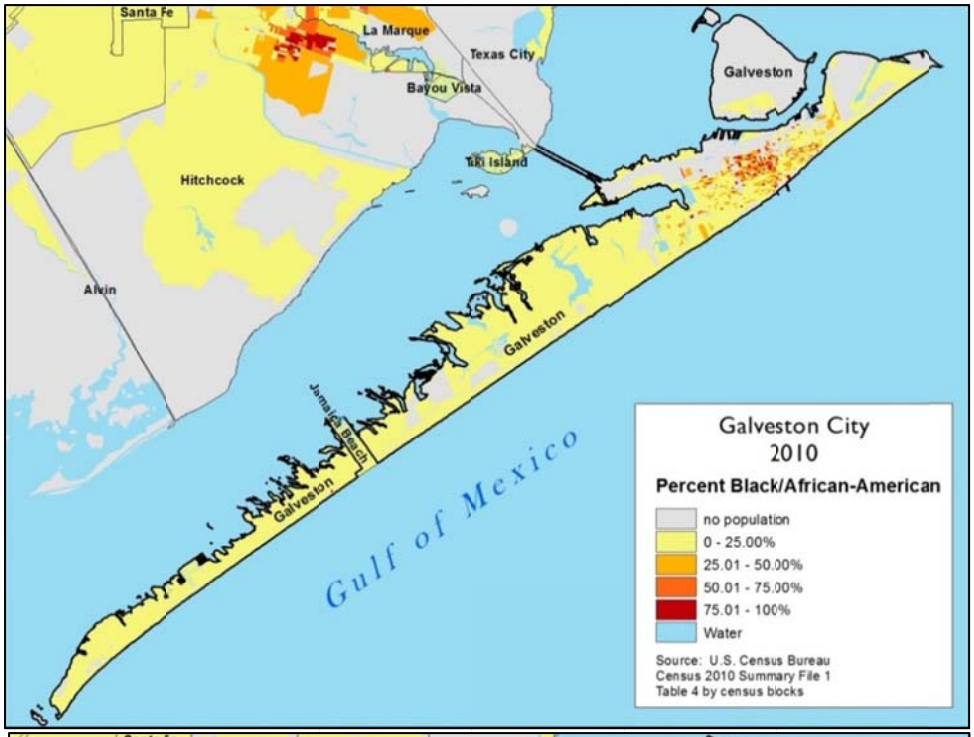
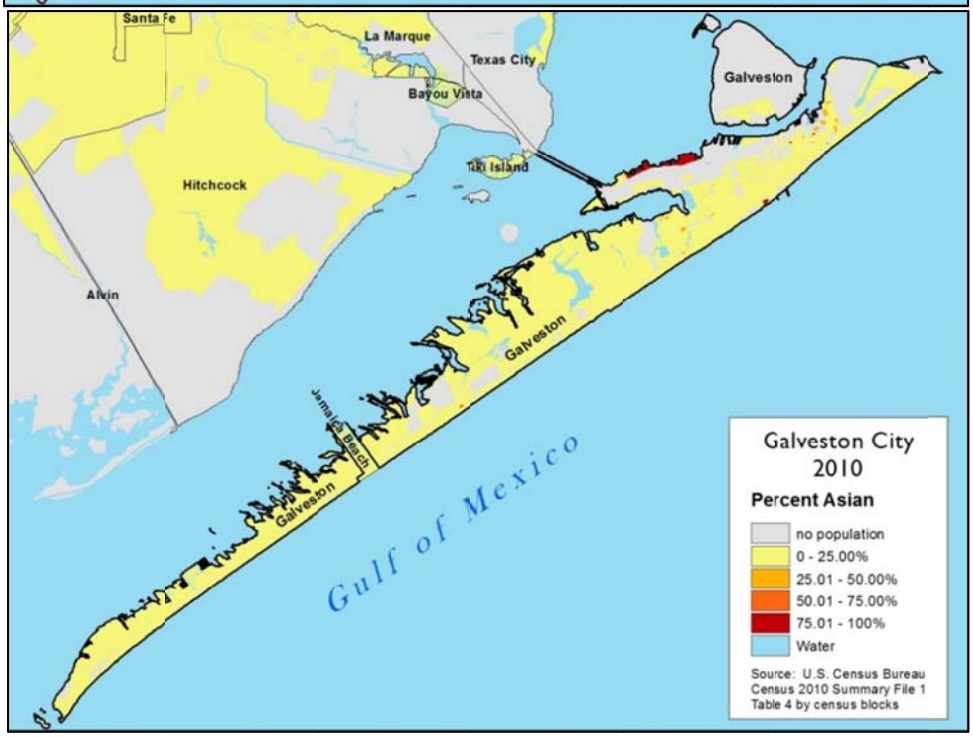


Figure I-66. Percent Asian, Galveston, 2010

Source:

Cedar Grove Institute for Sustainable Communities, Inc. 2017.



Municipal exclusion. The City of Galveston encompasses the whole of Galveston Island, except for the City of Jamaica Beach. The City of Galveston contains no excluded neighborhoods.

SECTION II.

Racially/Ethnically Concentrated Areas of Poverty

SECTION II.
Racially/Ethnically Concentrated Areas of Poverty

This section expands on the segregation analysis in Section II by added a layer of economic consideration. A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood with a poverty rate of 40 percent and a racial and ethnic concentration. The core analysis in this section fulfills the AFH requirement to:

a. *Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.*

b. *Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?*

c. *Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).*

It is very important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choice if they occur in a non-discriminatory market. R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR

- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

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. 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. This section of the report examines racially and ethnically concentrated areas and areas of concentrated poverty. Section IV, the Access to Opportunity analysis, examines minority concentrations and access to affordable housing, quality schools, neighborhood conditions and transit.

Regional Overview

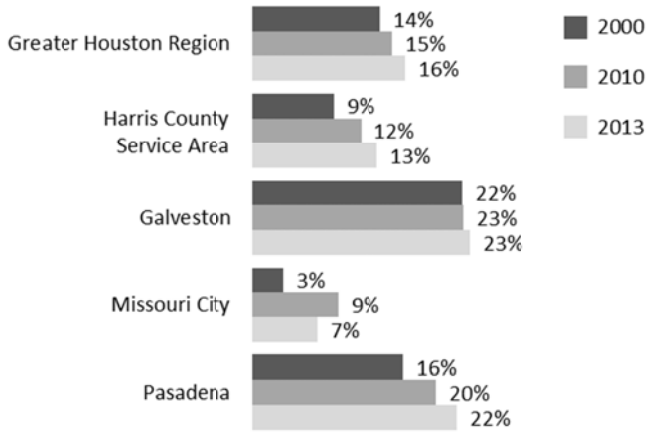
According to a recent Pew Research Study, residential income segregation increased substantially in the Houston metro area between 1980 and 2010. By 2010, Houston had the highest residential income segregation among the nation's 10 largest metro areas (followed closely by Dallas and New York).[1]

Sixteen percent of the Greater Houston Region residents are living in poverty. The poverty rate for the region's children is 24 percent and the rate for seniors is 11 percent. Among the participating jurisdictions, poverty is highest in Galveston (23%) and Pasadena (22%) and lowest in Missouri City (7%). Figure II-1 displays poverty rates by participating jurisdiction in 2000, 2010, and 2013. In most communities, poverty increased over both intervals.

Figure II-1.
Poverty Rate, Greater Houston Region, 1990, 2000 and 2010

Source:

1990 Census, 2000 Census, 2006-2010 ACS and BBC Research & Consulting.



At the neighborhood level, 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 up to 14 percent of poverty have no noticeable effect on community opportunity.[2]

"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. Specifically, they are Census tracts that have family poverty rates exceeding 40 percent or three times the regional poverty rate and are majority minority (minorities account for 50% or more of the total population).[3]

[1] http://www.pewsocialtrends.org/2012/08/01/the-rise-of-residential-segregation-by-income/

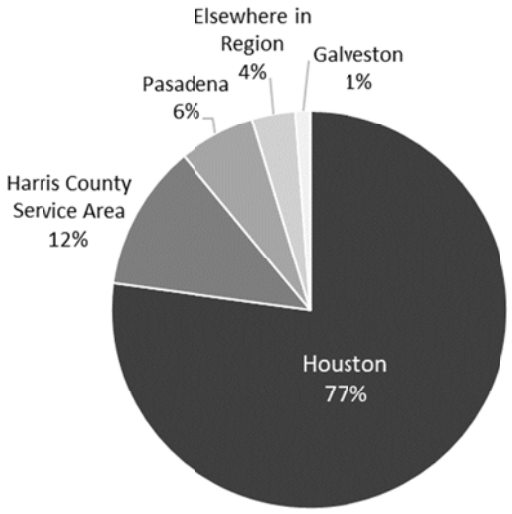
[2] The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline." In Nicolas P. Retsinas and Eric S. Belsky, eds., Revisiting Rental Housing: Policies, Programs, and Priorities. Washington, DC: Brookings Institution, 116–9.

[3] The regional poverty measure is defined by core based statistical area (CBSA) and is 9 percent for all portions of the Denver region, excluding Boulder (7%) and Weld (10%) counties.

Figure II-2.
Residents of R/ECAPs, Greater Houston Region, 2013

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.



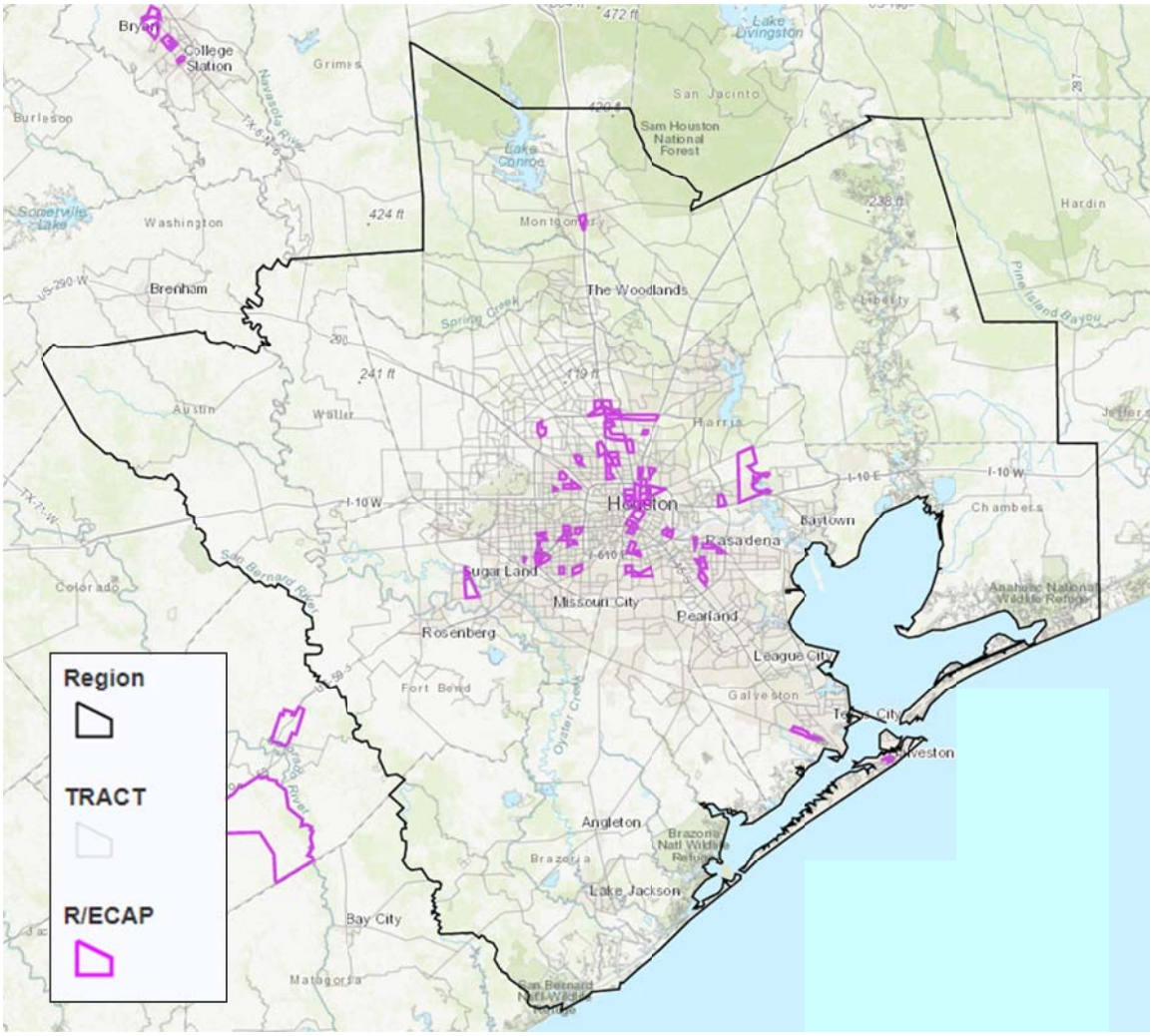
Altogether, 76 Census tracts in the region are R/ECAPs; 57 are located in Houston, four are in the City of Pasadena, nine are elsewhere in Harris County, two are in Galveston, one is elsewhere in Galveston County, two are located in Fort Bend County, and one is in Montgomery County. There are no R/ECAPs in Missouri City.

Together, these R/ECAPs represent 7 percent of Census tracts in the region. Among the 308,063 people living in R/ECAPs, over three-quarters (77%) are in the City of Houston. Six percent are in Pasadena, 12 percent are elsewhere in Harris County, 1 percent are in Galveston, 0 percent are in Missouri City, and 4 percent are elsewhere in the region.

Households within R/ECAP census tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (i.e. limited non-English information and materials); R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

Figure II-3 shows where the region's R/ECAPs are located.

Figure II-3.
Locations of R/ECAPs, Greater Houston Region, 2013



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

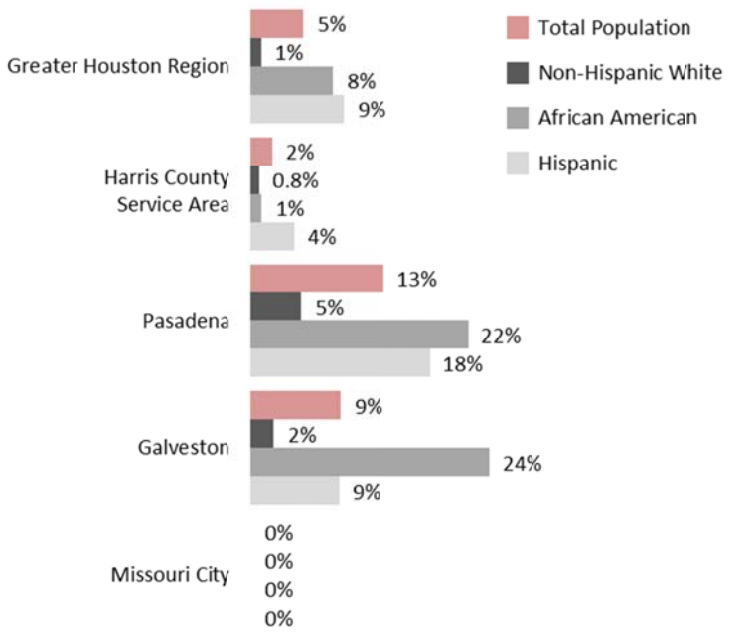
In the region as a whole, Hispanic and Black/African American residents have the highest shares of residents living in R/ECAPs: 9 percent of Hispanic and 8 percent of Black/African American residents live in R/ECAPs, compared to 1 percent of non-Hispanic white residents and 2 percent of Asian residents. Overall, 5 percent the region's population lives in R/ECAPs.

As displayed in Figure II-4, those proportions differ within each jurisdiction that contains R/ECAPs. Pasadena has the highest proportion of total population living in R/ECAPs (13%) but Galveston has the highest proportion of any single racial/ethnic groups living in R/ECAPs—24 percent of African American residents in Galveston are living in R/ECAPs.

Figure II-4.
Proportion of Residents Living in R/ECAPs, Greater Houston Region, 2013

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.



The remainder of this section takes a closer look at R/ECAPS in each participating jurisdiction.

The Harris County Service Area

Nearly 37,000 people living in Harris County (excluding Houston and Pasadena) are situated in neighborhoods that are both racially/ethnically concentrated and poverty concentrated. Over 8,000 families reside in R/ECAPs in the jurisdiction, and (62%) of these R/ECAP families are families with children.

Compared to the larger region, R/ECAP residents in Harris County (excluding entitlements) are more likely to be Hispanic (71% vs. 62%), almost twice as likely to be non-Hispanic white (15 vs. 8%) and half as likely to be non-Hispanic white (11% vs. 26%).

When comparing the R/ECAP population with the overall population in Harris County (excluding entitlements), it is clear that Hispanic residents are over-represented in R/ECAPs (75% compared to 36%) but African Americans are underrepresented in R/ECAPs (8% compared to 16%). Non-Hispanic whites and Asians are also underrepresented in R/ECAPs.

Approximately one-fifth of the residents of R/ECAPs are immigrants, with the largest group (11.6%) from Mexico. One-fourth (25.2%) of all Vietnamese immigrants live in R/ECAPs, as do 10.3 percent of Cubans and 11.1 percent of Peruvians in the region. Within Harris County (excluding entitlements) the immigrant population distribution in R/ECAPs is similar to the immigrant population distribution overall.

Figure II-5 compares R/ECAP demographics in The Harris County service area with R/ECAP demographics in the Greater Houston Region. Distribution by race/ethnicity, family type, and countries of birth for the city and the region overall are also included for comparison.

Figure II-5.
R/ECAP Demographics, Harris County Service Area, 2013

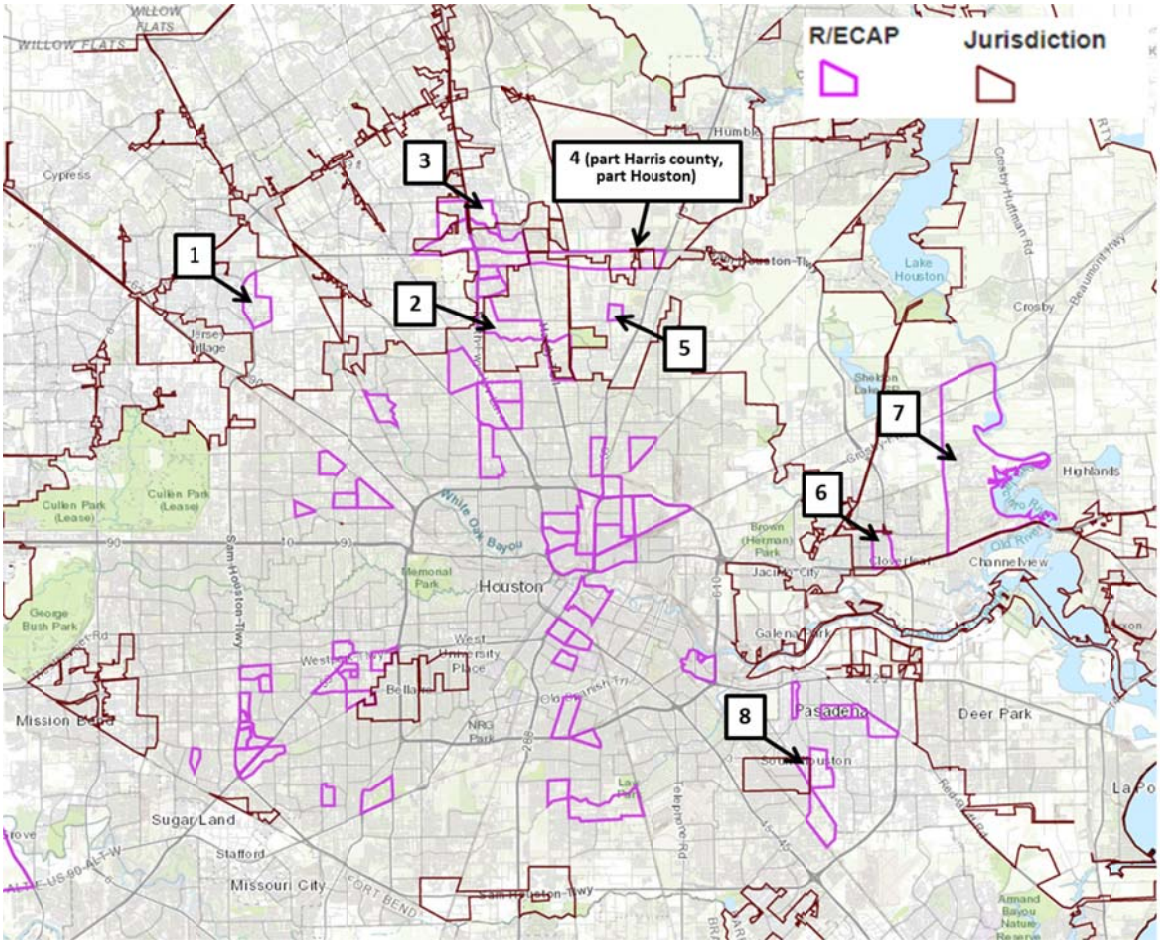
	Harris County Service Area R/ECAPs			Harris Jurisdiction	Greater Houston Region R/ECAPs			Region
	Country	*Number*	*Percent*	Overall	*Country*	*Number*	*Percent*	Overall
Race/Ethnicity								
Total Population in R/ECAPs		**36,593**	**100%**	**100%**		**308,063**	**100%**	**100%**
Non-Hispanic White		5,437	15%	40%		23,833	8%	40%
African American/Black		2,997	8%	16%		80,947	26%	17%
Hispanic		27,338	75%	36%		192,429	62%	35%
Asian or Pacific Islander		524	1%	7%		8,172	3%	7%
Native American		49	0%	0%		378	0%	0%
Other, Non-Hispanic		61	0%	0%		372	0%	0%
Family Type								
Total Families in R/ECAPs		**7,961**	**100%**	**100%**		**67,013**	**100%**	**100%**
Families with children		4,969	62%	55%		39,312	59%	51%
Foreign Born Population								
Total Population in R/ECAPs		**36,593**	**100%**	**100%**		**308,063**	**100%**	**100%**
#1 County of Origin	Mexico	4,246	12%	11%	Mexico	64,497	21%	11%
#2 Country of Origin	El Salvador	970	3%	2%	El Salvador	10,805	4%	2%
#3 Country of Origin	Guatemala	518	1%	0%	Honduras	7,927	3%	1%
#4 Country of Origin	Vietnam	413	1%	2%	Guatemala	7,604	2%	1%
#5 Country of Origin	Honduras	374	1%	1%	Vietnam	1,642	1%	1%
#6 Country of Origin	Cuba	125	0%	0%	Cuba	1,208	0%	0%
#7 Country of Origin	Peru	112	0%	0%	China*	1,009	0%	1%
#8 Country of Origin	Other S. Am.	54	0%	0%	Iraq	873	0%	0%
#9 Country of Origin	Germany	50	0%	0%	India	854	0%	1%
#10 Country of Origin	India	32	0%	1%	Nigeria	728	0%	0%

Note: *China excluding Hong Kong and Taiwan

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure II-6, from HUD's Affirmatively Furthering Fair Housing Mapping Tool, shows the location of R/ECAPs in Harris County. The eight R/ECAPs located in Harris County but not in Houston or Pasadena are identified by number and discussed in greater detail following Figure II-6.

Figure II-6.
Location of R/ECAPs in Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure II-7 zooms in on R/ECAPs labeled numbers 1 through 5 in the previous map. These R/ECAPs are all on the north side of Houston. R/ECAP #1 is located in the northwest corner of the Same Houston Tollway and R/ECAPs #2 through #5 are located along the I-45 and Sam Houston Tollway corridors in Aldine and Greater Greenspoint.

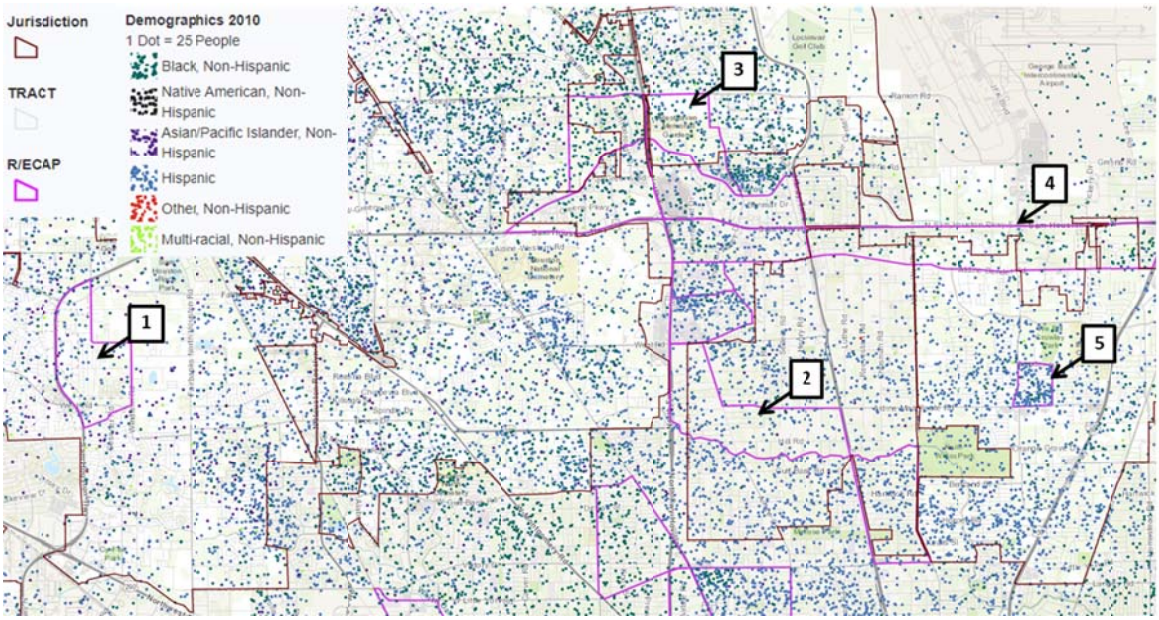
R/ECAP #1 has a higher poverty rate than surrounding areas and a higher proportion of Hispanic and Asian residents than nearby areas—particularly those on the outside of the Tollway.

R/ECAPs #2 through #5 are in a cluster of R/ECAPs that are in both Harris County and the City of Houston. R/ECAPs #2, #3, and #5 are entirely in Harris County but not in Houston, R/ECAP #4 is split between Harris County and Houston, and the other R/ECAPs shown in the map (not labeled but indicated with pink outline) are predominantly in the City of Houston's jurisdiction.

These R/ECAPs are located along transit corridors and include a mix of commercial and residential uses and are more likely to have multifamily developments than some of the more traditional residential neighborhoods further from highways. R/ECAPs #3 and #4 have high

proportions of African American residents while R/ECAPs #2 and #5 have higher proportions of Hispanic residents.

Figure II-7.
Location of R/ECAPs #1-5, Harris County

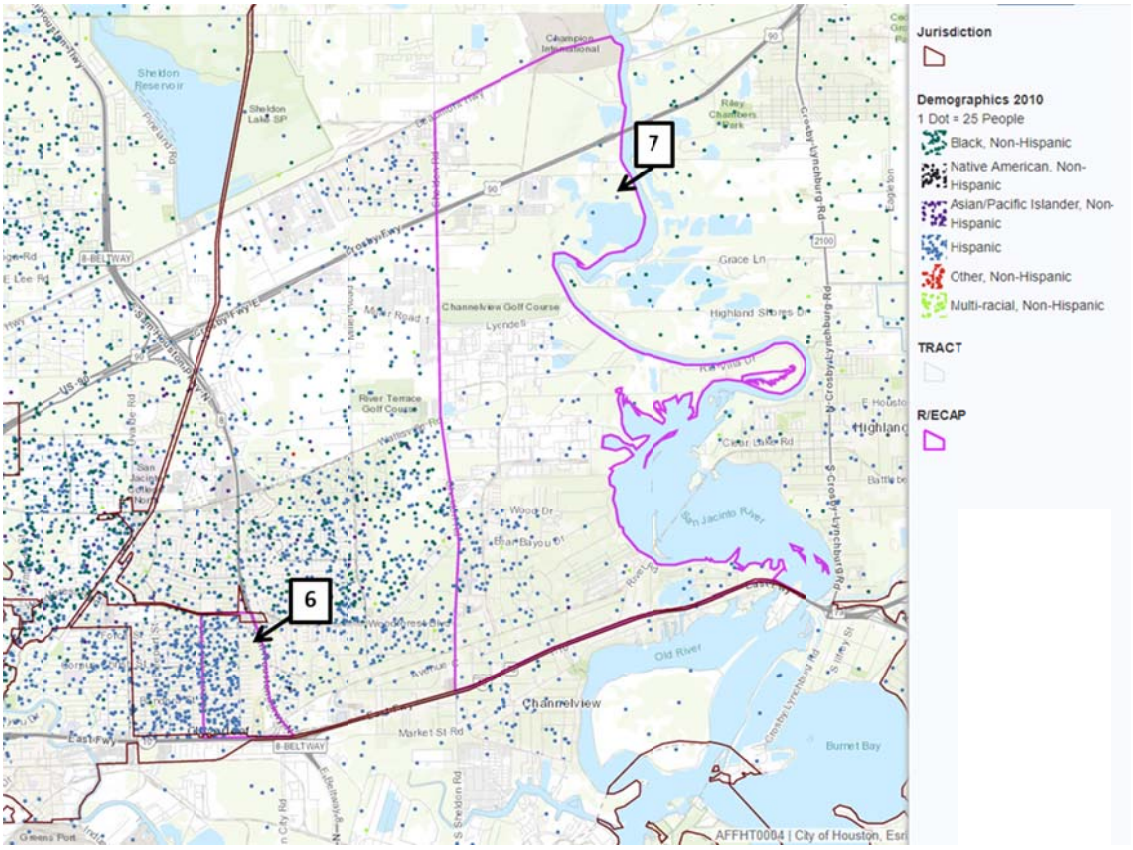


Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure II-8 zooms in on R/ECAPs labeled numbers 6 and 7 in Figure II-6. These R/ECAPs are on the east side of Houston between I-10 and Highway 90. R/ECAP #6 is in Cloverleaf and R/ECAP #7 includes the northern portion of Channelview.

R/ECAP #6 is densely population and includes a high proportion of Mexican immigrants. R/ECAP #7 is sparsely population but includes a high proportion of Hispanic residents. Both of these R/ECAPs have fewer African American residents than surrounding neighborhoods.

Figure II-8.
Location of R/ECAPs #6-7, Harris County

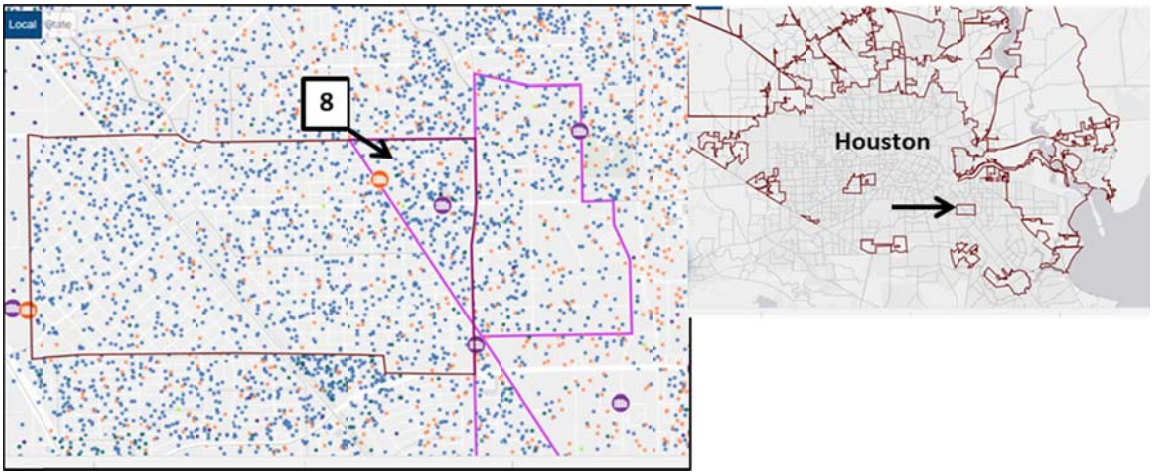


Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure II-9 shows the eighth R/ECAP in the Harris County HUD jurisdiction, located between Houston, South Houston, and Pasadena. This area is an excluded low-income minority community which lies adjacent to another R/ECAP and near a third. It is bordered by Allen Genoa Road, a four-lane undivided highway, and crossed by Spencer Highway, a five-lane undivided highway. This R/ECAP includes one Section 8 property (Grenada Terrace) and one LIHTC property (Windsor Apartments). Grenada Apartments includes 154 households, and its residents are 4 percent non-Hispanic white, 9 percent non-Hispanic black, and 86 percent Hispanic. Over half (58%) are families with children. Windsor Apartments contains 192 units, of which 153 are low-income.[4] This R/ECAP's Census tract contains 2,985 residents, of whom 7.2 percent are non-Hispanic White, 2.6 percent are non-Hispanic Black, and are 89.4 percent Hispanic. In addition, 3.4 percent of households are Voucher holders.

[4] HUD, Low Income Housing Tax Credit database, https://www.huduser.gov/portal/datasets/lihtc.html accessed 8/22/2017.

Figure II-9.
Location of R/ECAP #8, Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

As illustrated above, many of the Harris County R/ECAPs are in close proximity to interstates and other major highways, illustrating a common health risk faced by many residents of predominantly-minority low-income neighborhoods. According to the Centers for Disease Control (CDC), "Traffic-related air pollution is a main contributor to unhealthy ambient air quality,…"[5] adding:

> *"a recent review determined that there is sufficient evidence of a causal association between exposure to traffic-related air pollution and asthma exacerbation and suggestive evidence of a causal association for onset of childhood asthma, nonasthma respiratory symptoms, impaired lung function, all-cause mortality, cardiovascular mortality, and cardiovascular morbidity."*

The CDC stated that the greatest disparities in residential exposure to major highways "were observed for race/ethnicity, nativity (country of origin) and language other than English spoken at home. Such exposures are often a function of institutionalized discrimination by federal, state or local governments or other official bodies in the placement of highways and affordable housing.

Pasadena

Figure II-10 compares R/ECAP demographics in Pasadena with R/ECAP demographics in the Greater Houston Region. Distribution by race/ethnicity, family type, and countries of birth for the city and the region overall are also included for comparison.

Just over 19,000 Pasadena residents live in R/ECAPs; 83 percent of R/ECAP residents are Hispanic, 12 percent are non-Hispanic white, and 3 percent are black.

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[5] Boehmer, Tegan K. et al., "Residential Proximity to Major Highways — United States, 2010," CDC Health Disparities and Inequalities Report — United States, 2013, Morbidity and Mortality Weekly Report (MMWR), Supplements., November 22, 2013 / 62(03);46-50. https://www.cdc.gov/mmwr/preview/mmwrhtml/su6203a8.htm accessed 8/25/2017.

About 4,400 families reside in R/ECAPS in Pasadena. Two thirds of families living in R/ECAPs have children, compared to 54 percent of families living in Pasadena as a whole. That difference indicates that families with children are overrepresented in R/ECAPs in Pasadena.

Thirty-one percent of R/ECAP residents were born in Mexico, compared to 21 percent of Pasadena residents overall. Residents from El Salvador and Honduras are also slightly overrepresented in Pasadena's R/ECAPs.

Figure II-10.
R/ECAP Demographics, Pasadena, 2013

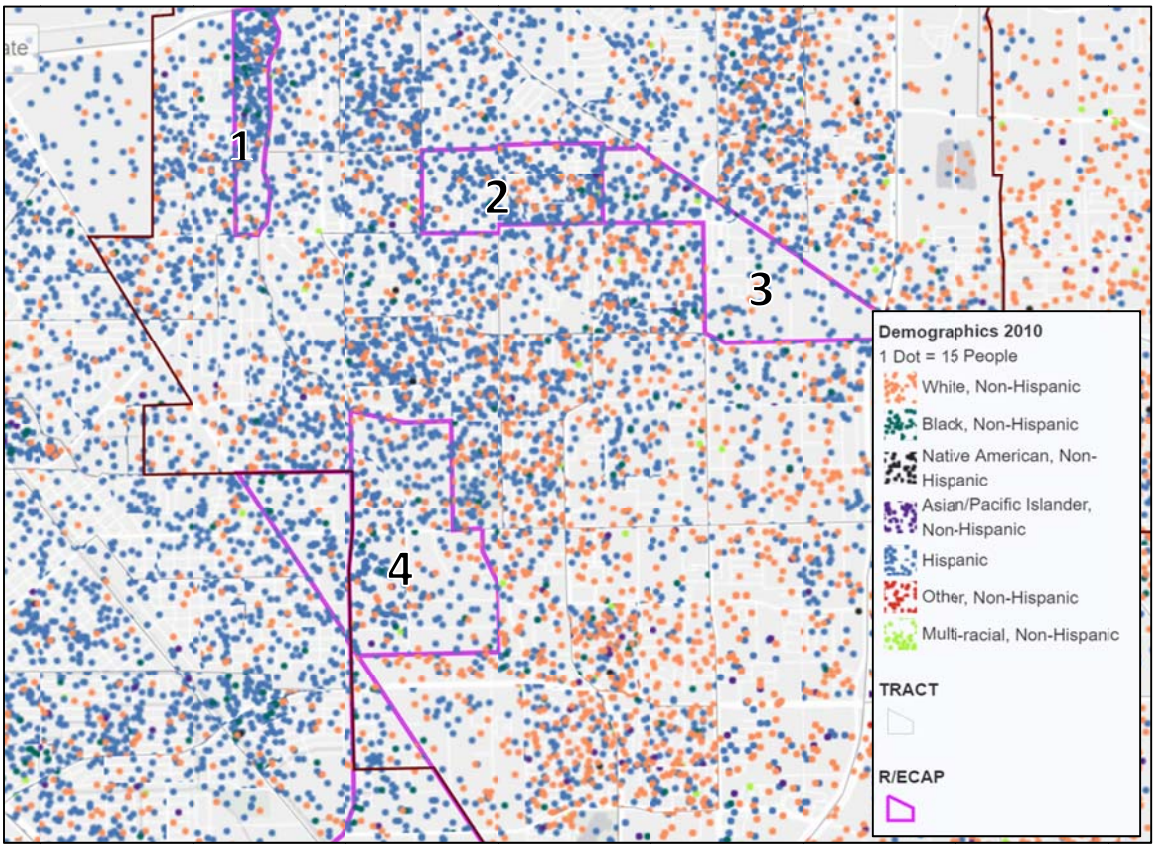
	Pasadena R/ECAPs			Pasadena	Greater Houston Region R/ECAPs			Region
	Country	*Number*	*Percent*	Overall	*Country*	*Number*	*Percent*	Overall
Race/Ethnicity								
Total Population in R/ECAPs		**19,286**	**100%**	**100%**		**308,063**	**100%**	**100%**
Non-Hispanic White		2,391	12%	33%		23,833	8%	40%
African American/Black		619	3%	2%		80,947	26%	17%
Hispanic		16,053	83%	62%		192,429	62%	35%
Asian or Pacific Islander		87	0%	2%		8,172	3%	7%
Native American		24	0%	0%		378	0%	0%
Other, Non-Hispanic		19	0%	0%		372	0%	0%
Family Type								
Total Families in R/ECAPs		**4,359**	**100%**	**100%**		**67,013**	**100%**	**100%**
Families with children		2,916	67%	54%		39,312	59%	51%
Foreign Born Population								
Total Population in R/ECAPs		**19,286**	**100%**	**100%**		**308,063**	**100%**	**100%**
#1 County of Origin	Mexico	5,976	31%	21%	Mexico	64,497	21%	11%
#2 Country of Origin	El Salvador	429	2%	1%	El Salvador	10,805	4%	2%
#3 Country of Origin	Honduras	345	2%	1%	Honduras	7,927	3%	1%
#4 Country of Origin	Guatemala	96	1%	0%	Guatemala	7,604	2%	1%
#5 Country of Origin	Cuba	47	0%	0%	Vietnam	1,642	1%	1%
#6 Country of Origin	Canada	38	0%	0%	Cuba	1,208	0%	0%
#7 Country of Origin	Japan	38	0%	0%	China*	1,009	0%	1%
#8 Country of Origin	Ecuador	29	0%	0%	Iraq	873	0%	0%
#9 Country of Origin	Germany	24	0%	0%	India	854	0%	1%
#10 Country of Origin	Nepal	17	0%	0%	Nigeria	728	0%	0%

Note: *China excluding Hong Kong and Taiwan

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool..

Figure II-11, from HUD's AFFH Mapping Tool, shows the location of R/ECAPs in Pasadena. There are four R/ECAPs in the City of Pasadena and two on its borders. Two of Pasadena's R/ECAPs are appreciably denser than the city as a whole.

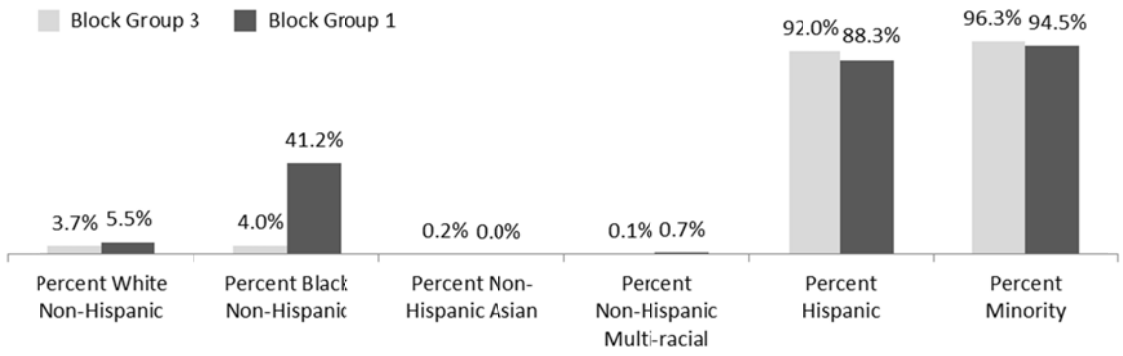
Figure II-11.
Location of R/ECAPs, Pasadena



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Over 3,500 (3,512) residents live in the R/ECAP #1 (centered on Sealy Street). Of these, 95.6 percent are minority, predominantly Hispanic. Note that the northern section of this neighborhood is more densely populated than the city as a whole. Figure II-12 shows the demographics of the two Census block groups that comprise R/ECAP #1.

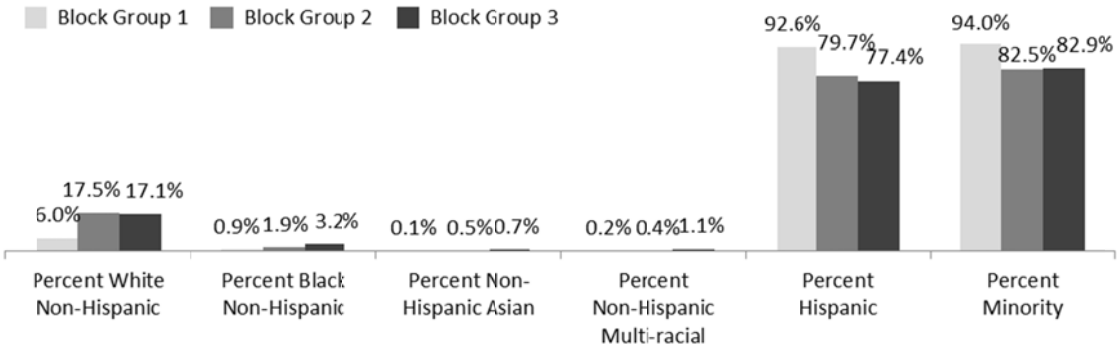
Figure II-12.
R/ECAP #1 Demographics, Pasadena, 2010



Source: 2010 Census and International Development and Planning, LLC.

R/ECAP #2 lies across Broadway Avenue from the first R/ECAP. It contains 6,300 residents, of whom 88.7 percent are minority, predominantly Hispanic. Figure II-13 shows the demographics of the three Census block groups that comprise R/ECAP #2.

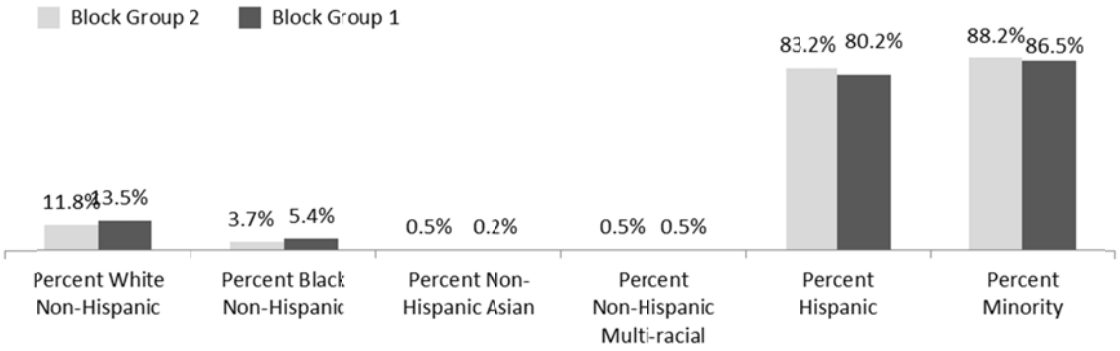
Figure II-13.
R/ECAP #2 Demographics, Pasadena, 2010



Source: 2010 Census and International Development and Planning, LLC.

R/ECAP #3 lies south and east of R/ECAP #2 on the south side of Red Bluff Road. It includes the areas of Satsuma Gardens and Pineswept. Its 2010 population was 3,333 and was 87.6 percent minority, primarily Hispanic. Figure II-14 shows the demographics of the two Census block groups that comprise R/ECAP #3.

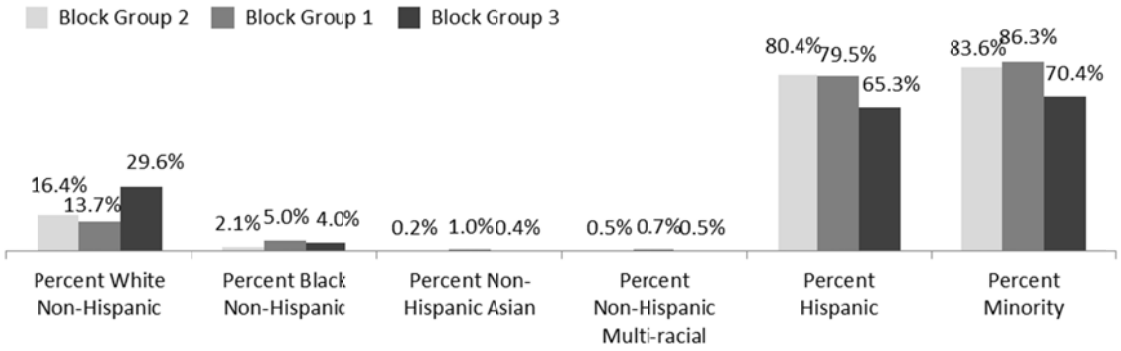
Figure II-14.
R/ECAP #3 Demographics, Pasadena, 2010



Source: 2010 Census and International Development and Planning, LLC.

R/ECAP #4 lies on the southwest border of the city, east of Shaver Street, south of Fresa and Perla Roads, west of Strawberry Road and north of Fairmont Parkway. Its 2010 population was 5,377 and was 82 percent minority, primarily Hispanic. (Note that there are two adjacent R/ECAPs, one of which lies within the city of Houston's city limits and the other is in unincorporated Harris County). Figure II-15 shows the demographics of the three Census block groups that comprise R/ECAP #4.

Figure II-15.
R/ECAP #4 Demographics, Pasadena, 2010



Source: 2010 Census and International Development and Planning, LLC.

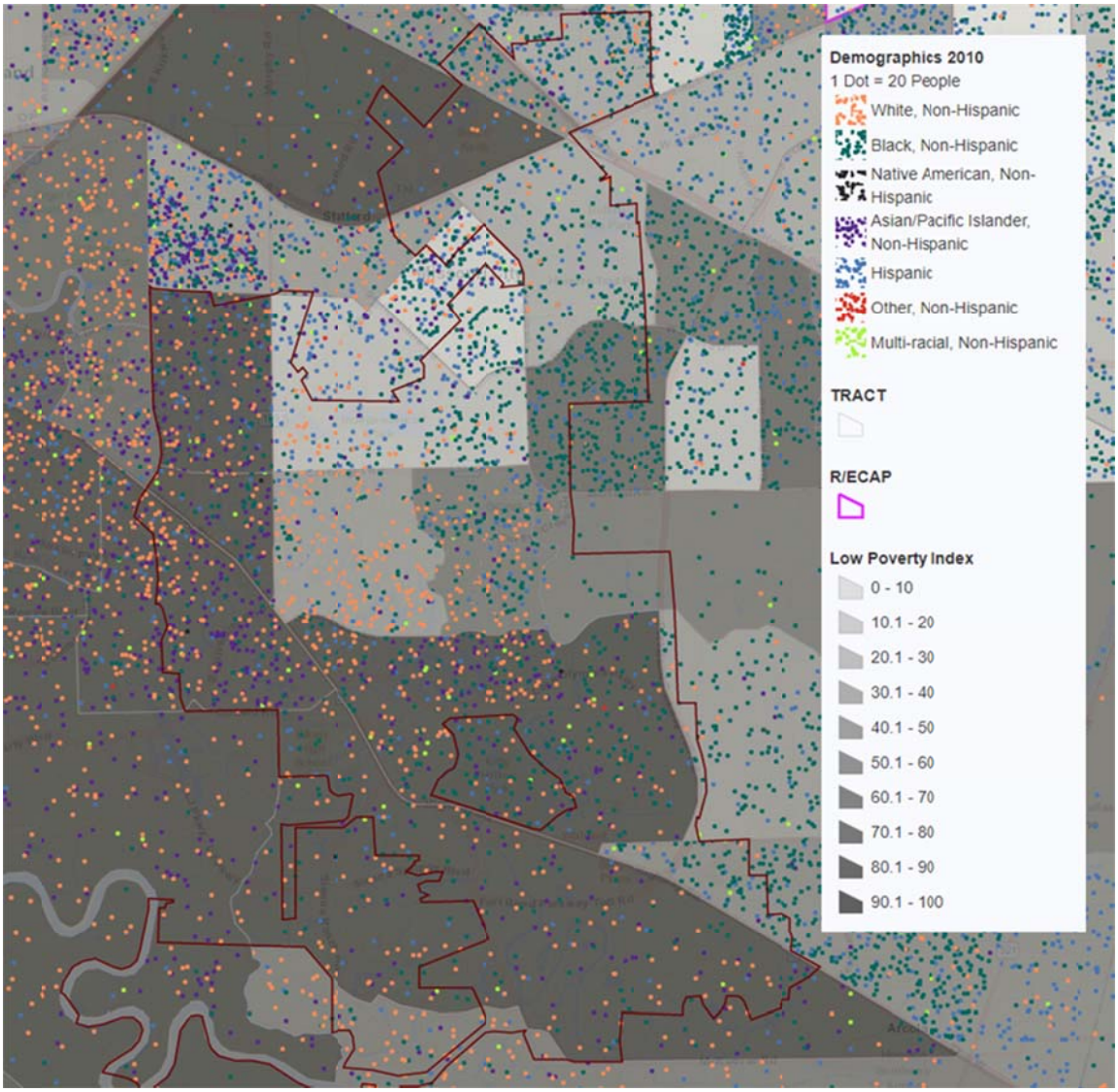
In 2013, there were 19,286 residents in Pasadena's R/ECAPs. This represents 13 percent of the city's population. These neighborhoods must be an area of focus for housing and economic development. However, to place more affordable housing in these neighborhoods could have an unintended effect of perpetuating segregation, as they are all predominantly-minority, and almost all of the city's publicly assisted housing is located in or near these neighborhoods (see discussion in Section VI, Publicly Supported Housing).

Missouri City

HUD's Affirmatively Furthering Fair Housing Mapping Tool identifies areas of Racially- and Ethnically-Concentrated Areas of Poverty (R/ECAPs). There are none in Missouri City.

Figure II-16 maps HUD's poverty index and race/ethnicity in Missouri City. Though there are no R/ECAPs in the city, the Census tract in north central Missouri City has relatively high poverty (indicated by light shading) and a concentration of minority residents (both black and Hispanic). Poverty is not high enough in this tract to trigger R/ECAP status the tract is at risk of becoming a R/ECAP if poverty were to increase.

Figure II-16.
HUD Poverty Index and Race/Ethnicity, Missouri City



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Galveston

Figure II-17 compares R/ECAP demographics in Galveston with R/ECAP demographics in the Greater Houston Region. Distribution by race/ethnicity, family type, and countries of birth for the city and the region overall are also included for comparison.

Just over 3,700 Galveston residents live in R/ECAPs; 55 percent of R/ECAP residents are African American/black, 33 percent are Hispanic, and 10 percent are non-Hispanic white. Hispanic representation in Galveston's R/ECAPs is the same as their representation in the city overall; however black representation in R/CAPs (55%) is significantly higher than their representation in the city overall (21%). This is offset by very low representation of non-Hispanic whites in R/ECAPs.

About 850 families reside in R/ECAPS in Galveston. Half of families living in R/ECAPs have children, compared to 40 percent of families living in Galveston as a whole. That difference indicates that families with children are somewhat overrepresented in R/ECAPs in Galveston.

Five percent of R/ECAP residents were born in El Salvador, compared to 1 percent of Galveston residents overall. Residents from Guatemala are also slightly overrepresented in Galveston's R/ECAPs (2% of R/ECAP residents compared to 0.48% overall).

Figure II-17.
R/ECAP Demographics, Galveston, 2013

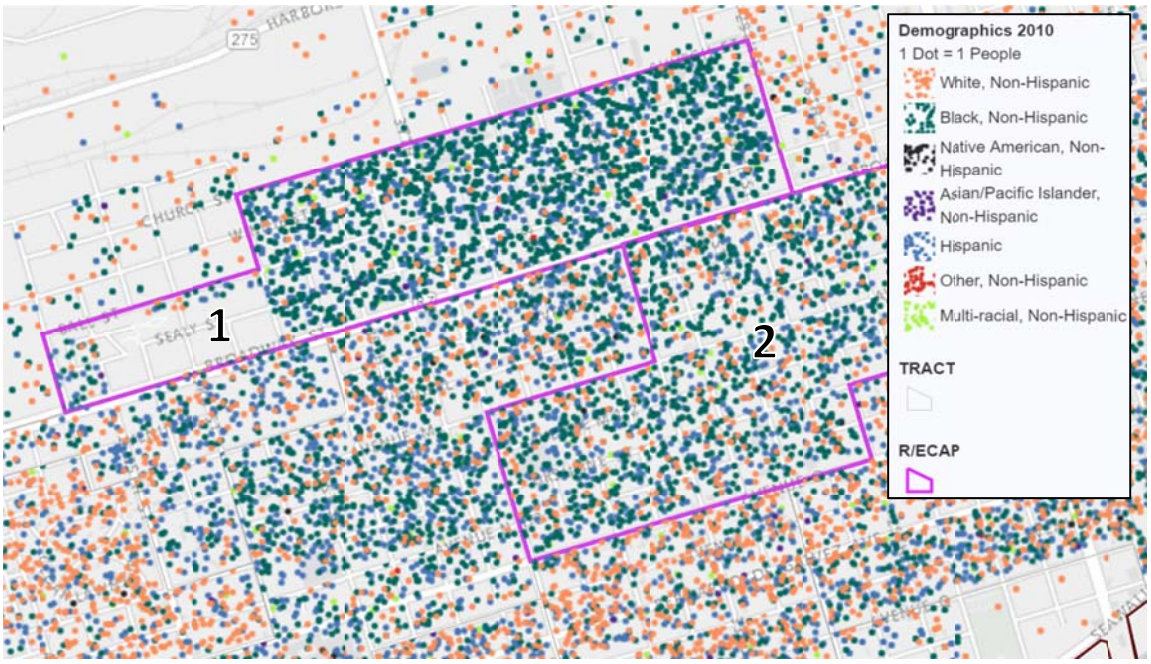
	Galveston R/ECAPs			Galveston	Greater Houston Region R/ECAPs			Region
	Country	*Number*	*Percent*	Overall	*Country*	*Number*	*Percent*	Overall
Race/Ethnicity								
Total Population in R/ECAPs		**3,709**	**100%**	**100%**		**308,063**	**100%**	**100%**
Non-Hispanic White		385	10%	41%		23,833	8%	40%
African American/Black		2,040	55%	21%		80,947	26%	17%
Hispanic		1,221	33%	33%		192,429	62%	35%
Asian or Pacific Islander		12	0%	3%		8,172	3%	7%
Native American		8	0%	0%		378	0%	0%
Other, Non-Hispanic		2	0%	0%		372	0%	0%
Family Type								
Total Families in R/ECAPs		**848**	**100%**	**100%**		**67,013**	**100%**	**100%**
Families with children		419	49%	40%		39,312	59%	51%
Foreign Born Population								
Total Population in R/ECAPs		**3,709**	**100%**	**100%**		**308,063**	**100%**	**100%**
#1 County of Origin	El Salvador	177	5%	1%	Mexico	64,497	21%	11%
#2 Country of Origin	Mexico	94	3%	6%	El Salvador	10,805	4%	2%
#3 Country of Origin	Guatemala	79	2%	0%	Honduras	7,927	3%	1%
#4 Country of Origin	Honduras	52	1%	1%	Guatemala	7,604	2%	1%
#5 Country of Origin	Colombia	6	0%	0%	Vietnam	1,642	1%	1%
#6 Country of Origin	Other S. America	5	0%	0%	Cuba	1,208	0%	0%
#7 Country of Origin					China*	1,009	0%	1%
#8 Country of Origin	Haiti	4	0%	0%	Iraq	873	0%	0%
#9 Country of Origin	Null	0	0%	0%	India	854	0%	1%
#10 Country of Origin	Null	0	0%	0%	Nigeria	728	0%	0%

Note: *China excluding Hong Kong and Taiwan.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool..

Figure II-18, from HUD's Affirmatively Furthering Fair Housing Mapping Tool, shows the location of R/ECAPs in Galveston. There are two adjacent R/ECAP Census tracts in the city.

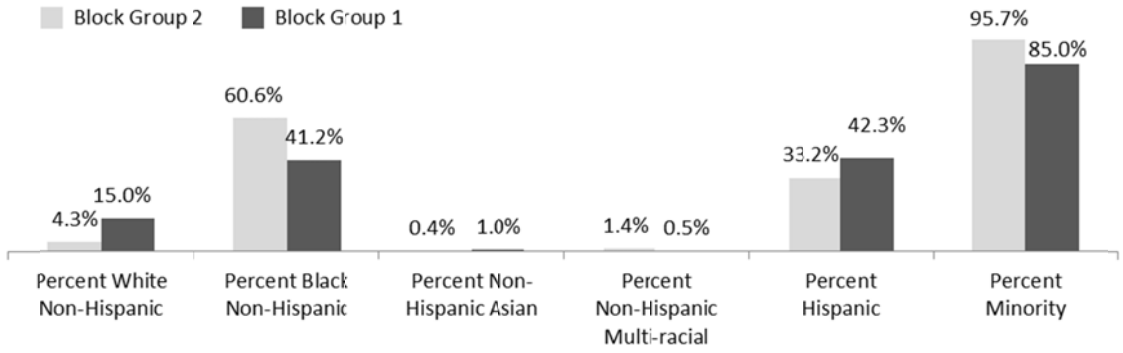
Figure II-18.
Location of R/ECAPs in Galveston



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

About 1,800 residents live in the first R/ECAP neighborhood centered on Sealy Street. Of these, 94.5 percent are minority, predominantly black. Figure II-19 shows the demographics of the two Census block groups that comprise R/ECAP #1.

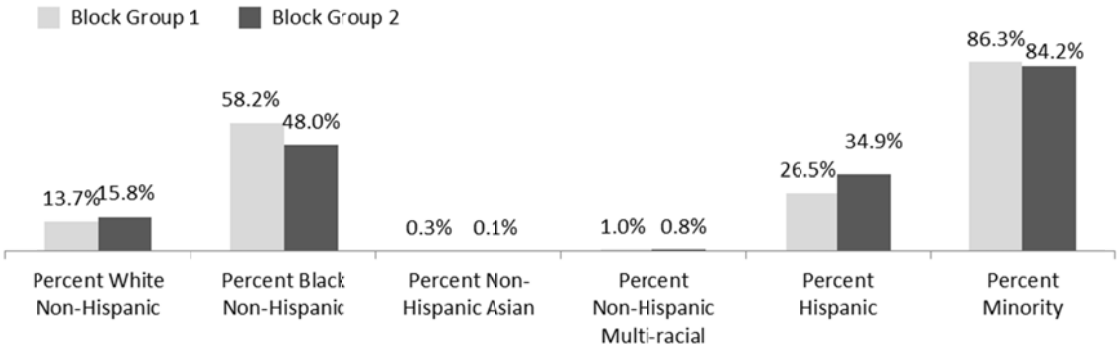
Figure II-19.
R/ECAP #1 Demographics, Galveston, 2010



Source: 2010 Census and International Development and Planning, LLC.

The second R/ECAP lies across Broadway Avenue from the first. It, too, contains almost 2,000 residents (1,916), of whom 85 percent are minority, predominantly Black. Figure II-20 shows the demographics of the two Census block groups that comprise R/ECAP #2.

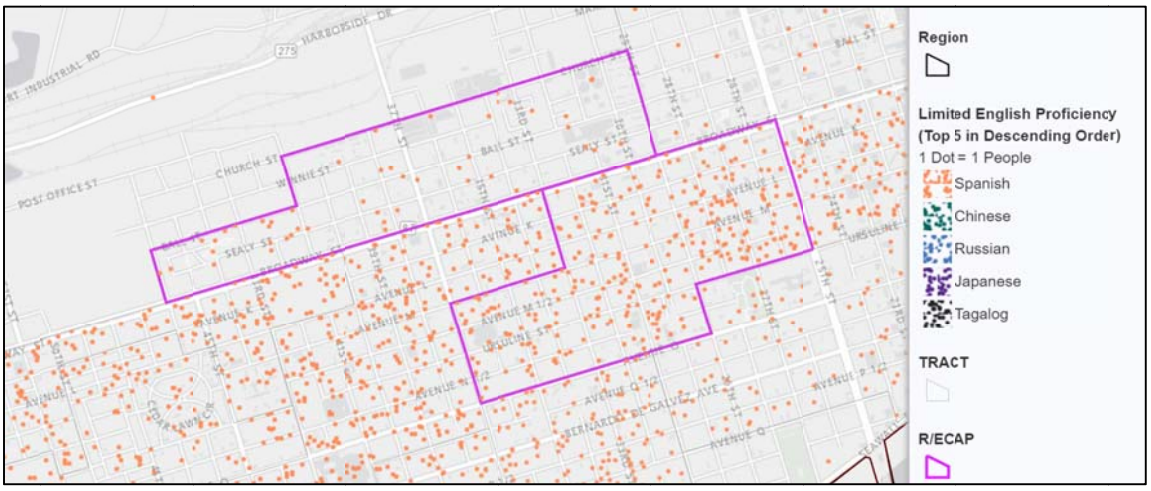
Figure II-20.
R/ECAP #2 Demographics, Galveston, 2010



Source: 2010 Census and International Development and Planning, LLC.

Spanish is overwhelmingly the major language spoken by residents of Galveston's R/ECAPs who are not English proficient (see Figure II-21).

Figure II-21.
Limited English Proficiency in R/ECAPs, Galveston, 2013



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

SECTION III.

Housing and Lending Analysis

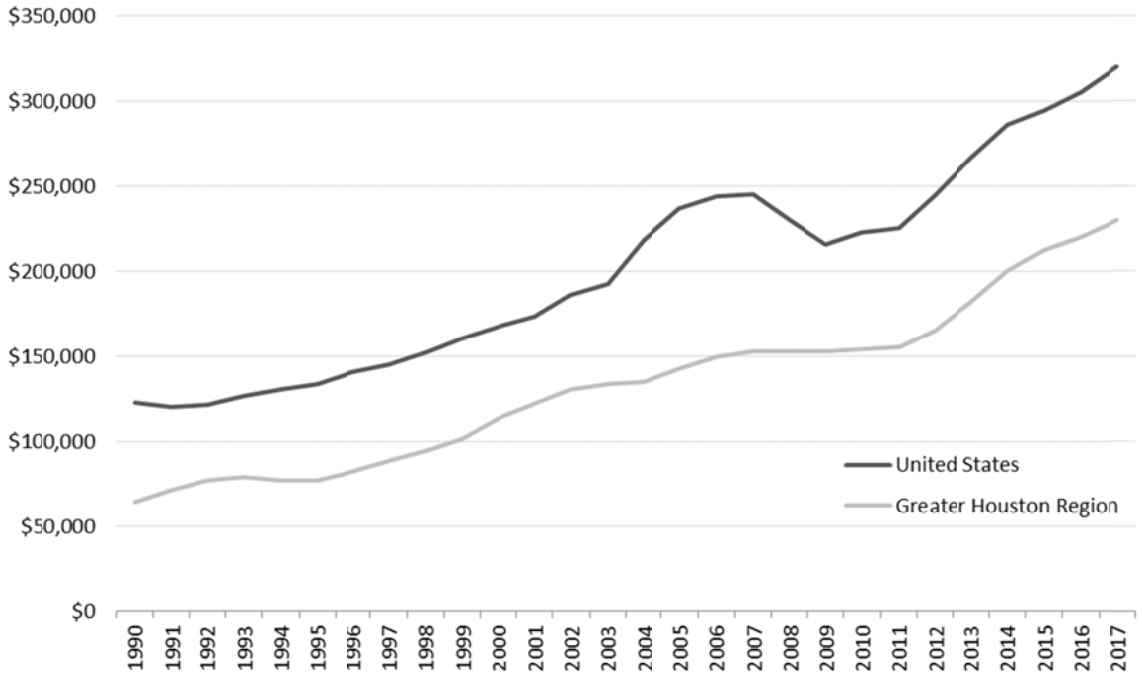
SECTION III.
Housing and Lending Analysis

This section examines which protected classes experience the highest rates of housing problems compared to other groups and examines how tenure and housing burden vary geographically. It begins with a discussion of housing market trends in general.

Housing Market Trends

The Greater Houston Region is known as a relatively affordable housing market with median home prices typically below national medians and median rents at or below national rates. In addition, the Houston market did not experience as severe a downtown as the nation overall during Great Recession in the late 2000s. Figure III-1 illustrates these trends by plotting median sale prices for the Greater Houston Region and the United States overall between 1990 and 2017.

Figure III-1.
Median Price Trends



Source: Texas A&M Real Estate Center, Federal Reserve Bank of St. Louis Economic Division, and BBC Research & Consulting.

However, housing prices relative to national markets is not the best indicator of affordability in a given market. Rather, housing prices should be considered relative to the incomes of residents within that market. Figure III-2 shows trends in median rent and median home values relative to median incomes of renters and owners in the Greater Houston region. Changes over time

demonstrate that home prices in the rental and ownership markets are increasing faster than incomes, resulting in declines in affordability since 2000.

Figure III-2.
Housing Price and Income, Greater Houston Region

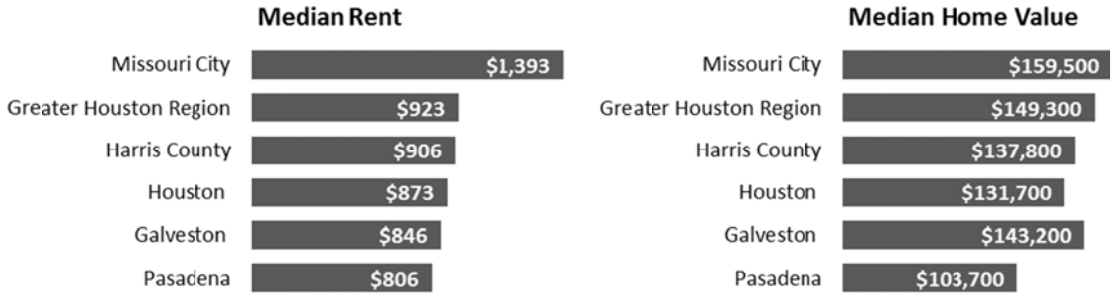
	2000	2010	2015	*Total Change*	*CAGR 2000-2010*	*CAGR 2010-2015*
Median gross rent	$591	$830	$923	*56%*	*3.5%*	*2.1%*
Median renter household income	$29,918	$33,461	$37,245	*24%*	*1.1%*	*2.2%*
Median value	$91,265	$138,000	$149,300	*64%*	*4.2%*	*1.6%*
Median owner household income	$58,791	$73,750	$80,512	*37%*	*2.3%*	*1.8%*

Source: 2000 Census, 2010 5-year ACS, 2015 5-year ACS.

Figure III-3 shows the median rent and home value for each participating jurisdiction. Note that the Harris County data do include entitlement jurisdictions; the City of Houston is also shown in the figure for comparison. Missouri City has the highest median rent at $1,393 per month (including utilities) and the highest median home value at $159,500. Pasadena has the lowest median rent ($806) and the lowest median home value ($103,700).

Galveston has one of the lowest median rents but one of the highest median home values. This is reflective of Galveston's disparity between high and low income residents—typical of resort communities.

Figure III-3.
Median Rent and Median Home Value by Participating Jurisdiction

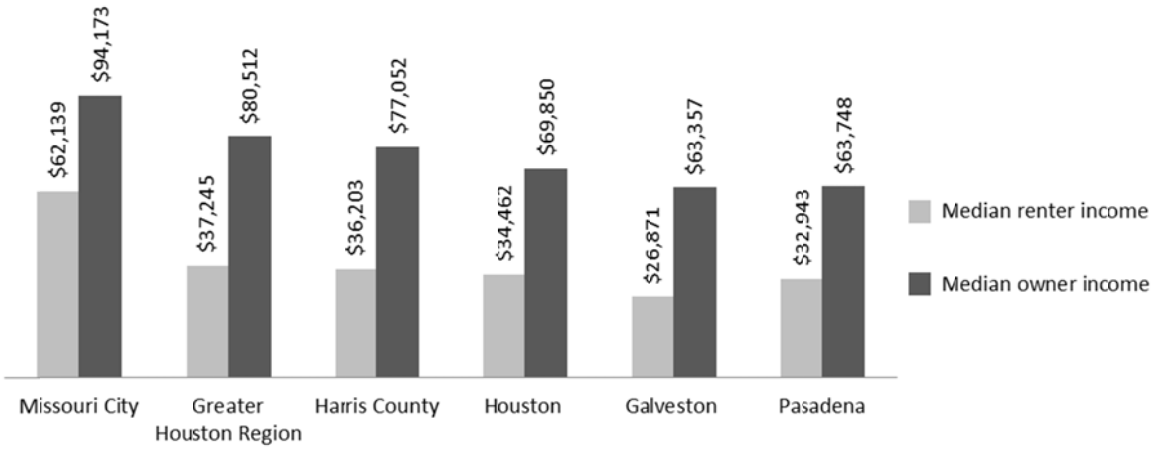


Source: 2015 5-year ACS.

It should be noted that these housing price trends do not include data post Hurricane Harvey. Oftentimes, natural disasters put additional pressure on market prices because there is an increase in displacement (demand) but a decrease in supply of homes.

Figure III-4 shows the difference in renter and owner incomes for each jurisdiction. Missouri City has the highest owner and renter incomes as well as the smallest difference between incomes for owners and renters (renter incomes are 66% of owner incomes). Galveston has the lowest median renter income and the greatest disparity between renter and owner incomes (renter incomes are just 42% of owner incomes).

Figure III-4.
Median Renter and Owner Incomes by Jurisdiction



Source: 2015 5-year ACS.

In the context of this fair housing analysis, affordability concerns and housing needs are viewed through the perspective of disparities by protected class. Affordability can become a fair housing issue if/when protected class groups are disproportionately impacted by housing prices and problems. Figures III-5 and III-6 show median income by race/ethnicity and by family status to identify which groups may be most vulnerable to affordability changes.

In the Greater Houston region, median household income overall is about $60,000. Asian households have the highest median income at $81,000 followed closely by non-Hispanic white households at $80,000. Hispanic, African American, Native Hawaiian and Some other race households all have median incomes below $50,000. Family households have higher median incomes than non-family households ($69,000 compared to $39,000). Among families, those without children have higher median incomes than those with children ($75,000 compared to $63,000). Patterns are similar at the jurisdiction level.

Figure III-5.
Median income by Race/Ethnicity and Family Status, Greater Houston Region, 2015

Source:
2015 5-year ACS.

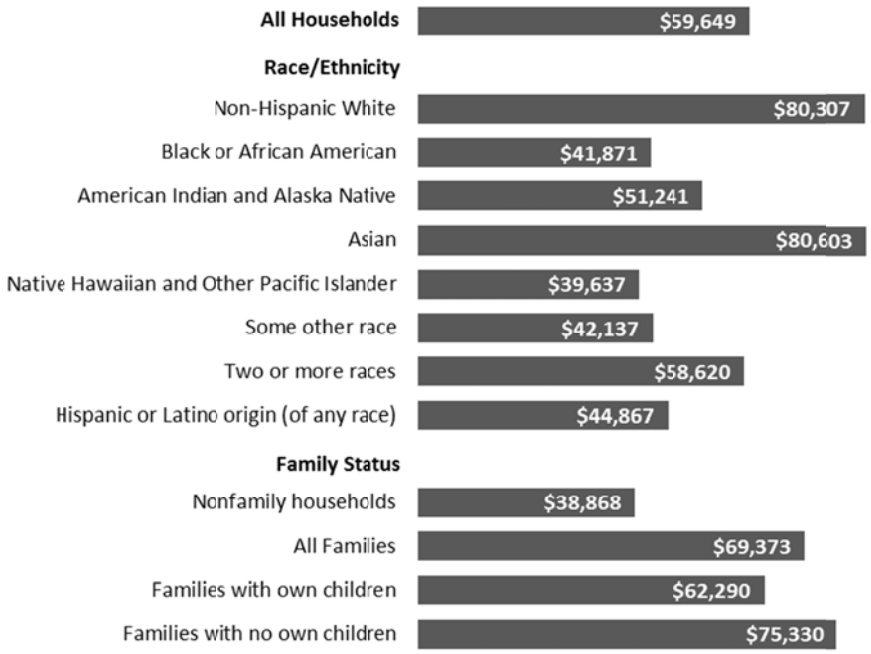


Figure III-6.
Median income by Race/Ethnicity and Family Status, Participating Jurisdictions, 2015

	Harris County	Galveston	Missouri City	Pasadena	Greater Houston Region
All Households	**$54,457**	**$39,098**	**$87,955**	**$48,004**	**$59,649**
Race/Ethnicity					
Non-Hispanic White	$80,807	$51,446	$90,432	$56,505	$80,307
Black or African American	$38,401	$20,143	$84,558	$36,673	$41,871
American Indian and Alaska Native	$47,894			$40,766	$51,241
Asian	$70,349	$41,375	$108,267	$72,389	$80,603
Native Hawaiian and Other Pacific Islander	$38,327				$39,637
Some other race	$41,454	$28,611	$67,375	$43,125	$42,137
Two or more races	$54,681	$50,263	$115,978	$43,667	$58,620
Hispanic or Latino origin (of any race)	$42,451	$35,212	$67,846	$42,106	$44,867
Family Status					
Nonfamily households	$38,756	$26,019	$49,502	$31,241	$38,868
All Families	$62,210	$51,763	$98,145	$53,129	$69,373
Families with own children	$53,115	$41,022	$95,322	$44,485	$62,290
Families with no own children	$71,380	$59,175	$100,310	$62,860	$75,330

Source: 2015 5-year ACS.

Patterns in Tenure

In the Greater Houston Region overall, 62 percent of all households are owners and 38 percent are renters. Ownership rates are higher in Harris County, excluding entitlement jurisdictions, (71% owners) and Missouri City (85% owners) but lower in Galveston (47%) and Pasadena (57%). In each jurisdiction, and in the region overall, ownership rates vary substantially by race/ethnicity.

Figure III-7 displays the total households and the percent of those households that are owners (ownership rate) for each racial/ethnic group. It also calculates the difference in ownership rates between non-Hispanic whites and the three largest racial/ethnic groups (African American/black, Hispanic, and Asian). Differences of 20 percentage points or more are considered substantial disparities and are highlighted for emphasis.

The most substantial disparities in each jurisdiction are between non-Hispanic whites and African Americans—the ownership rate gap between those groups is over 20 percentage points in each jurisdiction except Missouri City. Hispanic households also have substantial disparities in ownership in the region overall and in Pasadena.

Figure III-7.
Homeownership and Rental Rates by Race/Ethnicity, Jurisdictions and Region

	Greater Houston Region		Harris County Service Area		Galveston		Missouri City		Pasadena	
Race/Ethnicity of Householder	*Total Households*	*Ownership Rate*	*Total Households*	*Ownership Rate*	*Total Households*	*Ownership Rate*	*Total Households*	*Ownership Rate*	*Total Households*	*Ownership Rate*
Homeownership Rates										
All Households	**2,068,515**	**62%**	**576,475**	**71%**	**20,355**	**47%**	**22,190**	**85%**	**47,385**	**57%**
White, Non-Hispanic	972,155	73%	274,030	78%	10,695	55%	6,970	90%	19,925	67%
Black, Non-Hispanic	368,885	45%	93,838	52%	3,475	26%	9,000	80%	1,245	23%
Hispanic	570,245	54%	165,075	67%	4,775	51%	2,925	79%	24,535	50%
Asian or Pacific Islander, Non-Hispanic	128,365	67%	35,369	79%	1,045	25%	2,885	92%	1,090	70%
Native American, Non-Hispanic	4,705	60%	1,286	69%	90	28%	70	100%	255	53%
Other or Two or more Races	24,160	57%	6,892	65%	280	39%	325	75%	350	54%
Differences by Race/Ethnicity										
Black/non-Hispanic white difference		*-28%*		*-26%*		*-29%*		*-10%*		*-44%*
Hispanic/non-Hispanic white difference		*-19%*		*-11%*		*-3%*		*-11%*		*-18%*
Asian/non-Hispanic white difference		*-6%*		*1%*		*-30%*		*2%*		*3%*

Note: Data presented are numbers of households, not individuals. Refer to the Data Documentation for details (www.hudexchange.info).

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool; and BBC Research & Consulting.

Disproportionate Housing Needs

HUD provides data tables through the AFFH-T to assess the differences in housing needs among household groups. "Housing problems" are defined by HUD as units having incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and households with cost burden greater than 30 percent. "Severe" housing problems include all of the above except that cost burden is greater than 50 percent. The incidence of these housing problems is discussed by jurisdiction in the following subsections.

Harris County service area. Figure III-8 shows the percentage of households with housing needs in the region and in the Harris County service area according to HUD AFFH-T data. Overall, 34 percent of households experience at least one of the four housing problems. African American and Hispanic households experience housing problems at higher rates (45% and 46%, respectively), as do large family households and non-family households (48% and 40%, respectively). Disparities are similar in the region overall and for households experiencing severe housing problems.

Figure III-8.
Demographics of Households with Disproportionate Housing Needs, Harris County Service Area

	Harris County Service Area			Greater Houston Region		
Households Experiencing Any of 4 Housing Problems	# with Problems	Total Households	% with Problems	# with Problems	Total Households	% with Problems
Total	**197,505**	**576,475**	**34%**	**735,595**	**2,068,515**	**36%**
Race/Ethnicity						
Non-Hispanic White	65,024	273,953	24%	246,075	972,175	25%
African American/Black	41,887	93,857	45%	166,049	368,894	45%
Hispanic	75,814	165,026	46%	270,679	570,233	47%
Asian or Pacific Islander	11,937	35,379	34%	42,395	128,349	33%
Native American	321	1,273	25%	1,444	4,692	31%
Other, Non-Hispanic	2,427	6,892	35%	8,910	24,195	37%
Household Type and Size						
Family households, <5 people	100,996	354,295	29%	349,855	1,188,224	29%
Family households, 5+ people	45,429	93,714	48%	142,640	277,794	51%
Non-family households	51,038	128,451	40%	243,100	602,490	40%
Households Experiencing Any of 4 Severe Housing Problems	**# with Severe Problems**	**Total Households**	**% with Severe Problems**	**# with Severe Problems**	**Total Households**	**% with Severe Problems**
Total	**100,568**	**576,475**	**17%**	**405,180**	**2,068,515**	**20%**
Race/Ethnicity						
Non-Hispanic White	28,688	273,953	10%	117,154	972,175	12%
African American/Black	20,292	93,857	22%	90,987	368,894	25%
Hispanic	44,124	165,026	27%	168,908	570,233	30%
Asian or Pacific Islander	6,099	35,379	17%	22,790	128,349	18%
Native American	138	1,273	11%	721	4,692	15%
Other, Non-Hispanic	1,247	6,892	18%	4,659	24,195	19%

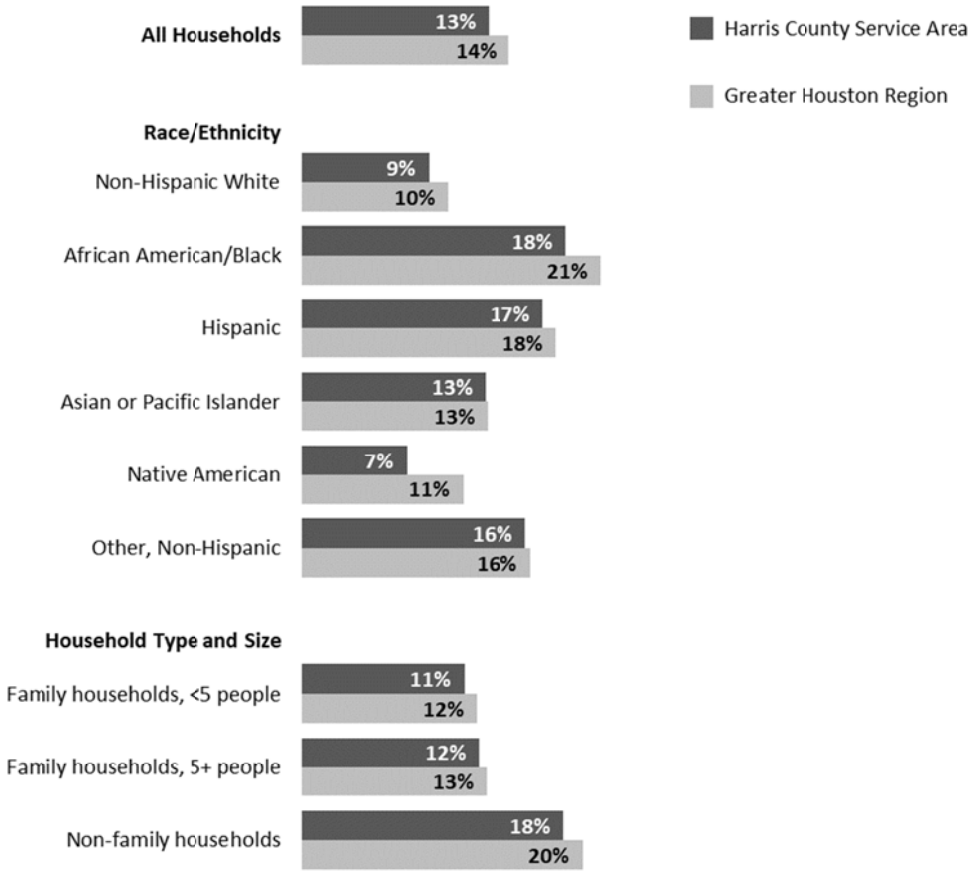
Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure III-9 focuses on households with severe cost burden—spending 50 percent or more of their income on housing costs. The Harris County service area has slightly lower rates of severe cost burden than the region overall. However, disparities do exist across racial/ethnic groups and across household types/sizes in Harris County:

- Among racial/ethnic groups, African American and Hispanic households have the highest rates of severe cost burden (18% and 17%, respectively); and
- Nonfamily households experience higher rates of severe cost burden (20%) than family households (11% of small family households and 12% of large family households).

Figure III-9.
Severe Cost Burden by Race/Ethnicity and Household Type and Size, Harris County Service Area



Note: Percent shown reflects proportion of households in each category that spend 50% or more of their income on housing costs.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Pasadena. Figure III-10 shows the percentage of households with housing needs in the region and in Pasadena according to HUD AFFH-T data. Overall, 39 percent of Pasadena households experience at least one of the four housing problems. African American and Hispanic households experience housing problems at higher rates (52% and 50%, respectively), as do large family

households (60%). Disparities are similar in the region overall and for households experiencing severe housing problems.

Figure III-10.
Demographics of Households with Disproportionate Housing Needs, Pasadena

Households Experiencing Any of 4 Housing Problems	Pasadena # with Problems	Pasadena Total Households	Pasadena % with Problems	Greater Houston Region # with Problems	Greater Houston Region Total Households	Greater Houston Region % with Problems
Total	**18,660**	**47,385**	**39%**	**735,595**	**2,068,515**	**36%**
Race/Ethnicity						
Non-Hispanic White	5,420	19,944	27%	246,075	972,175	25%
African American/Black	639	1,233	52%	166,049	368,894	45%
Hispanic	12,275	24,529	50%	270,679	570,233	47%
Asian or Pacific Islander	183	1,077	17%	42,395	128,349	33%
Native American	35	255	14%	1,444	4,692	31%
Other, Non-Hispanic	113	352	32%	8,910	24,195	37%
Household Type and Size						
Family households, <5 people	8,294	25,763	32%	349,855	1,188,224	29%
Family households, 5+ people	5,245	8,815	60%	142,640	277,794	51%
Non-family households	5,115	12,790	40%	243,100	602,490	40%
Households Experiencing Any of 4 Severe Housing Problems	**# with Severe Problems**	**Total Households**	**% with Severe Problems**	**# with Severe Problems**	**Total Households**	**% with Severe Problems**
Total	**11,270**	**47,385**	**24%**	**405,180**	**2,068,515**	**20%**
Race/Ethnicity						
Non-Hispanic White	2,514	19,944	13%	117,154	972,175	12%
African American/Black	519	1,233	42%	90,987	368,894	25%
Hispanic	8,065	24,529	33%	168,908	570,233	30%
Asian or Pacific Islander	84	1,077	8%	22,790	128,349	18%
Native American	19	255	7%	721	4,692	15%
Other, Non-Hispanic	48	352	14%	4,659	24,195	19%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

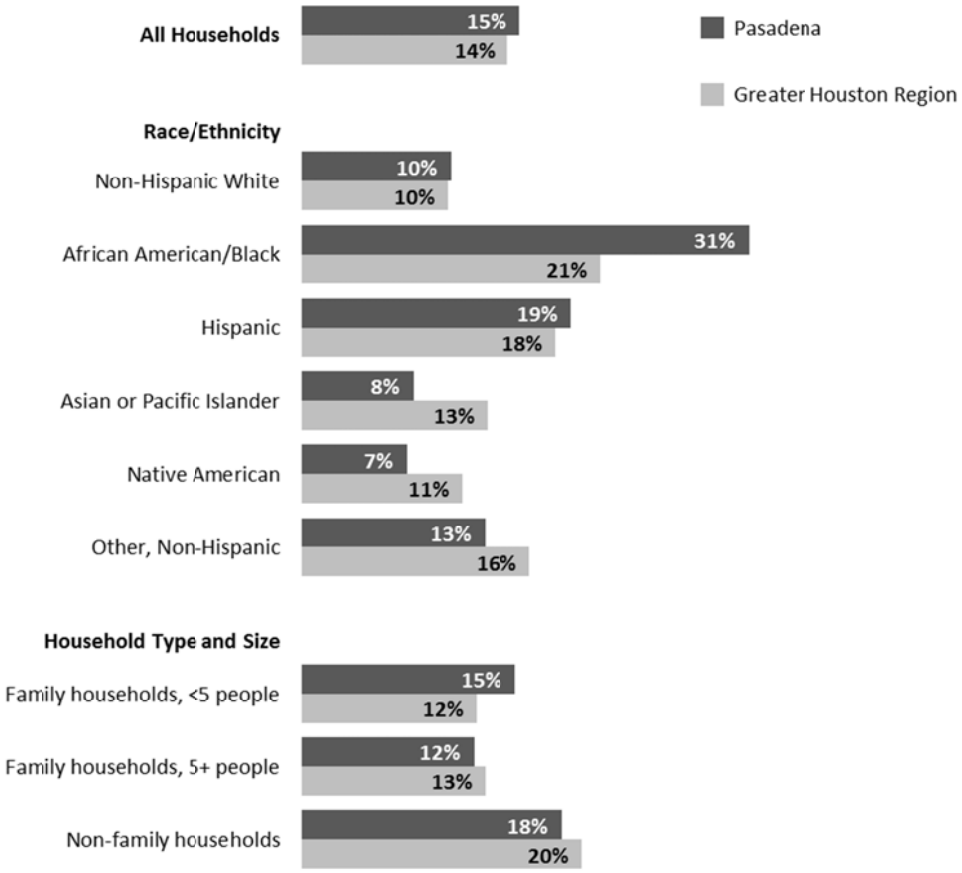
Figure III-11 focuses on households with severe cost burden—spending 50 percent or more of their income on housing costs. Disparities do exist across racial/ethnic groups and across household types/sizes in Harris County:

- Thirty-one percent of African American households in Pasadena are severely cost burdened—a rate double that of all households (15%) and triple that of non-Hispanic white households (10%).

- Hispanic households also have relatively high rates of severe cost burden (19%) compared to non-Hispanic white households (10%), respectively); and

- Nonfamily households experience slightly higher rates of severe cost burden (18%) than family households (15% of small family households and 12% of large family households).

Figure III-11.
Severe Cost Burden by Race/Ethnicity and Household Type and Size, Pasadena



Note: Percent shown reflects proportion of households in each category that spend 50% or more of their income on housing costs.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Missouri City. Figure III-12 shows the percentage of households with housing needs in the region and in Missouri City according to HUD AFFH-T data. Overall, 30 percent of households experience at least one of the four housing problems. Native American and Hispanic households experience housing problems at higher rates (50% and 40%, respectively). Thirty three percent of African American households experience one or more housing problems, compared to 23 percent of non-Hispanic white households.

Nearly half (48%) of large family households and 40 percent of non-family households have one or more housing problems, compared to just 29percenet of small family households.

Figure III-12.
Demographics of Households with Disproportionate Housing Needs, Missouri City

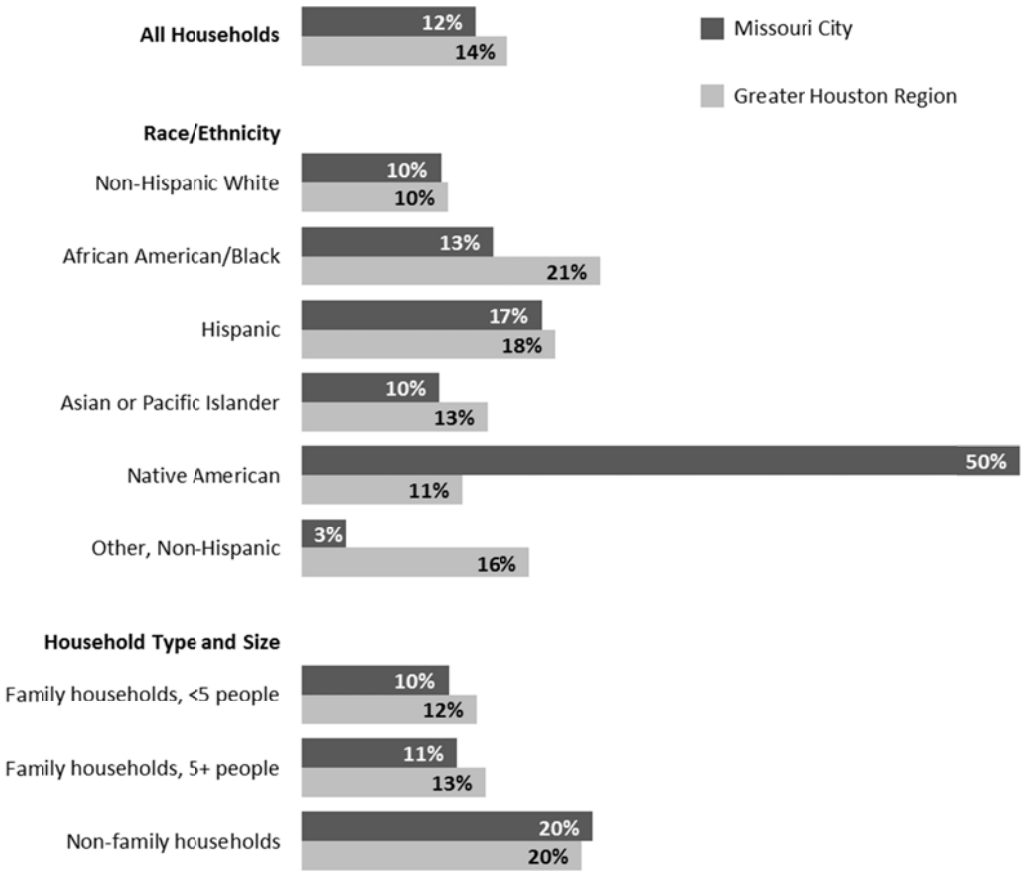
	Missouri City			Greater Houston Region		
Households Experiencing Any of 4 Housing Problems	# with Problems	Total Households	% with Problems	# with Problems	Total Households	% with Problems
Total	**6,605**	**22,190**	**30%**	**735,595**	**2,068,515**	**36%**
Race/Ethnicity						
Non-Hispanic White	1,624	6,974	23%	246,075	972,175	25%
African American/Black	2,964	9,004	33%	166,049	368,894	45%
Hispanic	1,174	2,914	40%	270,679	570,233	47%
Asian or Pacific Islander	730	2,895	25%	42,395	128,349	33%
Native American	35	70	50%	1,444	4,692	31%
Other, Non-Hispanic	85	329	26%	8,910	24,195	37%
Household Type and Size						
Family households, <5 people	3,945	15,050	26%	349,855	1,188,224	29%
Family households, 5+ people	1,155	2,985	39%	142,640	277,794	51%
Non-family households	1,500	4,130	36%	243,100	602,490	40%
Households Experiencing Any of 4 Severe Housing Problems	# with Severe Problems	Total Households	% with Severe Problems	# with Severe Problems	Total Households	% with Severe Problems
Total	**3,115**	**22,190**	**14%**	**405,180**	**2,068,515**	**20%**
Race/Ethnicity						
Non-Hispanic White	680	6,974	10%	117,154	972,175	12%
African American/Black	1,339	9,004	15%	90,987	368,894	25%
Hispanic	739	2,914	25%	168,908	570,233	30%
Asian or Pacific Islander	309	2,895	11%	22,790	128,349	18%
Native American	35	70	50%	721	4,692	15%
Other, Non-Hispanic	10	329	3%	4,659	24,195	19%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure III-13 focuses on households with severe cost burden—spending 50 percent or more of their income on housing costs. For the most part, Missouri City has lower rates of severe cost burden across groups than the region overall and disparities between groups are lower than in other jurisdictions. However, Native Americans in Missouri City have a very high incidence of severe cost burden (50%) relative to all other racial/ethnic groups and relative to other jurisdictions. Hispanic residents, and to a lesser extent, African American residents are somewhat more likely than non-Hispanic white residents to be severely cost burdened.

Figure III-13.
Severe Cost Burden by Race/Ethnicity and Household Type and Size, Missouri City



Note: Percent shown reflects proportion of households in each category that spend 50% or more of their income on housing costs.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Galveston. Figure III-14 shows the percentage of households with housing needs in the region and in Galveston according to HUD AFFH-T data. Overall, 43 percent of households experience at least one of the four housing problems—higher than the region overall and higher than the other participating jurisdictions in the AI.

Nearly two-thirds of African American households have one or more housing problems, compared to about one-third of non-Hispanic white households. Hispanic households also have higher rates of housing problems than non-Hispanic white households (46% compared to 36%). Similar trends are evident for those experiencing severe housing problems.

As in the region overall and in most other jurisdictions, large family households and non-family households are more likely to have housing problems than small family households.

Figure III-14.
Demographics of Households with Disproportionate Housing Needs, Galveston

Households Experiencing Any of 4 Housing Problems	Galveston # with Problems	Galveston Total Households	Galveston % with Problems	Greater Houston Region # with Problems	Greater Houston Region Total Households	Greater Houston Region % with Problems
Total	**8,805**	**20,355**	**43%**	**735,595**	**2,068,515**	**36%**
Race/Ethnicity						
Non-Hispanic White	3,890	10,705	36%	246,075	972,175	25%
African American/Black	2,214	3,474	64%	166,049	368,894	45%
Hispanic	2,210	4,774	46%	270,679	570,233	47%
Asian or Pacific Islander	365	1,045	35%	42,395	128,349	33%
Native American	25	84	30%	1,444	4,692	31%
Other, Non-Hispanic	104	279	37%	8,910	24,195	37%
Household Type and Size						
Family households, <5 people	3,325	9,254	36%	349,855	1,188,224	29%
Family households, 5+ people	865	1,430	60%	142,640	277,794	51%
Non-family households	4,615	9,655	48%	243,100	602,490	40%
Households Experiencing Any of 4 Severe Housing Problems	**# with Severe Problems**	**Total Households**	**% with Severe Problems**	**# with Severe Problems**	**Total Households**	**% with Severe Problems**
Total	**5,200**	**20,355**	**26%**	**405,180**	**2,068,515**	**20%**
Race/Ethnicity						
Non-Hispanic White	1,964	10,705	18%	117,154	972,175	12%
African American/Black	1,494	3,474	43%	90,987	368,894	25%
Hispanic	1,415	4,774	30%	168,908	570,233	30%
Asian or Pacific Islander	255	1,045	24%	22,790	128,349	18%
Native American	0	84	0%	721	4,692	15%
Other, Non-Hispanic	69	279	25%	4,659	24,195	19%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

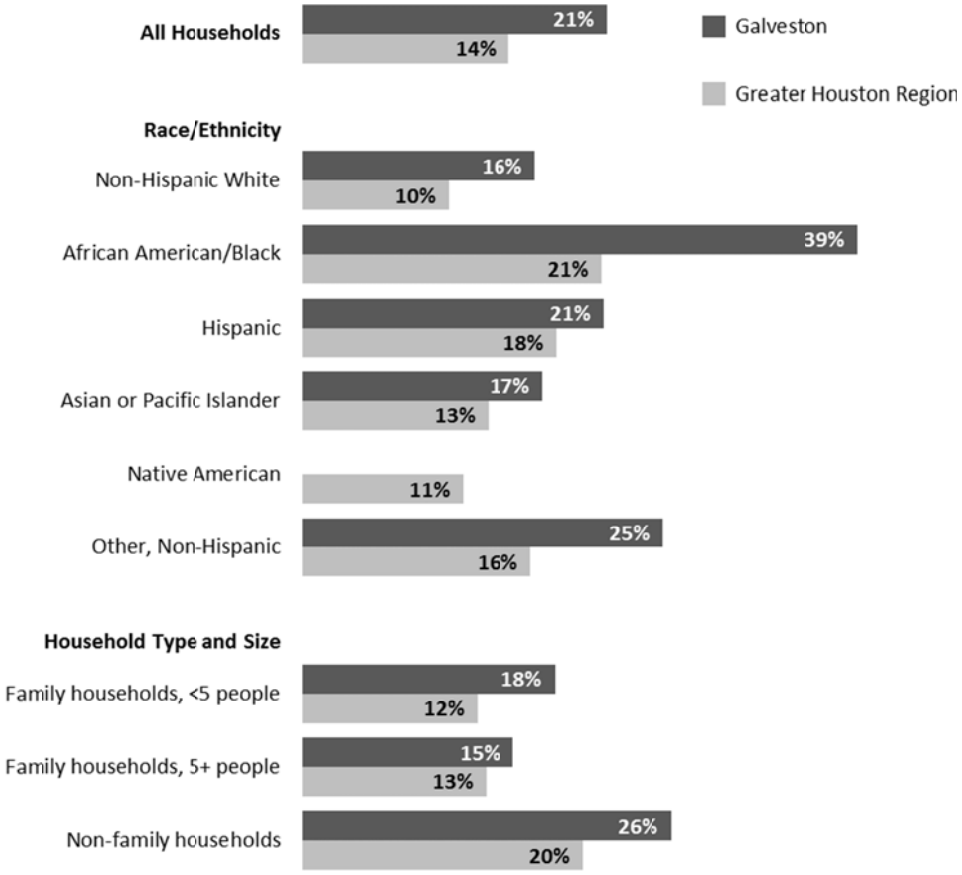
Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure III-15 focuses on households with severe cost burden—spending 50 percent or more of their income on housing costs. Across all groups, Galveston residents are more likely to be severely cost burdened than similar residents in the region overall.

Disparities between groups are most notable for African American households (39%) and other non-Hispanic race households (25%) when compared to non-Hispanic white households (16% severely cost burdened).

Nonfamily households experience higher rates of severe cost burden (26%) than family households (18% of small family households and 15% of large family households).

Figure III-15.
Severe Cost Burden by Race/Ethnicity and Household Type and Size, Galveston



Note: Percent shown reflects proportion of households in each category that spend 50% or more of their income on housing costs.

Source: CHAS data from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Disparities in Mortgage Lending

This section uses an analysis of Home Mortgage Disclosure Act data (HMDA) to identify areas of private disinvestment in the Greater Houston Region and the households most affected by lack of capital.

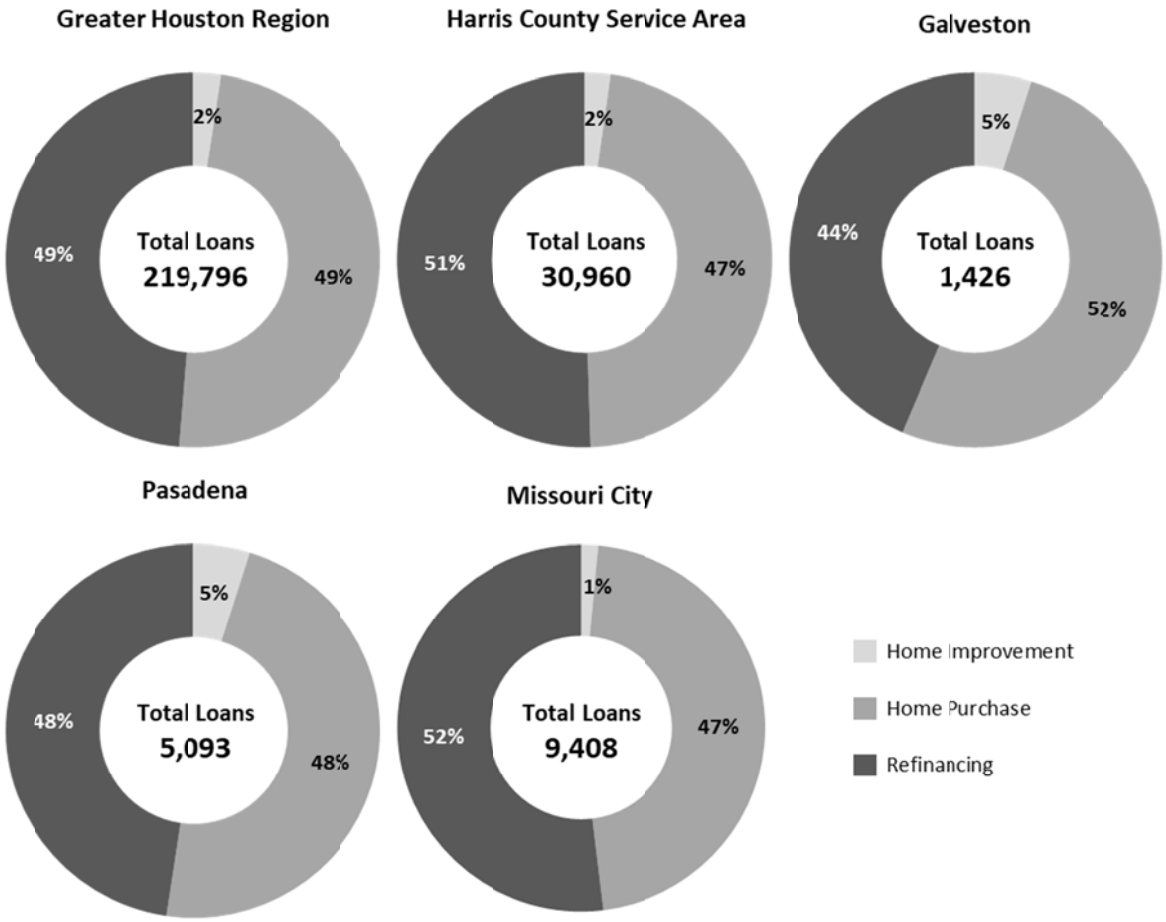
About the HMDA data. The Home Mortgage Disclosure Act requires financial institutions to maintain and disclose data on loan applications for home purchases, home improvements and mortgage refinances. In general, HMDA applies to lending institutions above an annually adjusted asset threshold that have offices in metropolitan areas. HMDA was originally enacted in 1975 in response to the practice of "redlining"—the systematic exclusion of neighborhoods with high concentrations of minorities in home mortgage lending.

HMDA data are widely used to detect evidence of discrimination in mortgage lending. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, HMDA analyses remain limited because of the information that is *not* reported.

As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities and genders, as well as the location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to a borrower. Basically, the data provide *a lot* of information about the lending decision—but *not all* of the information. Still, HMDA data remain the best and most comprehensive source of mortgage lending transactions available for fair lending analysis.

Regional lending overview. In 2016, there were about 220,000 loan applications made in the Greater Houston Region for owner-occupied homes. Forty-nine percent were for home purchases, 49 percent were for refinances and 2 percent were home improvement applications. Distribution by loan type was similar in the participating jurisdictions. Galveston had the fewest total loan applications (fewer than 1,500) and Harris County, excluding entitlement areas, had the most (about 31,000).

Figure III-16.
Purpose of Loan Applications, Region and Jurisdictions, 2016



Note: Does not include loans for multifamily properties or non-owner occupants.

Source: FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting

Outcome of loan applications. Figure III-17 shows the result of loan applications by loan type for the region overall. Home improvement and refinance loans have much lower rates of origination than do home purchase loans, 51 percent of improvement loans and 45 percent of refinance loans originated compared to 71 percent of home mortgage loans.

In addition to the distribution of loan outcomes, BBC calculates a separate "denial rate," defined as the number of denied loan applications divided by the total number of applications excluding withdrawn applications and application files closed for incompleteness. This measure of denial provides a more accurate representation of applications with an opportunity for origination and is consistent with the methodology used by the Federal Reserve in analyzing HMDA denial data.

The denial rate for all types of loans collectively was 24 percent: 12 percent for home purchase loans, 35 percent for home improvement loans and 37 percent for refinances.

Figure III-17.
Action Taken on Loan Applications, Greater Houston Region, 2016

	All Loans		Home Purchase		Home Improvement		Refinance	
Action Taken	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*
Loan originated	126,667	58%	76,182	71%	2,661	51%	47,824	45%
Application approved but not accepted	7,608	3%	3,750	3%	168	3%	3,690	3%
Application denied by financial institution	42,563	19%	10,393	10%	1,534	29%	30,636	29%
Application withdrawn by applicant	32,499	15%	15,124	14%	658	13%	16,717	16%
File closed for incompleteness	10,459	5%	2,096	2%	228	4%	8,135	8%
Total	**219,796**	**100%**	**107,545**	**100%**	**5,249**	**100%**	**107,002**	**100%**
Denial rate*	**24%**		**12%**		**35%**		**37%**	

Note: Does not include loans for multifamily properties or non-owner occupants.

*Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source: FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

Figure III-18 shows the denial rate by participating jurisdiction and loan type. Denial rates for loan applications overall and for home purchase loans were highest in Galveston (28% denial rate for all loans and 15% denial rate for home purchase loans). The denial rate for refinance loans was also highest in Galveston (45%) but Missouri City had the highest denial rate for home improvement loans (41%).

Figure III-18.
Denial Rate by Application Type, Participating Jurisdictions, 2016

Location	All Loans	Home Improvement	Home Purchase	Refinance
Greater Houston Region	24%	35%	12%	37%
Harris County Service Area	25%	34%	12%	38%
Galveston	28%	31%	15%	45%
Pasadena	24%	35%	10%	39%
Missouri City	26%	41%	13%	39%

Note: Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source: FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

Subprime lending. For the purposes of HMDA reporting, lenders are required to disclose the interest rate on loans when the annual percentage rate (APR) on the loan exceeds the yield on Treasury securities of comparable maturity by 3 percentage points for first liens and 5 percentage points for junior liens. These higher cost loans are sometimes called "subprime" loans. The subprime lending market declined significantly following the housing market crisis. Nationally, in 2016, only about 4 percent of conventional home purchases and 2 percent of refinance loans were subprime (compared to 23% of conventional home purchases and 30% of refinance loans in 2006).[1,2]

In 2016, in the Greater Houston Region, 8 percent of originated loans were subprime. Subprime loans were more common in Pasadena, where 15 percent of originated loans were subprime, as well as in The Harris County service area (11%) and Galveston (10%). In Missouri City, 7 percent of originated loans were considered subprime.

Racial/ethnic disparities in lending. In 2016, 47 percent of applicants for residential mortgage, home improvement or refinance loans in the Greater Houston Region classified their race/ethnicity as non-Hispanic white. Twenty percent was Hispanic, 12 percent was Black or African American, 8 percent was Asian and 1 percent identified as another non-Hispanic minority (Native American, Native Hawaiian/Pacific Islander, or some other race). Twelve percent did not provide race information.

At the regional level, African American and Other race applicants had the highest denial rates—both 34 percent—followed by Hispanic applicants (27% denial rate). That compares to denial rates of 20 percent for both non-Hispanic white and Asian applicants. Non-Asian minority groups were also more likely than both Asian and non-Hispanic white borrowers to receive subprime loans.

[1] For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

[2] www.federalreserve.gov/publications/files/2016_HMDA.pdf

Disparities in denials and subprime lending by race/ethnicity are discussed in more detail by jurisdiction in the following subsections.

The Harris County service area. Figure III-19 shows the denial rate by race/ethnicity for applicants living in Harris County excluding entitlement areas. Similar to the region overall, Hispanic, black and other race minority applicants were more likely to be denied loans in the Harris County HUD jurisdiction.

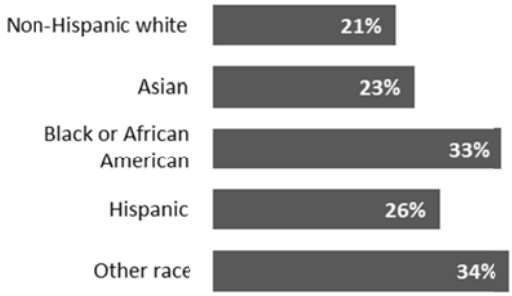
Figure III-19.
Denial Rate by Race/Ethnicity, Harris County Service Area, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



There are many reasons why denial rates may be higher for certain racial and ethnic groups. First, overall denial rates for some racial and ethnic groups may skew towards lower income households, since some minority groups typically have lower incomes. Figure III-20 examines differences in loan origination and denial rates by income range. Loan applicants were grouped into one of three income ranges:

- Applicants earning less than 80 percent of the HUD Area Median Income (AMI) at the time—or less than $54,400;
- Applicants earning between 80 and 120 percent AMI—$54,400 and $81,600; and
- Applicants earning greater than 120 percent AMI—$81,600 and more.

As shown by Figure III-20, the disparity in denial rates persists for Hispanic and non-Hispanic minority applicants, even at higher incomes.

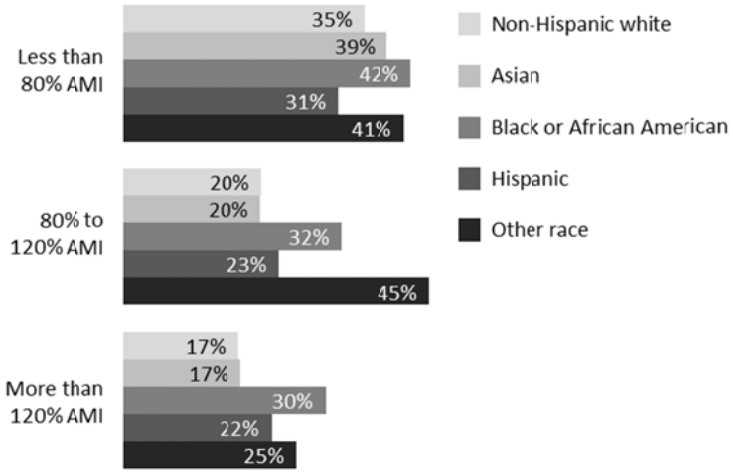
Figure III-20.
Denial Rate by Race/Ethnicity and Income, Harris County Service Area, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



Second, loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

An examination of the types of loans applied for by applicants of varying races and ethnicities found that Hispanic applicants were less likely to apply for home purchase loans (26% of loan applications) than non-Hispanic whites (42%) and other minorities (44%). Hispanic applicants were more likely to apply for refinancing loans (69% of loan applications) than non-Hispanic whites (55%) and other minorities (52%)

Figure III-21 displays the denial rate by race and ethnicity and loan purpose. Denial rates for home purchases are very low across racial and ethnic groups but are highest for Hispanics. Both Hispanics and other minority groups experience higher rates of denial for refinancing applications than non-Hispanic whites.

Inability to access capital for home improvements and refinances (often used to support home improvements) has a broader effect on a neighborhood. Racial and ethnic borrowers enter the mortgage lending market with disparities in wealth (due to historical discrimination and denial of economic opportunity) and, as such, are limited to purchasing older homes or homes in less than pristine condition. Lack of capital to make improvements has a negative and cumulative impact on neighborhoods and further discourages private investment. These types of market failure are where the public sector can play an effective role in stabilizing housing condition and broader neighborhoods.

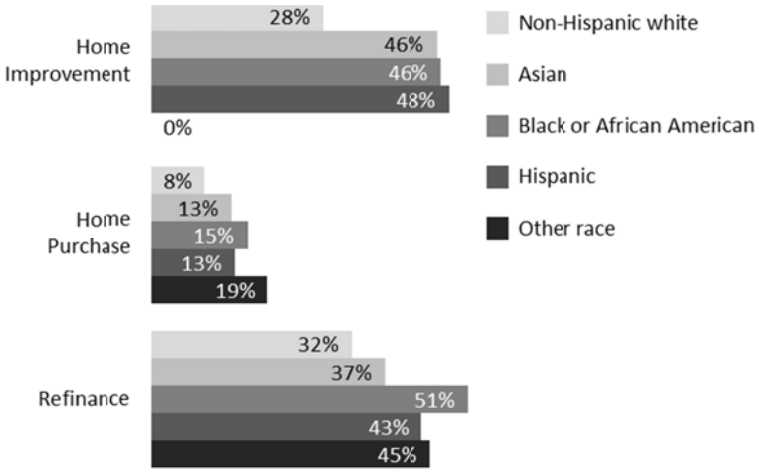
Figure III-21.
Denial Rate by Race/Ethnicity and Loan Purpose, Harris County Service Area, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

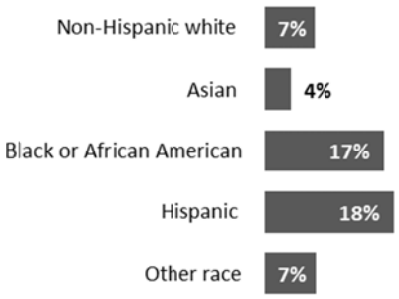


Among applicants whose loans were originated, racial/ethnic disparities can still exist in the form of subprime loans (those with disproportionately high interest rates).[3] Figure III-22 shows subprime loans as a percent of all originated loans by race/ethnicity in The Harris County service area.

[3] For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries, a definition consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

Figure III-22.
Subprime Loans by Race/Ethnicity, Harris County Service Area, 2016

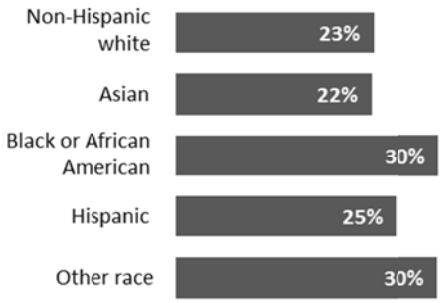
Note:
Does not include loans for multifamily properties or non-owner occupants.
Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



Pasadena. Figure III-23 shows the denial rate by race/ethnicity for applicants living in Harris County excluding entitlement areas. Similar to the region overall, Hispanic, black and other race minority applicants in Pasadena were more likely to be denied loans than non-Hispanic white and Asian applicants.

Figure III-23.
Denial Rate by Race/Ethnicity, Pasadena, 2016

Note:
Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.
Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



There are many reasons why denial rates may be higher for certain racial and ethnic groups. First, overall denial rates for some racial and ethnic groups may skew towards lower income households, since some minority groups typically have lower incomes. Figure III-24 examines differences in loan origination and denial rates by income range. Loan applicants were grouped into one of three income ranges:

- Applicants earning less than 80 percent of the HUD Area Median Income (AMI) at the time—or less than $54,400;
- Applicants earning between 80 and 120 percent AMI—$54,400 and $81,600; and
- Applicants earning greater than 120 percent AMI—$81,600 and more.

As shown by Figure III-24, the disparity in denial rates persists for minority applicants—particularly black applicants—even at higher incomes. This trend indicates that income alone does not explain the differences in denial rates by race/ethnicity.

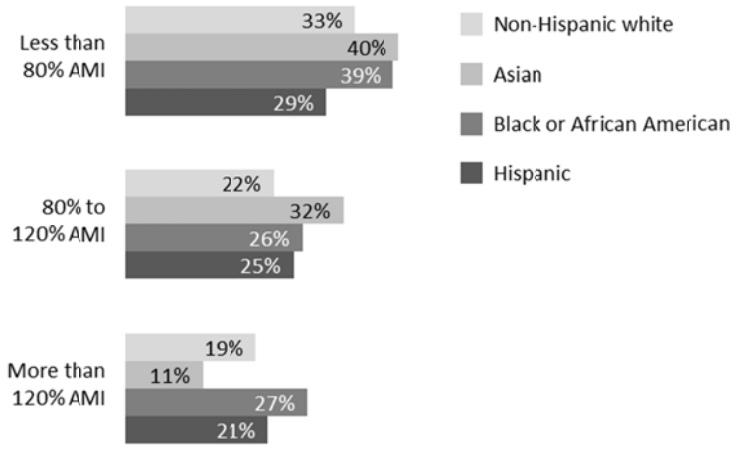
Figure III-24.
Denial Rate by Race/Ethnicity and Income, Pasadena, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



Second, loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

Figure III-25 displays the denial rate by race and ethnicity and loan purpose. Denial rates for home purchases are very low across racial and ethnic groups but are highest for Hispanics (12%) and Asians (11%). Both Hispanics and African Americans experience higher rates of denial for refinancing applications than non-Hispanic whites. There were not enough home improvement loans by each racial/ethnic group to include in the analysis.

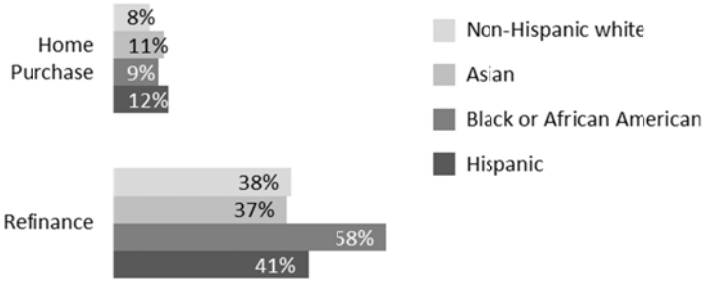
Figure III-25.
Denial Rate by Race/Ethnicity and Loan Purpose, Pasadena, 2016

Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

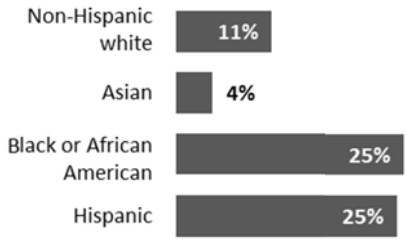


Among applicants whose loans were originated, racial/ethnic disparities can still exist in the form of subprime loans (those with disproportionately high interest rates).[4] Figure III-26 shows subprime loans as a percent of all originated loans by race/ethnicity in Pasadena. One quarter of all originated loans for African American and Hispanic borrowers had subprime interest rates, compared to just 4 percent of Asian and 11 percent of non-Hispanic white borrowers. There were too few originated loans among "other race minorities" to analyze.

[4] For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries, a definition consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

Figure III-26.
Subprime Loans by Race/Ethnicity, Pasadena, 2016

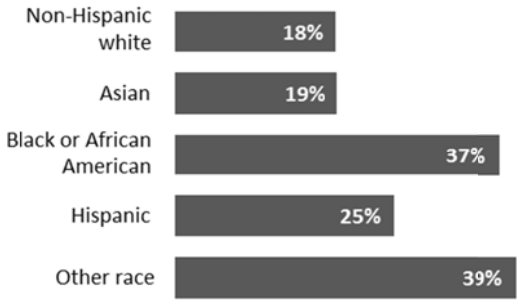
Note:
Does not include loans for multifamily properties or non-owner occupants.
Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.



Missouri City. Figure III-27 shows the denial rate by race/ethnicity for applicants living in Missouri City. Similar to the region overall, Hispanic, black and other race minority applicants in Missouri City were more likely to be denied loans than non-Hispanic white and Asian residents.

Figure III-27.
Denial Rate by Race/Ethnicity, Missouri City, 2016

Note:
Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.
Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

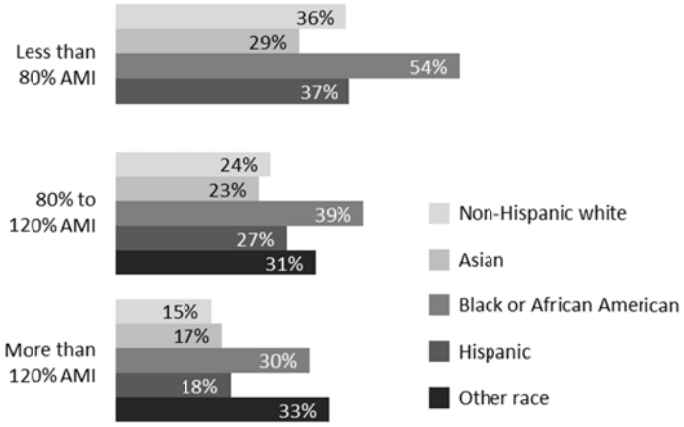


Overall denial rates for some racial and ethnic groups may skew towards lower income households, since some minority groups typically have lower incomes. Figure III-28 examines differences in loan origination and denial rates by income range. Loan applicants were grouped into one of three income ranges:

- Applicants earning less than 80 percent of the HUD Area Median Income (AMI) at the time—or less than $54,400;
- Applicants earning between 80 and 120 percent AMI—$54,400 and $81,600; and
- Applicants earning greater than 120 percent AMI—$81,600 and more.

As shown by Figure III-28, the disparity in denial rates persists for Hispanic and non-Hispanic minority applicants—particularly African American and "other race" applicants—even at higher incomes.

Figure III-28.
Denial Rate by Race/Ethnicity and Income, Missouri City, 2016



Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

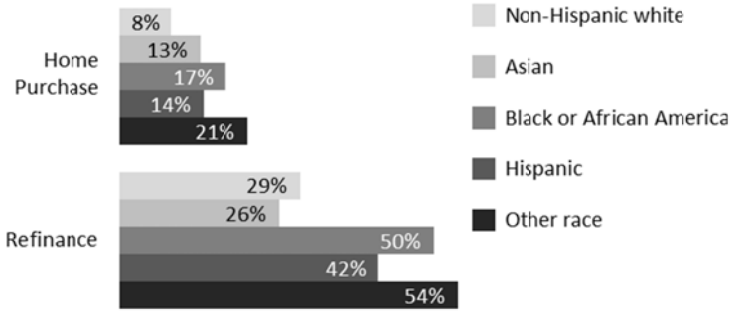
Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

Loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

Figure III-29 displays the denial rate by race and ethnicity and loan purpose. Disparities persist for African Americans, Hispanics, and "other race" compared to non-Hispanic whites for both home purchase loans and refinance loans. There were not enough home improvement loans by each racial/ethnic group to include in the analysis.

Figure III-29.
Denial Rate by Race/Ethnicity and Loan Purpose, Missouri City, 2016



Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

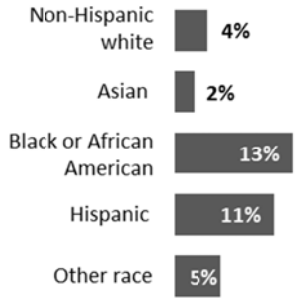
Among applicants whose loans were originated, racial/ethnic disparities can still exist in the form of subprime loans (those with disproportionately high interest rates).[5] Figure III-30 shows subprime loans as a percent of all originated loans by race/ethnicity in Missouri City. African American and Hispanic borrowers were much more likely to receive subprime interest rates than Asian and non-Hispanic white borrowers—13 percent of African American borrowers and 11 percent of Hispanic borrowers had subprime loans compared to 2 percent of Asian and 4 percent of non-Hispanic white borrowers.

[5] For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries, a definition consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

Figure III-30.
Subprime Loans by Race/Ethnicity, Missouri City, 2016

Note:
Does not include loans for multifamily properties or non-owner occupants.

Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

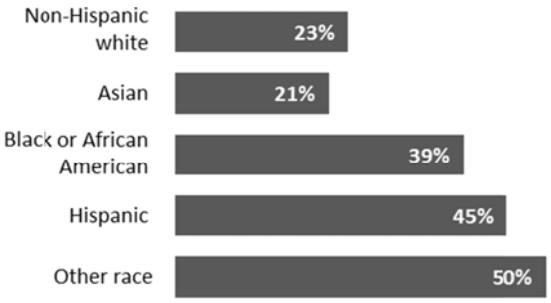


Galveston. Figure III-31 shows the denial rate by race/ethnicity for Galveston applicants. Denial rates in Galveston are substantially higher for African American (39%), Hispanic (45%) and other non-Asian minorities (50%) relative to the denial rates for non-Hispanic whites (23%) and Asians (21%).

Figure III-31.
Denial Rate by Race/Ethnicity, Galveston, 2016

Note:
Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:
FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

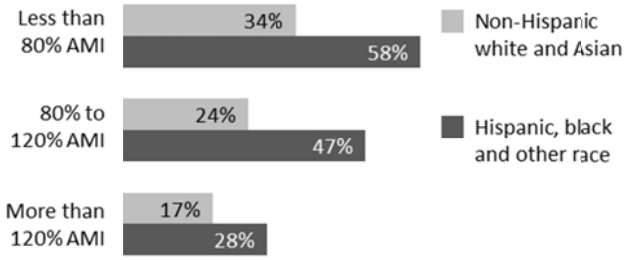


Denial rates for some racial and ethnic groups may skew towards lower income households, since some minority groups typically have lower incomes. Figure III-32 examines differences in loan origination and denial rates by income range. Loan applicants were grouped into one of three income ranges:

- Applicants earning less than 80 percent of the HUD Area Median Income (AMI) at the time—or less than $54,400;
- Applicants earning between 80 and 120 percent AMI—$54,400 and $81,600; and
- Applicants earning greater than 120 percent AMI—$81,600 and more.

Due to relatively few loan applications for each racial/ethnic group, Asian and non-Hispanic white applicants are grouped into a single category and Hispanic, black, and other race minorities are grouped into a single category. As shown by Figure III-32, the disparity in denial rates persists for Hispanic, black and other race applicants collectively, even at higher incomes.

Figure III-32.
Denial Rate by Race/Ethnicity and Income, Galveston, 2016



Note:

Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

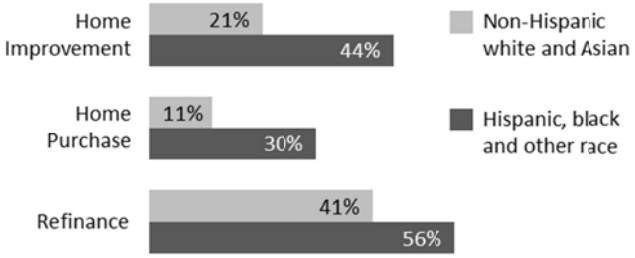
Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

Loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

Figure III-33 displays the denial rate by race and ethnicity and loan purpose. Again, due to relatively few loan applications for each racial/ethnic group, Asian and non-Hispanic white applicants are grouped into a single category and Hispanic, black, and other race minorities are grouped into a single category. Hispanic, black and other race applicants (collectively) for all loan types are more likely to be denied than non-Hispanic white and Asian applicants.

Figure III-33.
Denial Rate by Race/Ethnicity and Loan Purpose, Galveston, 2016



Note:

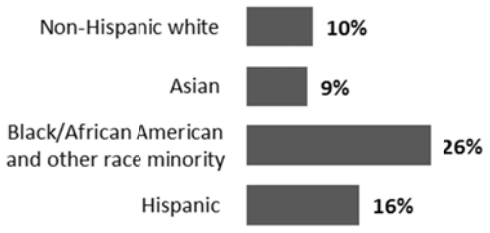
Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

Among applicants whose loans were originated, racial/ethnic disparities can still exist in the form of subprime loans (those with disproportionately high interest rates).[6] Figure III-34 shows subprime loans as a percent of all originated loans by race/ethnicity in Galveston. Due to relatively few loans, African American and other race minority borrowers are grouped into a single category for the analysis. Hispanic borrowers as well as Black and other race borrowers are more likely to receive subprime loans than non-Hispanic whites or Asians.

Figure III-34.
Subprime Loans by Race/Ethnicity, Galveston, 2016



Note:

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2016 and BBC Research & Consulting.

[6] For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries, a definition consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

SECTION IV.

Disparities in Access to Opportunity

SECTION IV.
Disparities in Access to Opportunity

The access to opportunity section of the Assessment of Fair Housing (AFH) expands the fair housing analysis beyond housing to examine conditions that affect economic opportunity more broadly. This section of the AFH examines access to opportunity in education, employment, transportation, low-poverty environments, and environmentally healthy neighborhoods through the lens of race and ethnicity, national origin, and family status.

Measuring "Opportunity"

To facilitate the Assess to Opportunity analysis, HUD has developed a series of indices that measure access to opportunity and allow comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and to the region. HUD maps and tables are available through the AFFH data and mapping tool and are based on data from the Decennial U.S. Census, American Community Survey (ACS), Great Schools, Common Core of Data, School Attendance Boundary Information System (SABINS), Location Affordability Index (LAI), Longitudinal Employer-Household Dynamics (LEHD), and National Air Toxics Assessment (NATA). Additional data sources include Census Transportation Planning Products data from the Federal Highway Administration, local governments, and transit authorities.

The specific indices developed by HUD are defined below. In general, higher values of each index can be interpreted as greater access to opportunity.

- **Low-Poverty Index.** The low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate. Values are inverted and ranked nationally to obtain percentiles. The resulting values range from 0 to 100. The higher the index score, the less exposure to poverty in a neighborhood.

- **School Proficiency Index.** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are ranked nationally to obtain percentiles and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

- **Labor Market Engagement Index.** The labor market engagement index provides a summary description of the relative intensity of labor market engagement in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a Census tract. Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

- **Transit Trips Index.** The transit trips index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the CBSA). The estimates come from the LAI. Values are ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the transit trips index score, the more likely residents in that neighborhood utilize public transit. The index controls for income so a higher index value will often reflect better access to public transit.

- **Low Transportation Cost Index.** The low transportation cost index is based on estimates of transportation costs for a three-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the CBSA). The estimates come from the LAI. Values are inverted and ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the index score, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

- **Jobs Proximity Index.** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core-Based Statistical Area (CBSA), with larger employment centers weighted more heavily. Values are ranked nationally to obtain percentiles with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

- **Environmental Health Index.** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory, and neurological hazards. Values are inverted and ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health and the better the environmental quality of a neighborhood, where a neighborhood is a Census block-group.

Missing data. Index scores for some Census tracts are not computed. This is especially relevant for the environmental health index where significant portions of three of the participating jurisdictions are missing. In some cases, missing data prohibits drawing firm conclusions about disparities in access.

Supplementary data. In addition to the HUD access to opportunity indices and associated maps, supplementary data and maps are included from a number of sources. A major source of supplementary data is the 2011-2015 ACS.

Access to Opportunity Overview and Reference Maps

Figure IV-1 (below) shows data from the HUD AFFH-T Table 12, which summarizes the opportunity index scores described above by jurisdiction, race/ethnicity, and income (total population vs population in poverty).

These data allow for comparisons among racial or ethnic groups by poverty status among jurisdictions, and to the region as whole. Inclusion of income as a cross-tabulation means access to opportunity can be evaluated between income-similar groups and that disparities reflect barriers that are not purely economic in nature.

Findings are discussed by topic area and jurisdiction in the remainder of this section.

To interpret the indices in the tables, use the rule that a higher number is always a better outcome. The index should not be thought of as a percentage—but as an "opportunity score."

Figure IV-1.
HUD Table 12 — Opportunity Indicators, by Race/Ethnicity

Greater Houston Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Non-Hispanic White	62.74	67.61	65.21	47.66	50.97	48.49	45.71
African American/Black	38.13	42.95	43.89	53.80	59.61	43.98	41.45
Hispanic	35.36	50.11	43.14	54.31	60.86	49.03	37.59
Asian or Pacific Islander	61.28	68.79	69.90	52.89	57.49	48.87	45.20
Native American	52.45	60.02	55.69	48.57	52.77	47.55	45.23
Population below federal poverty line							
Non-Hispanic White	47.01	55.31	52.50	49.79	55.69	50.43	44.33
African American/Black	24.04	34.24	32.72	57.21	65.34	45.59	38.46
Hispanic	23.70	44.74	35.47	57.34	65.90	51.52	35.59
Asian or Pacific Islander	43.11	58.01	56.34	57.71	65.10	49.15	44.94
Native American	30.15	48.22	39.70	56.66	65.64	51.46	35.38

Figure IV-1 (Continued).
HUD Table 12 — Opportunity Indicators, by Race/Ethnicity

Harris County Service Area	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Non-Hispanic White	67.43	71.13	67.72	47.14	47.08	45.26	39.84
African American/Black	46.19	49.40	51.40	51.53	53.69	42.68	39.57
Hispanic	43.09	55.14	46.96	50.66	52.43	44.32	37.67
Asian or Pacific Islander	60.17	67.04	66.06	50.60	52.32	44.47	45.06
Native American	59.70	64.48	60.59	48.75	49.29	44.95	38.25
Population below federal poverty line							
Non-Hispanic White	52.26	59.21	55.47	49.55	52.22	48.94	36.50
African American/Black	34.99	41.35	42.79	54.29	58.06	45.28	37.37
Hispanic	30.51	49.81	38.40	53.07	57.08	47.06	36.39
Asian or Pacific Islander	43.59	61.08	54.39	51.68	55.99	45.01	45.69
Native American	39.36	55.31	42.44	55.75	60.82	44.77	31.36

Pasadena	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Non-Hispanic White	50.07	70.22	41.99	54.69	62.26	53.92	31.46
African American/Black	32.41	64.96	30.12	59.72	69.40	57.70	30.95
Hispanic	26.50	58.06	21.79	58.79	67.50	52.57	29.52
Asian or Pacific Islander	66.80	79.19	59.96	49.00	57.86	53.72	32.21
Native American	38.47	66.32	33.82	57.07	65.53	57.18	30.64
Population below federal poverty line							
Non-Hispanic White	29.67	63.16	25.41	59.78	68.90	56.73	29.98
African American/Black	23.87	61.37	22.12	60.57	69.24	55.06	30.45
Hispanic	20.41	57.18	18.74	61.07	71.08	54.60	29.99
Asian or Pacific Islander	35.22	65.26	29.24	63.15	73.38	56.27	29.21
Native American	19.52	57.49	18.32	58.62	71.89	73.98	28.59

Figure IV-1 (Continued).
HUD Table 12 — Opportunity Indicators, by Race/Ethnicity

Missouri City	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Non-Hispanic White	74.84	68.28	80.63	43.62	38.70	36.22	56.77
African American/Black	64.61	51.84	68.96	46.58	41.53	34.32	56.28
Hispanic	54.39	54.08	65.72	46.46	44.54	36.04	56.14
Asian or Pacific Islander	86.68	76.85	84.49	42.84	39.96	47.35	56.91
Native American	73.49	63.84	76.21	43.99	40.64	39.15	56.25
Population below federal poverty line							
Non-Hispanic White	57.95	64.09	74.35	45.02	40.41	34.95	56.87
African American/Black	56.45	52.17	66.49	47.97	43.36	34.15	56.00
Hispanic	36.53	45.83	53.25	45.91	47.79	45.20	55.28
Asian or Pacific Islander	74.94	67.46	74.15	45.07	45.19	57.19	54.59
Native American	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Galveston	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Non-Hispanic White	46.40	32.94	48.19	52.70	60.69	51.86	92.11
African American/Black	23.90	28.68	33.50	61.89	68.57	50.22	90.29
Hispanic	35.65	28.27	41.42	59.28	65.99	45.93	91.31
Asian or Pacific Islander	38.83	31.23	45.49	64.21	69.82	46.92	90.63
Native American	36.61	29.36	42.96	58.19	65.76	52.84	90.98
Population below federal poverty line							
Non-Hispanic White	38.53	32.59	43.28	57.40	65.69	57.62	91.93
African American/Black	21.10	28.50	27.97	61.90	69.20	52.04	90.23
Hispanic	24.40	27.61	34.30	60.41	67.12	49.64	90.75
Asian or Pacific Islander	29.79	29.80	42.96	69.20	74.71	49.85	89.78
Native American	32.56	30.44	56.11	66.44	65.22	18.71	93.22

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

The following series of maps reviews the geographic distribution of race, ethnicity, national origin, and family status of residents along with racially/ethnically concentrated areas of poverty (R/ECAPs). Many of these maps have already been discussed in previous sections but are provided here as additional context for the Access to Opportunity discussions that follow. Maps of political divisions are also included for easy reference.

Figure IV-2.
Race/Ethnicity and R/ECAPs

Harris County

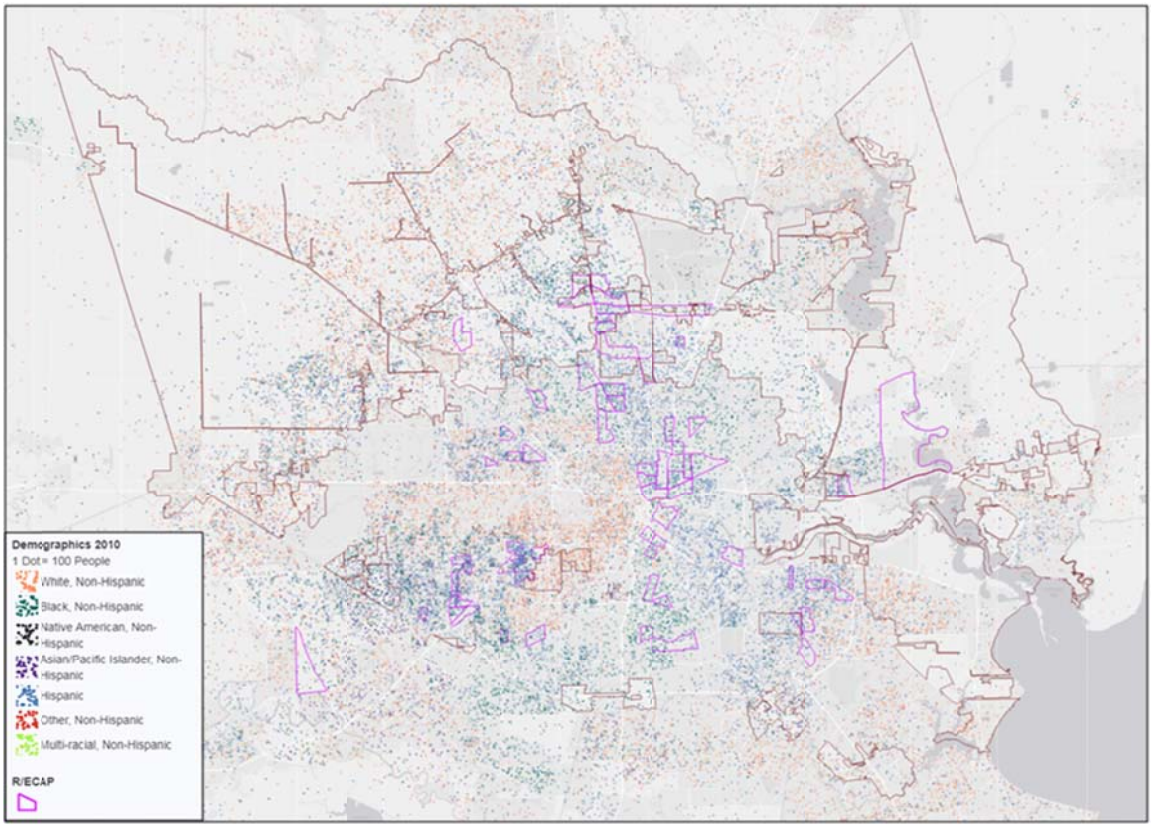
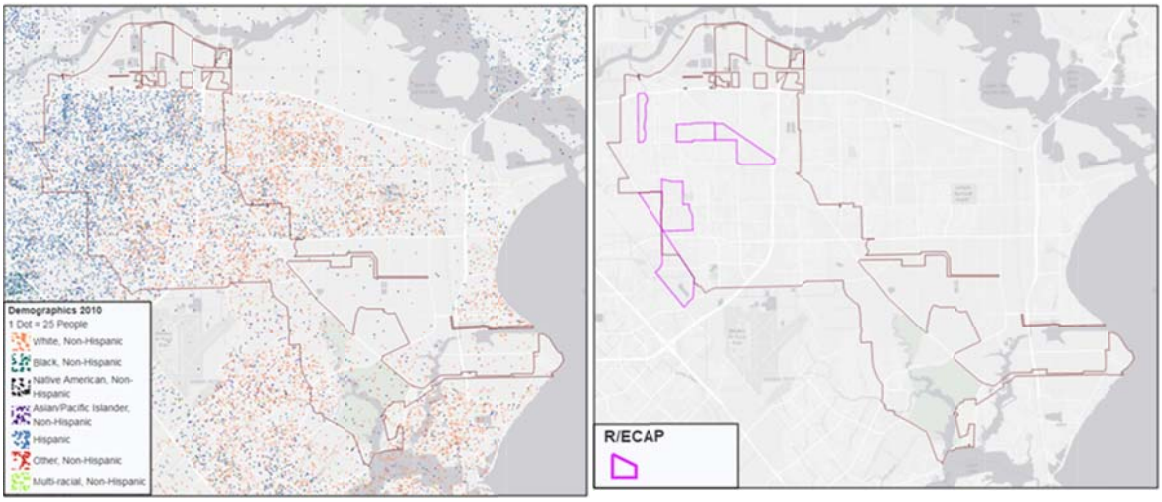
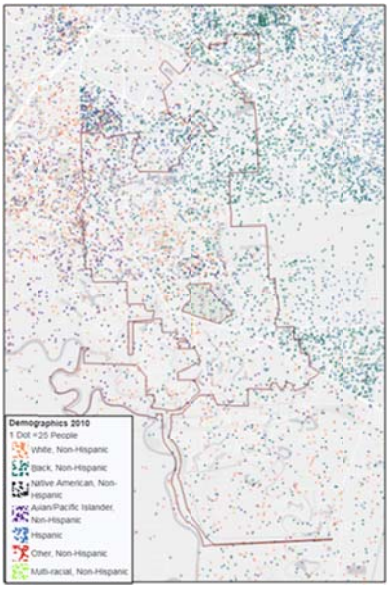


Figure IV-2. (Continued)
Race/Ethnicity and R/ECAPs

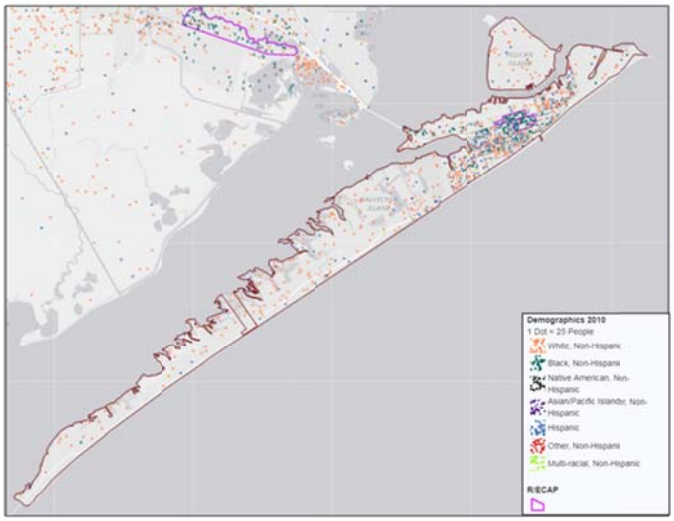
Pasadena



Missouri City



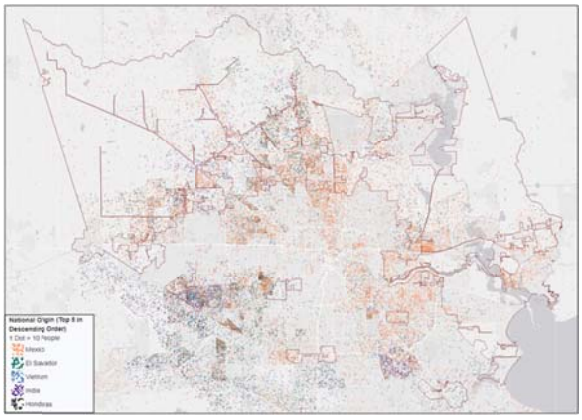
Galveston



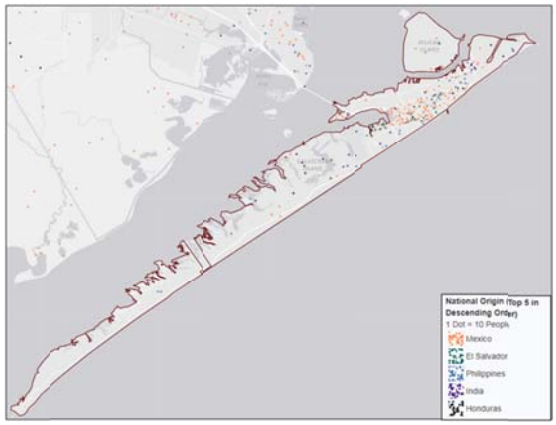
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-3.
National Origin

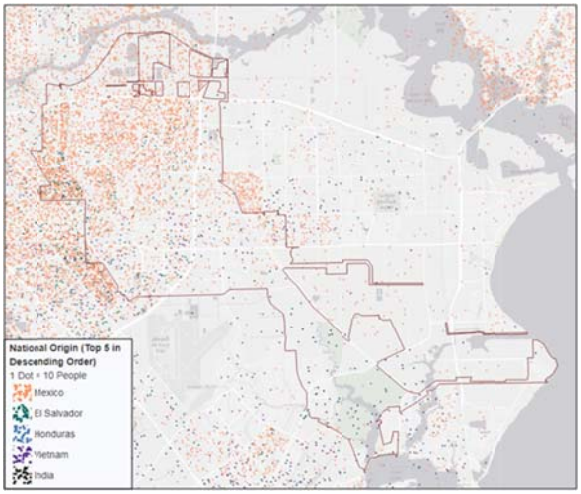
Harris County



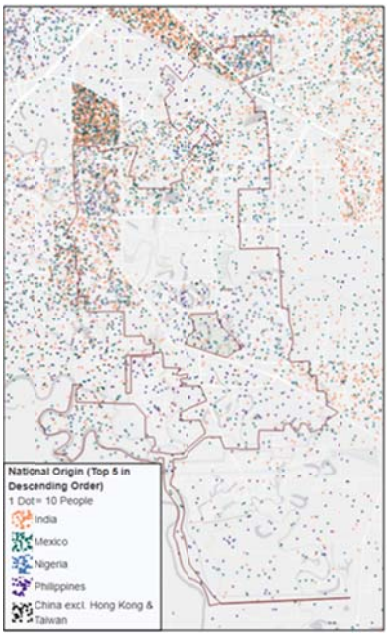
Galveston



Pasadena



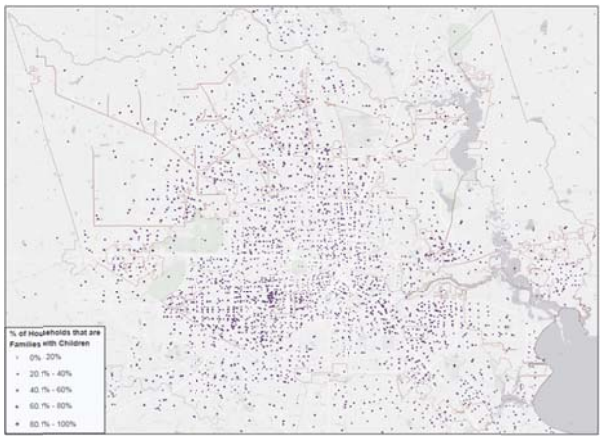
Missouri City



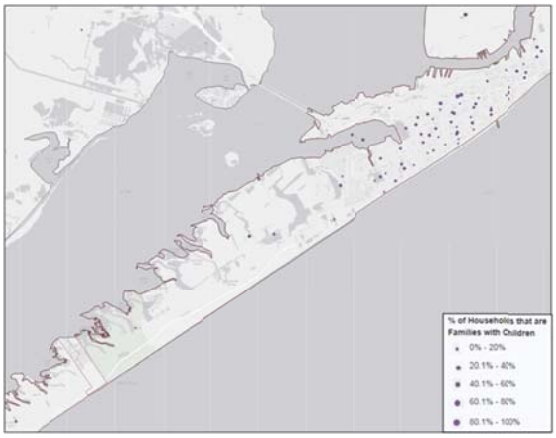
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-4.
Family Status

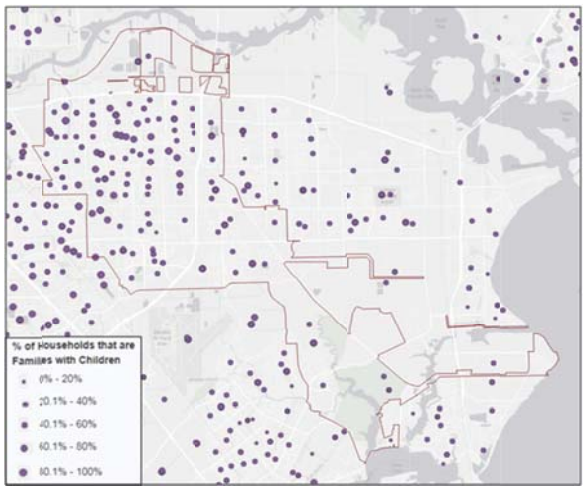
Harris County



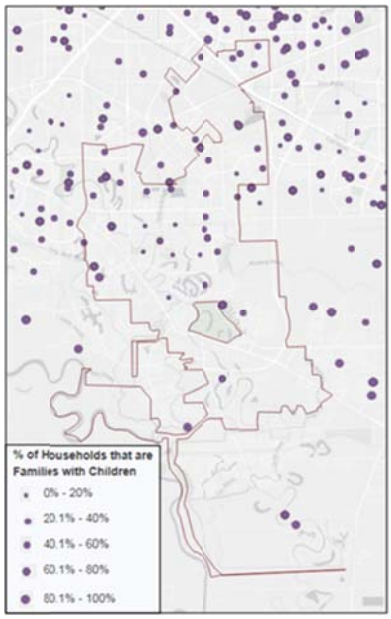
Galveston



Pasadena



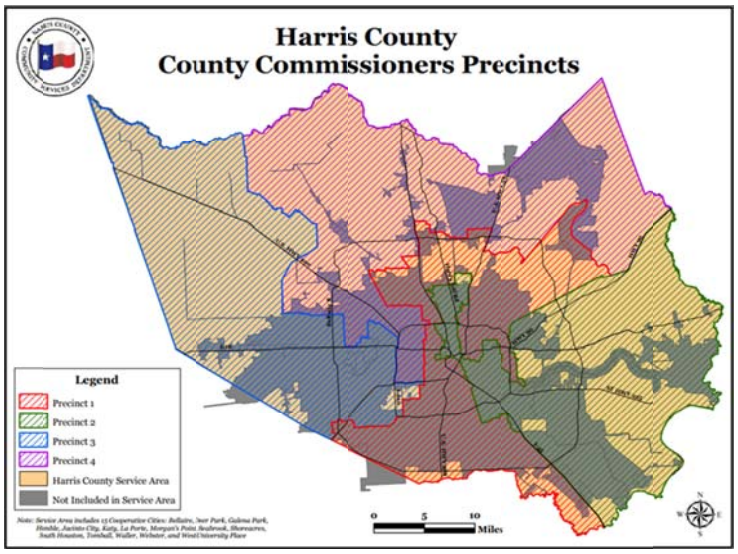
Missouri City



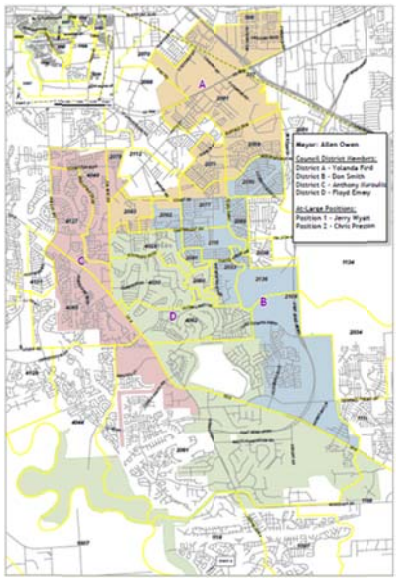
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-5.
Political Boundaries

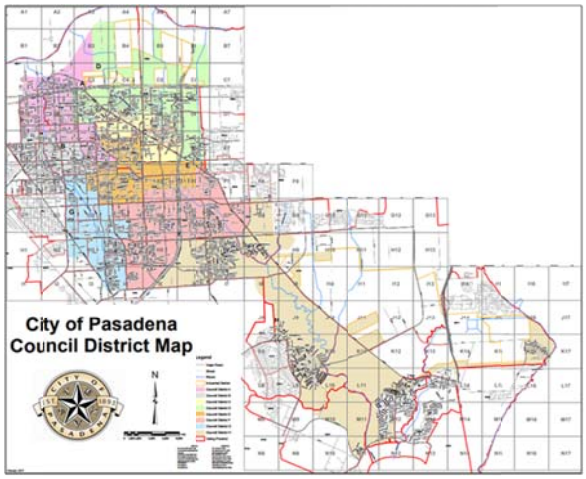
Harris County



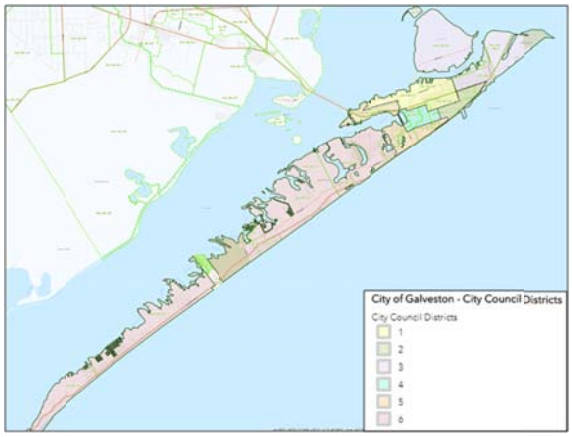
Missouri City



Pasadena



Galveston



The remainder of this section discusses access to opportunity by indicator and jurisdiction. Disparities in access to opportunity by protected class are summarized under the heading "Patterns in Disparities in Access to Opportunity."

Access to Proficient Schools

The following discussion of access to proficient schools in the participating jurisdictions is structured to meet the following objectives:

1. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

2. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

3. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

Figures IV-6 and IV-7 show the HUD table and maps depicting the school proficiency index for participating jurisdictions. Keep in mind: higher index values (and associated darker shading on the maps) indicate higher access to proficient schools. The maps are shown here without the race/ethnicity and national origin overlays for the sake of simplicity and clarity; however, the discussion of findings incorporates spatial analysis of opportunity and protected class populations. Note that the HUD school proficiency index data do not include performance data from private schools.

Figure IV-6. School Proficiency Index

Note:

Higher index values indicate greater access to proficient schools.

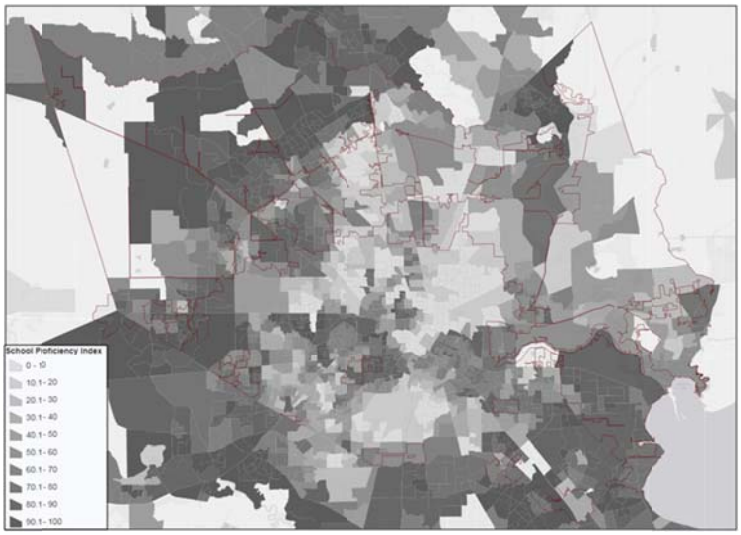
Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

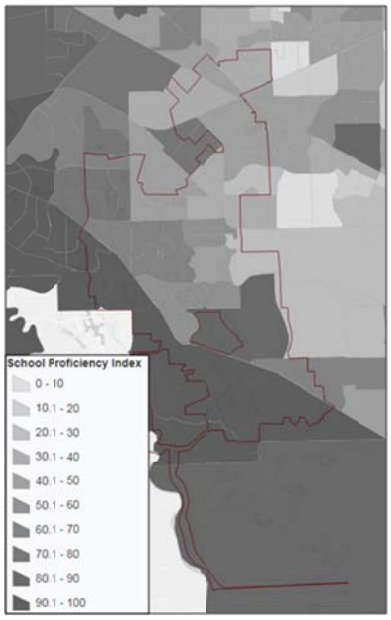
School Proficicency Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	68	71	70	68	33
African American/Black	43	49	65	52	29
Hispanic	50	55	58	54	28
Asian or Pacific Islander	69	67	79	77	31
Native American	60	64	66	64	29
Population below federal poverty line					
Non-Hispanic White	55	59	63	64	33
African American/Black	34	41	61	52	29
Hispanic	45	50	57	46	28
Asian or Pacific Islander	58	61	65	67	30
Native American	48	55	57	N/a	30

Figure IV-7.
School Proficiency Index Maps

Harris County



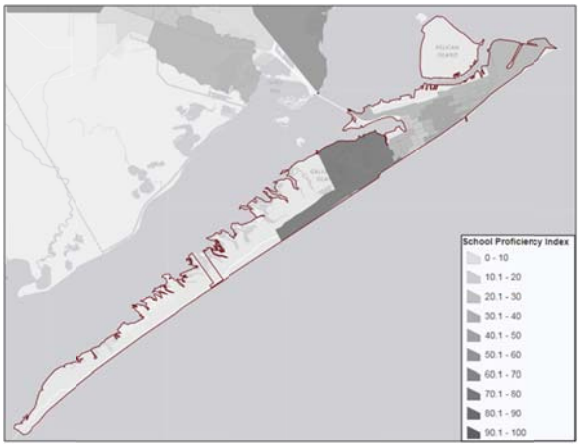
Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-8, on the following page shows educational attainment by race/ethnicity for participating jurisdictions. Results are discussed by jurisdiction on the following pages.

Figure IV-8.
Educational Attainment by Race/Ethnicity

	Harris County Service Area		Pasadena, TX		Missouri City, TX		Galveston, TX		Greater Houston Region	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Non-Hispanic White	**541,160**		**34,384**		**12,520**		**16,946**		**1,743,662**	
High school graduate or higher	513,201	95%	30,885	90%	12,022	96%	15,661	92%	1,643,699	94%
Bachelor's degree or higher	209,812	39%	8,137	24%	6,684	53%	6,637	39%	717,990	41%
African American/Black	**174,172**		**2,139**		**19,711**		**6,204**		**666,158**	
High school graduate or higher	159,814	92%	1,921	90%	18,886	96%	4,636	75%	590,211	89%
Bachelor's degree or higher	46,782	27%	279	13%	7,791	40%	641	10%	165964	25%
American Indian or Alaska Native	**5,316**		**1,274**		**135**		**138**		**16094**	
High school graduate or higher	3,966	75%	862	68%	110	82%	129	94%	11943	74%
Bachelor's degree or higher	783	15%	166	13%	43	32%	32	23%	2825	18%
Asian	**97,194**		**2,155**		**7,729**		**1,442**		**310,492**	
High school graduate or higher	82,061	84%	1,967	91%	7,262	94%	1,366	95%	268,013	86%
Bachelor's degree or higher	46,343	48%	1,101	51%	4,915	64%	1,176	82%	171,528	55%
Native Hawaiian and Other Pacific Islander	**832**		**16**		**136**		**8**		**2123**	
High school graduate or higher	768	92%	8	50%	136	100%	8	100%	1857	88%
Bachelor's degree or higher	94	11%	0	0%	28	21%	8	100%	336	16%
Some other race	**80,910**		**8,931**		**2,217**		**474**		**265335**	
High school graduate or higher	50,137	62%	5,185	58%	1,545	70%	217	46%	146812	55%
Bachelor's degree or higher	8,939	11%	439	5%	239	11%	84	18%	24955	9%
Two or more races	**19,861**		**1,045**		**690**		**605**		**63977**	
High school graduate or higher	16,445	83%	866	83%	684	99%	544	90%	53957	84%
Bachelor's degree or higher	6,009	30%	202	19%	348	50%	145	24%	19885	31%
Hispanic or Latino	**394,908**		**51,593**		**6,325**		**8,284**		**1,245,034**	
High school graduate or higher	253,095	64%	29,563	57%	4,916	78%	5,167	62%	738,260	59%
Bachelor's degree or higher	52,229	13%	3,242	6%	1,230	19%	901	11%	157089	13%

Note: Universe is the population aged 25 or older.

Source: 2015 5-year ACS and BBC Research & Consulting.

Harris County service area. Figure IV-6 shows that among racial and ethnic groups, non-Hispanic white residents have the greatest access to proficient schools among the total population. Asian or Pacific Islander residents have the greatest access among the population below the federal poverty line. African American and Hispanic residents experience a large disparity in access to proficient schools compared to other racial and ethnic groups. Comparing the HUD map of school proficiency (Figure IV-7) and the HUD map of race/ethnicity (Figure IV-2) shows that African American and Hispanic residents appear to be concentrated in areas with lower school proximity index scores, including the area north of I-10 and west of Highway 6 in Precinct 2, as well as the areas around George Bush International Airport (IAH) in Precincts 1 and 4. These areas also have relatively high concentrations of residents from India and Mexico as well as families with children.

Five-year estimates from the American Community Survey (ACS 2011-15) indicate that in the Harris County service area, Hispanic or Latino residents are much less likely to have graduated high school than non-Hispanic white residents and African American residents.

Asian residents have completed high school at a lower rate than non-Hispanic white or African American residents, however, Asian residents are most likely to have completed a Bachelor's degree or higher. Nearly half (48%) of Asian residents hold Bachelor's degrees or higher, compared to 39 percent of non-Hispanic whites, 27 percent of African Americans, 15 percent of native Americans, and 13 percent of Hispanic residents. Residents identified as being of "some other race alone" have the lowest educational attainment of any group.

Pasadena. Figure IV-6 shows that among racial and ethnic groups, Asian or Pacific Islander residents have the greatest access to proficient schools among the total population. This is also the case among the population below the federal poverty line. African American and Hispanic residents experience the greatest disparity in access to proficient schools among the total population. Hispanic residents living below the federal poverty line are the most disadvantaged racial or ethnic group. Below the poverty line, Native American, non-Hispanic residents are the second most disadvantaged group.

Comparing the HUD map of school proficiency (Figure IV-7) and the HUD map of race/ethnicity (Figure IV-2) shows that African American and Hispanic residents are concentrated in areas with less access to proficient schools including the Districts A, B, C, and D as well as a small portion of District H. These areas also have relatively high concentrations of residents from Mexico, El Salvador, and Honduras. The HUD map of family status (Figure IV-4) does not show that families with children as a group experience a disparity in access to proficient schools.

ACS data in Figure IV-8 indicate that Hispanic or Latino residents are much less likely to have graduated high school than non-Hispanic white, African American, or Asian residents. While the rates of high school completion are similar for non-Hispanic white, African American, and Asian residents, the proportion of Asian residents who have completed a bachelor's degree or higher is more than twice that of non-Hispanic white residents, and more than three times that of African American residents. Hispanic residents and residents of some other race alone hold bachelor's degrees or higher at rates of less than 6 percent.

Missouri City. Figure IV-6 shows that among racial and ethnic groups, Asian and Pacific Islander residents have the greatest access to proficient schools for the total population and for the population below the federal poverty line. African American residents living below the federal poverty line experience slightly better access to proficient schools than African American residents in the total population. Non-Hispanic black and Hispanic residents experience a significant disparity in access to proficient schools compared to other racial and ethnic groups among the total population and for the population below the federal poverty line. Comparing the school proficiency map (Figure IV-7) with the race/ethnicity map (Figure IV-2) demonstrates this disparity clearly.

ACS data indicate that Hispanic or Latino residents are much less likely to have graduated high school than non-Hispanic white residents. While the rate of Asian residents who have completed at least high school is lower than the rate for non-Hispanic whites, the proportion of Asian residents with a bachelor's degree or higher is greater than for non-Hispanic whites. Native Hawaiian or Pacific Islander and Hispanic or Latino residents are much less likely to hold a bachelor's degree or higher than non-Hispanic whites. Residents identified as being of "some other race alone" have the lowest educational attainment of any group.

Comparing the map of school proficiency index (Figure IV-7) and the national origin map (Figure IV-3) shows that residents of Mexican and Nigerian origin are concentrated in Census tracts with less access to proficient schools. Residents from India, the Philippines, and China appear to be spread across Census tracts with a range of school proficiency index scores.

Figure IV-4 showing family status indicates that families with children are concentrated in council District C. While Census tracts in the north of District C have less proficient schools, the distribution of families with children does not suggest an obvious disparity in access to proficient schools.

Galveston. Figure IV-6 shows that among racial and ethnic groups, non-Hispanic white residents have the greatest access to proficient schools for the total population and for the population below the federal poverty line. African American and Hispanic residents experience a disparity in access to proficient schools compared to other racial and ethnic groups. Comparing the school proficiency map (Figure IV-7) and the race/ethnicity map (Figure IV-2) shows that African American and Hispanic residents appear to be concentrated in areas with less access to proficient schools. Notably, data for Pelican Island and the south end of Galveston Island is available. These areas are home to predominantly non-Hispanic white residents.

ACS data indicate that Hispanic or Latino residents are much less likely to have graduated high school than non-Hispanic white residents and Asian residents. While the proportion of Asian residents who have completed at least high school is comparable to that for non-Hispanic whites, a much larger proportion of Asian residents holds a bachelor's degree or higher. African American and Hispanic or Latino residents are much less likely to hold a bachelor's degree or higher than Asians and non-Hispanic whites. Residents identified as being of "some other race alone" have the lowest educational attainment of any group.

Comparing the map of school proficiency index (Figure IV-6) and the map national origin (Figure IV-3) suggest that residents of Mexican, Salvadorian and Honduran origin more likely to live in

Census tracts with somewhat lower access to proficient schools. Residents from India and the Philippines appear to be spread across Census tracts with a range of school proficiency index scores.

The family status map (Figure IV-4) indicates that families with children have equitable access to proficient schools.

Greater Houston region. In order to determine if disparities in access to proficient schools are better or worse in the participating jurisdictions than in the region as a whole, the jurisdiction level data are compared to the regional data. Divergences from regional trends in terms of which groups are most disadvantaged in each jurisdiction are also highlighted. The data show that residents of the Harris County service area, Pasadena and Missouri City have greater access to proficient schools than residents of the Greater Houston region as a whole (based on HUD school index data). The school index value for residents of Galveston overall is below that of the region.

Among the total population of the Greater Houston region, African American residents experience the greatest disparity of any racial or ethnic group in access to proficient schools. African American residents of the Harris County service area and Missouri City experience slightly less disparity than the region as a whole. Hispanic residents experience the greatest disparity in Pasadena and Galveston.

Among the population living below the federal poverty line in the region African American residents experience the greatest disparity of any racial or ethnic group in access to proficient schools compared to the most advantaged group. African American residents of the Harris County service area experience a disparity comparable to the region as a whole, while Hispanic residents experience the greatest disparity of any group in this income bracket in Pasadena, Missouri City, and Galveston.

State policy impacting school access. The state of Texas has adopted the following school enrollment policy that effects districts throughout the region and impacts the ability of protected class groups to access proficient schools.

Texas Education Code Section 29.202 indicates that:

> *A student is eligible to receive a public education grant or to attend another public school in the district in which the student resides under this subchapter if the student is assigned to attend a public school campus:*
>
> *(1) at which 50 percent or more of the students did not perform satisfactorily on an assessment instrument administered under Section 39.023(a) or (c) in any two of the preceding three years; or*
>
> *(2) that, at any time in the preceding three years, failed to satisfy any standard under Section 39.054(e)*

Section 29.203 indicates that:

A school district chosen by a student's parent under Section 29.201 is entitled to accept or reject the application for the student to attend school in that district but may not use criteria that discriminate on the basis of a student's race, ethnicity, academic achievement, athletic abilities, language proficiency, sex, or socioeconomic status. A school district that has more acceptable applicants for attendance under this subchapter than available positions must give priority to students at risk of dropping out of school as defined by Section 29.081 and must fill the available positions by lottery. However, to achieve continuity in education, a school district may give preference over at-risk students to enrolled students and to the siblings of enrolled students residing in the same household or other children residing in the same household as enrolled students for the convenience of parents, guardians, or custodians of those children.

This policy prohibits schools throughout Texas from denying a request from a student to transfer from a non-performing school to another school in the district on the basis of race, ethnicity, academic achievement, athletic abilities, language proficiency, sex, or socioeconomic status. Proficient schools may deny transfers if the school has insufficient space for additional students.

This policy allows parents more choice in which school their child attends and protects students seeking transfers from discrimination but does not guarantee access to proficient schools.

That said, choice can be complicated by a variety of factors:

- The number of "quality seats"—admission in high quality schools or specialized programs within schools—is lower than demand. Demand is created quickly, by population growth and family interest in schools and school districts. Supply is created much more slowly and can be limited by physical space in schools, inability to hire quality teachers, learning curves in implementation of curricula, and school funding.
- Low income families have very few options for getting their children to quality schools. This is due conflicts with work schedules, bus schedules that don't align with school schedules (and limit participation in sports and other activities), expense of transportation, and lack of public transportation discounts for low income kids.
- Quality seats are disproportionately available in specialized schools. These schools are not a universal "fit" for all children (e.g., schools for gifted children). Lower income families may not be aware of those schools, may not qualify, may not have transportation/convenient access to those schools, and/or are not sure if they belong in such an environment.
- Affordable housing near quality schools is very limited, which can lead to both travel and cultural barriers to access.

Access to Employment Opportunities

The following discussion of access to employment opportunities in the participating jurisdictions is structured to meet the following objectives:

1. Describe any disparities in access to jobs and labor markets by protected class groups.

2. How does a person's place of residence affect their ability to obtain a job?

3. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Figures IV-9, IV-10, and IV-11 show the HUD table and maps depicting the labor market engagement index and the jobs proximity index for participating jurisdictions. Keep in mind: higher index values (and associated darker shading on the maps) indicate higher exposure to labor market engagement and higher access to jobs. The maps are shown here without the race/ethnicity and national origin overlays for the sake of simplicity and clarity; however, the discussion of findings incorporates spatial analysis of opportunity and protected class populations.

Figure IV-9. Employment-Related Opportunity Indices

Note:

Higher index values indicate greater opportunities for labor market engagement and higher access to jobs.

Source:

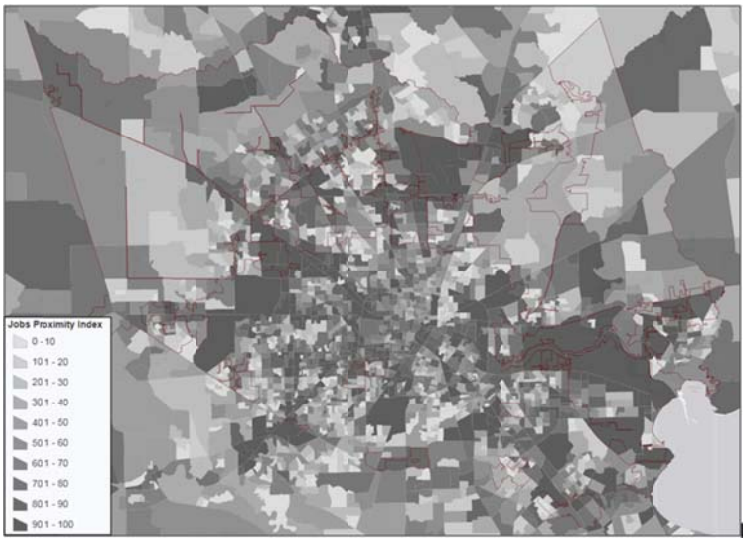
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Labor Market Engagement Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	65	68	42	81	48
African American/Black	44	51	30	69	34
Hispanic	43	47	22	66	41
Asian or Pacific Islander	70	66	60	84	45
Native American	56	61	34	76	43
Population below federal poverty line					
Non-Hispanic White	53	55	25	74	43
African American/Black	33	43	22	66	28
Hispanic	35	38	19	53	34
Asian or Pacific Islander	56	54	29	74	43
Native American	40	42	18	N/a	56

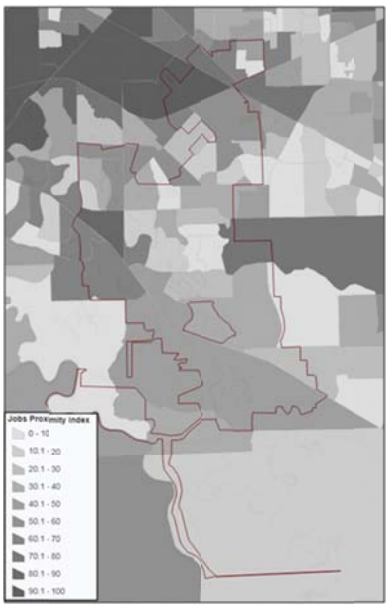
Jobs Proximity Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	48	45	54	36	52
African American/Black	44	43	58	34	50
Hispanic	49	44	53	36	46
Asian or Pacific Islander	49	44	54	47	47
Native American	48	45	57	39	53
Population below federal poverty line					
Non-Hispanic White	50	49	57	35	58
African American/Black	46	45	55	34	52
Hispanic	52	47	55	45	50
Asian or Pacific Islander	49	45	56	57	50
Native American	51	45	74	N/a	19

Figure IV-10.
Jobs Proximity Index Maps

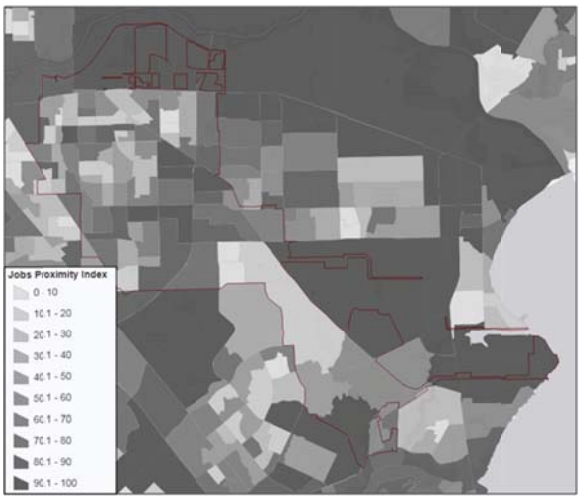
Harris County



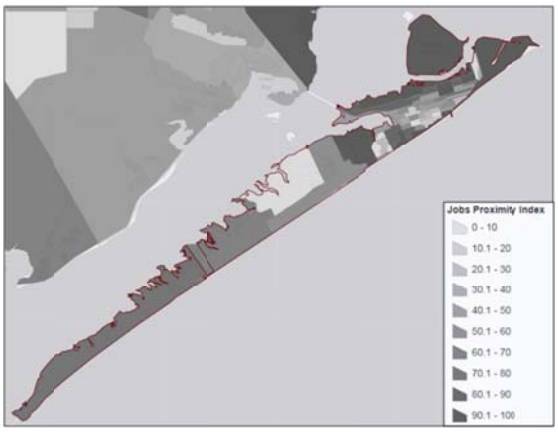
Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

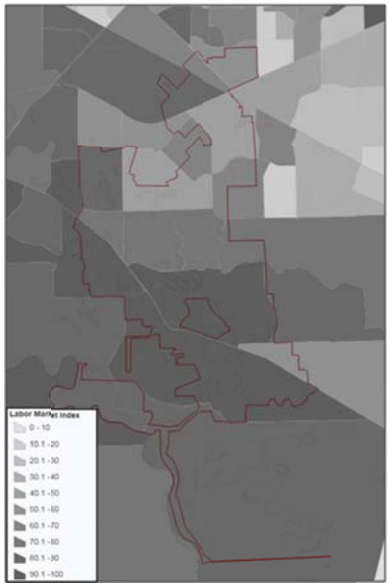
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-11.
Labor Market Engagement Index Maps

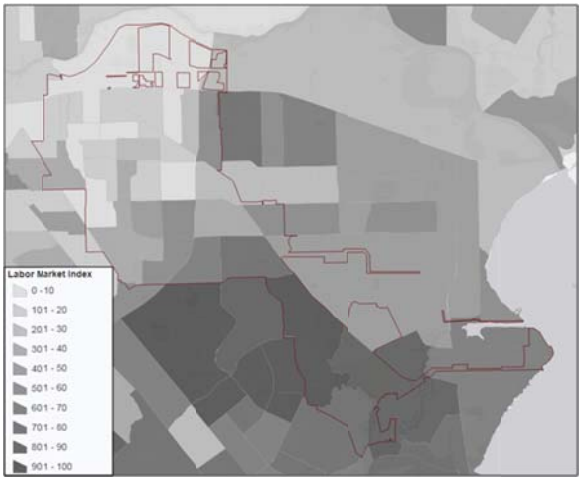
Harris County



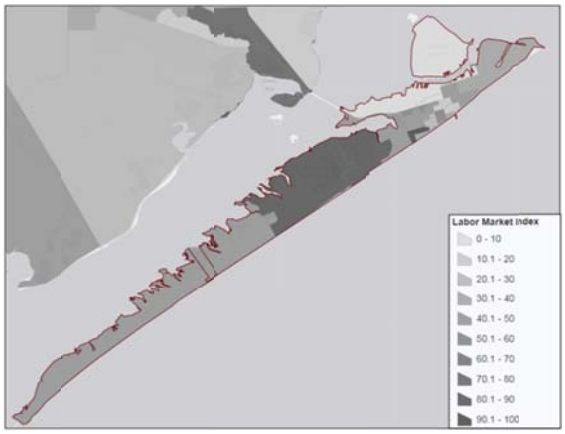
Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-12 supplements the HUD index data with unemployment data from the ACS. Findings are discussed by jurisdiction on the following pages.

Figure IV-12.
Unemployment by Race/Ethnicity

	Harris County Service Area				Pasadena			
	Total	Labor Force Participation Rate	Employment/ Population Ratio	Unemployment Rate	Total	Labor Force Participation Rate	Employment/ Population Ratio	Unemployment Rate
Population 16 years and over	**1,466,364**	**68.76%**	**64.15%**	**6.59%**	**112,962**	**65.20%**	**58.40%**	**10.40%**
White alone	995,490	68.16%	64.08%	5.74%	92,646	64.40%	57.80%	10.10%
Black or African American alone	220,533	71.75%	64.06%	10.69%	2,745	74.60%	64.10%	14.10%
American Indian and Alaska Native alone	6,488	71.39%	67.96%	4.48%	1,658	59.20%	43.10%	27.30%
Asian alone	112,044	65.30%	62.35%	4.49%	2,649	63.60%	58.90%	7.40%
Native Hawaiian and Other Pacific Islander alor	1,280	70.27%	67.37%	3.90%	37	100.00%	78.40%	21.60%
Some other race alone	102,702	72.39%	66.84%	7.60%	11,736	70.90%	63.90%	9.60%
Two or more races	27,827	69.67%	64.02%	8.04%	1,491	62.10%	53.30%	14.10%
Hispanic or Latino origin (of any race)	500,101	69.94%	65.19%	6.81%	67,026	68.70%	61.00%	11.20%
White alone, not Hispanic or Latino	614,968	67.45%	63.90%	5.16%	39,280	59.10%	53.90%	8.70%

	Missouri City				Galveston			
	Total	Labor Force Participation Rate	Employment/ Population Ratio	Unemployment Rate	Total	Labor Force Participation Rate	Employment/ Population Ratio	Unemployment Rate
Population 16 years and over	**55,852**	**70.00%**	**64.70%**	**7.60%**	**40,887**	**59.70%**	**53.10%**	**10.20%**
White alone	18,584	67.20%	63.70%	5.20%	29,809	62.60%	56.70%	8.50%
Black or African American alone	24,071	73.20%	65.60%	10.20%	7,871	47.60%	38.30%	18.70%
American Indian and Alaska Native alone	135	58.50%	58.50%	0.00%	149	62.40%	62.40%	0.00%
Asian alone	9,232	67.70%	64.50%	4.60%	1,707	65.30%	61.70%	5.50%
Native Hawaiian and Other Pacific Islander alor	136	20.60%	20.60%	0.00%	13	0.00%	0.00%	-
Some other race alone	2,707	69.90%	67.20%	3.90%	576	59.70%	51.60%	13.70%
Two or more races	987	76.80%	60.00%	21.90%	762	58.40%	46.20%	20.90%
Hispanic or Latino origin (of any race)	7,607	71.60%	66.00%	7.80%	10,550	68.20%	61.50%	9.70%
White alone, not Hispanic or Latino	14,007	65.90%	63.40%	3.80%	20,286	59.60%	54.10%	7.90%

Source: 2015 ACS and BBC Research & Consulting.

Harris County service area. Among the total population, non-Hispanic white and Native American, Non-Hispanic residents live closest to job opportunities and African American residents live the furthest from job opportunities (according to HUD's Jobs Proximity Index). Among the population below the federal poverty line, Native American, Non-Hispanic and Asian or Pacific Islander residents live the furthest from job opportunities and non-Hispanic white residents live the closest to job opportunities. non-Hispanic white residents living below the federal poverty line have the highest proximity to jobs of any group.

African American and Native American, Non-Hispanic residents live in areas with lower labor market engagement than do non-Hispanic white and Asian or Pacific Islander residents. Labor market engagement refers to the relative level of employment, labor force participation, and educational attainment in a Census tract. A similar pattern of labor market engagement exists for the population living below the federal poverty line. African American and Hispanic residents below the poverty line live in areas with less labor market engagement than their racial or ethnic group among the total population. The same is true for Asian or Pacific Islander residents. However, Asian residents living below the federal poverty line live in areas of higher labor market engagement than African American and Hispanic residents in the total population.

ACS data in Figure IV-12 indicate that unemployment is highest among African American residents. Native Hawaiian (and other Pacific Islanders), Native American and Asian residents experience the lowest rates of unemployment—all below 5 percent. The overall unemployment rate for the population 16 years and over is 6.6 percent.

Comparing the Figure IV-10 map of jobs proximity and the map of national origin (Figure IV-3) suggests that Indian and Mexican residents may be concentrated in areas with somewhat less access to jobs. Comparing the Figure IV-11 of labor market engagement and the map of national origin (Figure IV-3) suggests that some areas with high concentrations of Indian residents have low labor market engagement.

Comparing the jobs proximity map and the labor market engagement map (Figures IV-11 and IV-12) with the map of family status (Figure IV-4) shows that a relatively high proportion of families with children live in the area south of IAH, where proximity to jobs and labor market engagement are low.

Pasadena. In Pasadena, disparities in access to areas close to job opportunities are relatively small among racial or ethnic groups with the exception that Native American, Non-Hispanic residents living below the federal poverty line have significantly less access to neighborhoods close to job opportunities. Among the total population, African American and Native American, Non-Hispanic residents live closest to job opportunities and Hispanic residents live the furthest from job opportunities. Among the population below the federal poverty line, Hispanic and African American residents live the furthest from job opportunities.

Hispanic residents live in areas with substantially lower labor market engagement than non-Hispanic white residents, although anecdotal evidence indicates that a number of Hispanic residents may be working in informal labor markets and small businesses. Asian and Pacific Islander residents live in areas with the highest levels of labor market engagement both in the total population and the population living below the federal poverty line. For the population

living below the federal poverty line, Native American, Non-Hispanic residents live in areas with the least labor market engagement followed by Hispanic residents. For all ethnic groups, the disparity in access to neighborhoods with high labor market engagement between residents living below the federal poverty line and their racial or ethnic group as a whole is substantial (the average deficit in the index score for residents below the poverty limit is 35%).

ACS data indicate that unemployment is highest among American Indian or Alaska Native residents. Asian residents experience the lowest rate of unemployment. The overall unemployment rate for the population 16 years and over is 10.4 percent.

Comparing the Figure IV-11 map of proximity to jobs and the Figure IV-3 map of national origin suggests that Indian residents may be concentrated in areas which are farther from job opportunities. Comparing Figure IV-12 of labor market engagement and Figure IV-3 of national origin suggests that residents from Mexico, El Salvador, and Honduras are concentrated in areas with relatively low labor market engagement.

An overlay of family status (Figure IV-4) with the labor market engagement index and jobs proximity index maps suggests that families with children may be slightly concentrated in Districts C and H where labor market engagement is lower. It is not obvious that families with children as a group experience any disparity in proximity to jobs.

Missouri City. Asian or Pacific Islander and Native American, Non-Hispanic residents of Missouri City live closest to job opportunities. African American residents live the furthest from job opportunities. Among the population below the federal poverty line Hispanic and Asian or Pacific Islander residents live significantly closer to job opportunities than their racial or ethnic groups overall.

Despite relatively equal access to areas close to job opportunities, African American and Hispanic residents live in areas with substantially lower labor market engagement than non-Hispanic white residents. Asian and Pacific Islander residents again live in areas with the highest labor market engagement. A similar pattern of labor market engagement exists for the population living below the federal poverty line. Hispanic and Asian or Pacific Islander residents at this income level live in areas with much less labor market engagement than their racial or ethnic group as a whole. Differences in labor market engagement between residents living below the federal poverty line and their racial or ethnic groups as a whole are much smaller for other groups.

ACS data indicate that unemployment is highest among African American residents and Hispanic residents. non-Hispanic white residents experience the lowest rate of unemployment of any group followed by Asian residents. The overall unemployment rate for the population 16 years and over is 7.6 percent. Low unemployment among Native Hawaiian and other Pacific Islander residents masks extremely low participation in the labor force among this group.

Comparing maps of jobs proximity and national origin shows no obvious relationship between national origin and access to areas close to job opportunities. Comparing maps of labor market engagement and national origin shows that residents from India and the Philippines are concentrated in the south and east of the city where labor market engagement is high.

Comparing HUD maps of jobs proximity and labor market engagement with the map of family status suggests that families with children are concentrated in areas with closer to job opportunities and with greater labor market engagement.

Galveston. Non-Hispanic white and Native American, Non-Hispanic residents live closest to job opportunities in Galveston, according to the HUD opportunity index data shown in Figure IV-9. Hispanic residents live the furthest from job opportunities as a group. Among the population below the federal poverty line Native American, Non-Hispanic and Hispanic residents experience the least access to areas close to job opportunities; non-Hispanic white residents living below the federal poverty line live closer to job opportunities than non-Hispanic white residents in the total population.

African American residents live in areas with substantially lower labor market engagement than non-Hispanic white residents. Asian and Pacific Islander residents live in areas with high labor market engagement. Hispanic and Native American, Non-Hispanic residents live in areas with less labor market engagement than do non-Hispanic white and Asian or Pacific Islander residents but still significantly more than African American residents. A similar pattern of labor market engagement exists for the population living below the federal poverty line, though Native American, Non-Hispanic residents in this income bracket have unusually high access to areas with high labor market engagement. The overall size of this group is very small however. African American and Hispanic residents living below the federal poverty line live in areas with somewhat less labor market engagement than do residents of their race or ethnicity as a whole. The difference in access to areas with high labor market engagement for Asian or Pacific Islander residents living below the federal poverty line and their racial or ethnic group as a whole is smaller.

ACS data indicate that unemployment is highest among residents of two or more races and African American residents. Asian residents experience the lowest rate of unemployment followed by non-Hispanic white residents. The overall unemployment rate for the population 16 years and over is 10.2 percent. High employment among Hispanic residents is somewhat offset by low labor force participation.

Comparing the map of jobs proximity with the map of national origin suggests that Indian, Honduran, Salvadoran, and Mexican residents may be concentrated in areas with somewhat less access to areas close to job opportunities. Comparing the map of labor market engagement with the map of national origin suggests that Honduran, Salvadoran, and Mexican residents may be concentrated in areas with less labor market engagement.

Comparing HUD maps of jobs proximity and labor market engagement with the map of family status shows no obvious relationship between family status, proximity to jobs, and labor market engagement.

Greater Houston Region. In order to determine if disparities in access to neighborhoods with high labor market engagement and neighborhoods close to job opportunities are better or worse in the participating jurisdictions than in the region as a whole, jurisdiction level data are compared to regional data. Divergences from regional trends in terms of which groups are most disadvantaged in each jurisdiction are also highlighted.

The data show that access to neighborhoods with high labor market engagement in the Greater Houston region is slightly above the national average. Access to such neighborhoods in the Harris County service area, Missouri City, and Galveston is somewhat higher than the region; while in Pasadena access is more limited than the region and the national average. Access to neighborhoods close to job opportunities in the region is just below the national average. Access to job opportunities in the Harris County service area, Pasadena and Galveston are comparable to the region as a whole, while Missouri City neighborhoods are much farther from job opportunities.

Among the total population of the region, Hispanic residents experience the greatest disparity in access to neighborhoods with high labor market engagement, and African American residents experience the greatest disparity in access to neighborhoods close to job opportunities as compared to the most advantaged groups. In Galveston, African American residents experience the greatest disparity in labor market engagement. Hispanic residents experience the greatest disparity in proximity to jobs in Pasadena and Galveston.

Among the population living below the federal poverty line in the region, African American residents experience the greatest disparity of any racial or ethnic group in access to both neighborhoods with high labor market engagement and jobs proximity compared to the most advantaged group. In all four collaborating jurisdictions, Hispanic and Native American, Non-Hispanic residents experience the greatest disparity in one or both of the employment opportunity indices.

Access to Transportation Opportunities

The following discussion of access to transportation opportunities in the participating jurisdictions is structured to meet the following objectives:

1. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

2. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

3. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

Figures IV-13, IV-14, and IV-15 show the HUD table and maps depicting HUD's transit index and HUD's low transportation cost index for participating jurisdictions. Keep in mind: higher index values (and associated darker shading on the maps) indicate higher access to transit and higher exposure to neighborhoods with low transportation costs. The maps are shown here without the race/ethnicity and national origin overlays for the sake of simplicity and clarity; however, the discussion of findings incorporates spatial analysis of opportunity and protected class populations.

Figure IV-13. Transportation Related Opportunity Indices

Note:

Higher index values indicate greater access to transit and greater exposure to low transportation costs.

Source:

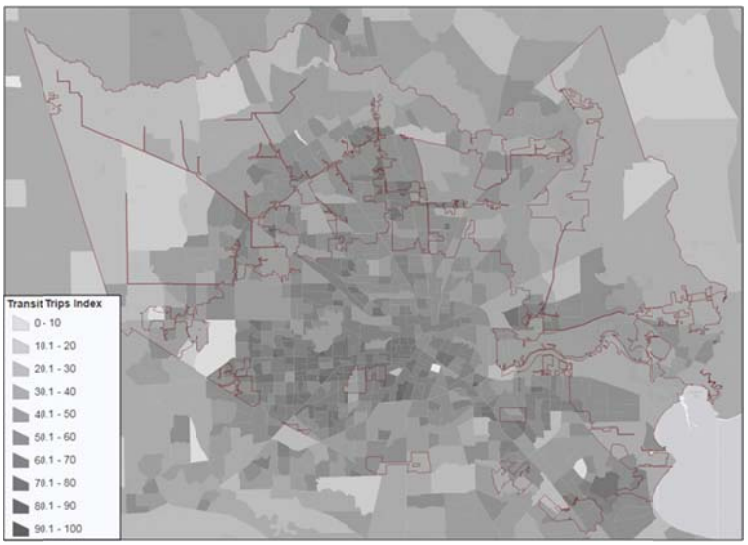
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Transit Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	48	47	55	44	53
African American/Black	54	52	60	47	62
Hispanic	54	51	59	46	59
Asian or Pacific Islander	53	51	49	43	64
Native American	49	49	57	44	58
Population below federal poverty line					
Non-Hispanic White	50	50	60	45	57
African American/Black	57	54	61	48	62
Hispanic	57	53	61	46	60
Asian or Pacific Islander	58	52	63	45	69
Native American	57	56	59	N/a	66

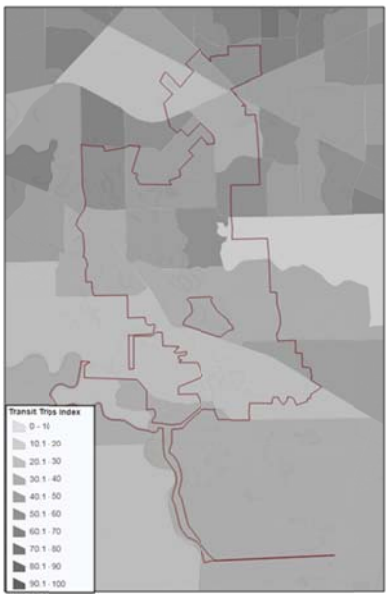
Low Transportation Cost Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	51	47	62	39	61
African American/Black	60	54	69	42	69
Hispanic	61	52	68	45	66
Asian or Pacific Islander	57	52	58	40	70
Native American	53	49	66	41	66
Population below federal poverty line					
Non-Hispanic White	56	52	69	40	66
African American/Black	65	58	69	43	69
Hispanic	66	57	71	48	67
Asian or Pacific Islander	65	56	73	45	75
Native American	66	61	72	N/a	65

Figure IV-14.
Transit Trips Index Maps

Harris County



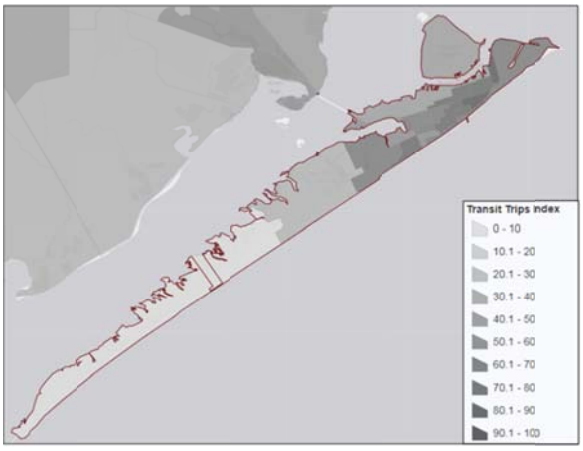
Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

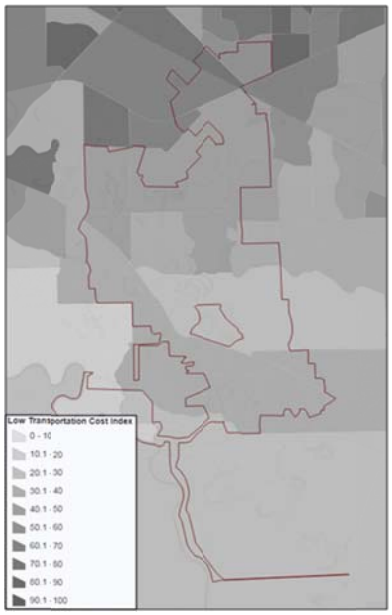
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure IV-15.
Low Transportation Cost Index Maps

Harris County



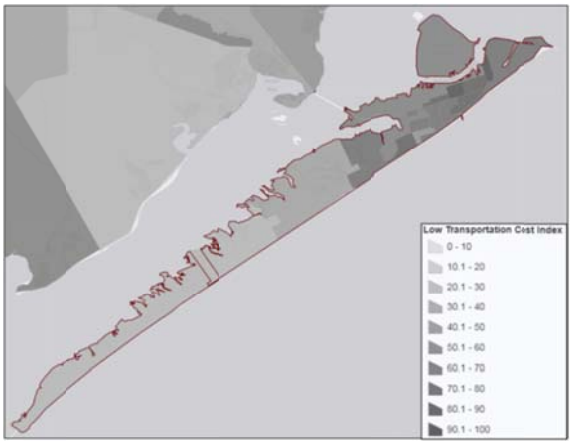
Missouri City



Pasadena



Galveston



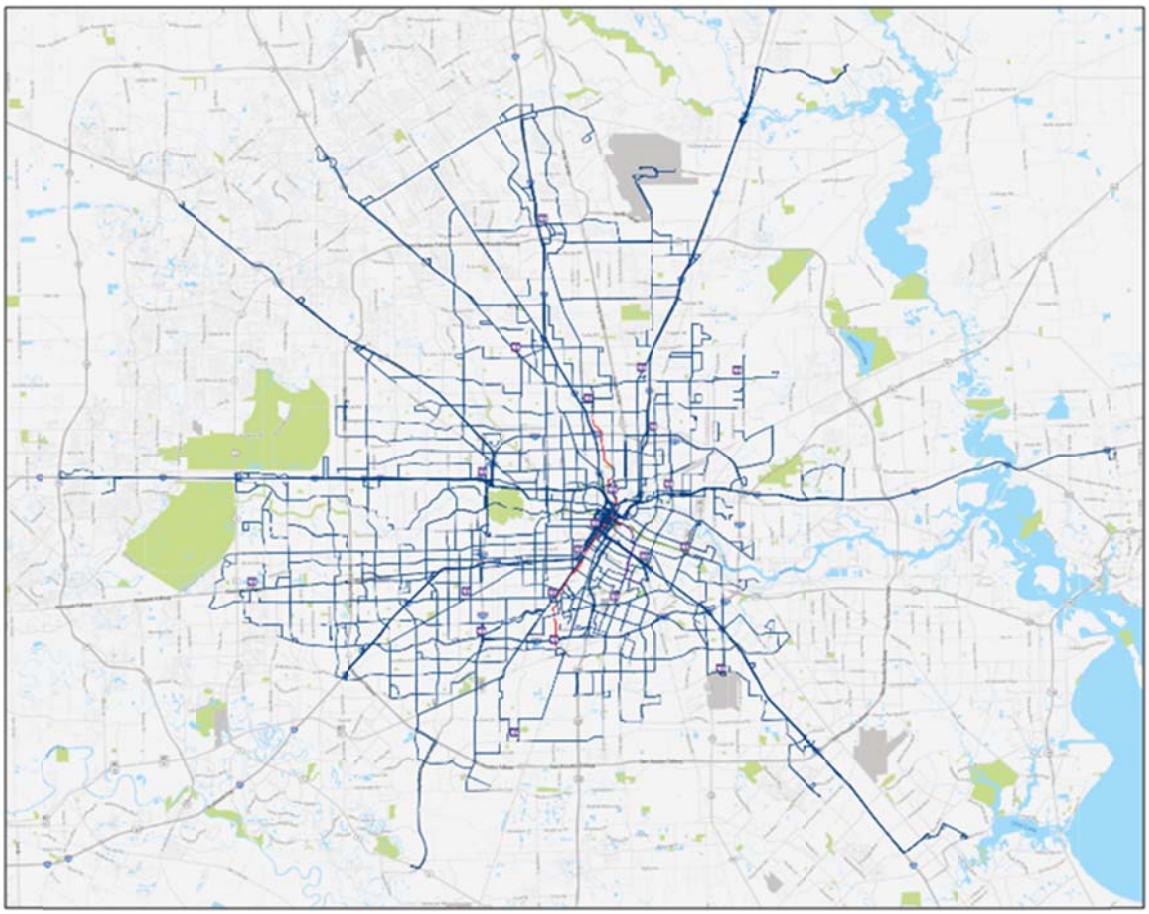
Note: Darker shading indicates higher opportunity index values.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figures IV-16 through IV-18 supplement the HUD opportunity maps with maps of transit service and maps and data of commute times for the participating jurisdictions.

Figure IV-16.
Transit Service

Harris County



Pasadena



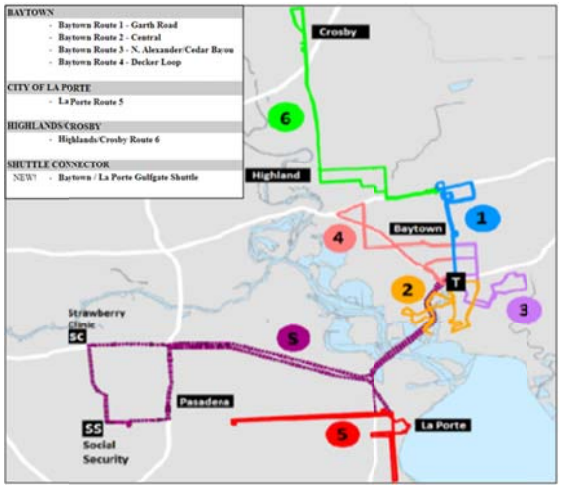


Figure IV-16. (Continued)
Transit Service

Galveston



Missouri City

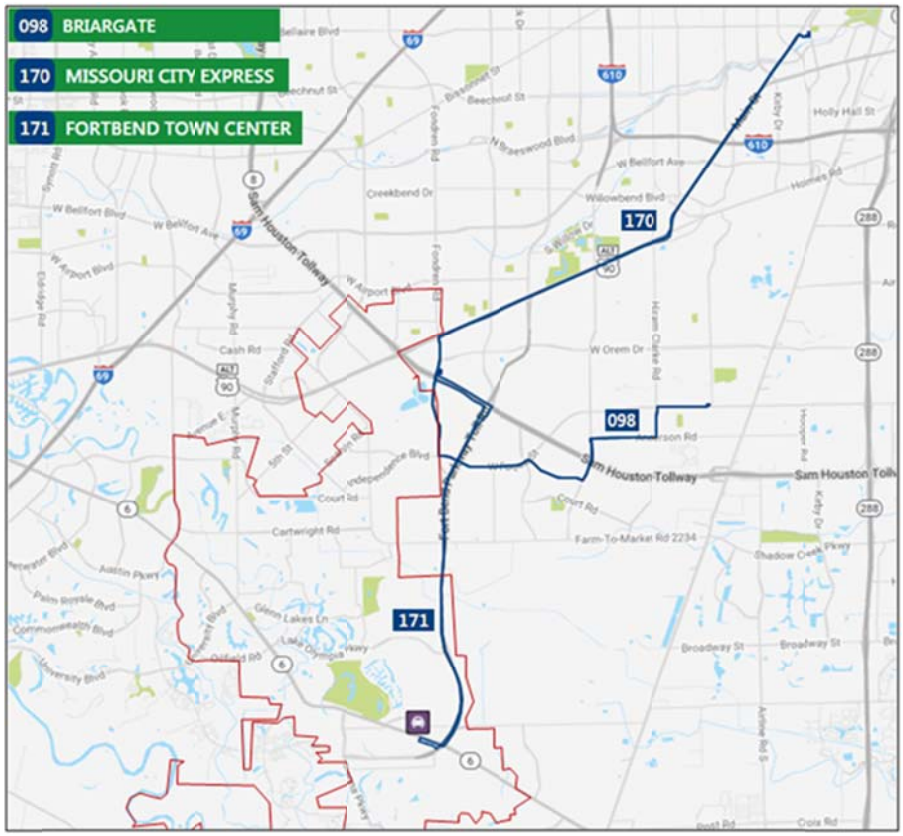
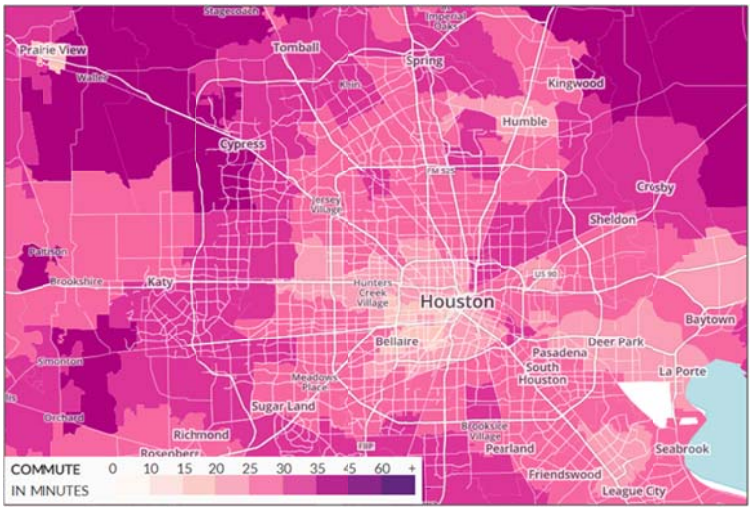
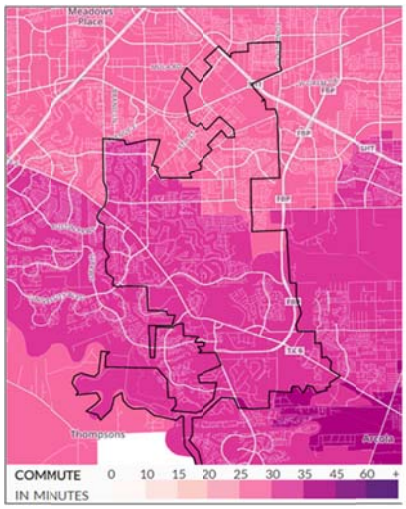


Figure IV-17.
Commute Time

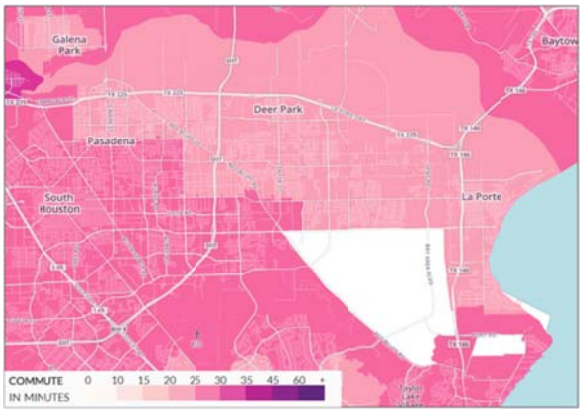
Harris County



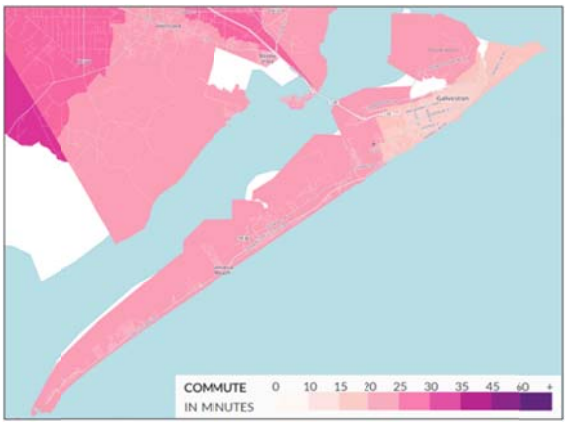
Missouri City



Pasadena



Galveston



Source: Census Transportation Planning Products data provided by the Federal Highway Administration based on the 2006-2010 U.S. Census.

Figure IV-18.
Commuting Patterns and Times

	Harris County Service Area	Pasadena	Missouri City	Galveston
Workers 16 years and over	**924,738**	**64,549**	**35,386**	**21,486**
Means of Transportation to Work				
Car, truck, or van:	92.7%	95.0%	93.0%	80.2%
Drove alone	82.5%	81.0%	85.0%	69.8%
Carpooled:	10.1%	14.0%	8.0%	10.4%
Public transportation (excluding taxicab):	1.5%	1.0%	3.0%	3.2%
Other means	2.2%	2.6%	1.1%	12.1%
Worked at home	3.3%	2.0%	4.0%	4.6%
Place of Work				
Worked in state of residence	99.2%	99.4%	99.0%	99.3%
Worked in county of residence	92.6%	91.4%	37.0%	88.2%
Worked outside county of residence	6.6%	8.0%	62.0%	11.1%
Worked outside state of residence	0.8%	0.6%	1.0%	0.7%
Travel Time to Work				
Less than 10 minutes	7.6%	9.8%	6.0%	27.0%
10 to 14 minutes	9.6%	13.4%	9.0%	23.1%
15 to 19 minutes	12.9%	15.0%	10.0%	17.5%
20 to 24 minutes	13.6%	16.0%	14.0%	9.7%
25 to 29 minutes	5.7%	7.4%	7.0%	2.6%
30 to 34 minutes	18.2%	16.8%	23.0%	5.8%
35 to 44 minutes	8.4%	6.0%	11.0%	2.7%
45 to 59 minutes	12.3%	7.9%	13.0%	3.5%
60 or more minutes	11.5%	7.8%	8.0%	7.9%
Mean travel time to work (minutes)	**30.3**	**25.9**	**29.8**	**19.8**

Source: 2015 ACS and BBC Research & Consulting.

Harris County service area. Figure IV-15 indicates that transportation costs are higher for areas farther from the city center of Houston. Figure IV-14 indicates similarly that residents living closer to the city of Houston are more likely to use public transportation.

Houston Regional Transportation Authority (METRO) is the regional transportation authority which serves the city of Houston as well as 15 other cities in the region and major portions of the Harris County service area. METRO offers over 100 bus routes, three rail lines, and 21 transit centers in the region shown on the system map above.

Overall, the proportion of workers commuting by public transportation reported in the ACS estimates is just 1.5 percent (see Figure IV-18). ACS data also indicate that 82.5 percent of workers in the Harris County service area, excluding entitlement areas, commute alone in a private vehicle. An additional 10.1 percent carpool to work. Other means of transportation (walking, biking, taxi or other) is used by 2.2 percent of workers and 3.3 percent of residents work at home. Most workers in The Harris County service area, excluding entitlement areas,

(92.6 percent) work inside their county of residence. The average travel time to work is 30.3 minutes with 24 percent of workers in the county commuting more than 45 minutes to work.

Figure IV-13 indicates that among the total population, non-Hispanic white residents live in areas with the highest transportation costs. African American residents had the greatest access to neighborhoods with low transportation costs. Among the population living below the federal poverty line, non-Hispanic white residents again have the least access to neighborhoods with low transportation costs, and Native American, Non-Hispanic have the greatest access to transportation.

Figure IV-13 indicates that among the total population, non-Hispanic white and Native American, Non-Hispanic residents are least likely to use public transportation. African American residents are most likely to use public transportation. Among the population living below the federal poverty line, non-Hispanic white residents remain the least likely to use public transportation and Native American, Non-Hispanic residents are the most likely to use public transportation.

Figure IV-17, which maps Census Transportation Planning Products data provided by the Federal Highway Administration based on the 2006-2010 U.S. Census indicates that average commute times are longer for workers living farther from the Houston city-center.

Pasadena. Figure IV-15 indicates that transportation costs are slightly higher in the south of the city in District H. Figure IV-14 indicates similarly that Districts F and H in the southern areas of the city are less likely to use public transportation.

Transit service in Pasadena is offered by two regional transportation services. METRO regional transportation authority serves the city of Houston as well as 15 other cities in the region and major portions of unincorporated Harris County; two METRO routes offer service at the western edge of District B in Pasadena shown on Map D above. The other, Harris County Transit, offers alternative transportation service for several jurisdictions, including Pasadena. La Porte Route 5, a new fixed-route bus line, recently began operating in the Pasadena/La Porte corridor. Harris County Transit also operates the Baytown/La Porte Gulfgate Shuttle with service through Pasadena.

ACS data (Figure IV-18) indicate that 1 percent of workers commute by public transportation and 81 percent of workers in Pasadena commute alone in a private vehicle. An additional 14 percent carpool to work. Public transportation is used by 1 percent of workers, and 2 percent work at home. Other means of transportation, including walking, riding a bicycle, motorcycle, or taxi, together are used by 1 percent of workers. Most workers (91.4 percent) work inside their county of residence. The average travel time to work is 25.9 minutes with over 38 percent of workers commuting more than 30 minutes to work.

Figure IV-13 indicates that among the total population, Asian or Pacific Islander residents live in areas with the highest transportation costs. African American residents had the greatest access to neighborhoods with low transportation costs. Among the population living below the federal poverty line, non-Hispanic white residents have the least access to neighborhoods with a low

transportation costs. Within this income bracket, Asian or Pacific Islander residents had the greatest access to areas with low transportation costs.

Figure IV-13 indicates that among the total population, Asian or Pacific Islander and non-Hispanic white residents are least likely to use public transportation. African American residents are most likely to use public transportation. Among the population living below the federal poverty line, Native American, Non-Hispanic residents are least likely to use public transportation followed by non-Hispanic white residents. Asian or Pacific Islander residents are the most likely to use public transportation in this income bracket.

Figure IV-17, which maps Census Transportation Planning Products data provided by the Federal Highway Administration based on the 2006-2010 U.S. Census indicates that average commute times are slightly shorter for workers living near the industrial zones at the north of the city in Districts A, C, and D.

Missouri City. Figure IV-15 indicates that transportation costs are highest in city District D and the southern part of District B. Figure IV-14 indicates that residents in the north of the city are more likely to use public transportation.

Map D of the METRO regional transit system shows that three routes offer service near Missouri City with only one route, Route 171 – Fortbend Town Center, offering service inside the city limits. Route 171 originates at the Missouri City Park and Ride at the south end of District B. The limited transit service is consistent with the low transit trip indices throughout the city and the small number (three percent) of workers commuting by public transportation reported in the ACS data.

As shown in Figure IV-18, 85 percent of workers in Missouri City commute alone in a private vehicle. An additional 8 percent carpool to work. Public transportation is used by 3 percent of workers. Four percent work at home. Other means of transportation, including walking, riding a bicycle, motorcycle, or taxi are used by less than 1 percent of workers. Most resident workers work outside their county of residence. This may be because many workers in the portion of Missouri City outside of Harris County commute into Harris County for work. The mean travel time to work is 29.8 minutes with 54 percent of workers commuting more than 30 minutes to work.

Figure IV-13 indicates that among the total population, Asian and Pacific Islander residents and non-Hispanic white residents live in areas with the highest transportation costs. Hispanic residents had the greatest access to neighborhoods with low transportation costs. Among the population living below the federal poverty line, non-Hispanic white residents have the least access to neighborhoods with low transportation costs. Within this income bracket, Hispanic and Asian or Pacific Islander residents had the greatest access to neighborhoods with low transportation costs.

Figure IV-13 also indicates that among the total population, Asian or Pacific Islander residents and non-Hispanic white residents are least likely to use public transportation. African American residents are most likely to use public transportation followed by Hispanic and Native American, Non-Hispanic residents. Among the population living below the federal poverty line, non-

Hispanic white residents are the least likely to use public transportation and African American residents are the most likely to use public transportation. Overall, transit use is low among all groups and differences in use are small between groups. This is consistent with the limited availability of public transportation to the city as a whole, regardless of race, ethnicity, or place of residence within the city.

Census Transportation Planning Products data provided by the Federal Highway Administration based on 2006-2010 U.S. Census indicates that most workers residing in Missouri City work in Houston or elsewhere in Harris County. The Figure IV-17 map of average commute times shows that commutes are shorter on average for workers living closer to Houston in District A and the northern part of District B.

Galveston. Figure IV-15 indicates that transportation costs are highest in city District 6. Figure IV-14 indicates that residents living near downtown have are more likely to use of public transportation while residents of District 6 are least likely to use public transportation. Figure IV-16, which maps the Galveston Transportation Services (Island Transit) system, shows that seven routes operate on the island. Service is concentrated near downtown, although all city districts excluding District 6 are served by at least one route. Pelican Island is served by one route during peak hours only.

The absence of bus routes in District 6 is consistent with the low public transportation usage and higher transportation costs there.

ACS data indicate that 69.8 percent of workers in Galveston commute alone in a private vehicle. An additional 10.4 percent carpool to work. Public transportation is used by 3.2 percent of workers and 4.6 percent work at home. Other means of transportation, including walking, riding a bicycle, motorcycle, or taxi, together are used by 12.1 percent of workers. Most workers (88.2 percent) work outside their county of residence. The mean travel time to work is 19.8 minutes with just under 20 percent of workers commuting more than 30 minutes to work.

Figure IV-13 indicates that among the total population, non-Hispanic white residents live in areas with the highest transportation costs and Asian or Pacific Islander residents have the greatest access to neighborhoods with low transportation costs. Among the population living below the federal poverty line, Non-Hispanic Native American, Non-Hispanic and non-Hispanic white residents have the least access to neighborhoods with low transportation costs and Asian or Pacific Islander residents have the greatest access.

Figure IV-13 indicates that among the total population non-Hispanic white and Native American, Non-Hispanic residents are least likely to use public transportation and Asian or Pacific Islander residents are most likely to use public transportation, followed by African American residents. Among the population living below the federal poverty line, non-Hispanic white residents remain the least likely to use public transportation and Asian or Pacific Islander residents are the most likely to use public transportation.

Figure IV-17, which maps Census Transportation Planning Products data provided by the Federal Highway Administration based on the 2006-2010 U.S. Census, indicates that average

commute times are shorter for workers living closer to downtown in Districts 2, 4, and 5 and the south of Districts 1 and 3.

Greater Houston region. In order to determine if disparities in access to neighborhoods with low transportation costs and public transportation opportunities are better or worse in the participating jurisdictions than in the region as a whole, the jurisdiction level data are compared to the regional data. Divergences from regional trends in terms of which groups are most disadvantaged in each jurisdiction are also highlighted.

The data show that residents of the Greater Houston region use public transportation at a rate roughly equal to the national average. Transportation costs for the region are slightly higher than the national average. Transit use and transportation cost in Harris County, Pasadena and Galveston is comparable to the region as a whole, Transportation costs in Missouri City are substantially higher than the region as a whole.

Among both the total population of the region and the population living below the federal poverty line non-Hispanic white are least likely to use public transportation. In Pasadena, Asian or Pacific Islander residents are least likely to use public transportation and are most likely to live in areas with higher transportation costs of all racial or ethnic groups among the total population. Within jurisdictions, disparities among racial and ethnic groups in access to transportation opportunities are relatively small.

Access to Low-Poverty Neighborhoods

The following discussion of access to low poverty neighborhoods in the participating jurisdictions is structured to meet the following objectives:

1. Describe any disparities in exposure to poverty by protected class groups.

2. What role does a person's place of residence play in their exposure to poverty?

3. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

4. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low-poverty areas.

Figure IV-19 shows the poverty rate by race/ethnicity for each participating jurisdiction using ACS data.

Figures IV-20 and IV-21 show the HUD table and maps depicting the low poverty index for participating jurisdictions. Keep in mind: higher index values (and associated darker shading on the maps) indicate *higher* access to *low* poverty areas. The maps are shown here without the race/ethnicity and national origin overlays for the sake of simplicity and clarity; however, the discussion of findings incorporates spatial analysis of opportunity and protected class populations.

Figure IV-19.
Poverty by Race/ Ethnicity

	Harris County Service Area			Pasadena		
	General Population	Population in Poverty	Poverty Rate	General Population	Population in Poverty	Poverty Rate
Population for whom poverty status is determined	**1,974,693**	**253,266**	**12.8%**	**151,760**	**30,259**	**19.9%**
Black or African American	303,298	53,433	17.6%	3,936	1,372	34.9%
American Indian and Alaska Native	8,717	1,600	18.4%	2,236	289	12.9%
Asian	140,630	11,467	8.2%	3,069	358	11.7%
Native Hawaiian and Other Pac. Isl.	1,657	330	19.9%	64	10	15.6%
Some other race	143,836	25,698	17.9%	16,602	4,029	24.3%
Two or more races	48,587	5,666	11.7%	2,736	633	23.1%
Hispanic or Latino	735,634	140,783	19.1%	98,137	23,504	24.0%
Non-Hispanic White	764,530	44,087	5.8%	44,876	4,939	11.0%
	Missouri City			**Galveston**		
	General Population	Population in Poverty	Poverty Rate	General Population	Population in Poverty	Poverty Rate
Population for whom poverty status is determined	**70,243**	**3,624**	**5.2%**	**45,415**	**11,151**	**24.6%**
Black or African American	30,844	1,915	6.2%	9,080	3,457	38.1%
American Indian and Alaska Native	153	0	0.0%	155	0	0.0%
Asian	11,619	310	2.7%	2,001	545	27.2%
Native Hawaiian and Other Pac. Isl.	136	0	0.0%	13	13	100.0%
Some other race	3,944	177	4.5%	612	173	28.3%
Two or more races	1,722	114	6.6%	1049	277	26.4%
Hispanic or Latino	10,562	784	7.4%	13,417	3,800	28.3%
Non-Hispanic White	15,723	539	3.4%	20,460	3,367	16.5%

Source: 2015 ACS.

Figure IV-20.
Low Poverty Index

Note:
Higher index values indicate greater exposure to low poverty areas.

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

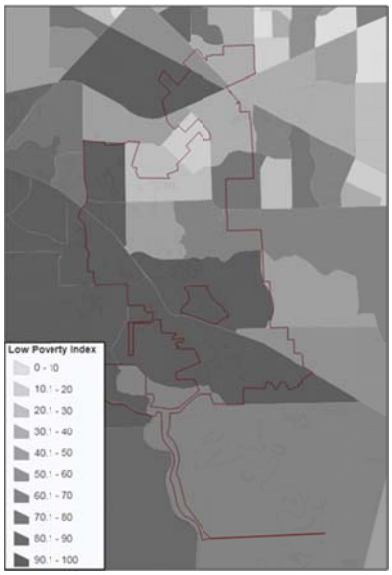
Low Poverty Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	63	67	50	75	46
African American/Black	38	46	32	65	24
Hispanic	35	43	27	54	36
Asian or Pacific Islander	61	60	67	87	39
Native American	52	60	38	73	37
Population below federal poverty line					
Non-Hispanic White	47	52	30	58	39
African American/Black	24	35	24	56	21
Hispanic	24	31	20	37	24
Asian or Pacific Islander	43	44	35	75	30
Native American	30	39	20	N/a	33

Figure IV-21.
Low Poverty Exposure Index Maps

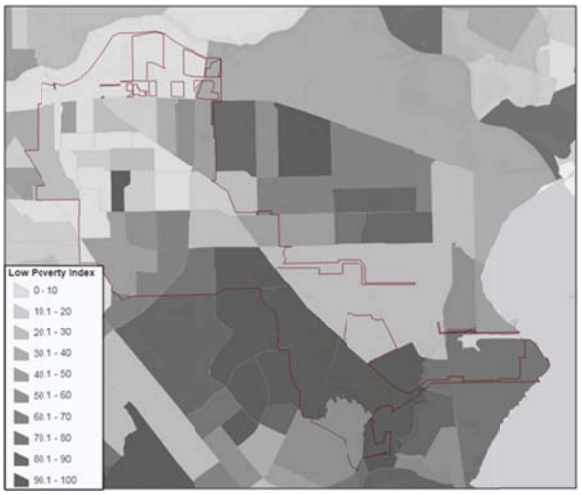
Harris County



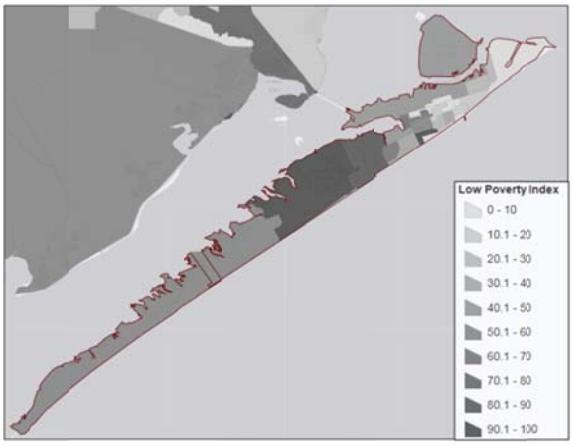
Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Harris County service area. According to five-year estimates from the ACS available in Figure IV-19, African American residents, Native American, Native Hawaiian (and other Pacific Islanders), Hispanic residents, and residents of "Some other race" are more likely than the total population to be living below the federal poverty line. Asian residents are less likely than the total population to be living below the federal poverty line. non-Hispanic white residents are the least likely of any racial or ethnic group to be living below the federal poverty line.

Among the total population, African American and Hispanic residents of The Harris County service area have the least access to low-poverty neighborhoods. Among the total population non-Hispanic white residents have the greatest access to low-poverty neighborhoods of any

racial ethnic group. For the population living below the federal poverty line, the pattern is identical.

Figure IV-21, which maps the HUD low poverty index, indicates that areas closer to the city of Houston tend to have less access to low-poverty neighborhoods. These include areas with higher concentrations of African American, Hispanic, and Asian residents, as well as residents from India and Mexico. Families with children also represent a relatively larger portion of households in areas close to Houston where low-poverty exposure indices are lower.

Pasadena. According to ACS data, African American residents of Pasadena are more likely than the population as a whole to be living below the federal poverty line. Hispanic residents and residents of "some other race alone" are somewhat more likely than the total population to be living below the federal poverty line. Asian residents and non-Hispanic white residents are less likely than the total population to be living below the federal poverty line. non-Hispanic white residents are the least likely of any racial or ethnic group to be living below the federal poverty line.

Among the total population, African American and Hispanic residents of Pasadena have the least access to low-poverty neighborhoods. Among the total population and the population living below the federal poverty line, Asian or Pacific Islander residents have the greatest access to low-poverty neighborhoods of any racial ethnic group. Native American, Non-Hispanic residents living below the federal poverty line have the least access to low-poverty neighborhoods.

Comparing the map of low poverty exposure (Figure IV-21) with demographic maps (Figures IV-2 through IV-4) indicates that the north of the city, including Districts A, B, C, D, and E have less access to low-poverty neighborhoods. These include areas with higher concentrations of African American and Hispanic residents, as well as residents from Mexico, El Salvador, and Honduras. Families with children also represent a relatively larger portion of households in District C where access to low-poverty neighborhoods is higher.

Missouri City. According to ACS data, Hispanic residents, African American and residents of two or more races are more likely than the total population to be living below the federal poverty line.

Among the total population, African American and Hispanic residents of Missouri City have the least access to low-poverty neighborhoods. Asian and Pacific Islander residents have the greatest access to low-poverty neighborhoods of any racial ethnic group regardless of income. African American residents living below the federal poverty line have somewhat lower access to low-poverty neighborhoods although still greater access than that of Hispanic residents in the total population. Hispanic residents living below the federal poverty line experience the greatest disparity in access to low-poverty neighborhoods.

Comparing the map of low poverty exposure (Figure IV-21) with demographic maps (Figures IV-2 through IV-4) indicates that District A and the northern part of District B have less access to low-poverty neighborhoods. These are areas with higher concentrations of African American and Hispanic residents, as well as residents from Mexico and Nigeria. The maps do not indicate that families with children experience a disparity in access to low-poverty neighborhoods.

Galveston. According to ACS data, African American residents are much more likely than the total population to be living below the federal poverty line. Hispanic residents, Asian residents, and residents of two or more races are somewhat more likely than the total population to be living below the federal poverty line. non-Hispanic white residents are less likely than the total population to be living below the federal poverty line.

Among the total population, African American and Hispanic residents of Galveston have the least access to low-poverty neighborhoods. non-Hispanic white residents have the greatest access to low-poverty neighborhoods of any racial or ethnic group regardless of poverty status. Hispanic residents living below the federal poverty line experience dramatically lower access to low-poverty neighborhoods compared to Hispanic residents in general.

Comparing the map of low poverty exposure (Figure IV-21) with demographic maps (Figures IV-2 through IV-4) indicates that District 2, District 3 excluding Pelican Island, the southern part of District 1, and the eastern edge of Districts 4 and 5 have less access to low-poverty neighborhoods. These include areas with higher concentrations of African American and Hispanic residents, as well as residents from Mexico, El Salvador, the Philippines, India, and Honduras. Families with children represent a relatively larger portion of households in Districts 2, 3, and 4. This suggests that as a group, families with children may experience a disparity in access to low-poverty neighborhoods.

Greater Houston Region. In order to determine if disparities in access to low-poverty neighborhoods is better or worse in the participating jurisdictions than in the region as a whole, jurisdiction level data are compared to regional data. Divergences from regional trends in terms of which groups are most disadvantaged in each jurisdiction are also highlighted.

The data show that residents of the Greater Houston region have access to low-poverty neighborhoods at a rate equal to the national average. Residents of unincorporated Harris County have slightly greater access than the region as a whole; while Missouri City have dramatically better access to such neighborhoods than residents of the region as a whole. Access to low-poverty neighborhoods is lower than the region as a whole for Pasadena and Galveston.

Among the total population of the region Hispanic residents experience the greatest disparity of any racial or ethnic group in access low-poverty neighborhoods compared to the most advantaged group. Hispanic residents of unincorporated Harris County experience a disparity comparable to the region as a whole, while the disparity is more severe in Pasadena and Missouri City. Hispanic residents in Galveston have slightly better access to low-poverty neighborhoods than in the region as a whole; African American residents of Galveston experience the greatest disparity in access to low-poverty neighborhoods compared to the most advantaged group.

Access to low-poverty neighborhoods among the population living below the federal poverty line in the region is well below the national average. Among the population living below the federal poverty line in the region Hispanic residents experience the greatest disparity of any racial or ethnic group in access to low-poverty neighborhoods compared to the most advantaged group. Hispanic residents of unincorporated Harris County experience a disparity comparable to the region as a whole, while the disparity is more severe in Missouri City. African American

residents of Galveston and Native American, Non-Hispanic residents of Pasadena experience the greatest disparities in this category compared to the most advantaged groups in those cities.

Access to Environmentally Healthy Neighborhoods

The following discussion of access to environmentally healthy neighborhoods in the participating jurisdictions is structured to meet the following objectives:

1. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

2. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Figures IV-22 and IV-23 show the HUD table and maps depicting the environmental health index for participating jurisdictions. Keep in mind: higher index values (and associated darker shading on the maps) indicate higher exposure to environmentally healthy neighborhoods. The maps are shown here without the race/ethnicity and national origin overlays for the sake of simplicity and clarity; however, the discussion of findings incorporates spatial analysis of opportunity and protected class populations.

Figure IV-22. Environmental Health Index

Note:

Higher index values indicate greater exposure to environmentally healthy conditions.

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

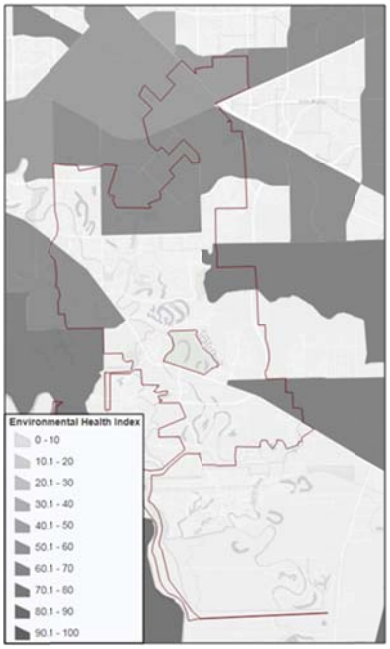
Environmental Health Index	Greater Houston Region	Harris County Service Area	Pasadena	Missouri City	Galveston
Total Population					
Non-Hispanic White	46	40	31	57	92
African American/Black	41	40	31	56	90
Hispanic	38	38	30	56	91
Asian or Pacific Islander	45	45	32	57	91
Native American	45	38	31	56	91
Population below federal poverty line					
Non-Hispanic White	44	37	30	57	92
African American/Black	38	37	30	56	90
Hispanic	36	36	30	55	91
Asian or Pacific Islander	45	46	29	55	90
Native American	35	31	29	N/a	93

Figure IV-23.
Environmental Health Index Maps

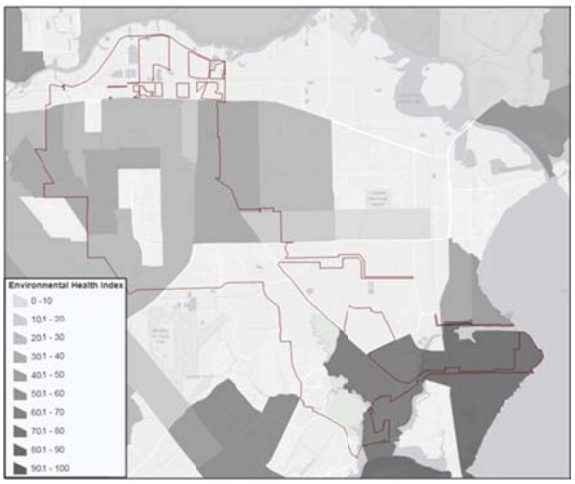
Harris County



Missouri City



Pasadena



Galveston



Note: Darker shading indicates higher opportunity index values.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

This HUD index relies largely on air quality indicators as a measure of environmental health. To supplement the HUD data, the study team included a discussion of proximity to industrial land uses for the City of Pasadena as part of the access to environmental health section. Flood risk and impact of natural disasters for all participating jurisdictions is discussed under a separate heading "Flood and Natural Disaster Risk Areas," which following the "Access to Environmentally Healthy Neighborhoods" discussion.

Harris County service area. Data are unavailable for a significant proportion of Census tracts in The Harris County service area, making it difficult to draw conclusions about disparities in access to environmentally healthy neighborhoods. Based on available data, Hispanic residents have the least access to environmentally healthy neighborhoods among the total population. Asian residents have the greatest access to environmentally healthy neighborhoods. The pattern is similar among the population living below the federal poverty line.

Pasadena. The analysis for the City of Pasadena includes a discussion of HUD data and a discussion of industrial land uses which are not measured in the HUD data but may impact environmental health for many Pasadena residents.

HUD environmental health index. HUD index data are unavailable for a number of Census tracts in Pasadena, making it difficult to draw conclusions about disparities in access to environmentally healthy neighborhoods within the city. Overall, access to environmentally healthy neighborhoods for all racial and ethnic groups in Pasadena is much lower than for the region as a whole. This is consistent with the close proximity of most Pasadena residents to industrial zones along Buffalo Bayou, the shipping channel at the northern edge of the city, and the Bayport industrial complex to the southeast.

Based on available data, Hispanic residents have the least access to environmentally healthy neighborhoods among the total population while Asian residents have the greatest access. Among the population living below the federal poverty line, all racial and ethnic groups have comparable access to environmentally healthy neighborhoods. This access is well below the national average.

Industrial land uses. Pasadena's economy is closely tied to the petroleum and other heavy industries. As shown in Figure IV-24, there are minority neighborhoods immediately adjacent to the industrial corridor that lines the Houston Ship Channel and Bayport. Research shows that Locally-Unwanted Land Uses (LULUs) are disproportionately sited in poor and minority neighborhoods throughout the country.[1] This has negative repercussions for physical and mental health[2] and often causes property values to fall.[3]

Throughout the Houston area, residents of these neighborhoods are exposed to various chemicals, aerosols and dust that accompany such industry. Pasadena neighborhoods adjacent to the Ship Channel are especially vulnerable. While most of the areas immediately adjacent to the heavy industry on the north of the city are not densely inhabited (See Figure IV-24), those just south of the Pasadena Freeway are also exposed.

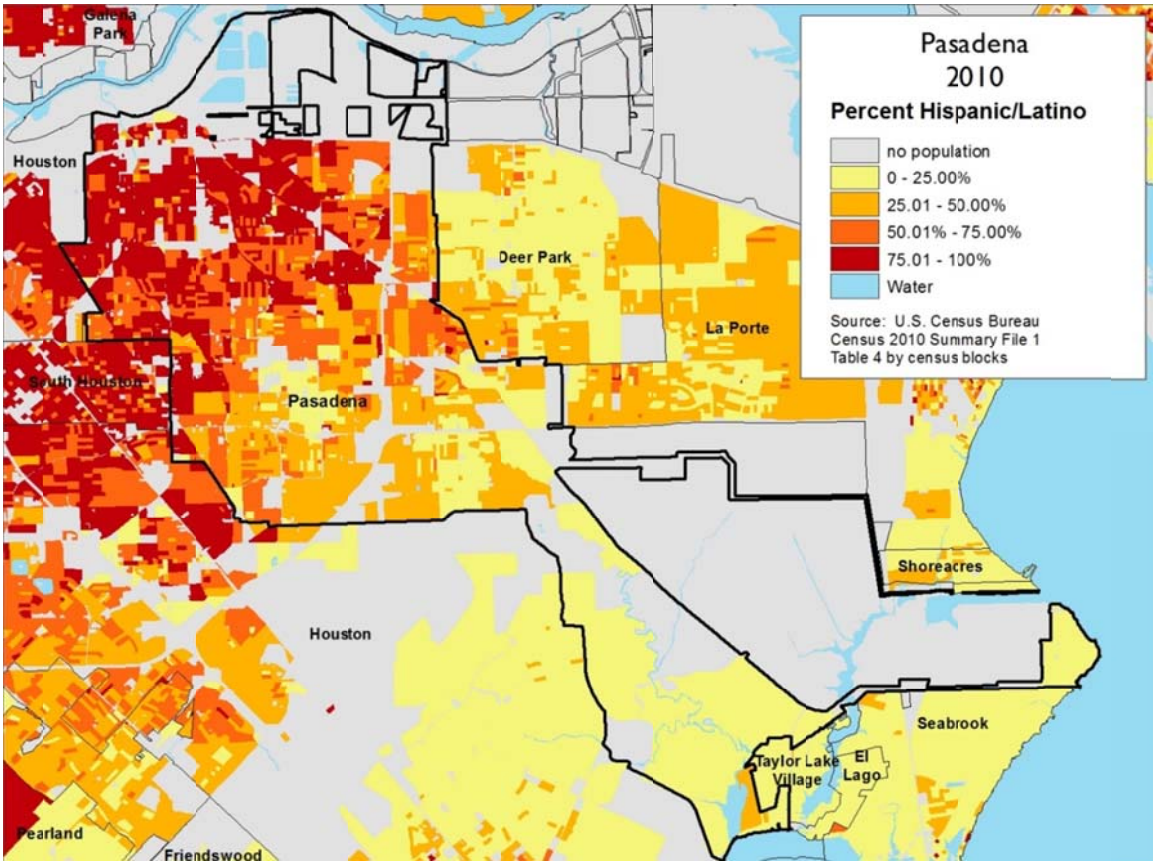
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[1] Clifford Rechtschaffen & Eileen Gauna, Environmental Justice: Law Policy & Regulation 56 (2002).

[2] "(Un)Safe at Home: The Health Consequences of Sub-standard Farm Labor Housing. A Review of the Literature and Call for Research." Don Villarejo, Mark Schenker, Ann Moss Joyner and Allan Parnell. CRLA Rural Justice Forum, December 31, 2009.

[3] Been, Vicki, "Locally Undesirable Land Uses in Minority Neighborhoods: Disproportionate Siting or Market Dynamics?" *The Yale Law Journal,* Vol. 103, No. 6 (Apr., 1994), pp. 1383-1422. http://www.jstor.org/stable/797089 accessed 7/10/2015.

Figure IV-24.
Predominantly-Latino Neighborhoods and Industrial Uses, Pasadena



Source: Cedar Grove Institute for Sustainable Communities.

A 2005 study of air pollution accompanying Houston's petrochemical industry and emissions from ships using the Ship Channel found the distribution of health risks are far from equal. "The substances identified as definite risks were found in greater numbers in several East Houston neighborhoods adjacent to the Houston Ship Channel."[4]

The study's summary noted "If we factor in other dimensions of vulnerability, then the overall risks to health increase still further." Discussing the "pockets of residences surrounded by industrial sites, either disposal lagoons for dredged material from the Ship Channel… or fence lines behind heavy industry…," the study noted "The conditions necessary for healthy lifestyles,

[4] Bethel, Heidi L. et al., "A Closer Look at Air Pollution in Houston: Identifying Priority Health Risks A summary of the Report of the Mayor's Task Force on the Health Effects of Air Pollution" Institute for Health Policy Report ES-001-006. https://www3.epa.gov/ttnchie1/conference/ei16/session6/bethel.pdf

economic sustenance and quality of life for residents are fewer here than in most neighborhoods."[5]

Duration of exposure is a critical factor. Living adjacent to these noxious LULUs guarantees prolonged exposures. Such exposures are especially harmful to young children, the elderly, and people with existing asthma or cardiopulmonary disease.[6]

Missouri City. Among the total population, Hispanic residents have the least access to environmentally healthy neighborhoods while Asian or Pacific Islander residents have the greatest access, according to the HUD environmental health index. Among the population living below the federal poverty line Asian or Pacific Islander and Hispanic residents are the racial or ethnic groups with the least access to environmentally healthy neighborhoods while non-Hispanic white residents have the greatest access.

Figure IV-23, which maps the environmental health index, shows that environmental health index data are missing for large parts of city Districts B, C, and D. In addition, the magnitude of the disparities identified in the opportunity table (Figure IV-22) is very small. As such, conclusions drawn regarding disparity of access to environmentally healthy neighborhoods based on race, ethnicity, national origin, or family status based on available data are tenuous.

Galveston. HUD environmental health index data are available for the majority of Census tracts in the City of Galveston with limited geographic variation in index scores. Disparities among ethnic groups in access to environmentally healthy neighborhoods are very small. Among the total population, African American residents have the least access to environmentally healthy neighborhoods and non-Hispanic white residents have the greatest access to environmentally healthy neighborhoods. Among the population living below the federal poverty line, African American residents have the least access to environmentally healthy neighborhoods and Native American, Non-Hispanic residents have the greatest access to neighborhoods with higher levels of air quality in this income bracket (based on HUD environmental health index data shown in Figure IV-22 and 23).

Greater Houston Region. In order to determine if disparities in access to environmentally healthy neighborhoods are better or worse in the participating jurisdictions than in the region as a whole, jurisdiction level data are compared to regional data. Divergences from regional trends in terms of which groups are most disadvantaged in each jurisdiction are also highlighted. The Greater Houston region is home to dozens of industrial sites which use or manufacture petroleum, solvents, and pesticides; the distribution of these sites in the region affects access to environmentally healthy neighborhoods within and among jurisdictions.

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[5] Bethel, Heidi L. et al., "A Closer Look at Air Pollution in Houston: Identifying Priority Health Risks A summary of the Report of the Mayor's Task Force on the Health Effects of Air Pollution" Institute for Health Policy Report ES-001-006. https://www3.epa.gov/ttnchie1/conference/ei16/session6/bethel.pdf

[6] U.S. Department of Veterans Affairs, Public Health, "Health Effects of Sand, Dust and PM Exposure," https://www.publichealth.va.gov/exposures/sand-dust-particulates/index.asp accessed 8/17/2017.

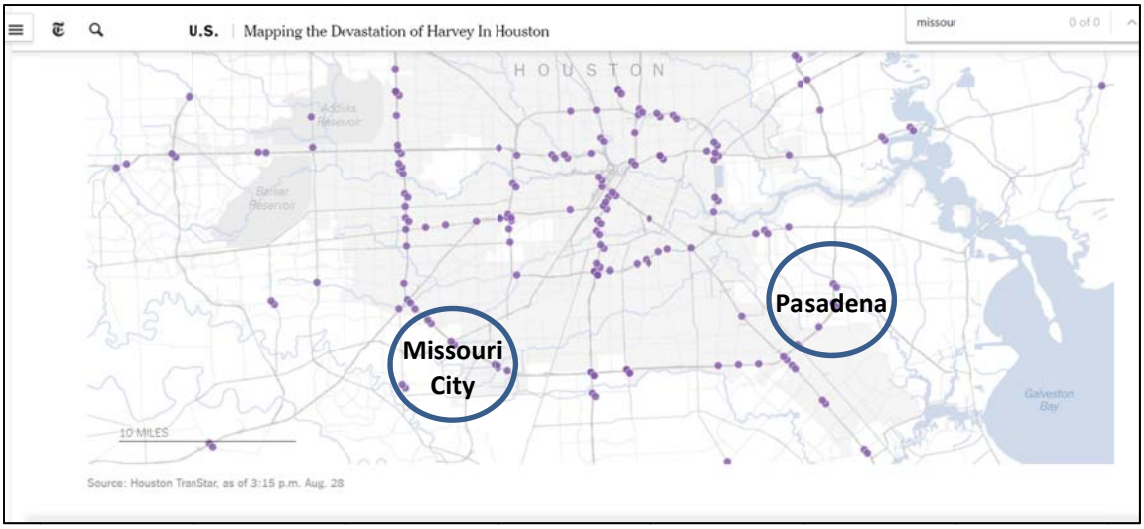
The HUD index data show that access to environmentally healthy neighborhoods in the region is below average for the nation. Access to such neighborhoods in Galveston is higher than the region as a whole and near the national average; Access in Missouri City is well above the region and the national average. Access to environmentally healthy neighborhoods for residents of unincorporated Harris County is roughly comparable to the region as a whole while the score for Pasadena is much lower than the region.

Disparities in access to environmentally healthy neighborhoods within jurisdictions are relatively low among racial or ethnic groups and between the total population and the population living below the federal poverty line in Pasadena, Missouri City, and Galveston. Native American, Non-Hispanic residents of the region experience the greatest disparity in access to environmentally healthy neighborhoods compared to the most advantaged group. Native American, Non-Hispanic residents living below the federal poverty line in The Harris County service area experience the greatest disparity in access to environmentally healthy neighborhoods compared to the most advantaged group in the jurisdiction.

Flood and Natural Disaster Risk Areas

The region's coastal location creates additional environmental risk beyond those traditionally evaluated through HUD data, including threats posed by sea level rise, more frequent and dangerous natural disasters, and salinization of groundwater. Hurricane/Tropical Storm Harvey (August 2017) demonstrated that the increase in rainfall intensity and amounts associated with the increased temperature in the Gulf of Mexico poses severe flooding problems for all of Harris County, including Pasadena and Missouri City, as well as for Galveston. Figure IV-25 below shows high water incidents from Hurricane Harvey that affected major roads, blocking evacuation routes and rescue efforts.

Figure IV-25.
Hurricane Harvey High Water Incidents Affecting Major Roads (8/28/2017)



Source: New York Times, "Mapping the Devastation of Harvey in Houston," https://www.nytimes.com/interactive/2017/08/28/us/houston-maps-hurricane-harvey.html accessed 8/29/2017

According to disaster recovery and urban planning expert Dr. Shannon Van Zandt,

> *"One of the most enduring findings in over 50 years of disaster literature is that low-income households and households of color are at a clear disadvantage when it comes to the proportion of damage received and the time it takes to recover. My work with my colleagues has shown this to be very true of our Texas communities."*[7]

According to Van Zandt, low-income homeowners are often uninsured or underinsured and many homeowners had still not recovered even six years after [Hurricane Ike], "thanks in large part to failures on the part of the State of Texas to equitably distribute recovery funds flowing in from the federal government."[8]

Van Zandt's research shows that groups protected by the Fair Housing Act are also subject to disparities in response, including warning, damage, preparedness, evacuation and recovery.

While Houston is not on the coast, the city and Harris County are probably most threatened by drought and extreme rainfall events, such as the 2015 record-breaking "deluge" which caused extreme flooding and killed at least 15 people.[9] More recently, Hurricane/Tropical Storm Harvey closed airports, flooded water treatment plants, and caused hospitals to be evacuation. Texas Governor Greg Abbott estimated initial damage of $150-180 billion in losses to homes, cars, infrastructure, dams, hospitals, oil refineries and chemical plants:

> "Harvey, which came ashore on August 25 as the most powerful hurricane to hit Texas in 50 years, has killed an estimated 47 people and displaced more than one million after causing wreckage in an area stretching for nearly 500km."[10]

The Kaiser Family Foundation partnered with Episcopal Health Foundation to conduct an Early Assessment of Hurricane Harvey Impact in the fall of 2017. The effort included a survey of adults in 24 counties (with an oversample of low income residents and people of color) along with five focus groups. The surveys and focus groups were conducted in October and November of 2017 and generated 1,635 survey responses. Results from the study indicate that black and Hispanic residents, along with low income households, were disproportionately impacted by the storm. Key findings from the study are summarized below:

- Overall about two-thirds of all households in the broader region were affected by Harvey. About 40 percent had damage to their home; half experienced an interruption or loss of

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[7] Henneberger, John, "A better way to speed recovery from Harvey, by Texas A&M Prof. Shannon Van Zand, Texas Housers, Texas Low Income Housing Information Service, September 3, 2017. https://texashousers.net/2017/09/03/a-better-way-to-speed-recovery-from-harvey-by-texas-am-prof-shannon-van-zandt/ accessed 9/5/2017.

[8] Henneberger, Ibid.

[9] Elizabeth Harball and Scott Detrow, "Deadly downpours flooded Texas and Oklahoma and may have been exacerbated by global warming," *Scientific American*, ClimateWire, May 27, 2015. https://www.scientificamerican.com/article/climate-change-may-have-souped-up-record-breaking-texas-deluge/ accessed 7/26/2017.

[10] Aljazeera, "Texas governor estimates Harvey damage at up to $180bn," Sept. 3, 2017. http://www.aljazeera.com/news/2017/09/texas-governor-estimates-harvey-damage-180bn-170903164353120.html accessed 9/5/2017.

employment or income; and one out of nine respondents had been displaced from their home at time of survey.

- Black and Hispanic residents and households with lower incomes in general were more likely to be affected by property damage or income loss than other households.
    - For Hispanics the disparity was driven primarily by higher rates of employment effects;
    - Black residents had higher rates of both employment impacts and damage to homes/vehicles than white residents.
    - Black and Hispanic residents were also more likely to report vehicle damage than other residents.
    - Lower income households as a group were more likely to report employment impacts and damage to homes than moderate and high income groups. Workers in low income households are less likely to hold salary jobs and therefore more likely to lose income for missed work days and/or temporary business closures.
    - Undocumented residents (12% of respondents) were particularly vulnerable to damage according to the survey: 73 percent were directly affected by Harvey, 68 percent had a disruption in employment/income, and nearly one-third had damage to their home.
- Overall, about one out of every six residents said someone in their household has a health condition that is new or worse as a result of Harvey. Both black residents and white residents were more likely to say a household member's health was impacted by Harvey than other groups. The survey also indicated that Hispanic and black residents may be less likely to manage health problems because they are less likely to have health insurance and access to health providers.
- In the broader region, about one quarter of homes that were damaged had flood insurance. However, lower income, black, and Hispanic households were less likely to report having insurance (owner, renter, and/or flood insurance).
- Most survey respondents (70%) said indicated that local, county and state governments were doing an "excellent," "very good," or "good" job responding to community needs in the wake of Harvey. However, black and low income residents more likely than other groups to say they are not getting the help they need.
- The survey indicated that language access a challenge for some in navigating recovery-related resources. Among those who completed survey in Spanish, three out of ten said it was "very" or "somewhat difficult" to find the information they needed in Spanish when trying to get recovery help.[11]

[11] Hamel, Liz et al. "An Early Assessment of Hurricane Harvey's Impact on Vulnerable Texans in the Gulf Coast Region." Kaiser Family Foundation and Episcopal Health Foundation. December 2017.

Harvey may have been unprecedented in itself, but the damage experienced was not new to the region. In July of 2016, a FEMA blog noted "With more than half its 254 counties eligible to receive assistance under six federal disaster declarations in the past year, Texas remains in recovery from severe storms and flooding."[12]

Galveston is situated on a barrier island which has always been vulnerable to natural disasters. In 1900, it was struck by what is still the nation's deadliest natural disaster.[13] After the storm, the City built a 10-mile long 17-foot high seawall, and much of the City's elevation was raised. However, in 2008, Hurricane Ike caused extensive damage to the seawall.[14]

Like all barrier islands, Galveston is unstable and subject to erosion. In 2011 Rice University released a study, *"Atlas of Sustainable Strategies for Galveston Island,"* which argued the West End of Galveston was quickly eroding and the City should reduce construction and/or population in that area. It recommended against any rebuilding of the West End in the event of damage from another hurricane."[15] According to Rice University professor of Oceanography John Anderson, "the ocean level in Galveston Bay is rising at 3 millimeters a year, compared with the long-term average of 0.5 millimeter."[16]

Figure IV-26 depicts Galveston at current sea level and with a theoretical sea level rise of three feet. A rise of three feet would destroy most of the residential neighborhoods on the island, making parts of the island inaccessible.

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12 Feehan, Jan, "Recovery Workers Stepping Up to the Plate Share Thoughts from the Front Lines," FEMA, https://www.fema.gov/blog/2016-08-15/recovery-workers-stepping-plate-share-thoughts-front-lines accessed 9/5/2017.

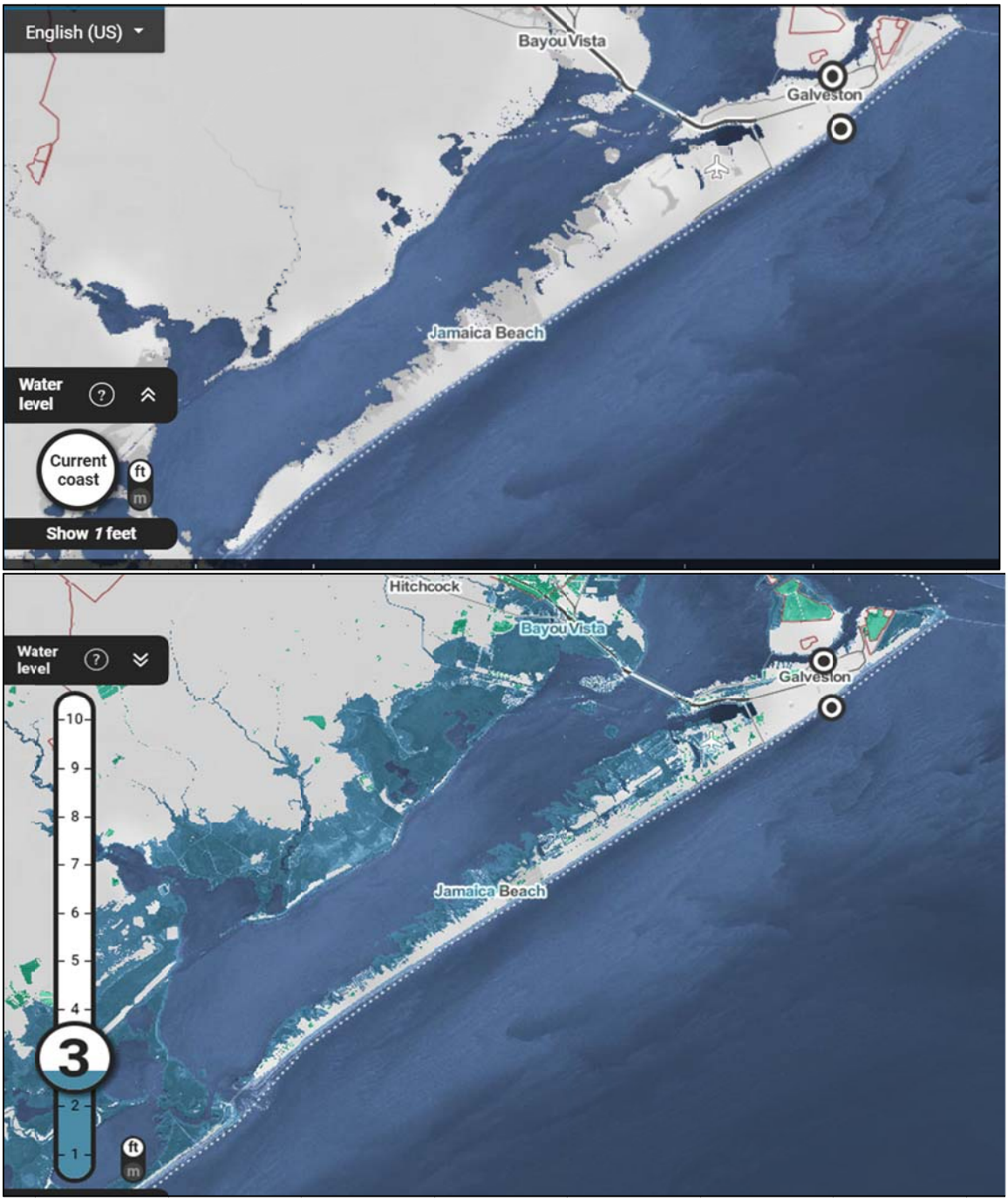
13 John Edward Weems. "Galveston Hurricane of 1900". *Handbook of Texas Online, Texas State Historical Association*. https://tshaonline.org/handbook/online/articles/ydg02 Accessed 8/5/2017.

14 "Ike Insured Damage Estimates Range from $6B to $18B". *Texas / South Central News, Insurance Journal.* September 15, 2008. *http://www.insurancejournal.com/news/southcentral/2008/09/15/93698.htm Accessed 8/14/2017.*

15 Rice, Harvey. "Galveston Island gets tough advice from Rice study", *Houston Chronicle*, October 26, 2011, http://www.chron.com/news/houston-texas/article/Houston-news-For-Isle-tough-advice-from-Rice-2238312.php Accessed 8/4/2017.

16 Rice, Harvey, "Professor says state agency censored article," *Houston Chronical*, October 10, 2011. http://www.chron.com/news/houston-texas/article/Professor-says-state-agency-censored-article-2211691.php?utm_source=twitterfeed&utm_medium=twitter accessed 7/26/2017.

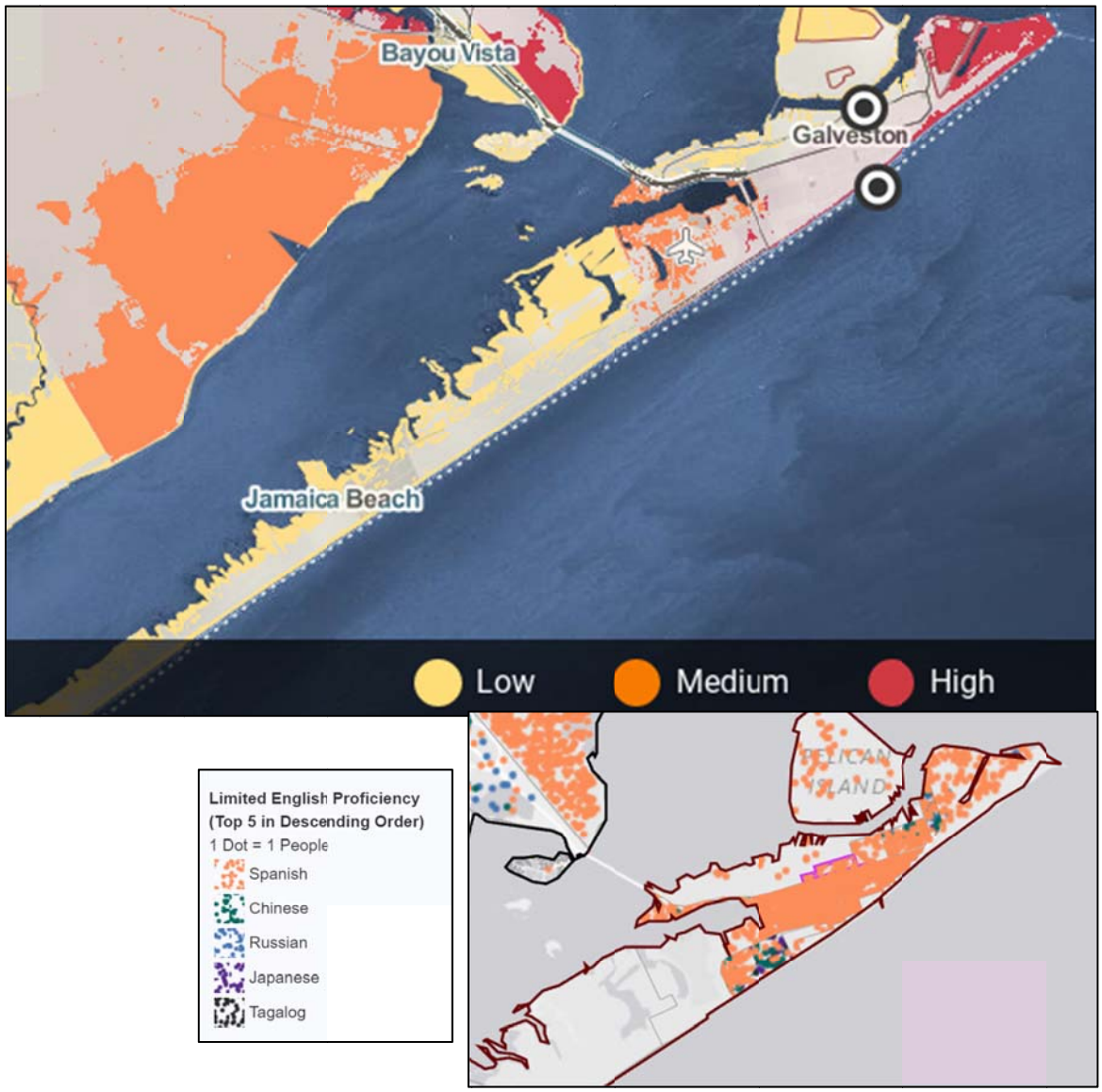
Figure IV-26.
Galveston Island and City: Current Sea Level



Source: Surging Seas: Risk Zone Map, created by Climate Central (http://sealevel.climatecentral.org/), http://ss2.climatecentral.org/#11/29.2016/-94.8766?show=satellite&projections=0-RCP85-SLR&level=0&unit=feet&pois=hide accessed 7/26/2017.

Figure IV-27 compares the vulnerable populations to sea level rise with limited English proficient populations in Galveston.

Figure IV-27.
Vulnerable Population Exposure of Residents at Sea Level Rise of Three Feet



Source: Surging Seas: Risk Zone Map, created by Climate Central (http://sealevel.climatecentral.org/), http://ss2.climatecentral.org/#11/29.2016/-94.8766?show=satellite&projections=0-RCP85-SLR&level=0&unit=feet&pois=hide accessed 7/26/2017.

As evidenced by the maps above, the City has a large vulnerable population that is affected by extreme weather events. A 2012 study of Galveston pre- and post-Hurricane Ike found that Galveston's households and neighborhoods identified using vulnerability mapping experienced multiple negative outcomes: later evacuation, a greater degree of damage sustained, fewer private and public resources for recovery, and slower and lower volumes of repair and

rebuilding activity.[17] In addition, more than half of the housing units administered by the Galveston Housing Authority were destroyed by Hurricanes Ike and Dolly in 2008.

As evidenced by the maps above and the original (pre-Hurricane Ike) number of publicly assisted housing units, the percent of vouchers in the city's downtown, the city has a large vulnerable population that are effected by extreme weather events.

Moreover, the existence of Galveston's seawall has the potential to divert any storm surge away from the eastern Gulf-front to the rear of the island, where most of the City's African American population reside.

A breach of the seawall would have a similar effect, as the island slopes to the northwest, sending the surge through the City towards those neighborhoods. This neighborhood was endangered a third time by "back surge":

> *"Hurricane Ike's surge … filled Galveston Bay with 12 feet of water, which subsequently drained back into the ocean as a "back surge."*[18]

In addition, many of the city's most vulnerable residents have Limited English Proficiency. Officials must take this in account when preparing for disasters and evacuations. Current notification requires online registration and instructions are only offered in English. The Galveston Housing Authority has an excellent online translation facility, which could serve as a model for the City's emergency preparedness efforts, but more is needed, as much of this population is not online.

Patterns in Disparities in Access to Opportunity

This portion of the analysis summarizes the previous discussion in order to:

1. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status.

2. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors.

3. Include how these patterns compare to patterns of segregation and R/ECAPs.

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[17] Van Zandt, S., W.G. Peacock, *D. Henry, H. Grover, W. Highfield, and S. Brody. 2012. "Mapping Social Vulnerability to Enhance Housing and Neighborhood Resilience," *Housing Policy Debate* 22(1): 29-55.

[18] University of Texas at Austin. "Hurricane Ike Caused Underwater Damage To Galveston." ScienceDaily. ScienceDaily, 5 November 2008. www.sciencedaily.com/releases/2008/10/081030144724.html accessed 9/5/2017.

Figure IV-28
Disparities in Opportunity Indices

Note:

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Harris County Service Area	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Hispanic	Black	Hispanic	White	White	Black	Hispanic
Disparity with most advantaged group	-24.34	-21.73	-20.76	-4.39	-6.61	-2.58	-7.39
Second most disadvantaged group	Black	Hispanic	Black	Native	Native	Hispanic	Native
Disparity with most advantaged group	-21.24	-15.99	-16.32	-2.78	-4.40	-0.94	-6.81
Population below federal poverty line							
Most disadvantaged group	Hispanic	Black	Hispanic	White	White	Native	Native
Disparity with most advantaged group	-21.75	-19.73	-4.04	-6.20	-8.60	-4.17	-14.33
Second most disadvantaged group	Black	Hispanic	Native	Asian	Asian	Asian	Hispanic
Disparity with most advantaged group	-17.27	-11.27	-13.03	-4.07	-4.83	-3.93	-9.30

Pasadena	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Hispanic	Hispanic	Hispanic	Asian	Asian	Hispanic	Hispanic
Disparity with most advantaged group	-40.30	-21.13	-38.17	-10.72	-11.54	-5.13	-2.69
Second most disadvantaged group	Black	Black	Black	White	White	Asisan	Native
Disparity with most advantaged group	-34.39	-14.23	-29.84	-5.03	-7.14	-3.98	-1.57
Population below federal poverty line							
Most disadvantaged group	Native	Hispanic	Native	Native	White	Hispanic	Native
Disparity with most advantaged group	-15.70	-8.08	-10.92	-4.53	-4.48	-19.38	-1.86
Second most disadvantaged group	Hispanic	Native	Hispanic	White	Black	Black	Asian
Disparity with most advantaged group	-14.81	-7.77	-10.50	-3.37	-4.14	-18.92	-1.24

Figure IV-28. (Continued) Disparities in Opportunity Indices

Note:

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Missouri City	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Hispanic	Black	Hispanic	Asian	White	Black	Hispanic
Disparity with most advantaged group	-32.29	-25.01	-18.77	-3.74	-13.03	-13.03	-0.77
Second most disadvantaged group	Black	Hispanic	Black	White	Asian	Hispanic	Native
Disparity with most advantaged group	-22.07	-22.77	-15.53	-2.96	-4.58	-11.31	-0.66
Population below federal poverty line							
Most disadvantaged group	Hispanic	Hispanic	Hispanic	White	White	Black	Asian
Disparity with most advantaged group	-38.41	-21.63	-21.10	-2.95	-7.38	-23.04	-2.28
Second most disadvantaged group	Black	Black	Black	Asian	Black	White	Hispanic
Disparity with most advantaged group	-18.49	-15.29	-7.86	-2.90	-4.43	-22.24	-1.59

Galveston	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Black	Hispanic	Black	White	White	Hispanic	Black
Disparity with most advantaged group	-22.50	-4.67	-14.69	-11.51	-9.13	-6.91	-1.82
Second most disadvantaged group	Hispanic	Black	Hispanic	Native	Native	Asian	Asian
Disparity with most advantaged group	-10.75	-4.26	-6.77	5.49	5.07	-5.92	-1.48
Population below federal poverty line							
Most disadvantaged group	Black	Hispanic	Black	White	Native	Native	Asian
Disparity with most advantaged group	-17.43	-4.98	-28.14	-11.80	-9.49	-38.91	-3.44
Second most disadvantaged group	Hispanic	Black	Hispanic	Hispanic	White	Hispanic	Black
Disparity with most advantaged group	-14.13	-4.09	-21.81	-8.79	-9.02	-7.98	-2.99

Figure IV-28. (Continued) Disparities in Opportunity Indices

Note:

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Greater Houston Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Hispanic	Black	Hispanic	White	White	Black	Hispanic
Disparity with most advantaged group	-27.38	-25.84	-26.76	-6.65	-9.89	-5.05	-8.12
Second most disadvantaged group	Black	Hispanic	Black	Native	Native	Native	Black
Disparity with most advantaged group	2.77	-18.68	-26.01	-5.74	-8.09	-1.48	-4.26
Population below federal poverty line							
Most disadvantaged group	Hispanic	Black	Black	White	White	Black	Native
Disparity with most advantaged group	-23.31	-23.77	-23.62	-7.92	-10.21	-5.93	-9.56
Second most disadvantaged group	Black	Hispanic	Hispanic	Black	Asian	Asian	Hispanic
Disparity with most advantaged group	-22.97	-13.27	-20.87	-0.50	-0.80	-2.37	-9.35

Harris County service area. According to HUD Table 12, among the total population, Hispanic residents of The Harris County service area have the least access to opportunity in three of seven categories and the second least access in two others. These five categories are access to neighborhoods with low exposure to poverty, access to neighborhoods with high labor market engagement, access to environmentally healthy neighborhoods, access to neighborhoods with proficient schools, and proximity to jobs.

African American residents have the least access to opportunity in two categories and the second least access in two more. These four categories are access to neighborhoods with proficient schools, access to neighborhoods with close jobs proximity, access to neighborhoods with low poverty exposure, and areas with high labor market engagement. non-Hispanic white residents and Native American, Non-Hispanic residents are least likely to use public transportation and have the least access to neighborhoods with low transportation costs.

African American and Hispanic residents are concentrated in Districts 1 and 4 while non-Hispanic white residents and Asian or Pacific Islander residents are concentrated in Precinct 3 north of I-10 and west of Houston, in Precinct 4 around the I-45 corridor north of Houston, in Precinct 1 south of IAH, and in Precinct 2 to the east of Houston and north of the Buffalo Bayou. These areas consistently have lower labor market engagement, jobs proximity, and school proficiency as well as higher rates of poverty. These districts are also closer to Houston where bus service is more available; this is consistent with the disparities in transit use and transportation costs indicated above. The differences in access to low-poverty neighborhoods, proficient schools, and areas of high labor market engagement are greatest. The differences in access for transit use, jobs proximity, and transportation cost are much smaller.

Four Census tracts designated as racially or ethnically concentrated areas of poverty (R/ECAPs) are located fully within unincorporated Harris County. Seven additional R/ECAPs fall partly in Houston or other incorporated jurisdictions and partly in unincorporated Harris County. More than 50 additional R/ECAPs fall within Houston and other incorporated jurisdictions in Harris County. The four R/ECAPs fully within unincorporated Harris County are tract 5342.01 in Precinct 4, tract 2230.02 in Precinct 1, and tracts 2331.02 and 2526 in Precinct 2. Census tracts 2218, 2224.01, 2227, 2401, 2406, 5501, and 5502 are also designated as R/ECAPs. These tracts include unincorporated areas of Precincts 1 and 4 along the I-45 corridor and the Sam Houston Toll-way south of IAH. The total population of these Census tracts is 25,120, 37 percent of whom are African American, and 54 percent of whom are Hispanic. ACS estimates indicate that Hispanic and African American residents are more likely than the total population to live below the federal poverty line.

Pasadena. According to HUD Table 12, among the total population, Hispanic residents of Pasadena have the least access to opportunity in five of seven categories. These five categories are; access to neighborhoods with low exposure to poverty, access to neighborhoods with proficient schools, access to neighborhoods with high labor market engagement, access to neighborhoods with close jobs proximity, and access to environmentally healthy neighborhoods.

African American residents have the second least access to opportunity in three of these categories. These are access to neighborhoods with proficient schools, low poverty exposure,

and high labor market engagement. Asian and non-Hispanic white residents are least likely to use public transportation and had the least access to neighborhoods with low transportation costs.

African American and Hispanic residents are concentrated in Districts A, B, C, D, G, and parts of E and F. These areas consistently have lower labor market engagement and school proficiency as well as higher rates of poverty. These districts are also closer to available bus service; this is consistent with the disparities in transit use and transportation cost indicated above. non-Hispanic white residents and Asian or Pacific Islander residents are concentrated in Districts F and H. Differences in access to low-poverty neighborhoods, proficient schools, and areas of high labor market engagement and proximity to jobs are largest. The differences in transit use, transportation cost, and environmental health are much smaller.

Four Census tracts designated as racially or ethnically concentrated areas of poverty (R/ECAPs) are located within the city of Pasadena. These are tract 3220 in District A, tract 3230 which crosses Districts A and C, tract 3231 and tract 3235 in District G. ACS estimates indicate that Hispanic and African American residents are more likely than the total population to live below the federal poverty line.

Missouri City. According to HUD Table 12, among the total population, African American and Hispanic residents of Missouri City have the least access to opportunity in four of the six categories for which there are sufficient data to draw conclusions (environmental health excluded). These are access to neighborhoods with low exposure to poverty, access to neighborhoods with proficient schools, access to neighborhoods with high labor market engagement, and access to neighborhoods with close proximity to jobs.

Non-Hispanic white residents and Asian or Pacific Islander residents are least likely to use public transportation and have the least access to neighborhoods with low transportation costs. This pattern is consistent with the pattern of racial and ethnic segregation visible in HUD Map 1. African American and Hispanic residents are concentrated in Districts A and B while non-Hispanic white residents and Asian or Pacific Islander residents are concentrated in Districts C and D. Districts A and B have lower school proficiency, labor market engagement, and higher rates of poverty. These districts are also closer to the City of Houston and the METRO bus service and are consistent with the disparities in transit use and transportation cost indicated above. Differences in access to low-poverty neighborhoods, proficient schools and areas of high labor market engagement are much larger than are the differences in transit use, proximity to jobs, and transportation cost. This is consistent with ACS data on the low utilization of public transportation overall and a difference in average commute times of less than five minutes between workers in the Districts A or B and those in Districts C and D.

Missouri City does not have any Census tracts designated as racially or ethnically concentrated areas of poverty (R/ECAPS). ACS estimates indicate that Hispanic and African American residents are more likely than the total population to live below the federal poverty line. According to HUD Table 12, among residents living below the federal poverty line, Hispanic residents have the least access to neighborhoods with low levels of poverty, proficient schools, and areas with high labor market engagement. Within this income bracket, African American

residents have the second lowest access to low-poverty neighborhoods, proficient schools, areas with high labor market engagement, and low transportation cost. Disparities between African American residents and the most advantaged groups among the population living below the federal poverty line are most substantial for proximity to jobs and access to low-poverty neighborhoods.

Galveston. According to HUD Table 12, among the total population, African American residents of Galveston have the least access to opportunity in three of seven categories and the second least access in one other. These four categories are access to neighborhoods with low exposure to poverty, access to neighborhoods with high labor market engagement, access to environmentally healthy neighborhoods, and access to neighborhoods with proficient schools.

Hispanic residents have the least access to opportunity in two categories and the second least access in one other. These are access to neighborhoods with proficient schools, access to neighborhoods with close jobs proximity, and access to neighborhoods with low exposure to poverty.

Non-Hispanic white residents and Native American, Non-Hispanic residents are least likely to use public transportation and have the least access to neighborhoods with low transportation costs. African American and Hispanic residents are concentrated in Districts 1 and 4 while non-Hispanic white residents and Asian or Pacific Islander residents are concentrated in Districts 2, 3, 5, and 6. Districts 1, 2, and 4 have lower labor market engagement, proximity to jobs, and higher rates of poverty. These districts are also closer to downtown where bus service is most available; this is consistent with the disparities in transit use and transportation cost indicated above. Differences in access to low-poverty neighborhoods and areas of high labor market engagement are greatest in magnitude. The differences in transit use, jobs proximity, and transportation cost are also substantial. This is consistent with ACS data on the low utilization of public transportation overall and a difference in average commute times of less than five minutes between workers in all parts of the city.

The City of Galveston has two Census tracts designated as racially or ethnically concentrated areas of poverty (R/ECAPS). These are tract 7246 and tract 7247. ACS estimates indicate that Hispanic and African American residents are more likely than the total population to live below the federal poverty line.

According to HUD Table 12, among residents living below the federal poverty line, Hispanic residents have the least access to neighborhoods with proficient schools, and less access to low-poverty neighborhoods, areas with high labor market engagement, and use of public transportation.

African American residents living below the federal poverty line have the least access to low-poverty neighborhoods and areas with high labor market engagement, and second to least access to proficient schools and environmentally healthy neighborhoods. Disparities between African American residents and the most advantaged groups among the population living below the federal poverty line are most substantial for labor market engagement and access to low-poverty neighborhoods.

Greater Houston Region. The overall trends in disparities in access for the factors identified in this section for the Houston – The Woodlands – Sugar Land region are that African American and Hispanic residents of the region are the most disadvantaged groups in terms of access to low-poverty neighborhoods, proficient schools, areas with high labor market engagement, and environmentally healthy neighborhoods. non-Hispanic white residents experience the greatest disparities in access to neighborhoods with high public transportation use and low transportation costs. Native American, Non-Hispanic and Asian or Pacific Islander residents also experience disparities in transit use and transportation cost. This suggests that in the region, non-Hispanic white and Asian or Pacific Islander residents tend to live in higher income areas farther from industrial and commercial centers with better schools and fewer public transportation options. African American and Hispanic residents tend to live in poorer areas which are closer to jobs and public transportation, but which have lower performing schools, less labor market engagement, and more air pollution. The magnitude of the disparities experienced by African American and Hispanic residents is greater than those experienced by non-Hispanic white and Asian or Pacific Islander residents.

SECTION V.

Disability and Access Analysis

SECTION V.
Disability and Access Analysis

This section provides a focused fair housing analysis for people with disabilities living the Greater Houston region. The section begins with a population profile of persons with disabilities then discusses housing accessibility, integration of persons with disabilities living in institutions and other segregation settings, disparities in access to opportunity for people with disabilities, and disproportionate housing needs of people with disabilities.

The Department of Housing and Urban Development (HUD) defines a person with disabilities as a person who:

i. has a disability as defined in Section 223 of the Social Security Act (42 U.S.C.423— see below), or

ii. is determined by HUD regulations to have a physical, mental or emotional impairment that: a) is expected to be of long, continued, and indefinite duration; b) substantially impedes his or her ability to live independently; and c) is of such a nature that such ability could be improved by more suitable housing conditions, or

iii. has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 15002(8)—see below), or

iv. has the disease acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome (HIV).

For the purpose of qualifying for low income housing under HUD public housing and Section 8 voucher programs, the definition does not include a person whose disability is based solely on any drug or alcohol dependence.

The U.S. Census Bureau, which provides much of the data on the number of people living with a disability uses the following self-reported definitions in the decennial Census and ACS datasets:

- Hearing difficulty: Deaf or having serious difficulty hearing.
- Vision difficulty: Blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory difficulty: having serious difficulty walking or climbing stairs.
- Self-care difficulty: Having difficulty bathing or dressing.

- Independent living difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone, such as visiting a doctor's office or shopping.

Population Profile

Individuals with disabilities represent 10 percent of the total population of the Greater Houston Region or 562,590 people. Of these individuals, 171,011 live in the Harris County service area, Galveston, Missouri City or Pasadena. Figures V-1 and V-2 on the following page show the number and percent of people with disabilities in the region and in each participating jurisdiction by type of disability and by age.

Galveston and Pasadena have a higher percentage of individuals with disabilities than the region as a whole at 14 percent and 12 percent of their respective populations. Ambulatory difficulty is the most prevalent form of disability in the region and all participating jurisdictions followed by cognitive difficulty and independent living difficulty.

In the region overall, people age 65 or older with a disability account for about one-third of all residents with a disability. The distribution is similar in the Harris County service area and in Pasadena. In Missouri City and in Galveston seniors with a disability account for over 40 percent of all residents with a disability.

Figure V-1.
Disability by Type

Disability Type	Greater Houston Region		Harris County Service Area		Missouri City		Pasadena		Galveston	
	Number	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*
Hearing difficulty	150,471	2.72%	38,820	2.34%	1,093	1.70%	4,439	3.23%	1,680	3.84%
Vision difficulty	115,667	2.09%	29,465	1.78%	1,036	1.62%	3,406	2.48%	1,232	2.81%
Cognitive difficulty	210,870	3.81%	54,091	3.26%	1,552	2.42%	6,262	4.55%	2,267	5.18%
Ambulatory difficulty	297,898	5.38%	72,632	4.38%	2,672	4.17%	8,772	6.38%	3,586	8.19%
Self-care difficulty	121,946	2.20%	31,296	1.89%	1,027	1.60%	3,666	2.67%	1,077	2.46%
Independent living difficulty	196,359	3.55%	48,376	2.92%	1,841	2.87%	5,239	3.81%	2,220	5.07%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure V-2.
HUD Table 14 — Disability by Age Group

Age of People with Disabilities	Greater Houston Region		Harris County Service Area		Missouri City		Pasadena		Galveston	
	Number	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*	*Number*	*Percent*
Ages 5-17 with Disabilities	55,501	1.00%	16,815	1.01%	523	0.82%	1,751	1.27%	321	0.73%
Ages 18-64 with Disabilities	310,640	5.61%	82,128	4.96%	2,142	3.34%	9,025	6.56%	3,298	7.54%
Age 65+ with Disabilities	196,449	3.55%	44,939	2.71%	2,101	3.28%	5,367	3.90%	2,601	5.94%
Total with a disability	**562,590**	**10.16%**	**143,882**	**8.68%**	**4,766**	**7.44%**	**16,143**	**11.73%**	**6,220**	**14.21%**

Note: All % represent a share of the total population within the jurisdiction or region.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

There is limited information on the living arrangements of persons with disabilities. Results from the resident survey conducted for the AI (see Section VII for more detail) provide some information about living arrangements. Among the survey respondents whose household includes a member with a disability:

- One in four (24%) live in households that include other adult family members (e.g., mother, father, adult siblings or other adult extended family members)
- One in five (20%) live alone;
- One in five are single and living with children;
- Slightly more than one in 10 (14%) live with a partner and children and 13 percent live with a partner and no children;
- Two in five have children under the age of 18 living in the home; and
- Nearly one in five (17%) live in households with five or more members.

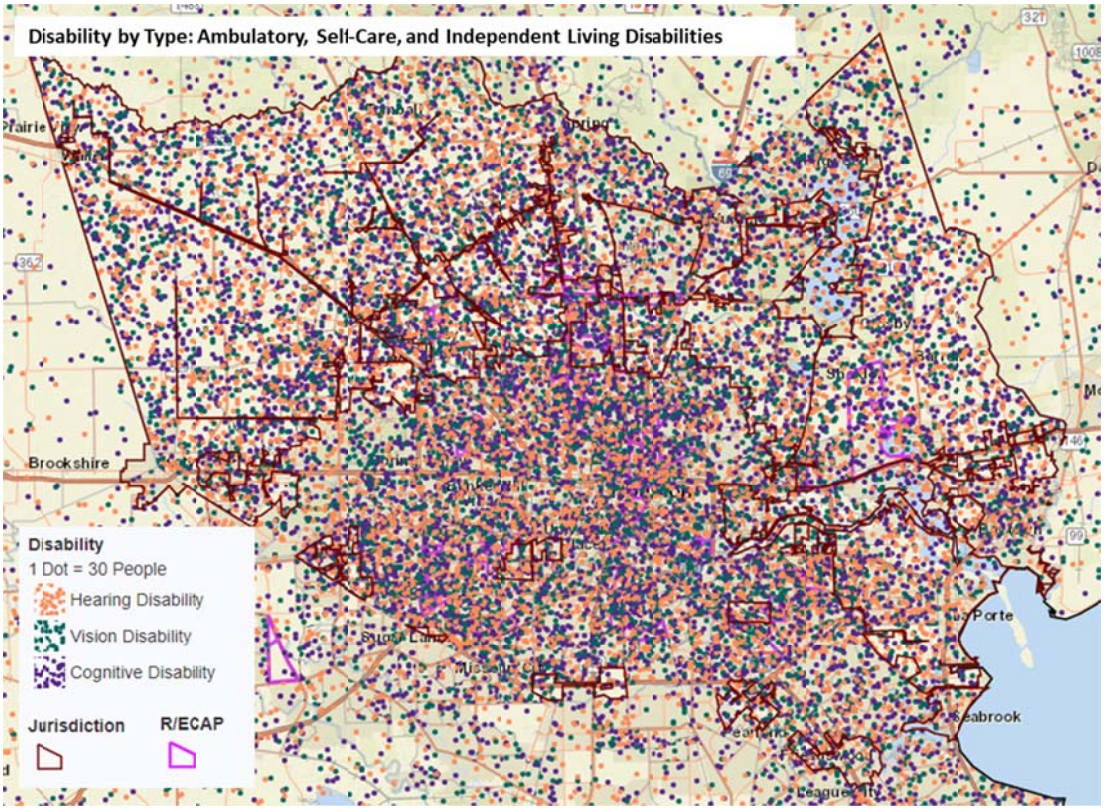
It is important to note that, just like any household, not all persons with disabilities need or desire the same housing choices. Fair housing analyses often focus on how zoning and land use regulations govern the siting of group homes. Although group homes should be an option for some persons with disabilities, other housing choices—particularly scattered site units—must be available to truly accommodate the variety of needs of residents with disabilities.

The following maps (Figures V-3 through V-6) show the geographic dispersion of persons with disabilities by type of disability and by age in Harris County, Pasadena, Missouri City, and Galveston.

The geographic distribution of persons with disabilities mirrors the distribution of the general population with only minor deviations:

- In the Harris County service area, individuals with disabilities aged 5 to 17 are more likely to live in the northwest of the county in County Commissioner Precincts 3 and 4.
- In Galveston, individuals with ambulatory, self-care, and independent living disabilities and individuals with disabilities who are 64 years of age and older are more likely to live in the less densely populated southern half of the island comprising City Council District 6.

Figure V-3.
Disability by Type and Age, Harris County



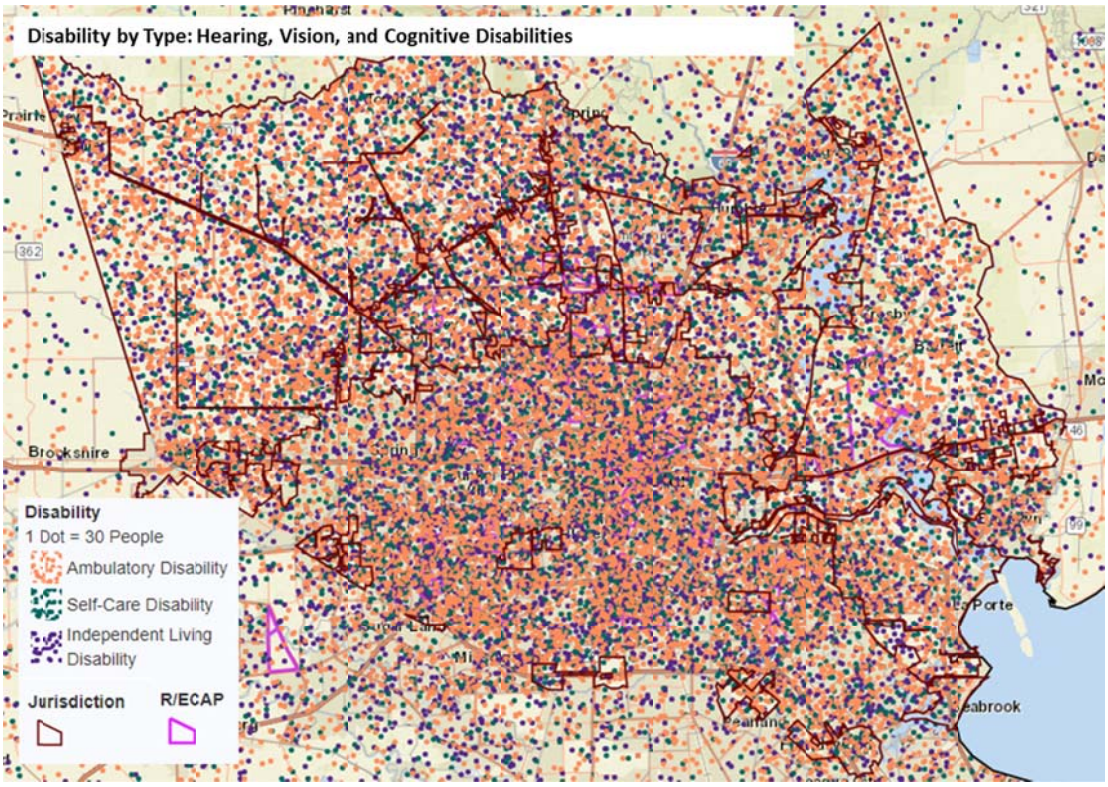
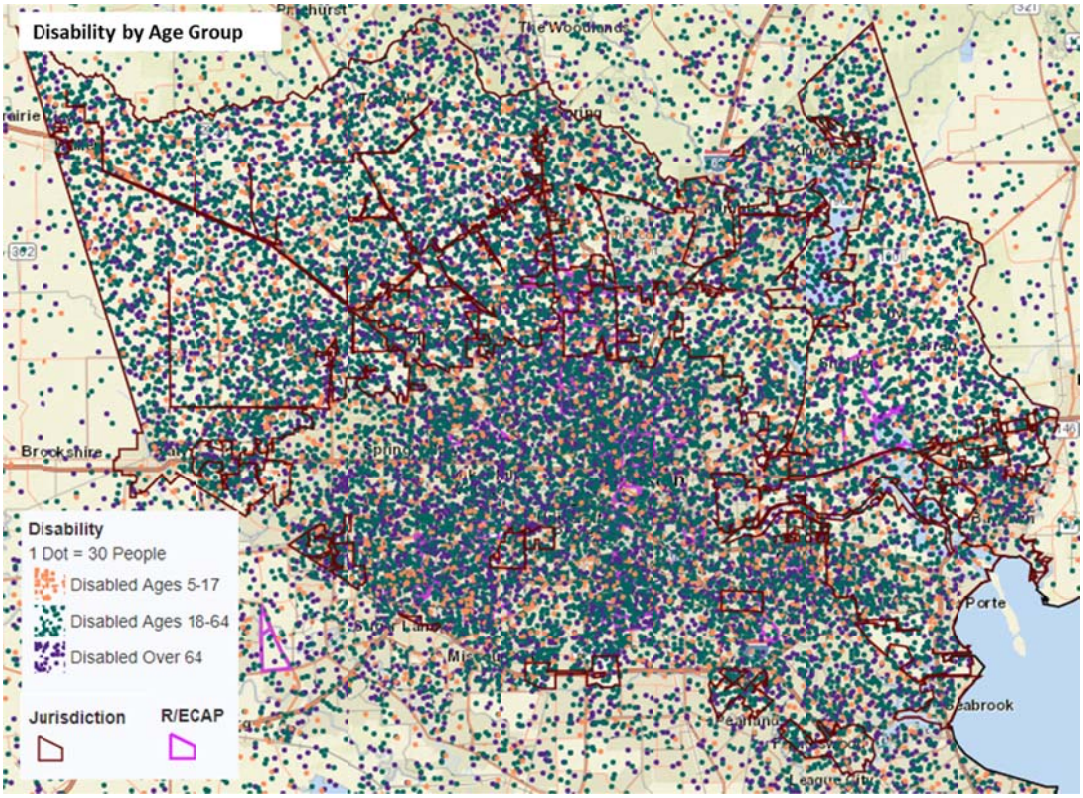


Figure V-3 (Continued).
Disability by Type and Age, Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure V-4.
Disability by Type and Age, Pasadena

Note:

xxx.

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

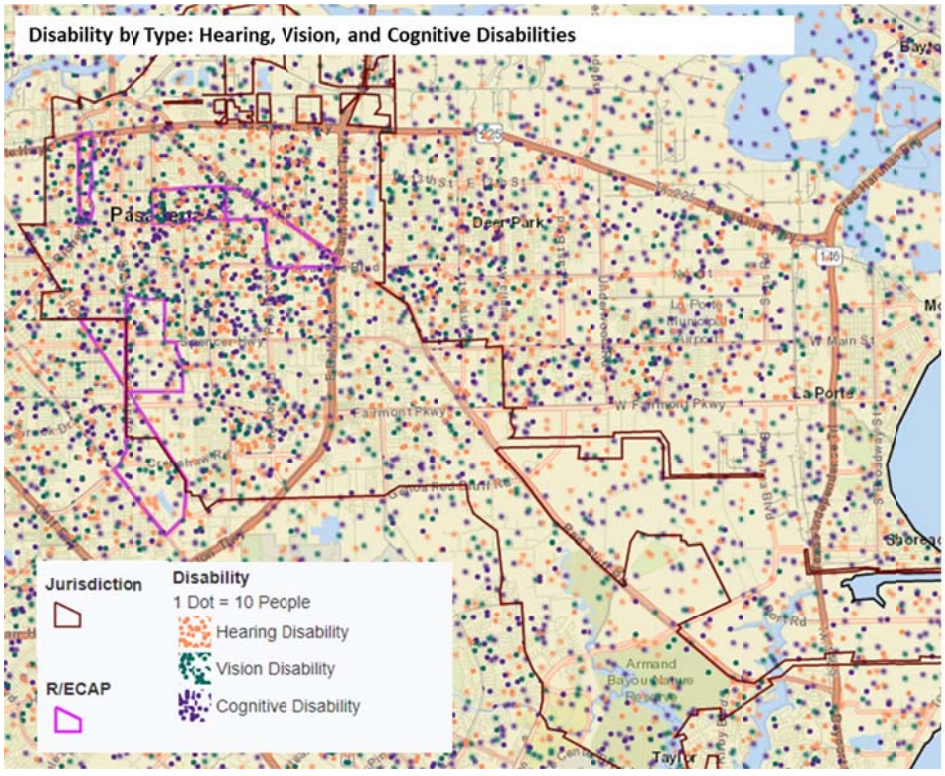
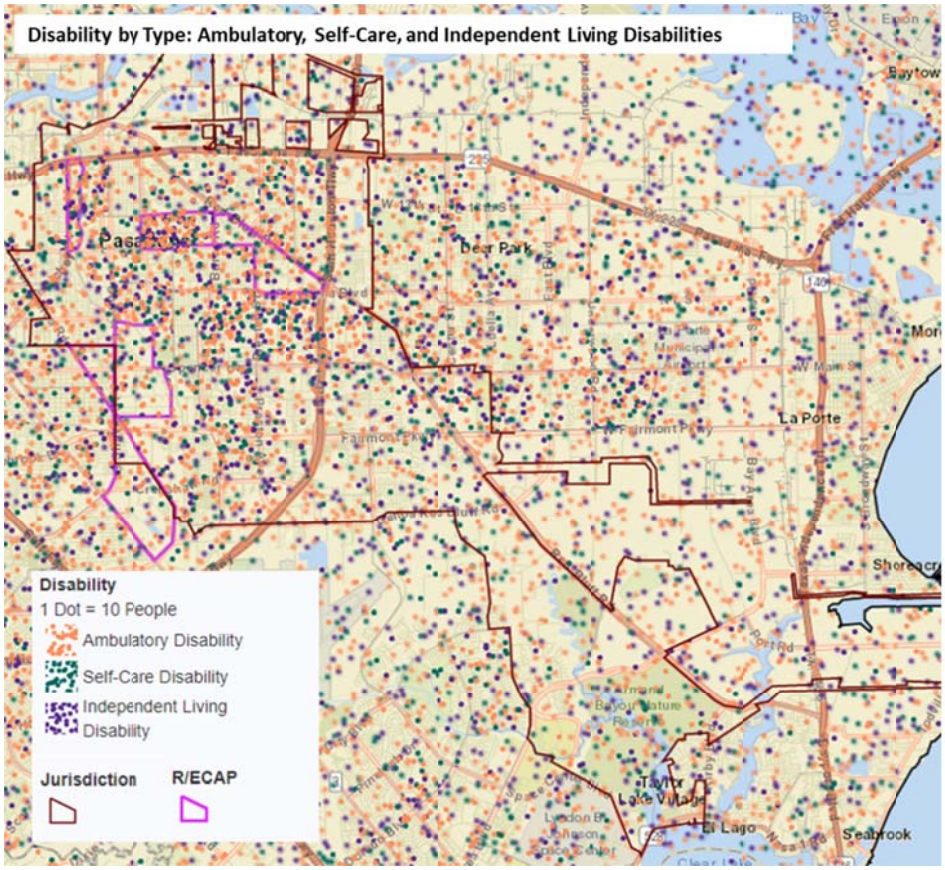


Figure V-4 (Continued). Disability by Type and Age, Pasadena

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.



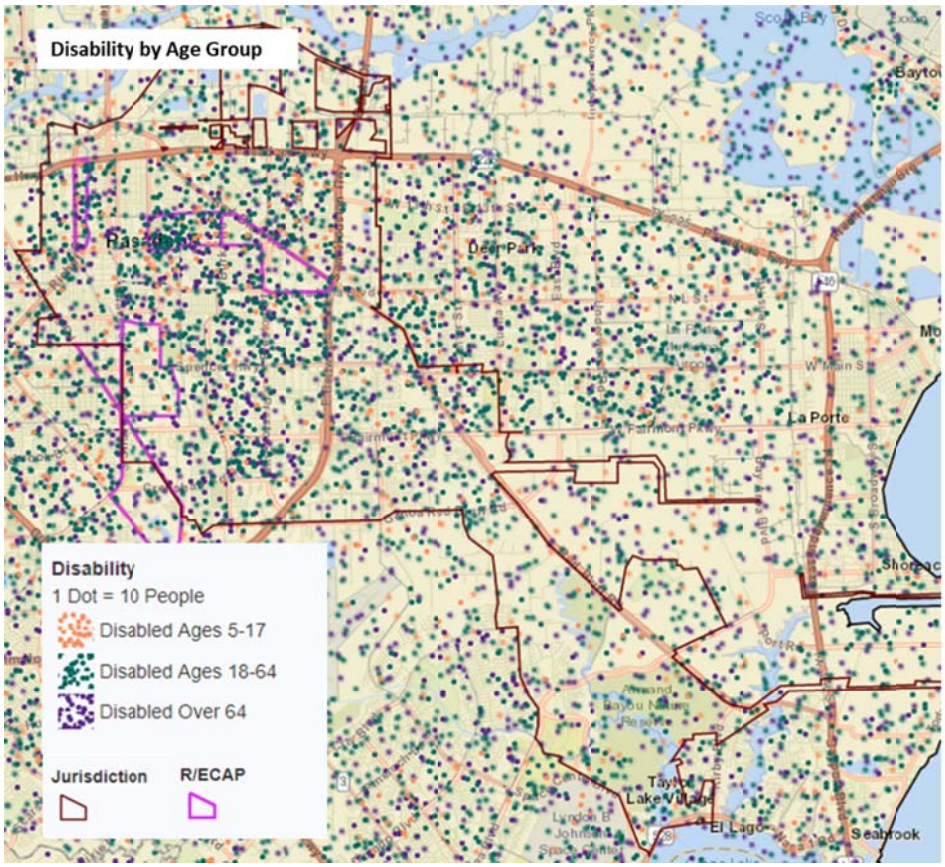
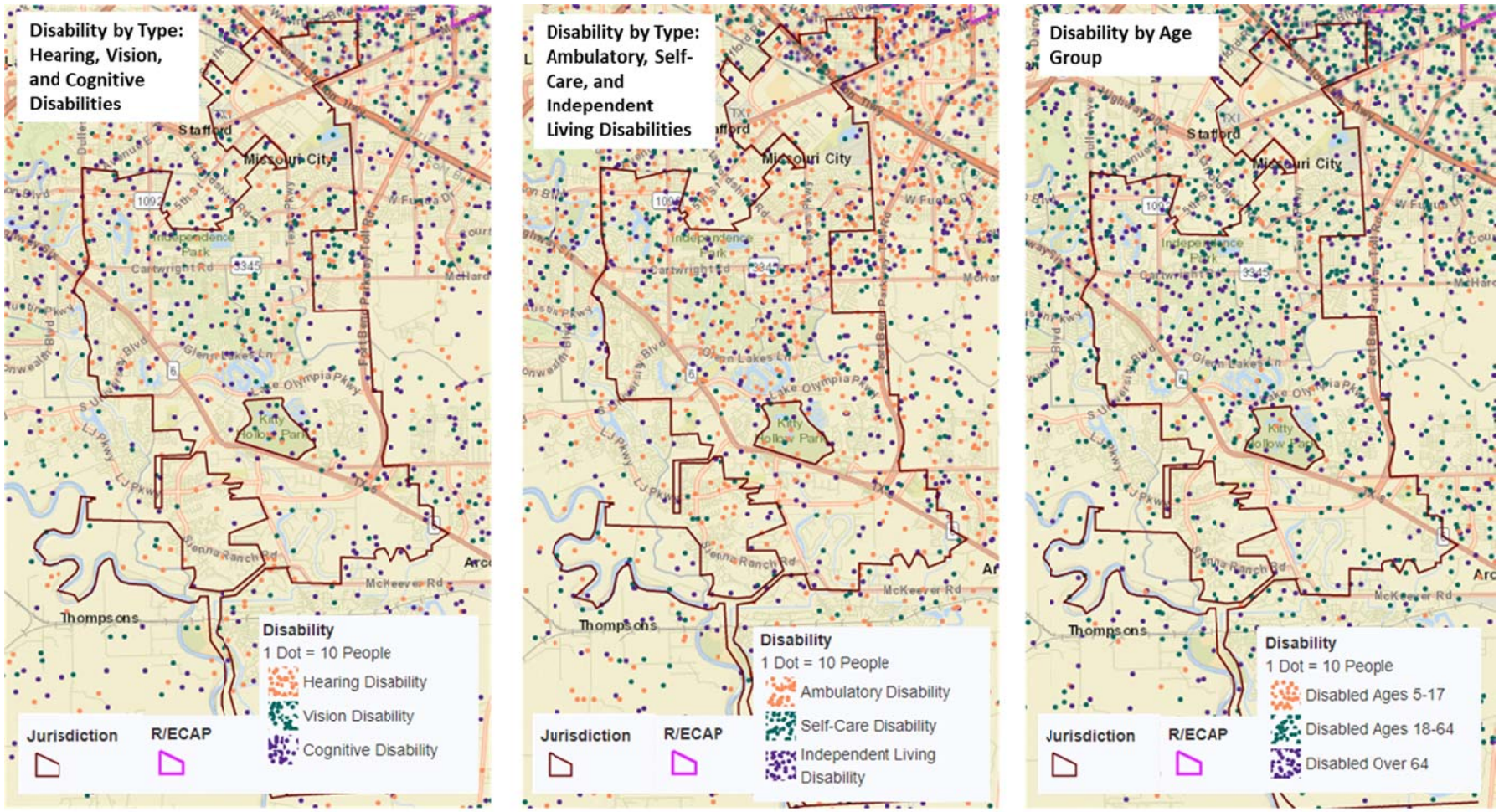


Figure V-5.
Disability by Type and Age, Missouri City



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure V-6.
Disability by Type and Age, Galveston

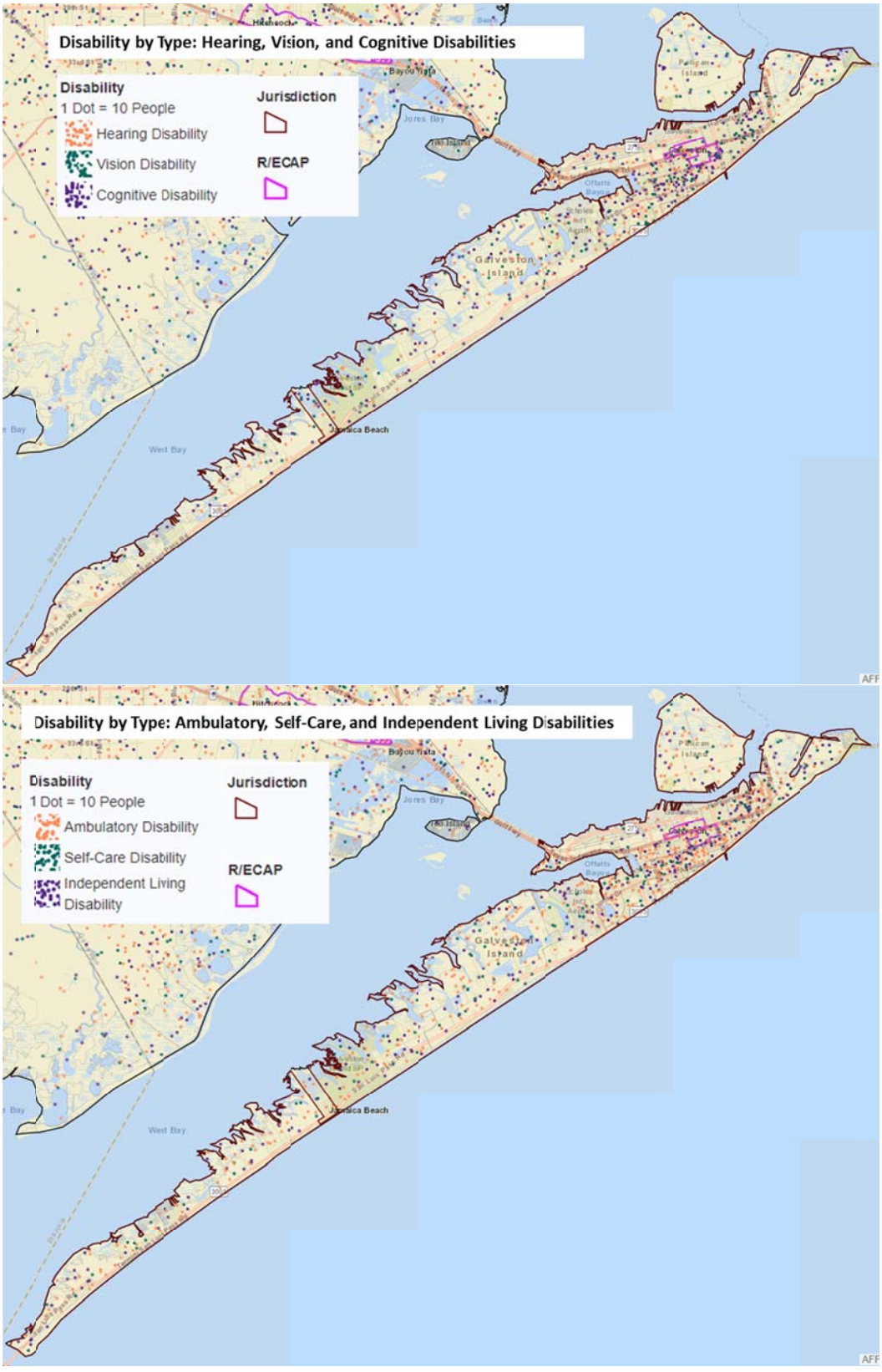
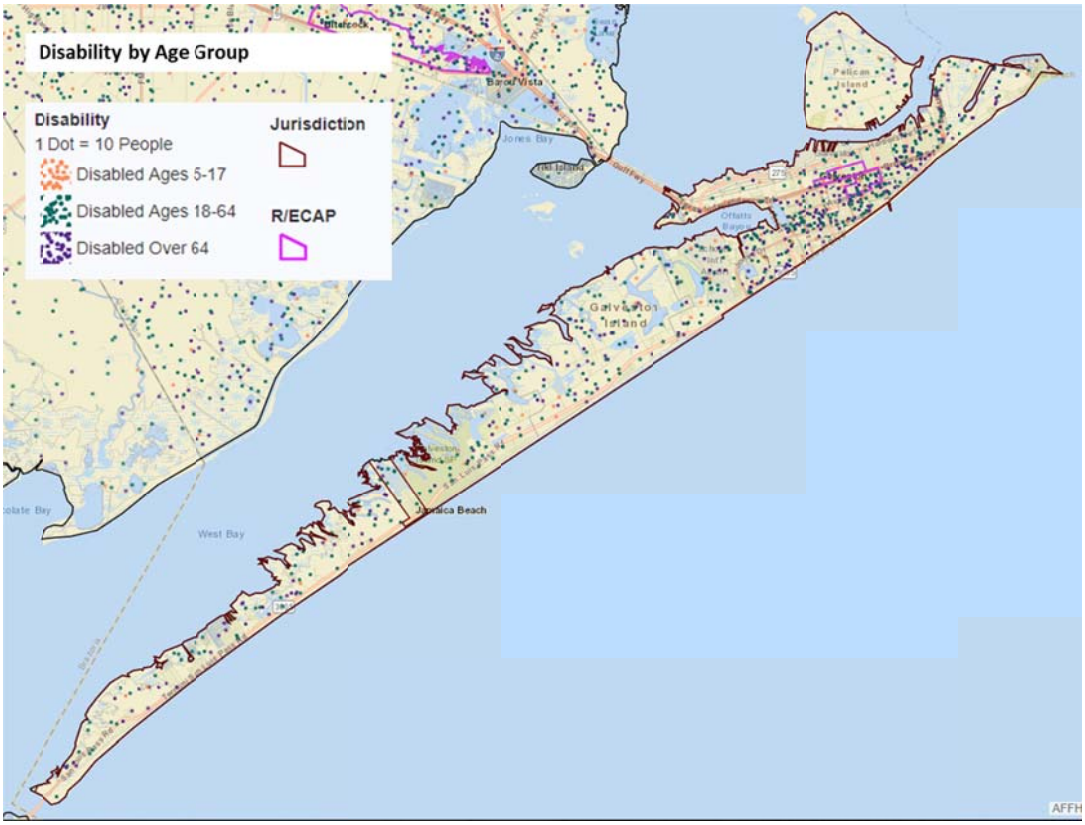


Figure V-6 (Continued).
Disability by Type and Age, Galveston



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Housing Accessibility

Affordable accessible housing. Overall, 56 percent of residents with disabilities would move if they had the opportunity and 42 percent seriously looked for housing to rent or buy in the region in the past five years. When asked to rate the relative ease of finding safe, quality housing that they could afford on a scale from 0 to 9, with 0 meaning "extremely difficult" and 9 meaning "extremely easy," one in three (33%) rated their experience "extremely difficult" (rating of 0) and 56 percent difficult (rating of 0 to 3). Participants in the focus group with residents with disabilities all had difficulty finding housing that met their accessibility needs that they could afford. Those with Section 8 vouchers faced even greater difficulties due to a lack of landlords willing to participate in the program.

Residents who participated in a prioritization exercise at pop up community engagement events and the open house events identified "accessible housing for disabled persons/elderly" and "housing options for persons with severe mental illness" as the top priorities for housing in the region.

Participants in stakeholder focus groups identified a lack of accessible housing to be a significant challenge in the region.

- Stakeholders noted a lack of accessible, ADA-compliant housing across the region, both market rate and affordable. In addition, many areas of the region lack public transportation and many businesses are not ADA compliant. In many areas, sidewalks are missing or are dilapidated.

- The height requirements for coastal homes make the cost of accessibility prohibitive. A lift or elevator is needed (which can cost $13,000 to $15,000) to enter a home and is not protected from the elements if it is outside the structure, or the slope requirements for a ramp require the ramp to circle the building, increasing the cost significantly.

- Developers do not commonly develop accessible housing without incentives. Stakeholders say ADA-compliant housing is not affordable and is not incentivized. Stakeholders say that for disaster relief funding, the state of Texas requires that visitibility standards be met.

Residents with disabilities living in housing that does not meet their needs. These issues—limited supply of accessible units, including a lack of ADA-compliant accessible housing in the public and private housing markets, may explain why one in four households that include a member with a disability of any type are living in housing that does not meet that member's accessibility needs.

The percentage of households living in housing that does not meet the accessibility needs of a member with a disability is similar across jurisdictions:

- One in five (20%) in Harris County;

- Slightly more than one in five in Galveston (22%);

- About one in four in Pasadena (23%);

- Slightly more than one in four in Houston (26%).

- Too few residents with disabilities from Missouri City responded to present results (n=8).

Types of improvements or modifications needed by these households include:

- Grab bars in bathroom or other locations (85%);

- Wider doorways/hallways (44%);

- Reserved accessible parking space (36%);

- Fire alarm/doorbell made accessible for person with hearing disability (23%); and

- Alarm to notify if a non-verbal child leaves the home (16%).

One in three (34%) of survey respondents who need accessibility features of any type cannot afford them.

Reasonable modification or accommodation requests. Among those to whom the question applied, about two in five report that their landlord refused to make an accommodation for the household member with a disability. One in 10 had a landlord refuse to accept a therapy/companion/emotional support animal and 7 percent had a landlord refuse a service animal.

Figure V-7 summarizes the housing challenges experienced by residents with disabilities by jurisdiction.

Figure V-7.
Housing Challenges Experienced by Residents with Disabilities

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	Galveston	Missouri City	Pasadena	Harris County Svc Area	Houston	Region
I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting	47%	57%	38%	26%	44%	37%
I can't afford the housing that has accessibility features (e.g., grab bars, ramps, location, size of unit, quiet) we need	8%	25%	29%	27%	42%	34%
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	35%	-	56%	34%	30%	34%
My landlord refused to make an accommodation for me or my household member's disability	-	-	10%	19%	22%	20%
My landlord refused to accept my therapy/companion/emotional support animal	-	-	6%	13%	8%	10%
My landlord refused to accept my service animal	-	-	6%	12%	1%	7%

Note: - Sample size too small to report.

Respondents could select Yes, No or Does Not Apply. The data shown are the percent with a housing challenge among those to whom the issue applies.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Access to publicly supported housing. Figure V-8 on the next page shows the number and percent and percent of HUD program participants living in various types of publicly assisted housing. It has been augmented with data from the HUD resident characteristics report for Texas and the United States to enable comparisons. For most publicly supported housing categories available in each jurisdiction and the region, individuals with disabilities are a smaller proportion of those receiving support from various public housing programs than the state or country. Public housing in Galveston is the only exception where 66 percent of non-Section 8 public housing residents have a disability compared to 37 percent in the state of Texas and 36 percent nationally.

According to a 2016 report by the Texas Workforce Investment Council, 11.7 percent of Texans have a disability. According to the U.S. Census Bureau, 19 percent of the total U.S. population has a disability. As noted in the population profile above, 10 percent of residents in the Greater Houston region have a disability, as do 9 percent of Harris County service area residents, 12 percent of Pasadena residents, 8 percent of Missouri City residents, and 14 percent of Galveston residents. In most program categories in all communities, people with disabilities are somewhat overrepresented among HUD program participants. However, their overrepresentation in the participating jurisdictions is not as severe as it is in Texas and the United States overall.

Figure V-8.
Disability by Publicly Supported Housing Program Category

Disability by Publicly Supported Housing Program Category	Harris County Service Area		Pasadena		Missouri City		Galveston	
	Num.	*Pct.*	*Num.*	*Pct.*	*Num.*	*Pct.*	*Num.*	*Pct.*
Public Housing	n/a	n/a	n/a	n/a	n/a	n/a	289	66%
Project-Based Section 8	200	11%	51	16%	n/a	n/a	7	3%
Other Multifamily	75	14%	14	20%	n/a	n/a	n/a	n/a
HCV Program	1,425	19%	197	22%	27	15%	254	22%

Disability by Publicly Supported Housing Program Category	Greater Houston Region		State of Texas		United States	
	Num.	*Pct.*	*Num.*	*Pct.*	*Num.*	*Pct.*
Public Housing	1,157	30%	14,631	37%	320,626	36%
Project-Based Section 8	1,629	16%	1,853	43%	54,135	44%
Other Multifamily	359	16%	-	-	-	-
HCV Program	6,815	25%	51,206	40%	799,519	44%

Note: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Location of housing. A detailed discussion of the location of publicly supported housing in relation to areas of racial/ethnic concentrations as well as poverty concentrations is included in Section VI Publicly Supported Housing Analysis. That analysis reveals that in most communities, publicly supported housing developments tend to be located in higher poverty areas. For residents with disabilities that live in publicly assisted units, the development locations may create a barrier to housing choice.

Difficulty using Section 8 vouchers. One in five (21%) residents with disabilities who participated in the resident survey has a Section 8 voucher. When asked how difficult it is to find a landlord that accepts a Section 8 voucher, nearly half (46%) said it is "very difficult," two in five (41%) considered it "somewhat difficult," and 13 percent rated their experience as "not difficult." Residents who had difficulty using their Section 8 vouchers attribute this to:

- Have a hard time finding information about landlords that accept Section 8 (56%);
- Landlords have policies of not renting to voucher holders (53%);

- Voucher is not enough to cover the rent for places I want to live (51%); and
- Not enough time to find a place to live before the voucher expires (51%).

Among the residents with disabilities who seriously looked for housing in the past five years, 40 percent were denied housing to rent or buy. Having a Section 8 voucher and landlords being unwilling to accept the type of income (social security or disability benefits) were two of the top five reasons these residents were denied housing to rent. The other reasons are income too low, bad credit and eviction history.

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

Olmstead Planning. The State of Texas first produced a Texas Promoting Independence Plan (i.e., Olmstead Plan) in 2001 to help improve opportunities for individuals with disabilities to live in the most integrated setting possible. The state was also an early participant in the Money Follows the Person Demonstration (MFPD) program to help assign funding in a way that allows people with disabilities to transition out of institutions but still receive the care they need in a more integrated setting. According to the 2016 Texas Promoting Independence Plan, nearly 35,000 residents were able to transition from institutional care to living in integrated settings through the Independence Initiative since its inception in 2003. Another 10,000 transitioned from institutional to community-based care through the MFPD program since 2008.[1]

The Houston Center for Independent Living (HCIL) is a key resource locally for residents with disabilities in the Greater Houston Region and has helps about 2,000 local residents transition from nursing homes to independent living situations.[2]

Accessible housing resources. As noted above, affordable, accessible housing is provided by a number of publicly supported programs including project-based Section 8 developments (housing support tied to a unit rather than to a tenant), tenant-based Section 8 vouchers (HCVs). LIHTC properties and other public housing developments administered by the housing authorities in Harris County and Galveston. The Harris County Housing Authority provides an online tool with search functions for identifying affordable housing with a range of accessibility features on the private market. The most recent Five-year Consolidated Plan for Harris County identifies affordability as a significant barrier to accessible housing in the private market and the supply of publicly supported accessible units as insufficient to meet the demand.[3]

A database of supportive services for seniors and individuals with disabilities in the Greater Houston Region is provided by the Care Connection aging and disability resource center. The Care Connection directory lists 248 resources in the region under the category "health supportive services" in addition to thousands of other resources in categories ranging from basic needs to income security and senior services. The Care Connection directory includes dozens of

[1] https://hhs.texas.gov/sites/default/files/documents/laws-regulations/reports-presentations/2017/revised-tx-promoting-independence-plan-2016-sept-1-2017.pdf

[2] http://www.hcil.cc/

[3] The plan is available through the county website here: https://csd.harriscountytx.gov/Pages/PlansReports.aspx

entries for senior housing, group homes, and facilities serving individuals with a range of disabilities in Houston and Galveston counties.[4]

While a wide range of affordable and accessible housing options and supportive service providers are available in the Greater Houston Region, the enormous population of the region means that the supply of such housing units and the reach of such services is inadequate to meet the needs of the regional population.

R/ECAPs. As noted in the R/ECAP Section of this AI, eight Census tracts designated R/ECAPs are located in the Harris County service area. The total population of these Census tracts is about 35,00. According to ACS estimates, 11 percent of residents of these R/ECAP Census tracts have disabilities—slightly higher than the county overall.

Four Census tracts designated as R/ECAPs are located within the city of Pasadena. These are tract 3220 in District A, tract 3230 which crosses Districts A and C, tract 3231 and tract 3235 in District G. The total population of these Census tracts is 22,119, and 9.8 percent of residents in these tracts have disabilities. This is comparable to the region overall.

Missouri City does not have any Census tracts designated as R/ECAPs. The highest poverty tract in Missouri City, located in north central Missouri City has disability population that accounts for 9 percent of the total tract population. This is only slightly higher than the citywide disability incidence rate of 8 percent. The single LIHTC development in Missouri City with affordable and accessible units is in Census tract 6745.01 in south central Missouri City. The proportion of the population in this tract with a disability (4%) is about half that of Missouri City overall. These data do not suggest that residents with disabilities live in segregated settings.

The City of Galveston has two Census tracts, 7246 and 7247designated as R/ECAPS. The total population in these Census tracts is 3,755, 19 percent of whom have a disability, a somewhat higher rate of disability than the city overall (14%).

Disparities in Access to Opportunity

Government Services and Facilities. An objective in the current five-year consolidated plan for Harris County is to provide public services to 450 disabled adults to enable them to increase or maintain their quality of life and promote physical, mental, and social well-being. Con Plans for the other jurisdictions do not include goals related specifically to persons with disabilities.

Government services in each jurisdiction offer accommodations for individuals with hearing, vision, or mobility impairment upon request by contacting the relevant department. Departmental directories for each jurisdiction are available here:

- Galveston: https://www.galvestontx.gov/152/Departments
- Harris County: http://www.harriscountytx.gov/phonedirectory.aspx
- Pasadena: http://www.ci.pasadena.tx.us/default.aspx?name=important_contact_info

[4] The full directory is available here: http://www.referweb.net/hadrc/Subcategory.aspx.

- Missouri City: https://www.missouricitytx.gov/directory.aspx

Complaints alleging any action prohibited by the U. S. Department of Justice regulations implementing Title II of the Americans with Disabilities Act (ADA) can be directed to the relevant ADA Coordinator or Title VI coordinator in Harris County and Pasadena. In jurisdictions without such coordinators, such as Galveston and Missouri City, complaints can be filed directly with the United States Department of Justice. Instructions for filing ADA complaints are available here: https://www.ada.gov/filing_complaint.htm.

Harris County ADA Coordinator: 1310 Prairie, Suite 240; Houston, Texas 77002; (713) 274-5419 or (713) 274-5427; Email: HRRMHCADACoordinator@bmd.hctx.net.

Pasadena Title VI Coordinator: Azell Carter, Compliance Examiner City of Pasadena 1211 Southmore Pasadena, Texas 77502 713-475-7295

Public Infrastructure. Throughout the community engagement process, the sidewalk infrastructure in each of the participating jurisdictions was lacking in many neighborhoods or along key corridors. According to a resident survey conducted for the AI (details in Section VII), nearly two in five (36%) residents with disabilities believe that their neighborhood has lower quality sidewalks than other neighborhoods in their community, similar to all resident in the region. The proportion of residents with disabilities who responded that they "cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting" varied by community:

- More than half (57%) in Missouri City;
- Nearly half (47%) in Galveston;
- More than two in five (42%) in Houston;
- About two in five (38%) in Pasadena; and
- About one in four (26%) in Harris County.[5]

The City of Galveston comprehensive plan calls for a review of public infrastructure to ensure pedestrian sidewalks and crosswalks are ADA compliant. In addition, the comprehensive plan calls for the development of a Bay Access Plan to enhance public pedestrian access to the area near Galveston Bay. The Bay Access Plan includes an inventory and evaluation of ADA compliance for pedestrian infrastructure. The City of Galveston has already adopted and is maintaining a similar Beach Access Plan which gives consideration to ADA compliance.

The existing five-year Consolidated Plan for Missouri City includes objectives to widen and repair sidewalks and install ADA-compliant curb cuts as a goal to address a need identified in the Fondren, Hunter's Glen, Fifth Street, Quail Green, Court Road and Lexington/Murphy Road areas.

[5] Statistics based on data collected in the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey conducted for this study. Additional details in Section VII.

The existing five-year Consolidated Plan for Pasadena also adopts an infrastructure development goal which includes improvements to sidewalks to meet ADA standards.

Transportation. Individuals in Galveston who qualify for services under the ADA and cannot access fixed route buses may use the Island Transit Dial-A-Ride Transit Service. Information regarding this service, is available at (409) 797-3909 and online at http://www.galvestontx.gov/543/Dial-A-Ride-Transit-DART-Service. Stakeholders pointed to recent news that bus service in Galveston may be reduced (Galveston County Daily News, December 18, 2017, http://www.newsobserver.com/news/business/article189755919.html).

Figure V-9.
Transit Service



Houston Regional Transportation Authority (METRO) is the regional transportation authority which serves the city of Houston as well as major portions of the Harris County service area and 15 other cities, including limited areas in Missouri City and Pasadena. METRO offers over 100 bus routes, three rail lines, and 21 transit centers in the region as shown on the system map below. According to the METRO website, METRO's fixed-route buses and METRORail are 100 percent accessible and require no advance notice to ride.

In addition, METRO offers METROLift, an on-demand, shared-ride public transit service. In accordance with the ADA, travel times and the timeliness of service are comparable to METRO's fixed-route bus service. Additional information is available at (713) 225-0119 and online at https://www.ridemetro.org/Pages/METROLift.aspx. Three categories of people are eligible for METROLift service:

1. Persons with disabilities who are unable, without the assistance of another person, to board, navigate, ride or disembark from an accessible local bus.

2. Persons with disabilities who can use an accessible vehicle but want to travel on a bus or rail route that is inaccessible.

3. Persons with disabilities who are prevented from getting to and from the local bus due to their disability. Eligibility is based on a functional limitation preventing the patron from walking or rolling to a bus stop without assistance from others.

METROLift transports riders to and from locations within three-quarters of a mile and during the same days and hours of METRO's existing fixed-route bus and light-rail services. These services operate seven days a week from 3:35 am to 2:15 am. Outside this three-quarters of a mile service area, METROLift offers service from 5:00 am to 11:30 pm Monday through Friday, 7:00 am to 12:30 am Saturday and 7:00 am to 11:30 pm Sunday. Base fares begin at $1.25 with additional fees possible for origins and destinations outside the three-quarter mile service area. Trips must be scheduled one day in advance by calling (713) 225-6716, or online using MACS-WEB (www.RideMETRO.org).

Figure V-10.
Transit Service

METRO full service map

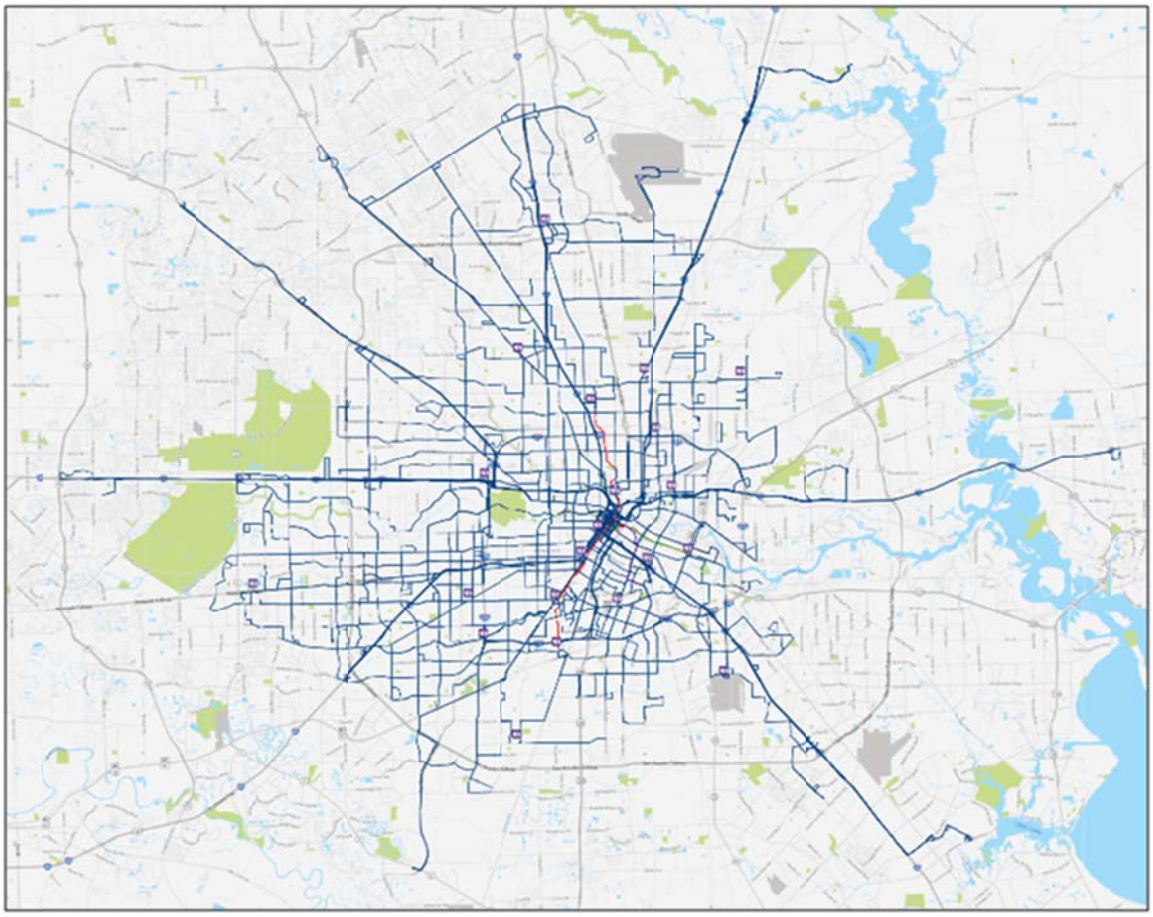
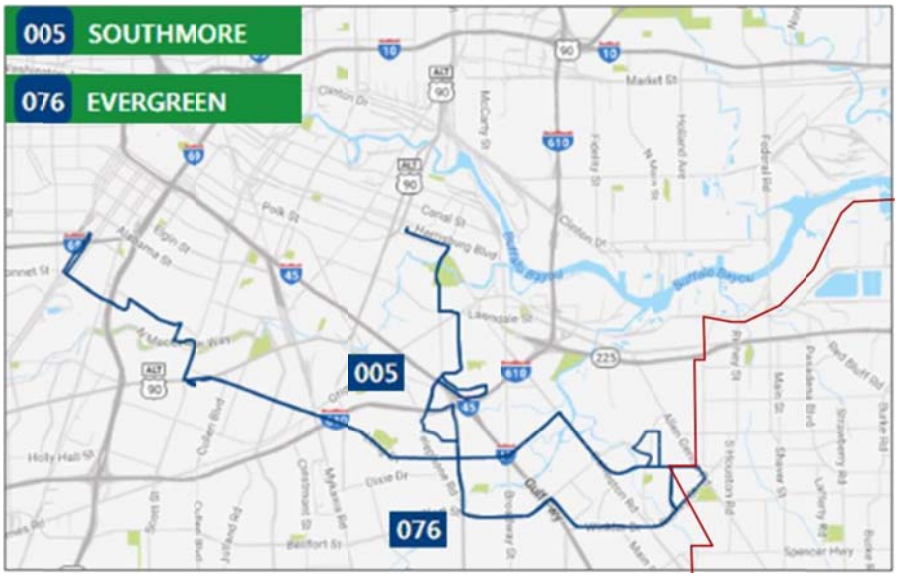
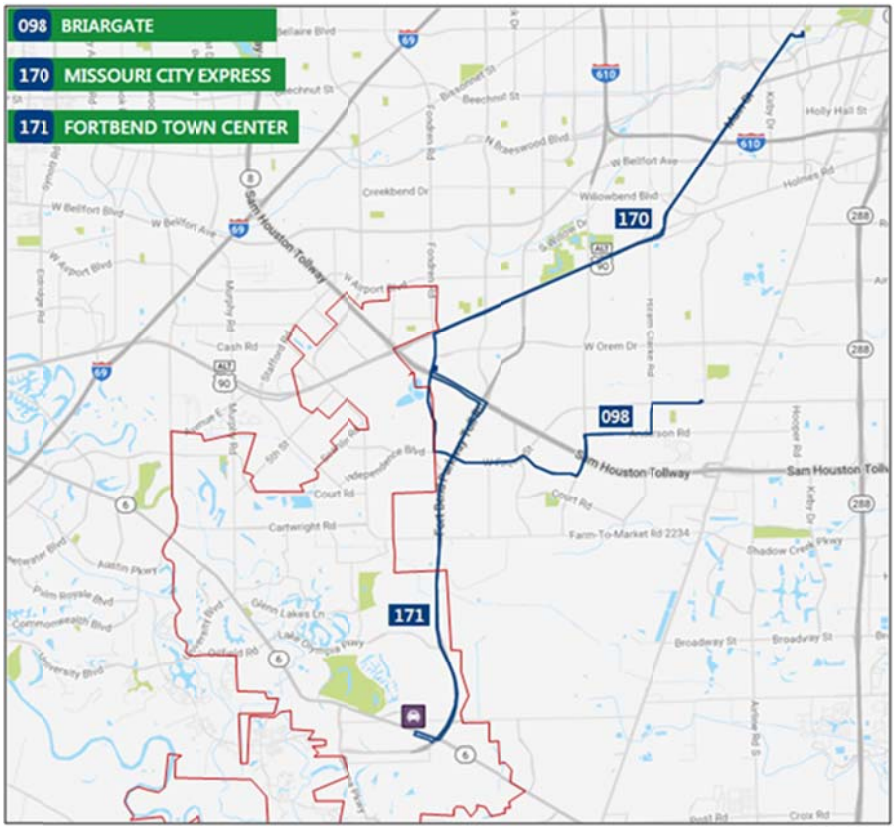


Figure V-10 (Continued).
Transit Service

Pasadena

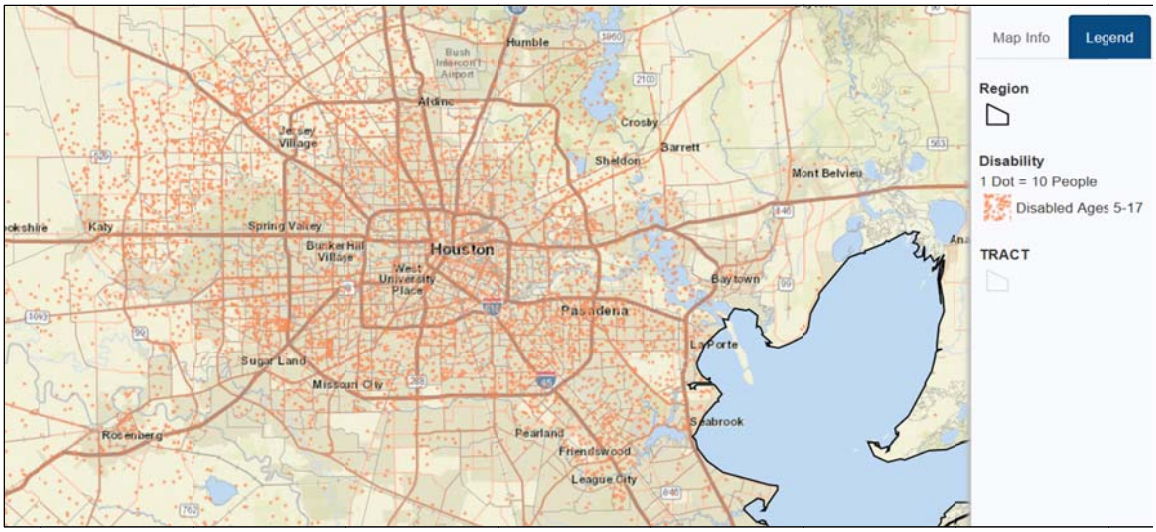


Missouri City



Proficient schools and educational programs. Comparing the maps of school aged children with disabilities to the map of the school proficiency index suggests no obvious regional trend towards concentration of children with disabilities in areas without access to proficient schools.

Figure V-11.
Disability by Age Group (selected age group 5-17 years)



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure V-12.
School Proficiency Index



Note: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

All school districts, colleges, and universities receiving federal financial assistance and employing 15 or more persons must designate at least one employee to coordinate their efforts to comply with and carry out their responsibilities under Section 504 of the 1973 Rehabilitation Act. This person is often, though not always, referred to as a Section 504 coordinator. Requests for reasonable accommodations are made through the Section 504 coordinator. A

comprehensive list of Section 504 coordinators is available from the U.S. Department of Education at https://www.ed.gov/civ-rts-coordinators.

Resident perspectives on transportation access. Access to fixed route bus service—and therefore access to paratransit services—is critically important to residents with disabilities who are transit dependent; this access is an important screening criteria for housing choice. Survey results, discussions at events and the disability focus group revealed that residents with disabilities who rely on METRO and METROLift are generally very satisfied with the service. On average, survey respondents agree with the statement, "I can easily get to the places I want to go using my preferred transportation option." It is important to note that during the development of the AI, the city of Galveston made the decision to cut service hours and routes due to financial constraints. As such, survey data may not be reflective of the current experience of Galveston residents with disabilities.

Jobs. Five-year estimates from the American Community Survey (ACS) (2011-15) suggest that accessing work in the region may be difficult for persons with disabilities. In the Greater Houston Region the labor force participation rate among persons with disabilities is 45.3 percent and the rate among all residents 16 years and older is 77.1 percent. The unemployment rate among the general population is 6.5 percent while for individuals with disabilities the unemployment rate is 14.1 percent.

Resident perspectives on jobs. When asked what was most needed to increase access to employment, residents with disabilities who participated in the survey identified four primary areas of need:

- Access to transportation;
- Outreach to employers to encourage them to hire residents with disabilities;
- Job training, coaching and counseling for residents with disabilities; and
- Reasonable accommodations for employees with disabilities.

Disability focus group participants noted that employers seem to be more willing to accommodate those with visible disabilities, but that residents with hidden, discrete, cognitive or mental disabilities have a more difficult time obtaining accommodations.

Housing. The City of Galveston operates a Handicap Accessibility Program using its CDBG funding. The Grants and Housing Department also provides a Handicap Accessibility Program that offers grants to homeowners with physical impairments. This program provides a number of home improvements to assist homeowners with accessibility needs, including wheelchair ramps and kitchen and bathroom modifications. Interested parties can contact the Department of Grants and Housing director at (409) 797-3820.

Harris County offers grant funds for minor home repairs under its Home Repair Assistance program in the form of assistance up to $20,000 for minor home repairs for those within 50 percent of the median category income for qualified housing including, but not limited to roof

repair/replacement, handicap accessibility improvements, mechanical, electrical, weatherization, and plumbing improvements. To be eligible, an applicant must be 62 years or older or have someone with a documented disability in the home at the time of application.

Applications are available at http://www.housingandcommunityresources.net/wp-content/uploads/2017/11/HomeRepairApplication_distributed.pdf.

According to the admissions and continued occupancy policy (ACOP) of the Galveston Housing Authority (GHA), if a person with a disability requests an accommodation to an existing rule, policy, practice, or service in order to fully access and utilize GHA's housing programs and related services, GHA will verify and evaluate the request. GHA is not required to make changes that would fundamentally alter the program or create an undue financial and administrative burden. GHA's reasonable accommodation language from the ACOP is below:

> *A reasonable accommodation is a change, modification, alteration or adaptation in a policy, procedure, practice, program or facility that is necessary for a qualified individual with a disability to have the opportunity to participate in, and benefit from a program or activity.*
>
> *It is the policy of GHA to be service-directed in the administration of its housing programs and to exercise and demonstrate a high level of professionalism while providing housing services to applicants, residents and participants and to ensure persons with disabilities are not discriminated against on the basis of their disability in connection with GHA's programs, services and activities. If a person with a disability requests an accommodation to an existing rule, policy, practice, or service in order to fully access and utilize GHA's housing programs and related services, GHA will verify and evaluate the request. GHA is not required to make changes that would fundamentally alter the program or create an undue financial and administrative burden.*
>
> *GHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, recertification documents, and notice of adverse action. The notice will include the name and phone number of the GHA contact person for requests for accommodation for persons with disabilities.*
>
> *A copy of GHA's Reasonable Accommodation Policy and Procedures is available at each public housing development and GHA's administrative offices.*

The Harris County Housing Authority (HCHA) addresses policies related to persons with disabilities in Part II of their 2018 Administrative Plan:

> *The PHA will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:*
>
> *"If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority."*

A specific name and phone number of designated staff will be provided to process requests for accommodation.

After a request for an accommodation is presented, the PHA will respond, in writing, within 10 business days.

If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.

If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 10 business days from the date of the most recent discussion or communication with the family.

Disproportionate Housing Needs

As discussed throughout this section, residents with disabilities are more likely than other residents to have difficulty finding housing that they can afford that meets their accessibility needs. This results in a high proportion of residents with disabilities—nearly one in four regionally—living in housing that does not meet their accessibility needs. A number of factors contribute to this situation, including:

- A lack of accessible, ADA-compliant housing across the region, both market rate and affordable;
- A lack of landlords willing to accept Section 8 vouchers;
- A lack of information available to Section 8 voucher holders to help them find landlords who do participate in the voucher program; and
- Many areas of the region lack public transportation and in many neighborhoods, sidewalks are missing or are dilapidated.

In addition to these region-wide factors, a unique aspect of providing accommodations to housing in coastal areas or areas in flood plains is the height of housing. Stakeholders indicated that building a ramp into a raised house requires circling the building which homeowners perceive as not aesthetically appealing. The costs of ramps to raised houses may also be cost-prohibitive for homeowners and service providers who are subsidizing the cost of the modifications.

SECTION VI.

Publicly Supported Housing Analysis

SECTION VI.
Publicly Supported Housing Analysis

This section provides an analysis of publicly-supported housing, including publicly supported housing demographics, location and occupancy, and access to opportunity. The analysis focuses on the two public housing authorities participating in the AI—the Harris County Housing Authority (HCHA), which serves all of Harris County excluding Houston, Pasadena, and Baytown; and the Galveston Housing Authority (GHA), which serves the City of Galveston.

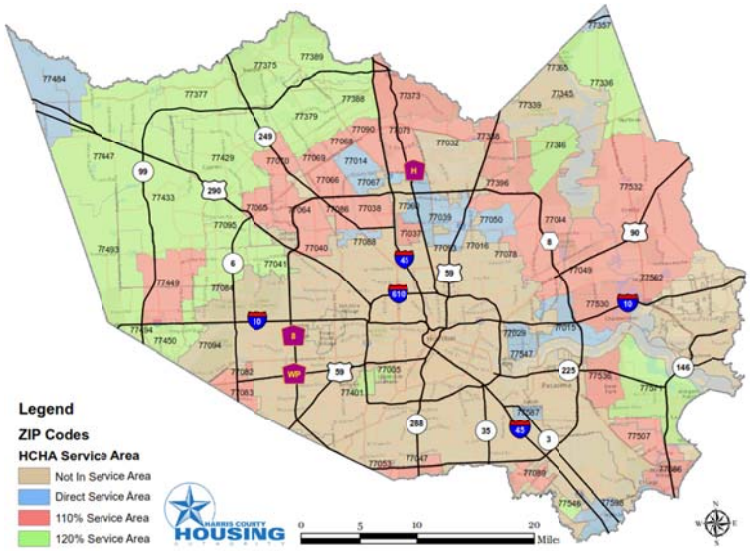
This section begins with a brief overview of HCHA's and GHA's services and then discusses all types of publicly supported housing (including HUD-funded programs as well as developments supported through the Low Income Housing Tax Credit, or LIHTC, program) by jurisdiction.[1]

Background

HCHA. HCHA serves Harris County, excluding Houston, which is served by the Houston Housing Authority; Baytown, which is served by the Baytown Housing Authority; and Pasadena, which is served by the City of Pasadena Housing Department as a public housing agency. HCHA does not have any public housing units in its inventory but manages 3,903 housing choice vouchers (HCV) and 673 Veteran's Assistance (VASH) vouchers. In addition to rental programs, HCHA also works to assist qualified clients to obtain homeownership. Figure VI-1 shows HCHA's direct service area, along with payment standards as a percent of Fair Market Rents (100%, 110% and 120%).

Figure VI-1.
Harris County Housing Authority Direct Service Area Map

Source:
Harris County Housing Authority.



[1] The LIHTC program originated in 1986 under the Tax Reform Act and was part of an effort by the federal government to devolve the obligation of publicly-supported housing to states and local governments. Today, the LIHTC is the largest single producer of affordable rental housing in the country.

HCHA's HCV waitlist opened in October 2016 but is currently closed. The PHA has four local preferences for the HCV program to help address community needs:

1) Living/working on unincorporated Harris County;

2) Homeless with school-aged children (up to 100 applicants);

3) Homeless and refereed by Harris County's Mental Health Jail Diversion Program (up to 100 applicants); and

4) 4) Shelter Plus Care voucher referrals (up to 20 applicants).

In the 2018 PHA Plan, HCHA outlines their efforts to build inclusive and sustainable communities free from discrimination:

- Build energy-efficient and location-efficient communities that are healthy, affordable, and diverse;

- Currently exploring options to develop new affordable housing communities in high opportunity areas;

- Continue to ensure HCHA's payment standards account for rental differences throughout Harris County and to encourage clients to move into areas with high performing schools.[2]

These efforts illustrate HCHA's attentiveness to access to opportunity issues—particularly school quality—for their clients. Over the past five years, HCHA has completed three affordable developments and is in process of financial closing for another; and has increased its number of VASH vouchers. It is also working to re-launch its Family Self-Sufficiency program.

GHA. The Galveston Housing Authority has served the City of Galveston since 1940. Prior to Hurricane Ike in 2008, GHA operated 942 units of public housing (four family developments and two senior developments along with scattered sites) and 1,213 housing choice vouchers (HCV). Hurricane Ike was a devastating force on the island and GHA units were no exception. All four of the PHA's family developments were destroyed by Ike and in total GHA half of its project-based housing as a collective result of Hurricanes Ike and Dolly. In the wake of these natural disasters GHA struggled with displacement of their clients and faced a number of challenges to replacing the lost housing stock (discussed in more detail in the Galveston-specific portion of this section).

Currently, GHA operates 450 public housing units, 127 project-based Section 8 units, 1,213 housing choice vouchers. The housing authority also administers 259 disaster recovery vouchers from Hurricane Ike and 35 VASH vouchers. GHA partnered with McCormack Baron Salazar to provide an additional 145 public housing units in mixed income communities. GHA also operates a Family Self Sufficiency program and a Homeownership program to qualifying HCV clients.

[2] HCHA Draft Annual PHA Plan for Fiscal Year 2018. Available online at http://hchatexas.org/wp-content/uploads/Draft-2018-PHA-Plan.pdf

GHA's HCV program includes the following local preferences:

1) Former public housing families displaced by a natural disaster;
2) Families that live or work in the City of Galveston;
3) Persons with a disability;
4) Persons 62 years of age or older;
5) Families with at least one adult employed at least 30 hours per week;
6) Persons currently enrolled and participating in a job training program;
7) Veteran status (or surviving spouse of veteran); and
8) Participants in GHA Disaster Voucher Ike program.

In the 2018 Draft PHA Plan, GHA outlines their efforts to build inclusive and sustainable communities free from discrimination:

- PHA Goal 1: Ensure equal opportunity and affirmatively further fair housing:
  - Collaborated with multiple municipalities/housing authorities to contract a consultant for research and development of Assessment of Fair Housing;
  - Undertook affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status;
  - Ensured that the waiting list was free from discrimination based on the varying factors above;
  - GHA has certified that it has taken affirmative measures, including displaying a statement on the Home page of our website www.ghatx.org;
  - Conducted AFFH training for staff including Section 504;
  - Conducted Fair Housing Workshop open to all Galveston citizens and officials in partnership with the City of Galveston during Fair Housing Month;
  - Abided by GHA's policies and procedures when admitting persons to housing from the waiting lists, including admitting based on established preferences;
  - Undertook affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status;
  - Ensured that maintenance concerns were addressed properly in the order in which they were received and without bias based on the varying factors above;

- Undertook affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required;
- Ensured that persons with disabilities were accommodated where necessary and to the greatest extent feasible;
- Continued to use mechanism for clients to notify GHA of need for reasonable accommodation; and
- Each employee signs a Code of Ethics Statement which includes an Equal Opportunity Non-Discrimination Statement at the time of the employee orientation.

- PHA Goal: Seek ways to address blight and deconcentrate poverty
  - Continued to work with GHA's mixed income management partner to promote income mixing and deconcentrate poverty through GHA's redevelopment plans; and
  - Worked with the Texas General Land Office and HUD as they implement the plan to use scattered sites as part of the overall redevelopment plan.[3]

PHA housing by jurisdiction. Figure VI-2 shows the HUD-assisted housing programs by location. The bulk of these units are supported by HCHA and GHA, though totals may also include Baytown Housing Authority units and state-administered vouchers.

The Harris County service area, has just over 10,000 HUD assisted households (through project-based Section 8, other multifamily and vouchers). This accounts for about 1.6 percent of all housing units in the jurisdiction. In Pasadena, HUD rental assistance programs support 1,337 households, or 2.6 percent of the total housing stock. Missouri City does not contain any public housing, project-based Section 8, or other multifamily units but does have 187 households participating in the HCV program—this account for less than 1 percent of the city's housing stock. Galveston is the only AI participant that has public housing units in its jurisdiction. In total, the city has about 1,900 households supported by some form of HUD-assisted rental (public housing, project based section 8, other multifamily, and HCV program), accounting for 6.3 percent of the total housing stock.

[3] GHA Draft Annual PHA Plan for Fiscal Year 2018. Available online at http://www.ghatx.org/pub_info_agencyplan.html

Figure VI-2.
Section 8, Public Housing, and Other Rental Assistance Programs in Participating Jurisdictions

	Harris County Service Area	Pasadena	Missouri City	Galveston
Public Housing	0	0	0	450
Project-based Section 8	1,860	335	0	192
Other Multifamily	527	76	0	0
HCV Program	7,631	926	187	1,275
Total HUD Assisted Units/Vouchers	**10,018**	**1,337**	**187**	**1,917**
Total Housing Units	615,680	52,203	26,225	30,562
Assisted Units as a % of all Units	1.6%	2.6%	0.7%	6.3%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

The remainder of this report section discusses publicly supported housing by jurisdiction (including HUD-supported housing and LIHTC). The focus on the analysis is on representation of racial and ethnic groups by housing program and patterns in location by program.

Harris County Service Area

The Harris County service area has about 2,400 HUD-supported units (project based section 8 or other multifamily units), 13,800 LIHTC units, and 7,600 voucher holders. The HUD AFFH-T provides demographic data on occupants of all HUD programs and provides location information about both HUD program developments and LIHTC developments. The following discussion first focuses on representation of protected class populations in HUD programs and then focuses on patterns in geographic location for HUD program units and vouchers and for LIHTC developments.

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic make-up of households assisted by housing authorities; these are shown below in Figure VI-3, along with the racial/ethnic make-up of all households earning less than 50 percent of AMI (that is, households likely to be eligible for housing authority assistance). Data for the Greater Houston region is included for context.

Disparities by race/ethnicity in program utilization relative to eligible households are evident in the jurisdiction as well as the region. Most notably, 83 percent of housing program participants are black or African American compared to 22 percent of total households earning less than 50 percent of AMI. This indicates that African Americans are participating in HUD programs at rates higher than would be expected, given their representation among income eligible households. Hispanic/Latino residents, on the other hand, are underrepresented in HUD programs (9% of program participants compared to 43% of income eligible households).

Figure VI-3. Publicly Supported Households by Race/Ethnicity, Harris County Service Area

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

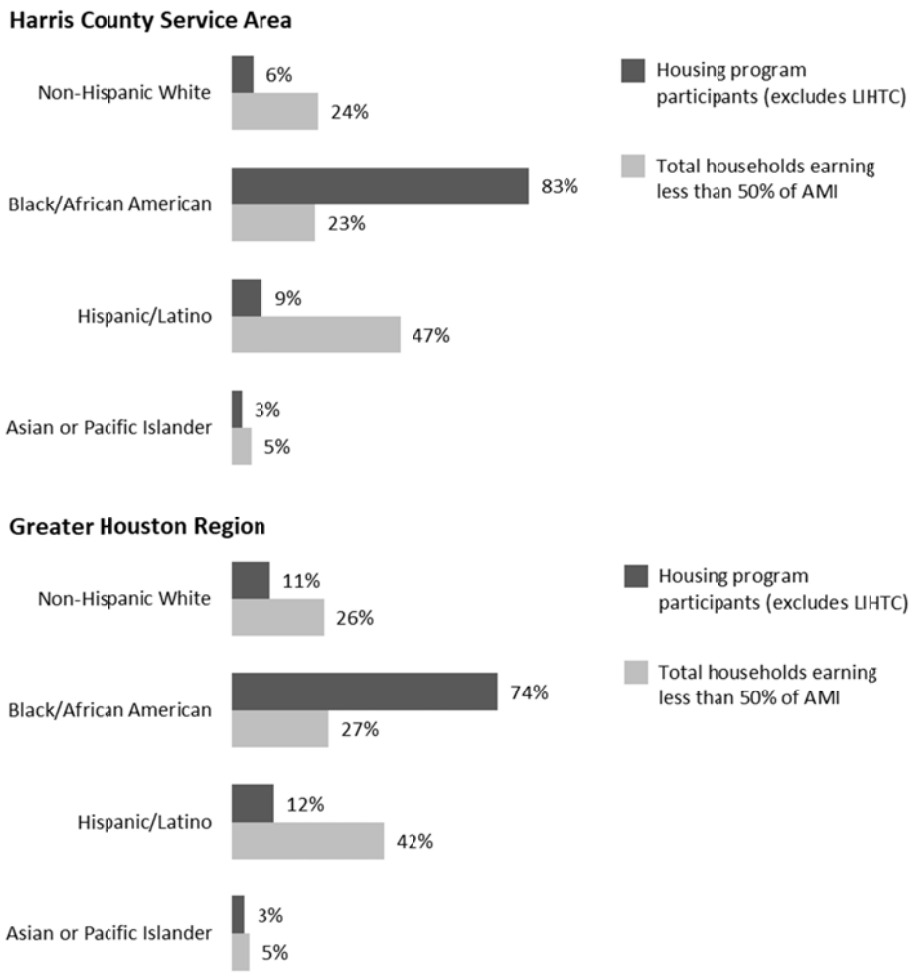


Figure VI-4 shows the racial/ethnic distribution of participants by program for the Harris County service area and the Greater Houston Region. Disparities are particularly apparent in the HCV program.

Figure VI-4.
Publicly Supported Households by Race/Ethnicity and Program Type, Harris County Service Area

Harris County Service Area	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	193	11%	1,275	72%	305	17%	4	0%
Other Multifamily	134	26%	67	13%	138	27%	171	34%
HCV Program	249	3%	6,566	90%	387	5%	95	1%
Total Households by Income	**273,953**	**48%**	**93,857**	**17%**	**165,026**	**29%**	**35,379**	**6%**
0-30% of AMI	15,115	29%	12,468	24%	21,694	42%	2,579	5%
0-50% of AMI	25,407	24%	24,372	23%	49,135	47%	5,753	5%
0-80% of AMI	58,159	30%	40,784	21%	82,826	43%	10,796	6%

Greater Houston Region	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	267	7%	2,798	74%	502	13%	225	6%
Project-Based Section 8	2,080	21%	5,937	59%	1,651	16%	343	3%
Other Multifamily	510	24%	336	16%	703	33%	574	27%
HCV Program	1,792	7%	22,634	84%	2,243	8%	343	1%
Total Households by Income	**972,175**	**48%**	**368,894**	**18%**	**570,233**	**28%**	**128,349**	**6%**
0-30% of AMI	73,755	28%	75,885	29%	98,619	38%	12,955	5%
0-50% of AMI	124,060	26%	129,850	27%	203,944	42%	23,505	5%
0-80% of AMI	244,115	30%	198,060	24%	325,753	40%	40,600	5%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Persons with disabilities represent 9 percent of residents aged five or older in the Harris County service area. As shown below, in Figure VI-5, people with disabilities are overrepresented in all HUD programs, particularly in Other Multifamily housing and as voucher holders. The same is true on the Greater Houston region overall, in which the incidence of disability is 11 percent among all residents aged five or older but ranges from 16 percent to 30 percent among HUD program participants.

Figure VI-5.
Disability by Publicly Supported Housing Program Category, Harris County Service Area

Note:

The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	People with a Disability	
	Num.	Pct.
Harris County Service Area		
Public Housing	N/a	N/a
Project-Based Section 8	200	11%
Other Multifamily	75	14%
HCV Program	1,425	19%
Greater Houston Region		
Public Housing	1,157	30%
Project-Based Section 8	1,629	16%
Other Multifamily	359	16%
HCV Program	6,815	25%

Of all of the publicly supported housing programs, Housing Choice Vouchers do the best in accommodating families with children and/or households who need larger units. The table below (Figure VI-6) shows unit size and occupancy of families with children by program type.

Figure VI-6.
Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, Harris County Service Area

	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	901	49%	791	43%	92	5%	899	49%
Other Multifamily	531	100%	0	0%	0	0%	0	0%
HCV Program	1,222	16%	2,125	28%	4,005	53%	4,799	63%

Note: Refer to the Data Documentation for details (www.hudexchange.info).

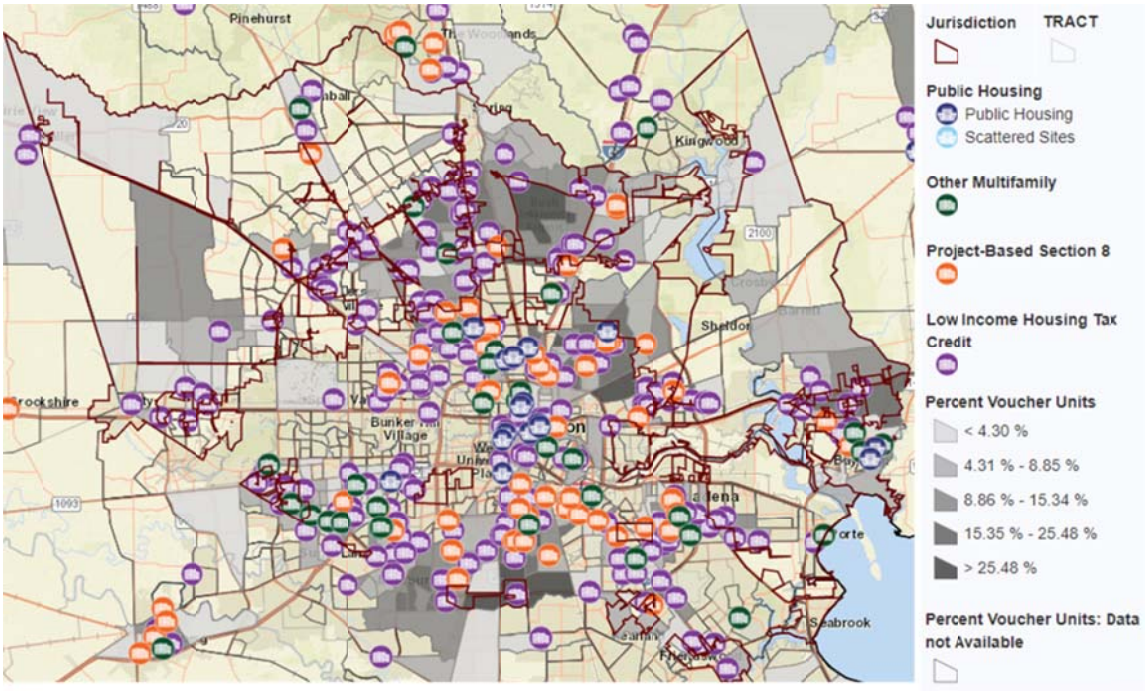
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Patterns in location by program. Figure VI-7 maps the location of publicly supported housing units in Harris County by type and identifies the percentage of rental units that house voucher holders. The icons and shading on the map represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.
- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders.

Most of the icons shown on the map fall within the City of Houston, but Harris County, excluding entitlements, contains 15 project-based section 8 developments, 15 other publicly supported multifamily developments, and 83 LIHTC developments.

Figure VI-7.
Publicly Assisted Housing in Harris County



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

The map shows an absence of developments in northwest Harris County, offset by higher voucher use in that area. Public housing is clustered in Central Houston and in Baytown (operated by Houston Housing Authority and Baytown Housing Authority). Voucher use is highest across the northern outskirts of Houston and also directly south of downtown Houston, and in Baytown.

Figure VI-8 evaluates the location of publicly supported housing units, excluding vouchers, by poverty rate of the surrounding neighborhood. About one quarter of all units are located in neighborhoods where the poverty rate exceeds 30 percent—relatively high poverty neighborhoods. Ten percent of units are in low poverty neighborhoods (poverty less than 10%).

Figure VI-8.
Publicly Assisted Units and Poverty by Census Tract, Harris County Service Area

Note:
Includes project based section 8, other multifamily, and LIHTC. Does not include HCV.

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Census Tract Poverty Rate	Number of Publicly Assisted Units	Percent of Publicly Assisted Units
Less than 10% poverty	1,550	10%
10% to 20% poverty	5,235	33%
20% to 30% poverty	4,925	31%
30% to 40% poverty	2,538	16%
40% poverty or higher	1,813	11%

Figure VI-9 shows demographic characteristics of publicly supported housing located in R/ECAPs and located outside R/ECAPs. Overall 56 percent of project based section 8 units are located in R/ECAPs compared to just 5 percent of housing choice vouchers. Within the section 8 voucher program, all protected class population shown in the figure have higher representation in R/ECAP-located units than non-R/ECAP units, except families with children.

Figure VI-9.
R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category, 2010

	Total Number of Units Occupied	Percent White	Percent Black	Percent Hispanic	Percent Asian/Pacific Islander	Percent Families with Children	Percent Elderly	Percent with a Disability
Public Housing								
R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-based Section 8								
R/ECAP	943	5%	75%	20%	0%	44%	21%	12%
Non R/ECAP	736	16%	68%	15%	0%	55%	17%	8%
Other HUD Multifamily								
R/ECAP	59	17%	47%	34%	2%	0%	87%	89%
Non R/ECAP	372	32%	11%	27%	30%	0%	96%	5%
HCV Program								
R/ECAP	383	1%	95%	5%	0%	60%	17%	21%
Non R/ECAP	6,696	4%	90%	5%	1%	63%	12%	19%

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Low Income Housing Tax Credit Housing. HUD's Low Income Housing Tax Credit database provides latitude and longitude for LIHTC locations. Note that the LIHTC database shows 121 developments with 18,322 total units located in the Harris County service area—more than the HUD AFFH-T data which report on 13,843 LIHTC units in 83 developments.

Using GIS to place each unit's location and match it with Census data on minority status provided the results below and the maps in Figures VI-10 through VI-13, assessing 2016 units using 2010 Census data:

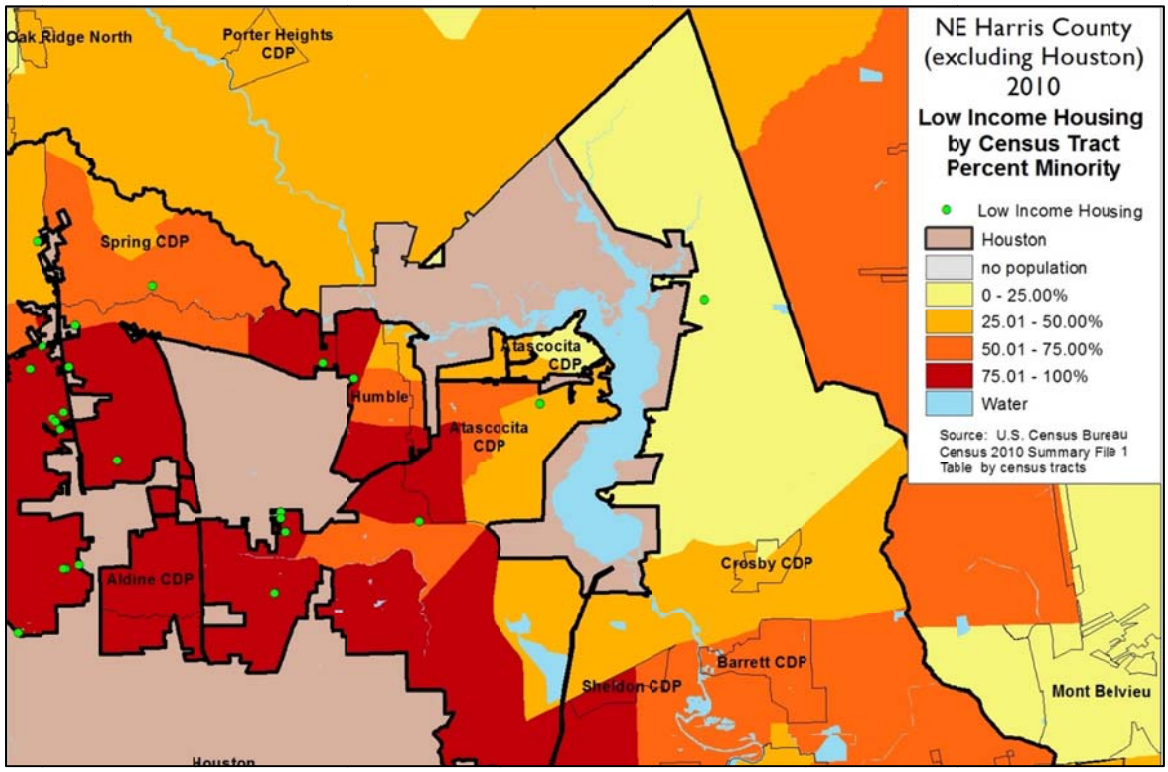
- Northeastern quadrant: Over three-fourths (79.2%) of 24 LIHTC locations are in Census tracts which are 75 percent or more minority. Only one was located in a tract that was less than 25 percent minority.

- Northwestern quadrant: Half of all locations (19 of 38) are in Census tracts which were 75 percent or more minority (2010). None were located in a tract that was less than 25 percent minority.

- Southwestern quadrant: All six LIHTC locations are in Census tracts which were 75 percent or more minority (2010).

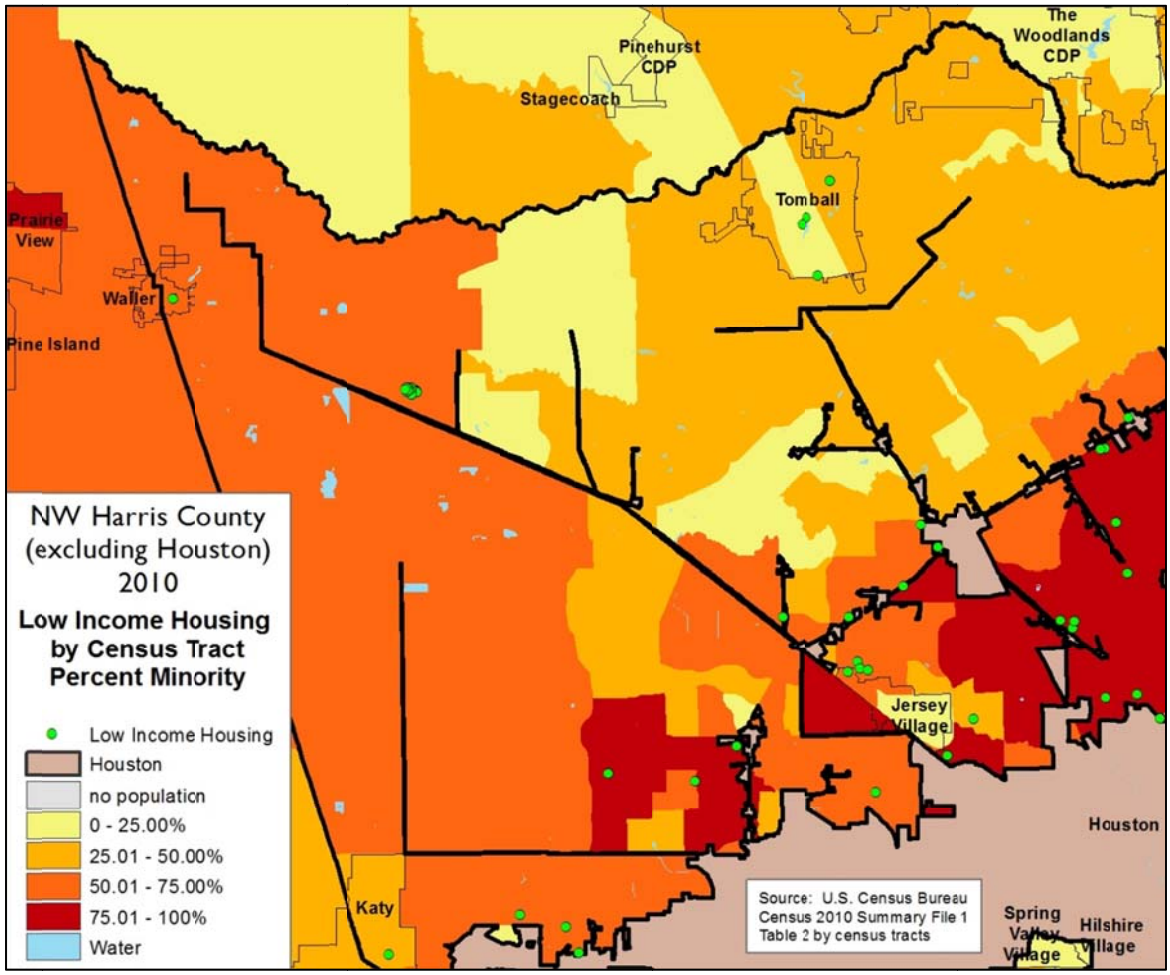
- Southeastern quadrant: More than one-third (38.2%) of 34 locations were in Census tracts which are 75 percent or more minority. None were located in a tract that was less than 25 percent minority.

Figure VI-10.
Northeastern Harris County: LIHTC Locations and Percent Minority



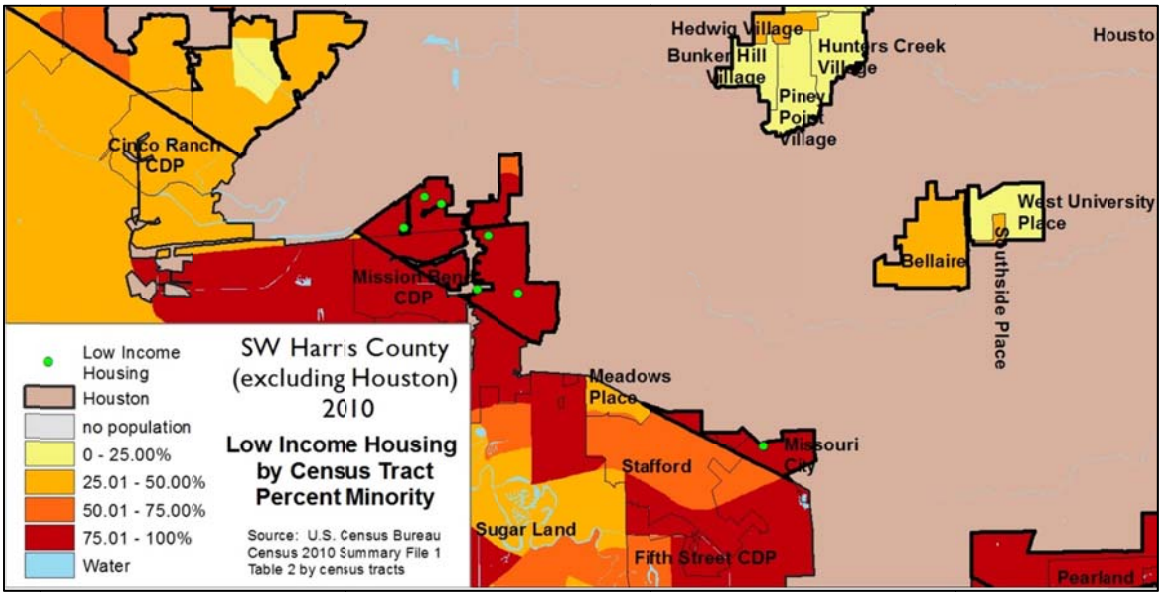
Source: Cedar Grove Institute for Sustainable Communities, Inc.

Figure VI-11.
Northwestern Harris County: LIHTC Locations and Percent Minority



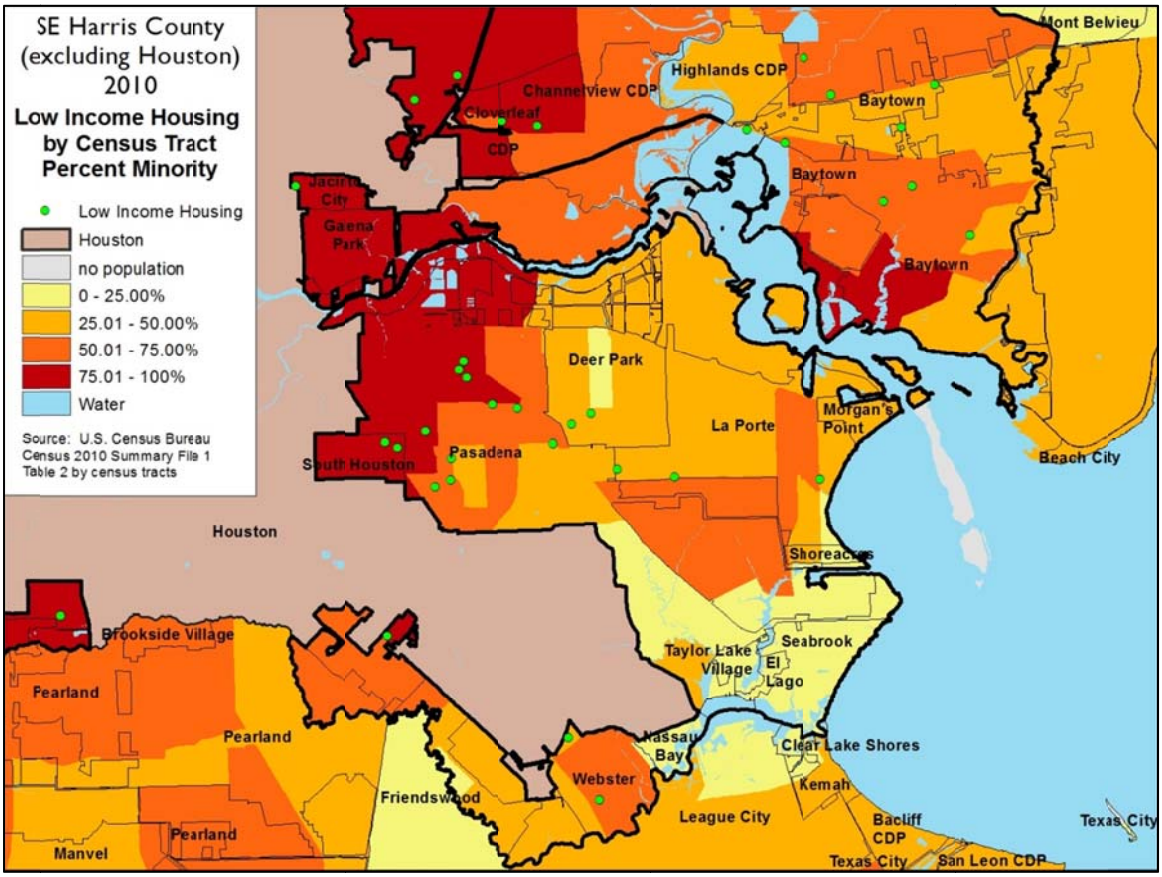
Source: Cedar Grove Institute for Sustainable Communities, Inc.

Figure VI-12.
Southwestern Harris County: LIHTC Locations and Percent Minority



Source: Cedar Grove Institute for Sustainable Communities, Inc.

Figure VI-13.
Southeastern Harris County: LIHTC Locations and Percent Minority

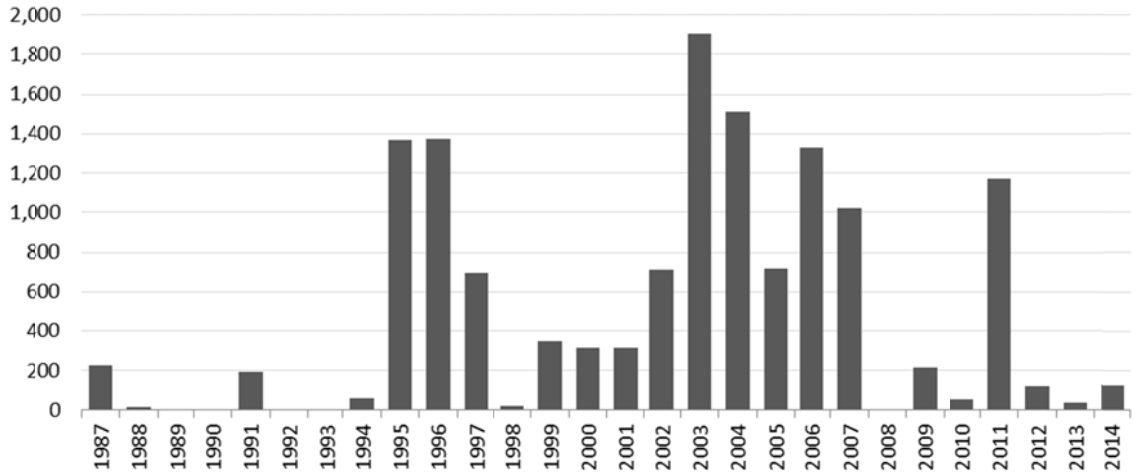


Source: Cedar Grove Institute for Sustainable Communities, Inc. City of Pasadena: Publicly Assisted Housing

Geocoding the LIHTC database indicates[4] that approximately two-thirds (64.6%) of all units in Harris County excluding Houston are in Census tracts that are 75 percent or more minority. The average percent minority for all 16,084 LIHTC units is 85.4 percent minority. These results indicate that LIHTC placement is perpetuating segregation.

These projects represent a total of 18,322 units. Ninety-five of 121 projects reported the year their units were placed in service, and that timeline is shown below:

Figure VI-14.
Pasadena, TX: 11 Low-Income Housing Tax Credit Project Timeline



Source: HUD's Low Income Housing Tax Credit database and International Development and Planning, LLC.

Of 102 LIHTC projects reporting target population restrictions, 91.7 percent serve low income residents.

Pasadena

Pasadena has 411 HUD-supported units (project based section 8 or other multifamily units), 2,525 LIHTC units, and administers nearly 1,100 housing choice vouchers. The HUD AFFH-T provides demographic data on occupants of all HUD programs and provides location information about both HUD program developments and LIHTC developments. The following discussion first focuses on representation of protected class populations in HUD programs and then focuses on patterns in geographic location for HUD program units and vouchers and for LIHTC developments.

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic make-up of households assisted by housing authorities; these are shown below in Figure VI-15, along with the racial/ethnic make-up of all households earning less than

[4] Geocoding points which are very close to a boundary could be allocated to the wrong "place" (one side of a street versus another may indicate a different Census tract). However, the large number of locations is likely to cancel out any major distortion when calculating average figures such as average percent minority.

50 percent of AMI (that is, households likely to be eligible for housing authority assistance). Data for the Greater Houston region is included for context.

Relative to the region, a higher proportion of program participants in Pasadena are Hispanic (46%) and a lower proportion are African American (23%). Even so, disparities still show that African Americans are overrepresented and Hispanics are underrepresented as housing program participants relative to their representation among low income households. That is true both in Pasadena and the region overall.

Figure VI-15. Publicly Supported Households by Race/Ethnicity, Pasadena

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

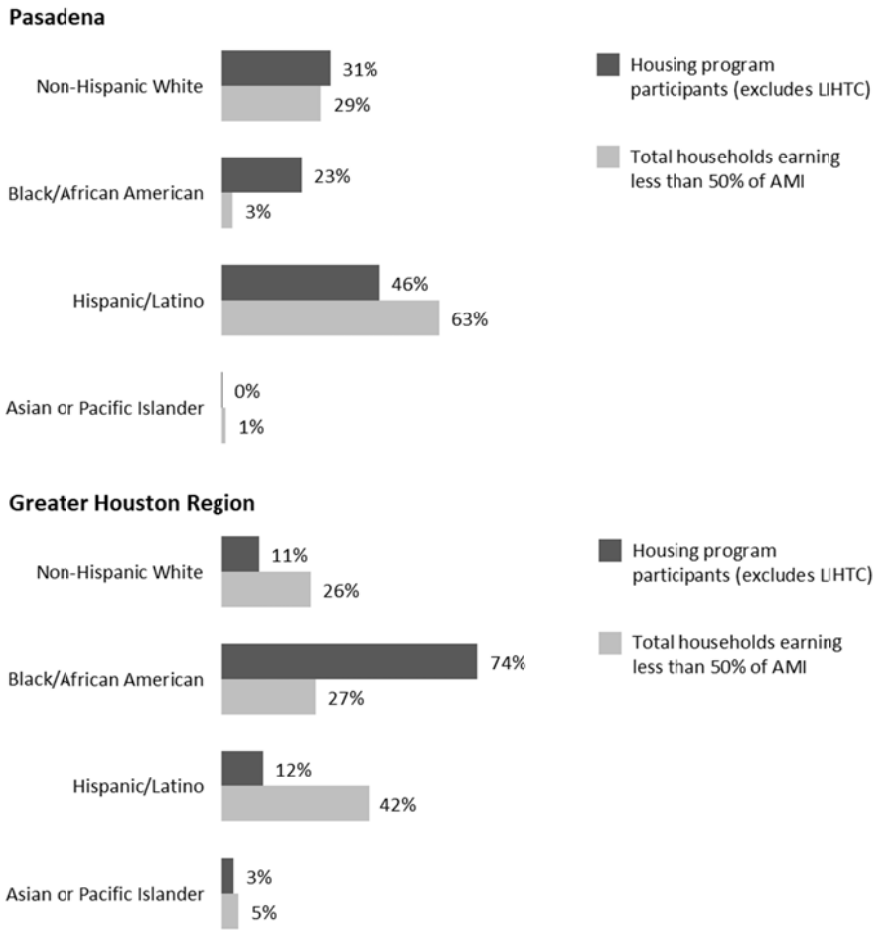


Figure VI-16 shows the racial/ethnic distribution of participants by program in Pasadena and the Greater Houston Region. Non-Hispanic white residents are overrepresented in project-based section 8 and other multifamily units relative to their representation among low and extremely low income households. For African American residents, the opposite is true: they are underrepresented in project based section 8 and other multifamily but overrepresented in the HCV program. This disparity seems to indicate that these different HUD programs are serving different populations—this could be due to preferences, demographic characteristics, or different types of marketing of the different programs.

Figure VI-16.
Publicly Supported Households by Race/Ethnicity and Program Type, Pasadena

Pasadena	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	194	60%	5	2%	122	38%	0	0%
Other Multifamily	33	49%	0	0%	34	50%	1	1%
HCV Program	159	19%	279	33%	409	48%	0	0%
Total Households by Income	**19,944**	**43%**	**1,233**	**3%**	**24,529**	**52%**	**1,077**	**2%**
0-30% of AMI	2,110	29%	438	6%	4,690	64%	140	2%
0-50% of AMI	4,280	30%	478	3%	9,395	65%	199	1%
0-80% of AMI	7,345	31%	813	3%	15,209	64%	334	1%

Greater Houston Region	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	267	7%	2,798	74%	502	13%	225	6%
Project-Based Section 8	2,080	21%	5,937	59%	1,651	16%	343	3%
Other Multifamily	510	24%	336	16%	703	33%	574	27%
HCV Program	1,792	7%	22,634	84%	2,243	8%	343	1%
Total Households by Income	**972,175**	**48%**	**368,894**	**18%**	**570,233**	**28%**	**128,349**	**6%**
0-30% of AMI	73,755	28%	75,885	29%	98,619	38%	12,955	5%
0-50% of AMI	124,060	26%	129,850	27%	203,944	42%	23,505	5%
0-80% of AMI	244,115	30%	198,060	24%	325,753	40%	40,600	5%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Persons with disabilities represent 12 percent of residents aged five or older in Pasadena. As shown below, in Figure VI-17, people with disabilities are overrepresented in all HUD programs, particularly in Other Multifamily housing and as voucher holders. The same is true on the Greater Houston region overall, in which the incidence of disability is 11 percent among all residents aged five or older but ranges from 16 percent to 30 percent among HUD program participants.

Figure VI-17.
Disability by Publicly Supported Housing Program Category, Pasadena

Note:

The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	People with a Disability	
	Num.	Pct.
Pasadena		
Public Housing	N/a	N/a
Project-Based Section 8	51	16%
Other Multifamily	14	20%
HCV Program	197	22%
Greater Houston Region		
Public Housing	1,157	30%
Project-Based Section 8	1,629	16%
Other Multifamily	359	16%
HCV Program	6,815	25%

Of all of the publicly supported housing programs, Housing Choice Vouchers do the best in accommodating families with children and/or households who need larger units. The table below (Figure VI-18) shows unit size and occupancy of families with children by program type.

Figure VI-18.
Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, Pasadena

	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	293	89%	30	9%	3	1%	24	7%
Other Multifamily	71	100%	0	0%	0	0%	0	0%
HCV Program	334	38%	348	40%	168	19%	416	47%

Note: Refer to the Data Documentation for details (www.hudexchange.info).

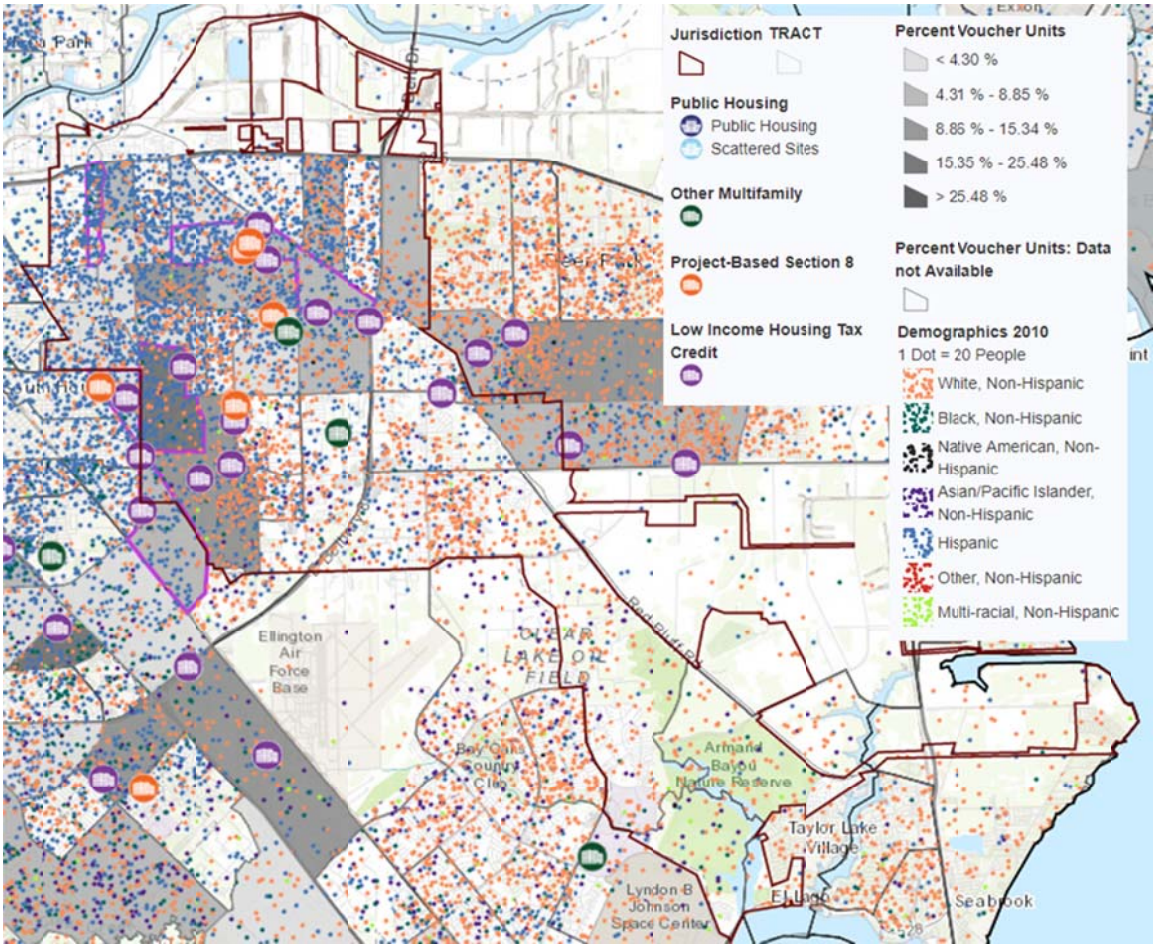
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Patterns in location by program. Figure VI-19 maps the location of publicly supported housing units in Pasadena by type and identifies the percentage of rental units that house voucher holders. Population by race/ethnicity is included for context. The icons and shading on the map represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.
- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders.

All of the city's publicly supported housing and all tracts with relatively high voucher use are located in the northern portion of Pasadena. This part of the city does accommodate more density but also has high concentrations of people of color and higher poverty.

Figure VI-19.
Publicly Assisted Housing and Race/Ethnicity in Pasadena



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Figure VI-20 evaluates the location of publicly supported housing units, excluding vouchers, by poverty rate of the surrounding neighborhood. Most units (61%) are located in neighborhoods where the poverty rate exceeds 30 percent—relatively high poverty neighborhoods. Just one development consisting of 14 units is located in low poverty neighborhoods (poverty less than 10%).

Figure VI-20.
Publicly Assisted Units and Poverty by Census Tract, Pasadena

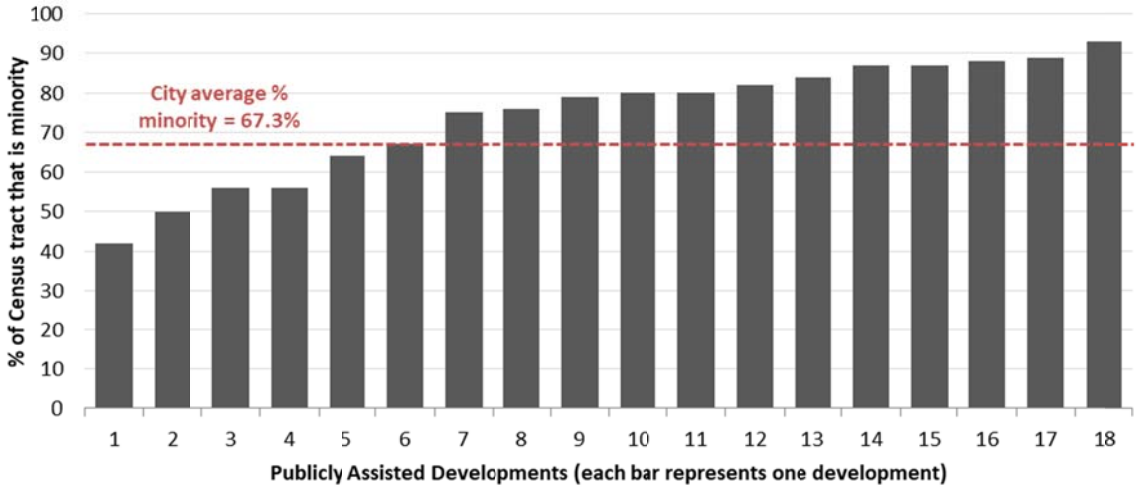
Note:
Includes project based section 8, other multifamily, and LIHTC. Does not include HCV.

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Census Tract Poverty Rate	Number of Publicly Supported Units	Percent of Publicly Assisted Units
Less than 10% poverty	14	0%
10% to 20% poverty	562	19%
20% to 30% poverty	563	19%
30% to 40% poverty	492	17%
40% poverty or higher	1,305	44%

In addition to being concentrated in higher poverty areas, publicly assisted housing in Pasadena is concentrated in higher minority areas. Figure VI-21 shows the percent minority population in neighborhoods surrounding each publicly assisted housing development in Pasadena. Sixty-one percent of Pasadena's publicly assisted developments are located in Census tracts which have a higher proportion of minority residents than the city overall.

Figure VI-21.
City of Pasadena: Publicly Assisted Housing Project and Location's Percent Minority (Tract, 2016)



Source: HUD Picture of Subsidized Households and International Development and Planning LLC.

Figure VI-22 shows demographic characteristics of publicly supported housing located in R/ECAPs and located outside R/ECAPs. Overall 66 percent of project based section 8 units and 42 percent of housing choice vouchers are located in R/ECAPs. Pasadena's two "other multifamily" developments (68 units collectively) are both located outside the city's R/ECAPs. These other multifamily developments primarily serve elderly residents (87%)—49 percent are non-Hispanic white and 50 percent are Hispanic.

Within the project based section 8 voucher program, Hispanic program participants and families with children are more likely to live in R/ECAP units than non-R/ECAP units. Non-Hispanic white program participants and those with a disability are more likely to live in non-R/ECAP units. Elderly program participants account for similar proportions of all program participants in and out of R/ECAPs.

Among HCV program participants, elderly residents and those with a disability account for a higher proportion of residents in non-R/ECAP units than in R/ECAP units.

Figure VI-22.
R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category, 2010

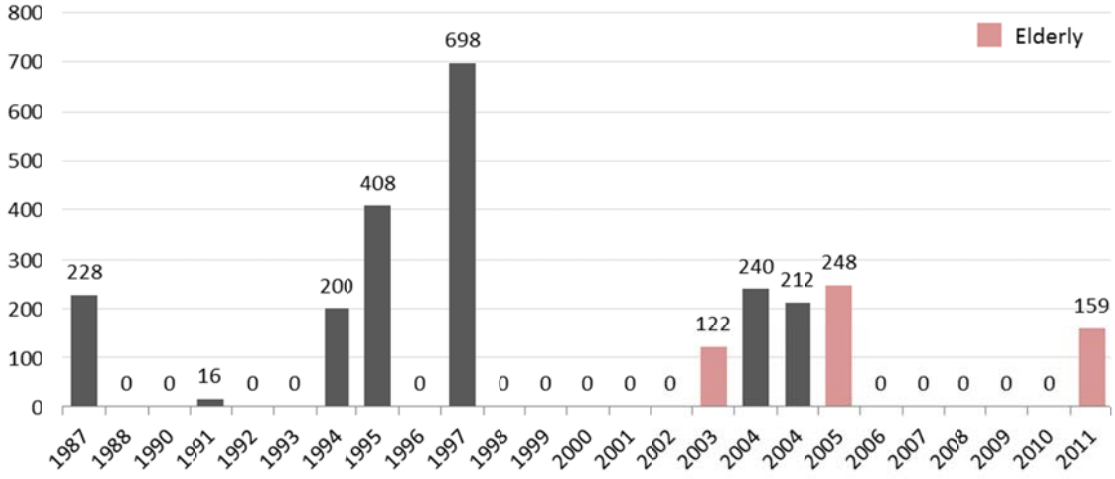
	Total Number of Units Occupied	Percent White	Percent Black	Percent Hispanic	Percent Asian/Pacific Islander	Percent Families with Children	Percent Elderly	Percent with a Disability
Public Housing								
R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-based Section 8								
R/ECAP	216	50%	1%	48%	0%	11%	81%	13%
Non R/ECAP	111	80%	2%	18%	0%	0%	87%	20%
Other HUD Multifamily								
R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP	68	49%	0%	50%	1%	0%	87%	20%
HCV Program								
R/ECAP	356	12%	44%	44%	0%	57%	14%	19%
Non R/ECAP	484	24%	25%	51%	0%	40%	31%	25%

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Low-Income Housing Tax Credits. According to HUD's Low Income Housing Tax Credit List, there are 11 LIHTC developments in Pasadena's city limits, providing about 2,531 units. Of these, 2,525 units are in service, and 90 percent serve low income residents. Only five projects have been constructed in the last almost-20 years (see Figure VI-23); thus 41.1 percent of the City's LIHTC units are almost 20 years old or older. Of the units built since 1998, 53.9 percent are reserved for the elderly, and this includes the only project built in the last decade.

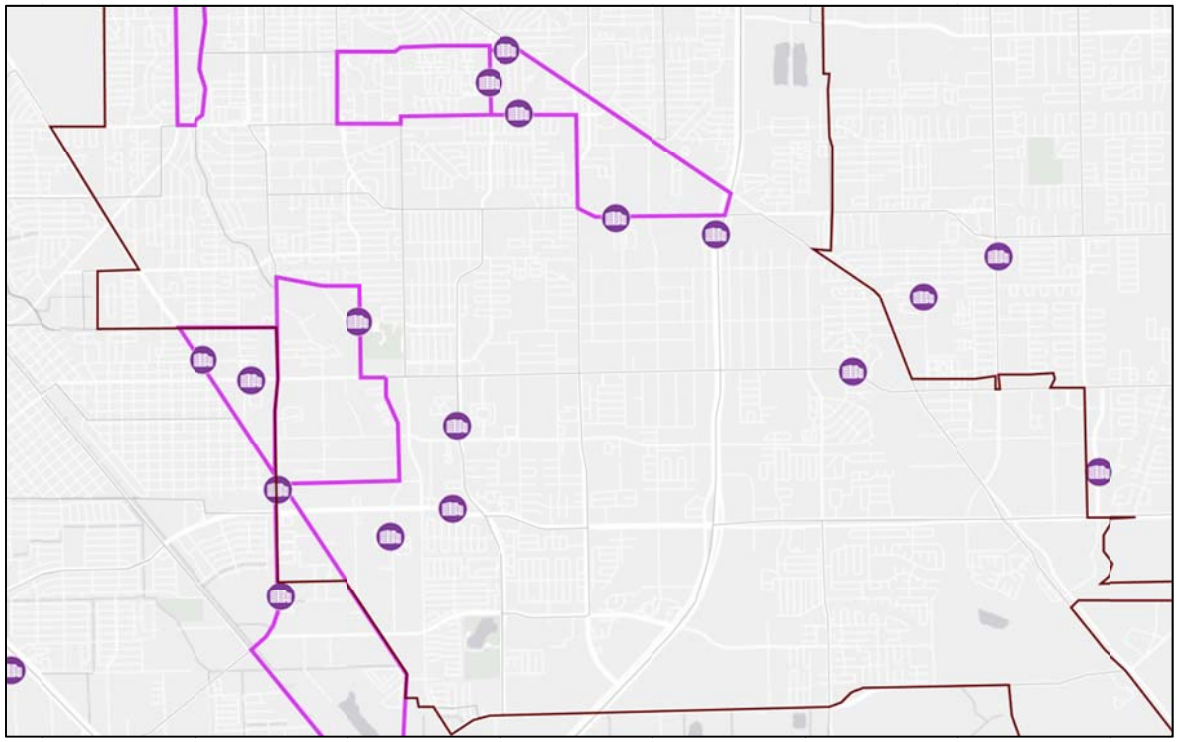
Figure VI-23.
Pasadena, TX: 11 Low-Income Housing Tax Credit Project Timeline



Source: HUD Picture of Subsidized Households and International Development and Planning LLC.

As shown in Figure VI-24, five of the 11 LIHTC developments in Pasadena are located in R/ECAPs. While some studies do show that siting LIHTC developments in disadvantaged areas can help catalyze private redevelopment, it is also important to consider whether LIHTC siting may be contributing to segregation and/or limiting LIHTC residents' ability to access areas of high opportunity.

Figure VI-24.
City of Pasadena, TX: LIHTC Developments and R/ECAPs

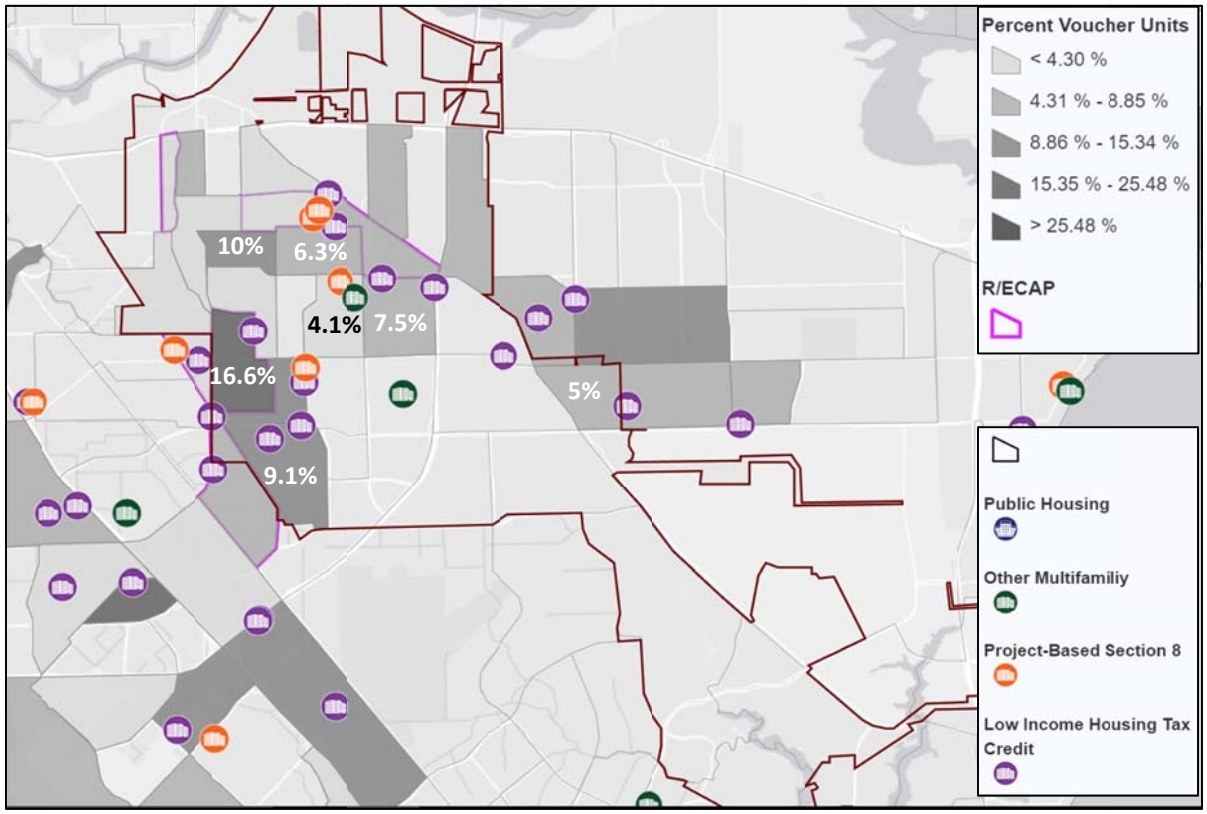


Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Housing Choice Vouchers. Pasadena Housing Authority Program administers about 1,100 Section 8 Housing Choice Vouchers (HCV). Like the Harris County Housing Authority, the City of Pasadena's Housing Choice Voucher Waiting List is closed. According to the city, it was last open for three days in April 2016 and received 9,101 applicants.[5]

As shown in Figure VI-25, voucher holders are more likely to live in or near publicly assisted housing.

Figure VI-25.
City of Pasadena, TX: Distribution of Voucher Units



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Missouri City

Missouri City has no Public Housing Authority,[6] no public housing, and no project based Section 8 units. It does have one LIHTC development (105 units) and 187 HCV holders. Although publicly supported housing is limited in Missouri City, the following discussion considers representation of racial/ethnic groups among voucher holders and discusses the geographic distribution of vouchers in the city and the location of the city's LIHTC development.

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[5] City of Pasadena, "Pasadena Housing Program Waiting List Opening."

[6] HUD, PHA Contact Information, https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/pha/contacts/tx2

Representation of protected class groups. Figure VI-26, shows the racial/ethnic distribution of HCV program participants in Pasadena compared to the racial/ethnic distribution of all households earning less than 50 percent of AMI (that is, households likely to be eligible for housing authority assistance). Data for HCV participants in the Greater Houston region is included for context.

The vast majority—97 percent—of voucher holders living in Missouri City are black or African American. This compares to 43 percent of low income residents in Missouri City that are black or African American. In other words, African American representation among voucher holders is 2.2 times their representation among income eligible households. In the region overall the overall representation of African Americans among voucher holders is lower (84%) but the disparity is even higher: African American representation among voucher holders is 3.1 times their representation among income eligible households in the Greater Houston region.

Figure VI-26. HCV holders by Race/Ethnicity, Missouri City

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

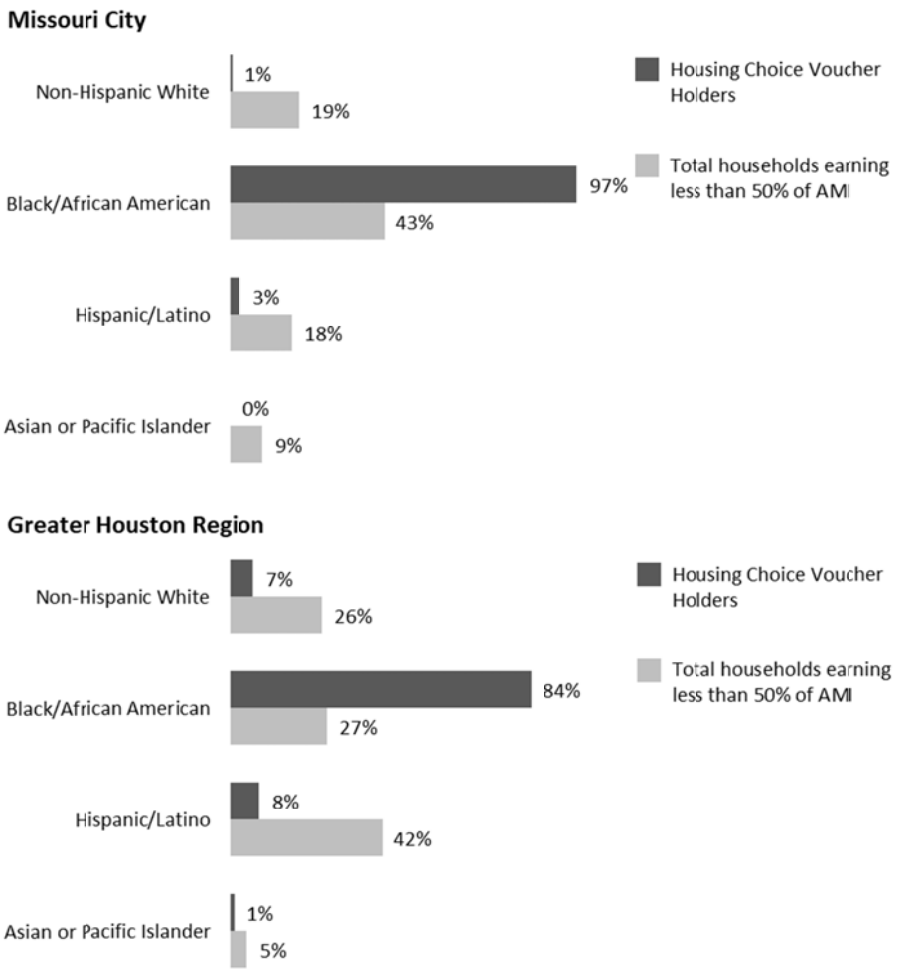


Figure VI-27 shows additional details about HCV holder households living in Missouri City. The voucher program in Missouri City primarily serves families with children (73%) and households requiring larger homes (83% live in 3+ bedroom units).

Persons with disabilities represent 7 percent of residents aged five or older in Missouri City but 15 percent of voucher holders. Seven percent of voucher holders are elderly.

Figure VI-27.
Housing Choice Vouchers in Missouri City

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	Number	Percent
Total Units	**176**	**100%**
Occupant Characteristics		
Families with children	128	73%
Elderly	12	7%
With a disability	26	15%
Number of Bedrooms		
Households in 0-1 Bedroom Units	2	1%
Households in 2 Bedroom Units	19	11%
Households in 3+ Bedroom Units	147	83%

Patterns in location by program. Figure VI-28 maps the location of Pasadena's single LIHTC development and identifies the percentage of rental units that house voucher holders. Population by race/ethnicity is included for context. On the map, LIHTC developments in and around Missouri City are depicted by purple icons. Grey shading shows the percentage of rental units that house Housing Choice Voucher holders.

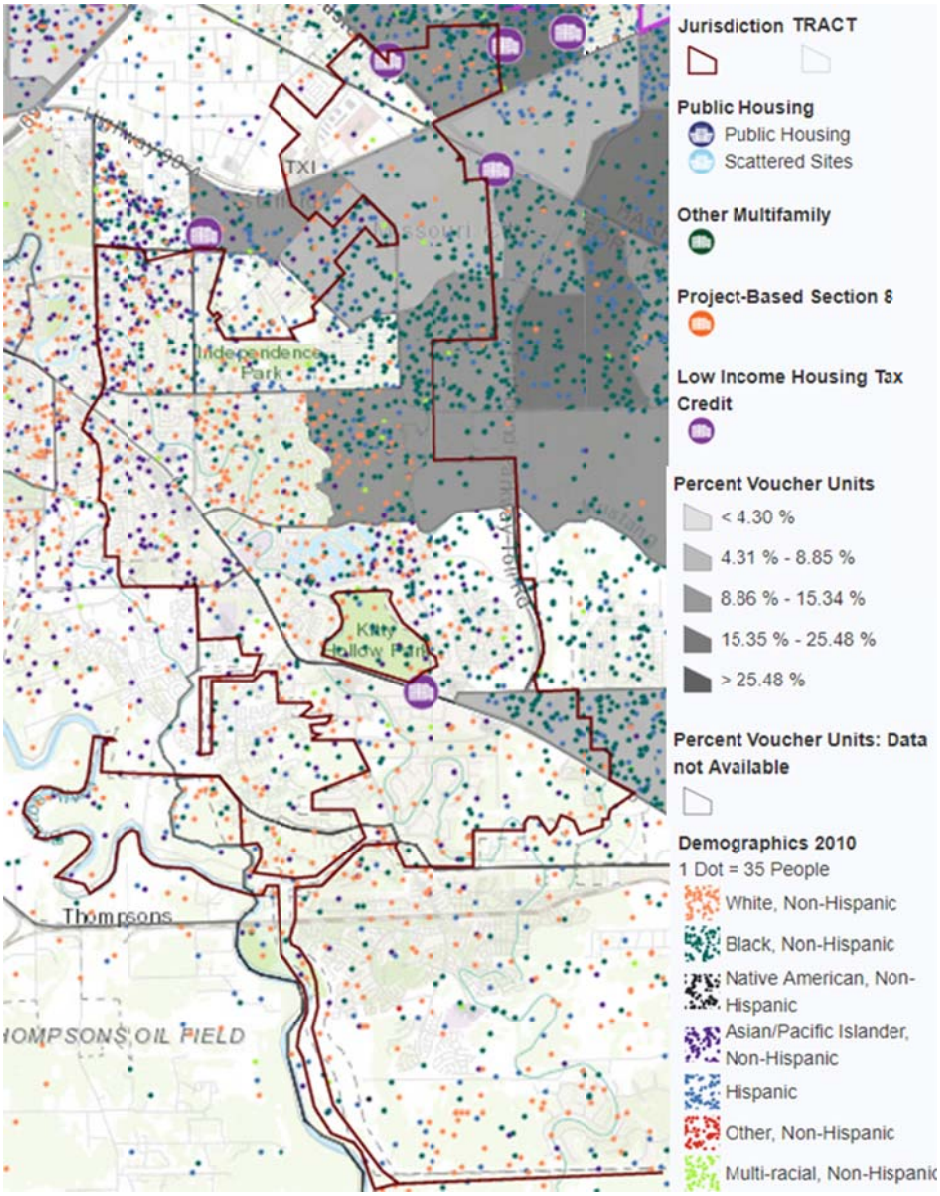
The single LIHTC development location in Missouri City's borders is an age-restricted property serving low income seniors. It is located in the south central portion of the city, along Highway 6, in a very low poverty neighborhood (2%). About one-third of neighborhood residents are non-Hispanic white (35%); 22 percent are Asian, 29 percent black and 12 percent Hispanic. Note that five other LIHTC developments are visible on the map, just outside Missouri City's northern borders.

In contract to LIHTC residents, voucher holders in Missouri City are likely to live in predominantly minority neighborhoods in the northeastern portions of the city.

Figure VI-28. Publicly Assisted Housing and Race/Ethnicity in Missouri City

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.



Galveston

The City of Galveston currently has 595 units of public housing, 127 project based section 8 units, 897 LIHTC units, and 1,213 voucher holders. The HUD AFFH-T provides demographic data on occupants of all HUD programs and provides location information about both HUD program developments and LIHTC developments. The following discussion first discusses impacts of recent natural disasters on the PHA's stock then focuses on representation of protected class populations in HUD programs and focuses on patterns in geographic location for HUD program units and vouchers and for LIHTC developments.

Natural disasters and GHA inventory. Prior to Hurricane Ike in 2008, GHA operated 942 units of public housing (four family developments and two senior developments along with scattered sites) and 1,213 housing choice vouchers (HCV). More than half of the units GHA administered were destroyed by Hurricanes Ike and Dolly in 2008 and have not been fully

replaced. A June 2011 Audit by the Texas Department of Housing and Community Affairs found that the City had spent only 3.2 percent of the $174 million in federal disaster recovery funds allotted to the City through the Affordable Rental Housing Recovery Program. In contrast, Houston had spent 38.6 percent by that point.[7]

The Ike and Dolly disaster funding Round Two Action Plan was found to violate the Fair Housing Act, but a Conciliation Agreement was signed May 21, 2010. As a result,

> *"In Galveston, HUD and the State of Texas made clear they would uphold federal law and the Conciliation Agreement and withhold $586 million in CDBG-DR funds to overcome racially motivated resistance to rebuilding public housing that threatened to prevent hundreds of low-income predominantly African-American, families from returning home to the Island."*[8]

However, racial animosity over replacement of public housing entered city politics, and the City's mayor and city council, elected in 2012, pledged to replace public housing with vouchers. According to the Houston Chronical,

> *"If Mayor Lewis Rosen replaces plans to rebuild public housing with a voucher program as he promised in his campaign, it would breach an agreement among federal and state governments and two housing groups to carry out the rebuilding as well as a separate agreement with Lone Star Legal Aid, a legal service for the poor."*[9]

The mayor vowed to declare as surplus the land set aside for rebuilding public housing and to sell it to a developer.

The City was not able to approve a plan for replacement and in 2013, the Texas General Land Office imposed a plan in which Galveston Housing Authority would build 145 units of public housing mixed with market-rate units and the Texas General Land Office would build another 384 scattered-site units around the island.

In 2016 and 2017, the Housing Authority completed its mixed income construction obligation (Cedars at Carver Park and The Villas on the Strand) but at the time this AI was written, none of the Land Office units had been built. Affordable housing advocates filed an official complaint with HUD in December 2016 indicating the Galveston Housing Authority willfully obstructed rebuilding efforts. The primary contention is related to procedural confusion about what is required to complete construction. The Land office believes the Housing Authority must request

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[7] Texas Department of Housing and Community Affairs - Internal Audit Department June 2011 Report # 11-1043, page 13. https://www.tdhca.state.tx.us/pdf/ia/11-AuditReport-DisasterRecoveryProgram.pdf accessed 8/29/2017.

[8] Sloan, Madison and Deborah Fowler, "Lessons From Texas 10 Years of Disaster Recovery Examined," White Paper, Texas Appleseed, September 15, 2015. https://www.texasappleseed.org/sites/default/files/TexasAppleseedHurricane_WhitePaper_02c_Final.pdf accessed 8/29/2017.

[9] Rice, Harvey, "Critics say new Galveston mayor can't block public housing," Houston Chronicle, July 2, 2012. http://www.chron.com/news/houston-texas/article/Critics-say-new-Galveston-mayor-can-t-block-3679982.php; accessed 8/29/2017.

a waiver of competitive bidding from HUD but the Housing Authority does not believe a waiver is required and suggests the Land office should seek competitive bids and proceed with construction.[10]

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic make-up of households assisted by housing authorities; these are shown below in Figure VI-29, along with the racial/ethnic make-up of all households earning less than 50 percent of AMI (households likely to be eligible for housing authority assistance). Data for the Greater Houston region is included for context.

In Galveston, nearly two-thirds (65%) of program participants are African American, 20 percent are non-Hispanic white and 14 percent are Hispanic. Disparities in program utilization relative to eligible households by race/ethnicity are similar to the region overall: African Americans overrepresented in HUD programs while Hispanics and non-Hispanic whites are underrepresented.

[10] Rice, Harvey, "Galveston accused of obstructing public housing," Houston Chronicle, February 11, 2017. www.houstonchronicle.com/news/houston-texas/houston/article/Galveston-accused-of-obstructing-public-housing-10926270.php

Figure VI-29. Publicly Supported Households by Race/Ethnicity, Galveston

Source:
HUD AFFH-T and BBC Research & Consulting.

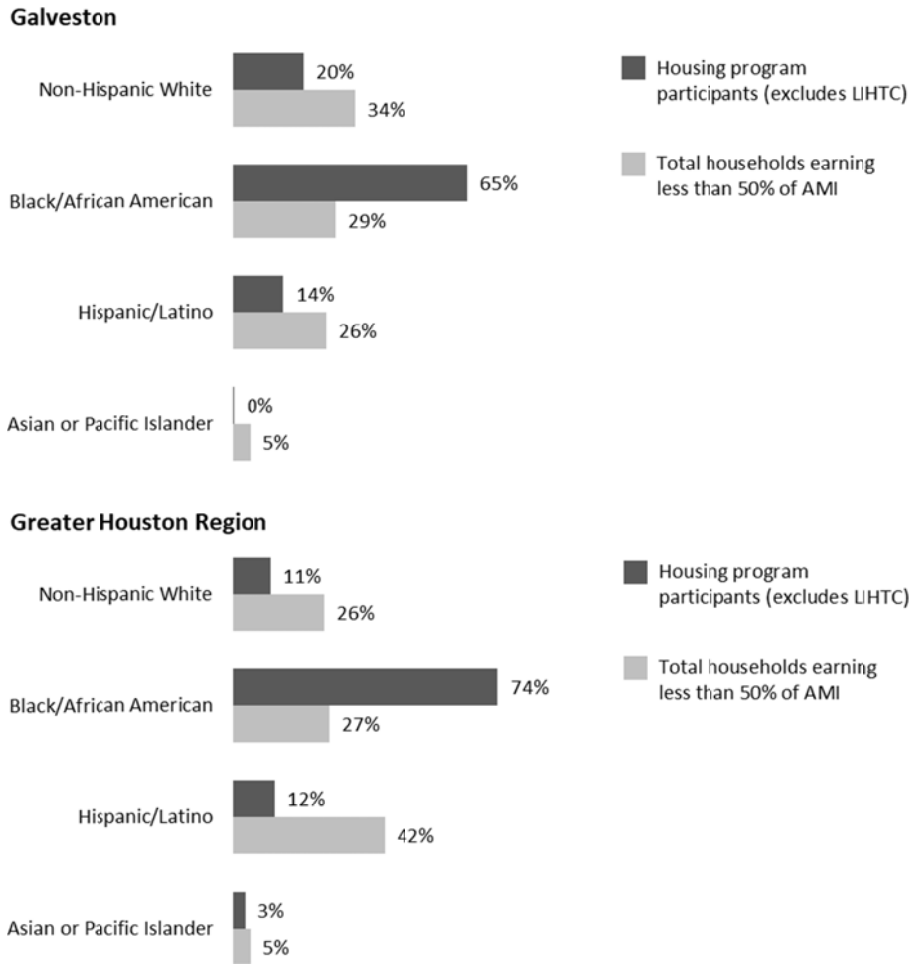


Figure VI-30 shows the racial/ethnic distribution of participants by program for Galveston and the Greater Houston Region. Disparities are particularly apparent in project-based section 8 units.

Figure VI-30.
Publicly Supported Households by Race/Ethnicity and Program Type, Galveston

Galveston	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	156	36%	210	49%	58	13%	3	1%
Project-Based Section 8	19	10%	159	82%	15	8%	0	0%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	175	15%	777	68%	180	16%	2	0%
Total Households by Income	**10,705**	**54%**	**3,474**	**17%**	**4,774**	**24%**	**1,045**	**5%**
0-30% of AMI	1,715	38%	1,505	34%	974	22%	285	6%
0-50% of AMI	2,505	36%	2,100	30%	1,924	28%	360	5%
0-80% of AMI	4,185	40%	2,745	26%	3,049	29%	605	6%

Greater Houston Region	Non-Hispanic White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Program Participants by Housing Type								
Public Housing	267	7%	2,798	74%	502	13%	225	6%
Project-Based Section 8	2,080	21%	5,937	59%	1,651	16%	343	3%
Other Multifamily	510	24%	336	16%	703	33%	574	27%
HCV Program	1,792	7%	22,634	84%	2,243	8%	343	1%
Total Households by Income	**972,175**	**48%**	**368,894**	**18%**	**570,233**	**28%**	**128,349**	**6%**
0-30% of AMI	73,755	28%	75,885	29%	98,619	38%	12,955	5%
0-50% of AMI	124,060	26%	129,850	27%	203,944	42%	23,505	5%
0-80% of AMI	244,115	30%	198,060	24%	325,753	40%	40,600	5%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool and BBC Research & Consulting.

Persons with disabilities represent 15 percent of residents aged five or older in Galveston. As shown below, in Figure VI-31, people with disabilities are overrepresented in Galveston's public housing (66% have a disability) and in Galveston's HCV program (22%). People with disabilities are underrepresented in the city's project based section 8 units (4%).

Figure VI-31.
Disability by Publicly Supported Housing Program Category, Galveston

Note:

The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

	People with a Disability	
	Num.	Pct.
Galveston		
Public Housing	289	66%
Project-Based Section 8	7	4%
Other Multifamily	N/a	N/a
HCV Program	254	22%
Greater Houston Region		
Public Housing	1,157	30%
Project-Based Section 8	1,629	16%
Other Multifamily	359	16%
HCV Program	6,815	25%

Of all of the publicly supported housing programs, the project based section 8 program does the best in accommodating families with children and/or households who need larger units. The table below (Figure VI-32) shows unit size and occupancy of families with children by program type.

Figure VI-32.
Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, Galveston

	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Public Housing	404	92%	11	3%	21	5%	32	7%
Project-Based Section 8	9	5%	93	48%	91	47%	143	74%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	342	29%	503	43%	293	25%	515	44%

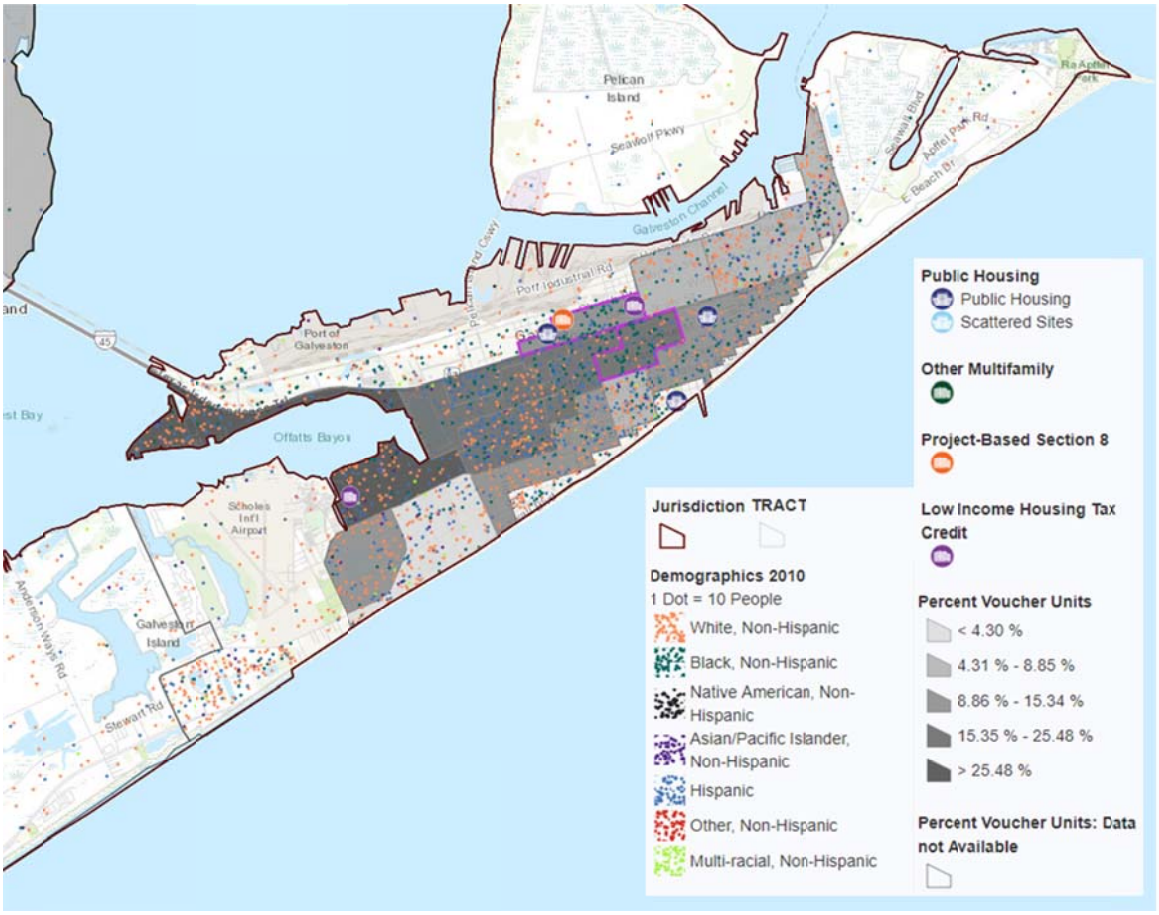
Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Patterns in location by program. Figure VI-33 maps the location of publicly supported housing units in Galveston by type and identifies the percentage of rental units that house voucher holders. Note that the map focuses on the east end of the island as there are no publicly assisted developments and no data for voucher use outside this area of the city. The icons and shading on the map represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.
- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders. This shading is also shown separately in another map later in the discussion.

Figure VI-33.
Publicly Assisted Housing in Galveston



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

As shown in the map, Galveston has one project based section 8 development, two LIHTC developments and three public housing developments. Notably, all of these developments are on the east end of the island; three developments are located in a single R/ECAP.

Public Housing. The City of Galveston has five public housing projects and two mixed income communities containing public housing units:

1. The Oaks IV is part of a single-family home project designed to be sold to low-to-moderate income residents. This project was developed even though the original Oaks IV redevelopment plan was opposed by conservative citizen "watchdog group" because "HUD will be performing a review to analyze if the redevelopment plan, in total, concentrates poverty north of Broadway."[11] In fact, The Oaks IV is located in R/ECAP.

[11] Open Government Project, "The Oaks IV", Galveston, TX. Undated. http://www.galvestonogp.org/GHA/TheOaksIV.pdf accessed 8/20/2017.

The Oaks IV is attractive, well-maintained, close to a park and recreation center, but adjacent to Moody Warehouse #4. Moody Compress and Warehouse[12] in Galveston is a Cotton Distributor. Cotton is processed using a variety of toxins, including 1, 4-Dioxane, which has a variety of adverse health effects, including nervous system effects and may be carcinogenic.[13] In addition, the #4 Warehouse is floored with asphalt,[14] which also has adverse health effects.[15] The grounds of the Oaks IV should be monitored for traces of these and other toxins associated with cotton processing.

2. Gulf Breeze Apartments includes 376 senior high-rise (11-story) apartments located three blocks east of Galveston's R/ECAPs. It is across the street from the City's Senior Citizen Center and the Bryan Museum. The Census tract includes 351 households, and is 59 percent minority (25% black and 31% Hispanic).

3. Holland House, 157 high-rise (four floors) apartments, consists of five multi-story buildings around a central courtyard. It is located at 2810 61st Street, a six-lane divided highway. It is adjacent to the municipal cemetery, two shopping centers, and a retirement village.

4. Thirty-four scattered site units include at least one that is a short block from the beach-front. Of the 33 occupied units, 15 percent were non-Hispanic white and 76 percent were non-Hispanic black.

5. The Cedars at Carver Park, located at 2914 Ball Street, consists of 59 market rate and 63 affordable units. Voucher holders make up 7.4 percent of the Census tract. It is located inside a Census tract that is 94.5 percent minority and a R/ECAP. Although the development fails to fully replace the units destroyed by Hurricane Ike in 2008, it was designed as a mixed-income project and it is a step toward reducing segregation.

6. Villas on the Strand, which was recently completed, is located across from the University of Texas Medical Branch at Galveston, in the midst of a historic district but across 18th Street from several locally-unwanted land uses. In 2010, the neighborhood was 57.0 percent non-Hispanic white, 10 percent black, 27.7 percent Latino and 3.2 percent Asian. The development contains 78 market rate units and 82 affordable units.[16] It does not, by its location, perpetuate segregation.

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[12] Moody Compress and Warehouse Company, http://moodycompress.com/ accessed 8/19/2017.

[13] EPA, Pollution Prevention Toxics: OPPT Chemical Facts Sheets 1,4-Dioxane (CAS No. 123-91-1), Feb. 1995. https://laboratory.pall.com/content/dam/pall/laboratory/literature-library/non-gated/U.S._EPA_OPPT_Chemical_Fact_Sheet.pdf accessed 8/19/2017.

[14] http://www.loopnet.com/Listing/16473815/4200-Ball-Street-Galveston-TX/ accessed 8/19/2017.

[15] New Jersey Department of Health and Senior Services, "Hazardous Substance Fact Sheet: Asphalt," April 2007. https://www.publichealth.va.gov/exposures/sand-dust-particulates/index.asp accessed 8/17/2017.

[16] McCormack Baron Salazar Inc., "Groundbreaking of Cedars at Carver Park and Villas on the Strand," Sept. 10, 2014.

Low Income Tax Credit Housing. The AFFH Mapping and Data tool provide different LIHTC data. The AFFH map shows two Low Income Tax Credit Housing projects while the data tool reports 17 LIHTC developments. The two shown on the map are Holland House and Seaport Village. Holland House, however, is not actually a LIHTC property and is discussed above under public housing.

Seaport Village Apartments, located at 7200 Heards Lane off Offatts Bayou near the Marina, includes 192 rental units ranging from 661-972 square feet. Seaport Village is an example of successful affordable housing in a non-impacted neighborhood—the Census Tract is 52 percent non-Hispanic white, 11 percent black, 5 percent Asian and 32 percent Hispanic. According to www.apartments.com, there are no available apartments at this writing.[17]

HUD's Low Income Housing Tax Credit Database[18] lists 17 LIHTC projects placed in service through 2015. These LIHTC properties comprise 957 units (not including Holland House and Seaport Village) which are located in Census blocks that average 65.6 percent minority. Almost one-third (29%) of these units are in Census blocks that are greater than 85 percent minority.

According to the LIHTC Database, 14 of these 17 properties were placed in service between 1987 and 1989. Sandpiper Cove was added in 1992, but only three additional properties have been completed in the past 25 years. Two of these were placed in Census tracts that were 94 percent or more minority.

Project based section 8. Sandpiper Cove is included in HUD's LIHTC Database (discussed above) but is also included in HUD's AFFH Mapping and Data Tool as a Project-Based Section 8 multifamily property. Sandpiper Cove is located at 3916 Winnie Street and serves families with children. The project serves 192 households, of which 7 percent of residents are Hispanic and 90 percent are non-Hispanic black. In addition, it is located in the same R/ECAP as The Oaks IV public housing and Holland House, a Low Income Housing Tax Credit project. Such clustering may perpetuate segregation and or make it difficult for program participants to access areas of high opportunity.

Housing Choice Vouchers. As discussed early in this section, Hurricane Ike destroyed more than half of Galveston's public housing and much of its LIHTC housing, placing more demand for vouchers at a time when there are fewer affordable housing units available to accept those vouchers. While the 2016 annual turnover was 18 percent, persons who were issued a voucher in the preceding 12 months waited an average of 57 months on the waiting list (although the average varies greatly from year to year), according to the 2016 Permanent Supportive Housing database. Like the Harris County Housing Authority and the City of Pasadena, Galveston's Housing Choice Voucher Waiting List is closed. According to the City, "It was last open for three days in April 2015. There is no notice of when this waiting list will reopen."[19]

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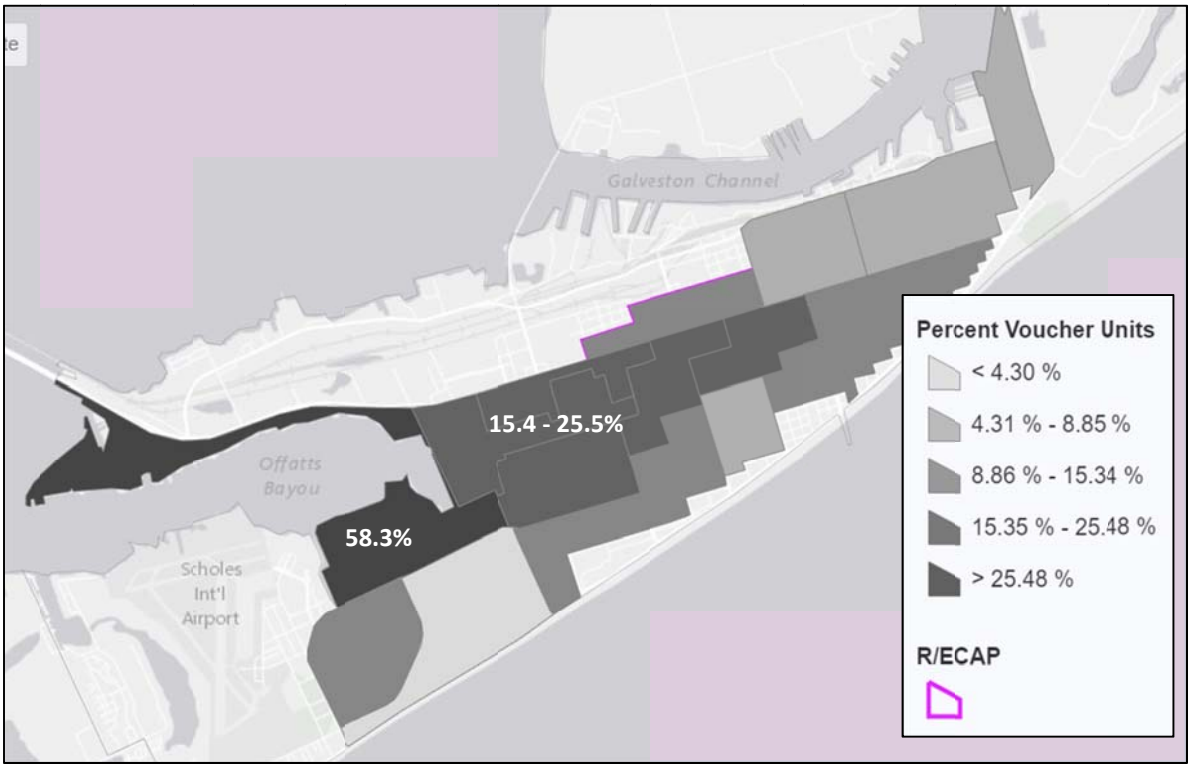
[17] https://www.apartments.com/seaport-village-galveston-tx/91800n5/ accessed 8/20/2017.

[18] HUD, Low Income Housing Tax Credit Database, revised: 7/10/17, https://www.huduser.gov/portal/datasets/lihtc.html, accessed 8/17/2017.

[19] https://affordablehousingonline.com/housing-authority/Texas/Galveston-Housing-Authority/TX017 accessed 8/19/2017.

Figure VI-34 shows the prevent of rentals occupied by vouchers holders in each Census tract in the City of Galveston. Voucher utilization is highest in the tracts surrounding Offats Bayou followed by the tracts running through the center of the city's east end.

Figure VI-34.
Galveston TX: Census Tracts by Percent of Housing Voucher Units (2010)



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Publicly assisted units and R/ECAPs. Figure VI-35 evaluates the location of publicly supported housing units, excluding vouchers, by poverty rate of the surrounding neighborhood. Forty percent of all units are located in neighborhoods where the poverty rate exceeds 30 percent—relatively high poverty neighborhoods. Fourteen percent of units are in low poverty neighborhoods (poverty less than 10%).

Figure VI-35.
Publicly Assisted Units and Poverty by Census Tract, Galveston

Note:
Includes project based section 8, other multifamily, and LIHTC. Does not include HCV.

Source:
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Census Tract Poverty Rate	Number of Publicly Supported Units	Percent of Publicly Assisted Units
Less than 10% poverty	208	14%
10% to 20% poverty	256	17%
20% to 30% poverty	451	29%
30% to 40% poverty	114	7%
40% poverty or higher	510	33%

Figure VI-36 shows demographic characteristics of publicly supported housing located in R/ECAPs and located outside R/ECAPs. One of the city's public housing developments, accounting for 9 percent of public housing units is located in a R/ECAP. The city's only project-

based section 8 development is located in the same R/ECAP. The vast majority (84%) of public housing residents that are situated in an R/ECAP are black compared to just 46 percent that are not situated in a R/ECAP.

In the housing choice voucher program, that disparity is smaller: 74 percent of voucher holders living in a R/ECAP are black compared to 68 percent of voucher holder living outside a R/ECAP. Overall most voucher holders (88%) live outside the city's R/ECAPs.

Figure VI-36.
R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category, 2010

	Total Number of Units Occupied	Percent White	Percent Black	Percent Hispanic	Percent Asian/Pacific Islander	Percent Families with Children	Percent Elderly	Percent with a Disability
Public Housing								
R/ECAP	39	8%	84%	8%	0%	0%	44%	67%
Non R/ECAP	396	39%	46%	14%	1%	8%	58%	66%
Project-based Section 8								
R/ECAP	184	10%	82%	8%	0%	74%	5%	4%
Non R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other HUD Multifamily								
R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program								
R/ECAP	116	14%	74%	12%	0%	43%	17%	24%
Non R/ECAP	813	15%	68%	16%	0%	44%	18%	22%

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

Policies Related to Publicly Supported Housing

Public housing authority policies. This portion of the discussion focuses on public housing authority policies related to accessing opportunity and requesting reasonable accommodations.

Accessing areas of opportunity. One of HCHA's five year goals is to "utilize housing as a platform for improving quality of life." This is accomplished through the following subgoals and intermediate steps:

- Utilize funding to improve educational outcomes and early learning development.
  - Provide a local preference for homeless families with school-aged children.
  - Provide information and economic resources to allow HCHA-assisted households with school-aged children to move to schools scoring at or above the local average.
- Utilize funding to improve health outcomes, especially for the homeless population.

- Coordinate with Federally Qualified Health Centers to provide collocated health services and wraparound supportive services to formerly chronically homeless individuals.
- Develop supportive housing for veterans and chronically homeless individuals, prioritizing individuals who are the most frequent users of emergency room services.

- Utilize funding to increase economic security and self-sufficiency.
  - As funding allows, establish a Family Self Sufficiency program that achieves a graduation rate of at least 50%.
  - Coordinate local organizations capable of assisting HCHA non-senior, non-disabled tenants to grow their household income to 80% area median income or higher.
  - Reduce the number of long-term zero income families assisted by HCHA by providing increased scrutiny, referrals to career services, and access to appropriate public benefits.

GHA also seeks to encourage access to areas of opportunity, particularly through the HCV program. As part of this process, GHA provides the following to HCV holders:

- Information on general locations and characteristics of neighborhoods including shopping centers, bus lines, etc.;
- A listing of available rental property. The list, updated monthly, states: address, amenities, deposit information, etc. as provided by owners;
- A list of properties and owners who accept HCV vouchers;
- A description of portability provisions available in the HCVP;
- A map that identifies areas within the City of Galveston that are areas of low poverty and minority concentrations.

In addition, GHA works to recruit property owners located outside areas of poverty and/or minority concentration to participate in the HCV program.

PHA reasonable accommodation process. HCHA and GHA outline their respective policies/procedures for handling reasonable accommodation requests in their Administrative Plans. HCHA's Administrative Plan was updated in January of 2018 and GHA's Administrative Plan was most recently revised for Fiscal Year 2017. The two PHAs have similar polices/procedures in plan and the key components are outlined below:

- As required by HUD, if an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HCHA and GHA will treat the information as a request for a reasonable accommodation, even if no formal request is made. Both HCHA and GHA will encourage the family to make accommodation requests in writing using a reasonable accommodation request form, but it will consider accommodation requests regardless of whether a formal written request has

been submitted. Both PHAs will also ask all applicants and participants if they require any type of accommodation on their intake application and reexamination documents.

- As part of the process, the person/family making the request must explain the type of accommodation required and, if the need for the accommodation is not readily apparent or known, the family must explain the relationship between the request and the disability.
- After a request has been made, HCHA/GHA must determine whether the person meets the definition of a person with a disability, the accommodation is reasonable, and that the accommodation will enhance the family's access to HCHA's programs and services. Once verified, it is HCHA's policy to respond to the request within 14 days; GHA's policy is to respond in 10 days.
- If HCHA/GHA denies a request for an accommodation because it is "not reasonable," HCHA/GHA will discuss alternative accommodation(s) with the family.

Source of income protection. In 2015 the Texas state legislature passed a law barring cities from passing laws banning landlords from discrimination based on source-of-income. According to a 2017 article in the Houston Chronicle, housing policy experts widely view such legislation as a barrier to integration and de-concentration of poverty. The law is currently being challenged in the U.S. District Court for the Northern District of Texas on the basis that the law violates the Fair Housing Act by blocking predominantly African American public housing voucher holders from securing housing in predominantly non-Hispanic white neighborhoods.

As discussed in Section VII Community Engagement Findings, survey respondents and focus group participants reported significant challenges in using vouchers due to landlords' unwillingness to accept vouchers as a source of income.

Policies related to siting LIHTC developments. The LIHTC program originated in 1986 under the Tax Reform Act and was part of an effort by the federal government to devolve the obligation of publicly-supported housing to states and local governments. Today, the LIHTC is the largest single producer of affordable rental housing in the country. There has been much debate nationally around siting LIHTC units. That debate underscores the benefits of locating LIHTC units in areas of high opportunity (to improve access to these neighborhoods for LIHTC residents) but also highlights the benefits of using LIHTC developments to catalyze economic recovery in disadvantaged neighborhoods. For the most part, experts agree that both strategies are important and both contribute to improving quality of live and economic opportunity for all community residents.

However, in Texas it has historically been particularly challenging to locate LIHTC units in areas of high opportunity. 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. The state's scoring mechanism for LIHTC applications that includes community support has, in some cases, perpetuated NIMBYism and made it difficult to site LIHTC units in areas of high opportunity.

- For example, in January 2012, a private company was hired to send out notifications to residents living near proposed LIHTC developments. The letter directed residents to contact state elected officials, the school district, county commissioners and TDHCA and

express support or opposition for "Low Income Apartment Projects." (It should be noted that LIHTC developments are often mixed-income developments and do not exclusively house low income individuals). The notification did not contain facts about the particular development (e.g., design standards, size of development and units, target population) but did include a map of where the development was proposed to be located.

- Advocates state that, in many cases, "neighborhood opposition letters" contain information that is untrue and should not be used against a proposed development. They suggest that such letters should be given less weight in LIHTC consideration and/or fact-checked for accuracy. Significant organized neighborhood opposition towards a project may cause a developer to relocate to a neighborhood with less opposition. Often times these areas of least resistance are low income neighborhoods without the organization to oppose a new development, according to an analysis by Texas Housers.

In 2013, Texas' QAP was changed to include an "Opportunity Index" to help prioritize locating LIHTC projects in high-opportunity areas. That criteria was changed again in 2017 in response to complaints that there were too few high-opportunity areas that qualified for the maximum application points and also that the requirements made it difficult to use LIHTC as a catalyst for redevelopment in underserved neighborhoods.

A recent report, conducted by Rice University's Kinder Institute for Urban Research and released in November 2017, evaluated the siting of Harris County LIHTC units in 2016 (under the 2013 QAP criteria) and in 2017 under the modified opportunity index from the 2017 QAP. The study found that the current QAP may push LIHTC developments to the outskirts of Harris County (outside areas of highest opportunity), perpetuating the separation of LIHTC residents from areas with high access to opportunity.

The study concludes by noting the need for continued solutions and the impact of other QAP criteria, including the community support points:

> *While the Opportunity Index is an important part of the scoring system, additional considerations, such as the support of an elected official or of the surrounding community, continue to hold significant sway in point totals for proposed tax credit projects. These considerations further complicate attempts to disperse housing throughout the region into both high-opportunity and lower-income areas, because proposed projects are often opposed by existing neighborhoods for a number of reasons. Addressing this hurdle is central to a balanced strategy that involves both opportunity and revitalization LIHTC projects.*
>
> *While research into Texas' LIHTC program and its QAP process has shown that the processes have led to units being built in higher opportunity areas since 2014, there remains a great need for jurisdictions and citizens to consider strategies to providing quality affordable housing in areas that can increase residents' ability to get to jobs and other public services. This work can and should be done in both high-opportunity areas and underserved communities simultaneously.* [20]

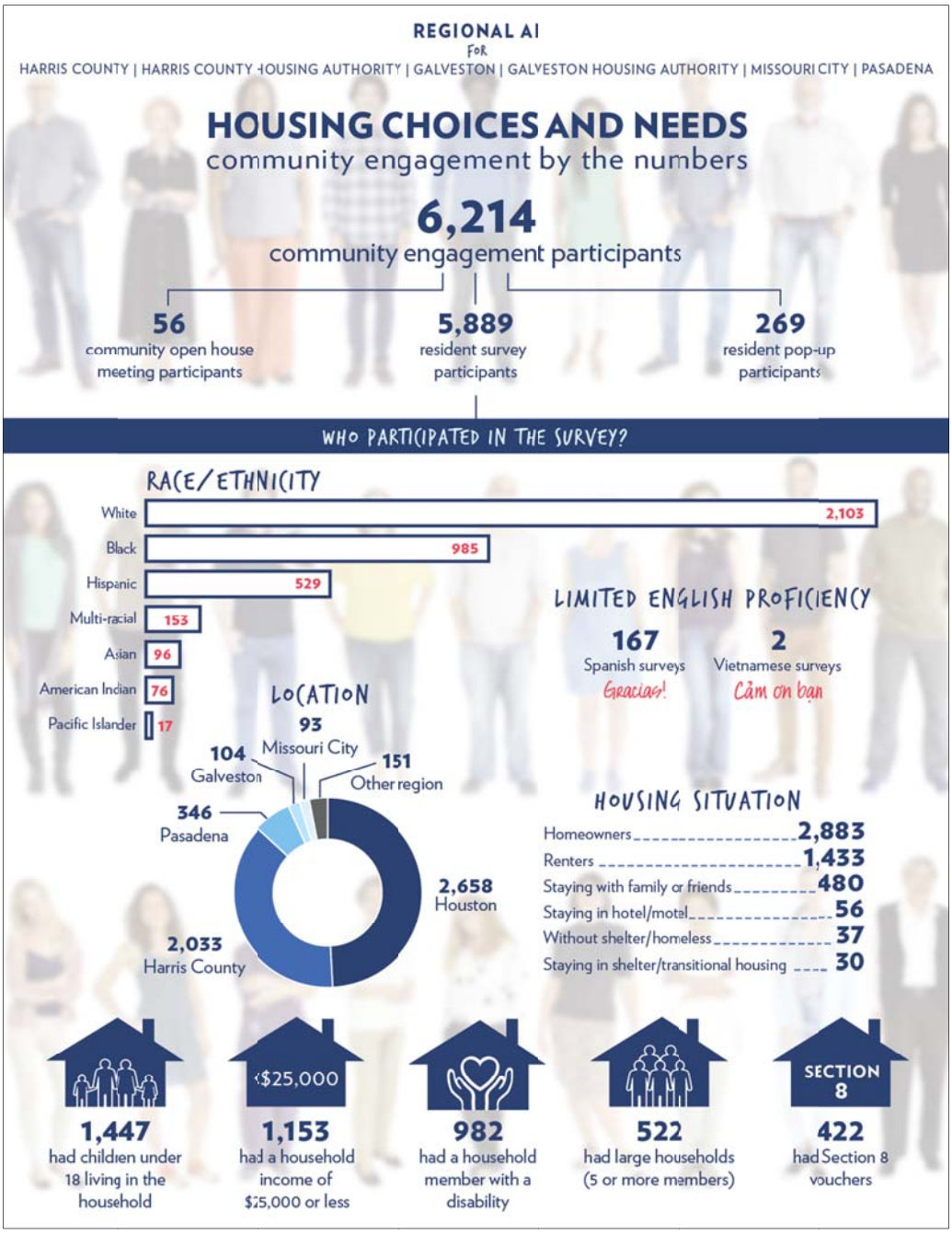
[20] Dian Nostikasari, et al. "Growing But Unequal: Mapping High Opportunity Areas and Implications for Affordable Housing." Kinder Institute for Urban Research, Rice University. November 2017.

SECTION VII.

Community Engagement Findings

SECTION VII.
Community Engagement Findings

The Regional AI community engagement process included stakeholder focus groups, "pop up" resident engagement and a comprehensive resident survey available in English, Spanish and Vietnamese. This section reports the findings from the community engagement process.



Community Participation Process

The community participation process for the regional AI provided multiple opportunities in various formats for residents and stakeholders to share their experience and opinions about fair housing choice and access to opportunity in the region.

Outreach Activities. Outreach activities included resident and stakeholder engagement opportunities and were promoted by each of the participating jurisdictions and community partners.

Methods of engagement. The community engagement process designed for the AI focused on creating opportunities to participate in whatever format residents preferred, from a survey available online and in a postage-paid mail format, pop up events where the study team engaged residents attending community events, open house public meetings and focus groups.

Resident survey. A total of 5,889 residents of the region responded to the resident survey which was available in English, Spanish and Vietnamese. The survey was offered online and in postage-paid mail surveys distributed to residents by the jurisdictions and community partners.

"Pop up" engagement events. At "pop up" engagement events, 269 residents participated in prioritization activities and more discussed their fair housing and access to opportunity experiences with the study team. HUD's AFFH-T maps of the region were available for residents to review and discuss. The purpose of the events was to bring the AI community engagement process to residents attending other scheduled community events. The selected "pop up" opportunities were chosen because members of protected classes were the most likely attendees. All materials were available in English and Spanish.

- Barrett Station Homecoming and Parade, July 15, 2017—About 200 residents attended the event; most attendees were African American adults and families with children. Many engaged in discussions of fair housing issues with the study team and 41 participated in the prioritization exercise.

- Galveston Holland House Development Tenant Tuesday, July 15, 2017—13 residents attended and all participated in the prioritization exercise. All of the attendees were elderly; half were white and half persons of color.

- Galveston Back to School Fair, July 15, 2017—400 residents attended, most were Hispanic or African American families with children. Many attendees stopped to discuss their experience with the study team and 80 participated in the prioritization exercise.

- Galveston Beach Band concert, July 15, 2017—distributed survey flyers to 175 event attendees. Attendees were predominantly elderly, many presenting with disabilities, and white, with the balance being families with children, including African American and Hispanic families.

- Pasadena Public Library, December 19, 2017—23 participants in prioritization exercise. Most of the participants were Hispanic parents who brought their children with them to the library.

- Pasadena Verne Cox Multipurpose Recreation Center Holiday Gala for Residents with Developmental Disabilities event, December 19, 2017—130 residents attended; most were Hispanic or white residents with a developmental disability or a family member of a resident with a developmental disability. Many discussed their housing experiences with the study team and 45 participated in the prioritization exercise.

- Galveston Public Housing Authority event, December 20, 2017—80 to 90 residents engaged and 24 participated in prioritization exercise. Most attendees were African American families and the remainder were Hispanic families.

- Missouri City Recreation and Tennis Center event, January 20, 2017—70 to 80 residents discussed their housing and access to opportunity experiences with the study team. The attendees were a nearly even mix of African American, Hispanic and white families with children; 26 participated in the prioritization exercise.

- Harris County outreach at Salvation Army's Mary Gibbs Jones Residence for Women, Children and Families. In order to preserve the privacy of the Residence residents, the study team provided the onsite manager with information about the AI and distributed resident survey flyers and hard copies of the survey in English and Spanish.

Focus group with residents with disabilities. The Houston Center for Independent Living hosted a focus group with residents with disabilities on March 14, 2017. Sixteen residents with disabilities participated in the discussion which was conducted in English and American Sign Language (ASL) through the assistance of two ASL interpreters.

Focus group with resident advisory board. The Galveston Housing Authority and the Harris County Housing Authority both hosted a focus group with their respective Resident Advisory Boards to discuss residents' experiences with fair housing choice and access to opportunity.

Community open house events. A total of 56 residents attended one of four community open house events held in February 2018 at locations in Galveston, Pasadena, Missouri City and Harris County. The open house format included:

- A scrolling presentation of results from the AI analysis including HUD AFFH-T maps allowing residents to receive all pertinent information regardless of their time of arrival;

- A prioritization exercise identifying fair housing and community development needs and issues residents want the AI goals to achieve;

- Opportunities for residents to identify housing, community and economic development needs on area maps;

- A NIMBY exercise related to the siting of different types of housing and housing uses as well as support for different types of people moving into a neighborhood or community; and

- Open discussion with study team members and staff from the participating partners.

All materials were provided in English and Spanish and Spanish-language interpreters were available to guide attendees with Limited English Proficiency (LEP) through the activities and exercises. Each event was held from 4:00 p.m. to 7:00 p.m. to accommodate as many residents as possible.

Stakeholder consultation. Stakeholder consultation included a kickoff meeting with stakeholders, consultation on the resident survey content and stakeholder focus groups.

- The stakeholder kickoff meeting was held on June 15, 2017 in Harris County; 31 people attended representing city and county departments, social service organizations, housing providers, fair housing organizations and advocates for low income residents.

- Prior to the launch of the resident survey, the participating partners invited representatives of local advocacy organizations to comment on the survey questions. In response to these thoughtful suggestions the survey was modified. The study team gratefully acknowledges the contributions these organizations made to the community engagement process. In addition to survey review, stakeholders were encouraged to promote the resident survey and other engagement opportunities to their clients, consumers and fellow advocates.

- Two focus groups were held with service providers and other housing stakeholders on December 13 and 14, 2017. The first focus group was held in Galveston at the Island Community Center with 19 people in attendance. The second focus group was held in the Missouri City City Hall Community Center with 23 people in attendance. Some attendees attended both stakeholder meetings and the total unduplicated number of attendees was 38.

Organizations represented in the stakeholder engagement process include:

- Catholic Charities
- City of Galveston
- City of La Porte
- City of Missouri City
- City of Pasadena
- Coalition for the Homeless of Houston/Harris County
- Galveston Housing Authority
- Graber Family Partnership
- Greater Houston Fair Housing Center
- Gulf Coast Interfaith
- Harmony House, Inc.
- Harris County Community Services Department
- Harris County Housing Authority
- Harris County Precinct 1
- Harris County Public Health
- Healthcare for the Homeless – Houston
- Hope Haven
- Houston Apartment Association

- Houston Area Urban Community Development Corporation
- Houston Area Urban League
- LISC
- Lone Star Legal Aid
- LULAC
- Mounting Horizons Inc., center for independent living
- NAACP
- Resource & Crisis Center of Galveston County, Inc.
- St. Vincent's House
- Stewart Title Company
- The House Company
- The Houston Launch Pad
- TX LIHIS
- United Way of Greater Houston
- Wheeler Avenue Triangle Ministries Inc. at Wheeler Avenue Baptist Church

Public outreach. Each of the participating partners conducted significant outreach efforts to engage all residents of the area but in particular members of protected classes and those most vulnerable to fair housing issues.

Harris County outreach activities

- Posted the survey link (English, Spanish and Vietnamese) to the HCCSD website.
- Posted and promoted the surveys on Facebook, Pinterest, and Twitter.
- Sent the survey link to over 500 persons representing nonprofit organizations that receive funding or are interested in receiving grant funding from HCCSD.
- Distributed 1,106 paper surveys and 2,125 flyers at Harris County outreach events which included Resource Fairs, Presentations, Conferences, Pop up Events, Open House Meeting and Expo's.
- Distributed 1,000 flyers and 350 paper surveys to the MUD and Water Districts to place in resident water bills. They also posted the flyer to their website.
- Galena Park ISD posted the survey link to their website and sent the survey link to faculty and teachers to fill out.
- Created a Fair Housing Survey dot exercise and engaged 330 people in this activity.

City of Galveston outreach activities

- Distributed paper surveys at a Tenant meeting for Galveston Housing Authority residents. There were 80-90 residents that were engaged at the event.
- Distributed paper surveys and flyers at a "Back to School Fair" at Ball High School. The attendees completed a prioritizing community issues exercise. There were 400 attendees at this event.

- Distributed flyers at the Galveston Beach Band concert at the Sealy Pavilion. An estimated that 175 persons attended this event.
- Promoted the survey on the City's Website, and the local cable access network Chanel 16.
- Promoted the survey on the City's Facebook page.
- Promoted the survey on the Nextdoor website.
- Distributed the flyer for the survey to several non-profit organizations, 341 realtors and lending institutions through email.
- Advertised the flyer in Galveston Daily News the City of Galveston's local newspaper.

Missouri City outreach activities

- Promoted the resident survey to all residents through email/website/HOA newsletter/City Manager's Report.
- Promoted the AFH/AI to city residents through social media posts about the resident survey and open house events.
- Distributed paper surveys to CDBG Subrecipient nonprofit organizations.
- Distributed paper surveys to stakeholders at Fort Bend Connect Networking meetings.
- Engaged Code Enforcement to promote survey during Hurricane Recovery efforts.

Pasadena outreach activities

- Promoted the survey to all Pasadena Housing Authority Housing Choice Voucher participants during their annual reexamination appointments and office walk-ins.
- Distributed paper surveys to residents at The Bridge of Troubled Waters Homeless Shelter on August 3, 2017.
- City of Pasadena Neighborhood Network Department promoted the AFH/AI surveys on their social media page on August 4, 2017.
- Distributed paper surveys to residents during a Back to School Fair at the Baker Ripley Neighborhood Center on August 5, 2017.
- Promoted the AFH/AI to members and attendees of the Pasadena Hispanic Business Council and handed out paper surveys on August 9, 2017.
- Distributed paper surveys to residents at the Pasadena Health Center in August 2017.
- Promoted the AFH/AI and distributed paper surveys during to residents during the Pasadena Senior Expo on August 16, 2017 to the elderly community.

- Promoted the AFH/AI to city residents through media push on the City website, Facebook, Twitter, along with a promotional video produced by staff and aired on the public television channel beginning August 18, 2017 with a second push on November 28, 2017.

- Promoted the AFH/AI by distributing paper surveys to 1,785 families at the Pasadena Donation Center immediately after Hurricane Harvey on August 30, August 31, and September 1, 2017.

- Promoted the AFH/AI by distributing paper surveys to residents at the Disaster Recovery Center in the Pasadena Convention Center beginning September 22, 2017.

- Gave a presentation in English and Spanish and distributed paper surveys to residents during the Police Department's Unidos Community Event held on September 26, 2017.

- Promoted the AFH/AI and distributed paper surveys to residents during the Transit Public Meetings held on Sept. 21, 2017 and October 3, 2017 at the Baker Ripley Neighborhood Center.

- Promoted the AFH/AI and distributed paper surveys to residents during the Pasabilities Expo for individuals living with disabilities on October 21, 2017.

- Promoted the AFH/AI during the Pop-up engagement at the Pasadena Convention Center and Pasadena Library held on December 19, 2017.

- Promoted the AFH/AI Open House event through social media (website, Facebook, Twitter) on Jan. 27, 2018 and during the Open House event at the City Library held on Feb. 7. 2018.

Galveston Housing Authority outreach activities

- Distributed paper surveys at a Tenant meeting for Galveston Housing Authority residents. There were 80-90 residents that were engaged at the event.

- Distributed flyers door to door to all GHA residents.

- Promoted survey through the Family Sufficiency Coordinator.

- Posted the flyers at each public housing location and at the main building.

- BBC's team attended the holiday party for public housing residents to survey residents.

- Promoted survey on the agency's website homepage, twitter, and Facebook.

- Held a Resident Advisory Board meeting with BBC and GHA staff present.

- Advertised the flyer in Galveston Daily News in conjunction with City of Galveston.

Housing Authority of Harris County

- Promoted the AFH/AI resident survey to all Active HCV participants and HCHA applicants by email.

- Promoted the AFH/AI to the families temporally residing at the NRG Building in Houston Texas after Harvey Hurricane.
- Promoted the AFH/AI on HCHA's Website.
- Sponsored a Resident Advisory Board (RAB) meeting for HCV participants.

Hurricane Harvey. The community engagement process, including the resident survey launched prior to Hurricane Harvey. To understand the hurricane's impact on residents' housing situation, a few questions were added to the survey specific to Hurricane Harvey. Overall, 66 percent of the surveys were received after the hurricane. As such, the findings of the community engagement process generally represent the experience of residents post-hurricane.

Geographic note. Throughout this section, survey data for Harris County ***excludes*** responses from residents of Houston. Data for the Region includes all survey respondents, including those living in Houston and nearby communities and counties outside of the participating jurisdictions' borders.

Sample size note. When considering the experience of members of certain protected classes living in Galveston, Missouri City and, in some cases, Pasadena, the sample sizes are too small (n<25 respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

Figure VII-1. Resident Survey Sample Sizes by Jurisdiction and Selected Characteristics

Source:

BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Total Responses	**104**	**93**	**346**	**2,033**	**2,658**	**5,889**
Race/ethnicity						
African American	22	23	14	232	633	934
Asian	0	3	3	29	51	89
Hispanic	12	5	112	182	180	505
Native American	2	0	4	32	31	72
White	48	36	120	865	868	2,005
LEP	1	0	49	76	0	129
Children under 18	25	21	104	496	711	1,382
Large family	8	7	32	182	266	503
Disability	25	10	67	315	473	914
Section 8	2	4	11	114	279	414
Household Income						
Less than $25,000	35	6	79	285	657	1,083

Current Housing Choice

This section explores residents' housing preferences, including the factors most important to them when they chose their current housing; their desire to move; and their experience with housing challenges.

Most important factors in choosing current home. Regardless of place of residence or a resident's demographic or socioeconomic characteristics, the most important factor when choosing their current home was cost. Figures VII-2 and VII-3 present the top five factors most important to respondents by place of residence and for selected protected classes. Overall, liking the neighborhood, being close to work or job opportunities, a low crime rate/safety, and good public schools are among the top five factors most important to residents. The order and specific factors included in the five most important varied somewhat by protected class. For example, low crime rate/safe was the second most important factor among African Americans while being close to quality public schools was the second most important to Hispanics and respondents with large families (five or more household members).

Figure VII-2.
Most Important Factors in Choosing Current Home, Jurisdiction

Galveston	Missouri City	Pasadena	Harris County	Houston	Region
What are the three factors that were most important to you in choosing your current home or apartment in your community? (Top 5 Factors)					
1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it
2 Close to work/job opportunities	2 Like the neighborhood	2 Close to work/job opportunities	2 Like the neighborhood	2 Close to work/job opportunities	2 Like the neighborhood
3 Like the neighborhood	3 Layout of home	3 Close to family/friends	3 Close to quality public schools	3 Like the neighborhood	3 Close to work/job opportunities
4 Like the type of home/apartment	4 Close to quality public schools	4 Like the neighborhood	4 Low crime rate/safe	4 Low crime rate/safe	4 Low crime rate/safe
5 It was available	5 Low crime rate/safe	5 Close to quality public schools	5 Close to work/job opportunities	5 Close to family/friends	5 Close to quality public schools

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-3.
Most Important Factors in Choosing Current Home, Protected Classes

African American	Hispanic	Disability	Large Families	LEP
What are the three factors that were most important to you in choosing your current home or apartment in your community? (Top 5 Factors)				
1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it
2 Low crime rate/safe	2 Close to quality public schools	2 Like the neighborhood	2 Close to quality public schools	2 Number of bedrooms
3 Close to work/job opportunities	3 Close to work/job opportunities	3 Low crime rate/safe	3 Close to work/job opportunities	3 Close to quality public schools
4 Close to quality public schools	4 Like the neighborhood	4 Close to quality public schools	4 Low crime rate/safe	4 Like the type of home/apartment
5 It was available	5 Low crime rate/safe	5 Close to family/friends	5 Number of bedrooms	5 Close to work/job opportunities

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Desire to move. Given the opportunity, nearly half (47%) of resident survey respondents would move from their current home. Figures VII-4 and VII-5 show the proportion of residents who would like to move if given the opportunity, the reasons they want to move as well as the reasons why they have not yet moved. Figure VII-3 presents this information by place of residence and VII-4 considers these questions for selected protected classes. Residents of Houston are most likely to want to move (53%) and Harris County residents are the least likely (39%).

Why do residents want to move? Residents identified numerous reasons for wanting to move; common themes in the *top five* reasons include a bigger home or a smaller home, homeownership, moving to a different neighborhood, city or county, moving for better opportunities and moving to save money or live in less expensive housing. Reasons for moving varied among the participating jurisdictions (Figure VII-4) and members of protected classes (Figure VII-5). For example, homeownership was in the top five reasons to move for Galveston and Pasadena residents and not for other jurisdictions. Moving to better job opportunities was among the top factors for Galveston residents and not in the top five for residents of other jurisdictions. Moving for better schools was the third most often selected reason to move for Missouri City residents and not in the top five for other jurisdictions.

African American residents, Hispanic residents and residents whose household includes a member with a disability had the same top five reasons for wanting to move, although the order varied among disability households, as residents of the region overall. Residents with large families were more likely than others to want to move in order to "get their own place/live with fewer people" and for better schools.

Why haven't they moved yet? As with the most important factor for choosing their current home—cost/I could afford it—cost/can't afford to live anywhere else is the factor selected by the greatest proportion of residents of each participating jurisdiction, African American residents, Hispanic residents, Disability households, Large Families, LEP respondents and respondents with household incomes less than $25,000. Other top reasons most residents identified for staying in their current home when they'd prefer to move include: not being able to afford moving expenses; their job; can't find a better place to live; and, their family is close by. Although most of their reasons are similar to regional residents overall, members of certain protected classes and the lowest income households experience other barriers to moving (among their top five reasons):

- ***Can't find a landlord to rent to me due to my credit history, eviction or foreclosure history.*** In the top five for African Americans, Large Families and households with incomes less than $25,000.

- ***Need to find a new job.*** Top five for African American residents, LEP respondents and households with incomes less than $25,000.

- ***Have submitted applications, but haven't secured housing.*** Top five for Large Families.

Figure VII-4.
Desire to Move by Jurisdiction

Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Percent who would move given the opportunity					
50%	**47%**	**45%**	**39%**	**53%**	**47%**
Why would you like to move? (Top 5 Reasons)					
1 Bigger house/apartment	1 Different neighborhood	1 Bigger house/apartment	1 Different neighborhood	1 Bigger house/apartment	1 Bigger house/apartment
2 Want to buy a home	2 Smaller house/apartment	2 Want to buy a home	2 Bigger house/apartment	2 Different neighborhood	2 Different neighborhood
3 Different neighborhood	3 Better schools	3 Different neighborhood	3 Crime/safety reasons	3 Crime/safety reasons	3 Crime/safety reasons
4 Smaller house/apartment	4 Get something less expensive	4 Get something less expensive	4 Get something less expensive	4 Want to buy a home	4 Want to buy a home
5 Better job opportunities	5 Crime/safety reasons	5 Different city/county	5 Smaller house/apartment	5 Get something less expensive	5 Get something less expensive
Why haven't you moved yet? (Top 5 Reasons)					
1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else
2 Can't pay moving expenses	2 Job is here	2 Can't pay moving expenses	2 Job is here	2 Can't pay moving expenses	2 Can't pay moving expenses
3 Job is here	3 Can't find a better place to live	3 Family is here	3 Family is here	3 Can't find a better place to live	3 Job is here
4 Can't find a better place to live	4 Family members do not want to move	4 Job is here	4 Can't pay moving expenses	4 Job is here	4 Can't find a better place to live
5 Need to find a new job	5 Can't pay moving expenses	5 Family reasons	5 Can't find a better place to live	5 Need to find a new job	5 Family is here

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-5.
Desire to Move by Members of Selected Protected Classes and Low Income Households

African American	Hispanic	Disability	Large Families	LEP	Income >$25,000
Percent who would move given the opportunity					
69%	**46%**	**56%**	**59%**	**43%**	**68%**
Why would you like to move? (Top 5 Reasons)					
1 Bigger house/ apartment	1 Bigger house/ apartment	1 Bigger house/ apartment	1 Bigger house/ apartment	1 Bigger house/ apartment	1 Bigger house/ apartment
2 Want to buy a home	2 Want to buy a home	2 Different neighborhood	2 Want to buy a home	2 Want to buy a home	2 Want to buy a home
3 Different neighborhood	3 Different neighborhood	3 Crime/safety reasons	3 Get own place/live with fewer people	3 Get something less expensive	3 Get something less expensive
4 Get something less expensive	4 Get something less expensive	4 Get something less expensive	4 Better schools	4 Different neighborhood	4 Different neighborhood
5 Crime/safety reasons	5 Crime/safety reasons	5 Want to buy a home	5 Different neighborhood	5 Better schools	5 Get own place/live with fewer people
Why haven't you moved yet? (Top 5 Reasons)					
1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else
2 Can't pay moving expenses	2 Can't pay moving expenses	2 Can't pay moving expenses	2 Can't pay moving expenses	2 Job is here	2 Can't pay moving expenses
3 Can't find a better place to live	3 Job is here	3 Can't find a better place to live	3 Can't find a landlord to rent to me due to my credit history, eviction, foreclosure	3 Need to find a new job	3 Can't find a better place to live
4 Can't find a landlord to rent to me due to my credit history, eviction, foreclosure	4 Can't find a better place to live	4 Job is here	4 Have submitted applications, but haven't secured housing	4 Family is here	4 Can't find a landlord to rent to me due to my credit history, eviction, foreclosure
5 Need to find a new job	5 Family is here	5 Family is here	5 Job is here	5 Can't pay moving expenses	5 Need to find a new job

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Participants in the disability focus group shared that one of the primary reasons why residents with disabilities rarely move—other than a lack of suitable units they can afford—is that they lack the resources, including manpower, to move. While other residents may be able to rely on friends with trucks and sturdy backs to physically move them, residents with disabilities often do not have such resources. Further, participants were not aware of any funding source that would pay for a service to help pack and move a resident with a disability.

Housing challenges. Residents participating in the survey had the opportunity to identify whether they experience or worry about any of 16 housing challenges. As shown in Figure VII-6, greater proportions of renters experience or worry about housing challenges than homeowners. For example, 68 percent of renters regionally worry about their "rent going up more than I can afford" compared to 35 percent of homeowners who worry about "being able to afford to pay my property taxes." Missouri City renters are most likely to worry about rent increases and are least optimistic about being able to afford a down payment for a home. Pasadena renters are more likely to say their landlord "refuses to make repairs despite my requests" and to worry "that if I request a repair it will result in a rent increase or an eviction." Galveston, Missouri City and Pasadena homeowners are more likely than others to report "my home needs repairs that I cannot afford to make."

Figure VII-6.
Top 10 Housing Challenges Experienced by Residents

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
I worry about my rent going up to an amount I can't afford	65%	77%	69%	63%	70%	68%
I want to buy a house but can't afford the down payment	47%	63%	50%	50%	56%	56%
I worry about my home flooding in a natural disaster	47%	38%	46%	38%	36%	40%
I am concerned about being able to afford to pay my property taxes	44%	42%	34%	35%	36%	35%
I worry about being evicted	25%	8%	29%	21%	30%	28%
I have Section 8 and I am worried my landlord will stop accepting Section 8	-	-	45%	26%	25%	27%
My landlord refuses to make repairs despite my requests	29%	15%	36%	19%	28%	26%
I worry that if I request a repair it will result in a rent increase or eviction	18%	15%	35%	20%	22%	22%
My home needs repairs that I cannot afford to make	25%	28%	29%	19%	14%	19%
I need housing assistance (voucher/public housing/ rent assistance) but the waitlist is too long/closed	21%	2%	10%	8%	22%	17%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Several participants in the disability focus group described their utility payments as being handwritten on their rent notices, rather than separately billed. These residents worry that they are being overcharged by the apartment manager or landlord since they have not proof that the amount being charged reflected their actual utility use or portion of utilities.

Attendees at community engagement events amplified the housing needs and challenges identified through the resident survey. In Galveston, residents discussed a number of housing challenges, including:

- A need for increased scattered site Section 8 housing opportunities. Several older adults and residents with disabilities described being offered project-based Section 8 housing units at the Parkland development which they turned down due to safety concerns.

- A lack of housing units suitable for large families in general, but especially in publicly supported housing.

- Several residents expressed frustration with the Galveston Housing Authority's policies for selecting tenants for certain developments, including housing units reserved for residents displaced by Hurricane Ike. *"Those people are gone and they're not coming back."*

- A lack of housing units accessible to people with disabilities.

Stakeholder perspectives on housing challenges. Participants in stakeholder focus groups identified a number of housing challenges in the region:

- **Lack of quality affordable housing.** Stakeholders across the region indicate that a lack of affordable housing contributes to fair housing issues. Stakeholders in Galveston indicate that much of the housing that is affordable is dilapidated and is managed by absentee landlords. Affordable housing stock across the region is said to be poor and much of it was built in the 30s, 40s, and 50s and basic home and property maintenance is challenging for landlords and homeowners. Some areas in the region have aged or no infrastructure. For example, Aldine, which is north of Houston in unincorporated Harris County, has on-site water wells and septic systems. Stakeholders report seeing multiple generations living in single-family homes.

- Galveston is reported to have no large parcels of land remaining, so infill is occurring with the development of duplexes and fourplexes. One concern expressed is that new businesses are looking at buying low-income properties for other uses, which would further reduce the availability of affordable housing.

- The region needs more affordable housing, both for homeowners and renters. Affordable housing needs to be in high-opportunity areas near transportation, schools, social services, and medical care. For individuals transitioning out of homelessness, the location of services is a serious challenge.

- Workforce housing is lacking, but low-income housing is not the only issue. An Exxon Mobile campus is going in near Greenspoint, a community in the northern part of Harris County and employees of that campus will face a shortage of all levels of housing. The company is "begging developers to build anything." The same issue will be faced by the new Generation Park development and the refineries in the southeast side of the county that are adding jobs.

- Galveston stakeholders report that housing is really mixed. The bulk of "good" multifamily housing is on the west end of the island. In Galveston, areas of multi-family housing are not areas of opportunity for jobs or other amenities.

- According to stakeholders, the region lacks three- and four-bedroom rental units and not enough multi-family housing is available overall.

- **Segregation.** Stakeholders identified many areas of segregation in the region. In general, stakeholders report that individuals with disabilities and low-income families "do not have a voice and get taken advantage of." Stakeholders discussed that populations may self-segregate.

- Participants noted a number of areas of segregation and concentrations of poverty, including but not limited to: Houston's 5th Ward and Sunnyside, both of which are food deserts, as well as the 3rd Ward, the 4th Ward, Yellowstone, and Denver Harbor. Historical communities in the region include Aldine (Latino), McNair (African-American), Barrett Station (African-American), Kashmere Gardens, and the 3rd Ward (African-American). Greenspoint is a mixed community and efforts were made at one point to create low-income housing there. Most apartments in Greenspoint are one- or two-bedroom, built in the 1970s for young people and then became low-income housing. This area is in the flood plain.

- While Galveston Island is considered to be very diverse and overall a very tolerant community, areas of segregation do exist on North Broadway (African American), 5th to Steward (Latinos), as well as "pockets all over."

- The phenomenon of not wanting low-income housing development, or even a multi-family development, in a community ("not in my backyard" or NIMBY) was raised numerous times by multiple stakeholders. Specific areas where NIMBY is an issue include: Cypress, West Houston, and Missouri City. Housing projects are denied in those affluent areas. Homeowner associations (HOAs) in some areas can perpetuate NIMBY attitudes.

- Several stakeholders discussed the role of churches in changing communities. Some stakeholders believe that churches have been a "stumbling block" to changes in a community. Many churches want to keep the community the same. "Progress" or development can change the demographics of a church, which can have a negative impact on attendance and the church budget. Churches can have a positive or a negative impact on development. In some cases, a church can side with a developer and create more racial divisions in the community.

- Stakeholders report "lots of suing going on" related to fair housing violations. In Houston, stakeholders report that the city is currently being sued by the U.S. Department of Justice (DOJ) about a development near the Galleria area. Stakeholders report the DOJ has sued the City of Galveston multiple times.

- Regarding areas of racial and ethnic concentrations of poverty, stakeholders do not believe that HUD maps cover all areas of concern.

Housing challenges experienced by members of protected classes. As shown in Figure VII-7, members of protected classes and the lowest income households are more likely to experience housing challenges than residents of the region overall.

Figure VII-7.
Housing Challenges Experienced by Residents who are Members of Protected Classes, Income and Regional Residents

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	African American	Hispanic	Asian	Native American	Disability	Children Under 18	Large Family	LEP	Income <$25,000	Region
I worry about my rent going up to an amount I can't afford	79%	70%	-	68%	72%	77%	80%	81%	77%	68%
I want to buy a house but can't afford the down payment	67%	69%	-	69%	56%	68%	62%	47%	61%	56%
I worry about my home flooding in a natural disaster	35%	50%	49%	47%	47%	42%	39%	47%	34%	40%
I am concerned about being able to afford to pay my property taxes	45%	42%	23%	43%	41%	41%	40%	25%	50%	35%
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	58%	79%	-	64%	33%	25%	29%	-	27%	33%
I worry about being evicted	24%	20%	-	27%	22%	23%	24%	11%	24%	28%
I have Section 8 and I am worried my landlord will stop accepting Section 8	19%	71%	-	18%	24%	22%	18%	-	20%	27%
My landlord refuses to make repairs despite my requests	31%	30%	-	42%	32%	33%	33%	29%	31%	26%
I worry that if I request a repair it will result in a rent increase or eviction	23%	31%	-	42%	27%	26%	33%	48%	25%	22%
My home needs repairs that I cannot afford to make	44%	46%	23%	36%	51%	39%	49%	57%	66%	19%
I need housing assistance (voucher/public housing/rent assistance) but the waitlist is too long/closed	47%	14%	11%	18%	30%	31%	33%	8%	46%	17%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	30%	19%	-	38%	24%	28%	35%	10%	27%	9%
I have a felony/criminal record and cannot find a place to rent	10%	4%	-	12%	10%	7%	10%	5%	9%	6%
I worry about my home going into foreclosure	11%	11%	3%	5%	10%	10%	12%	19%	15%	5%
I worry about retaliation if I report harassment by my neighbors/building staff/landlord	13%	5%	7%	10%	11%	7%	4%	2%	12%	5%
I worry that my rental unit will be converted to a condo	3%	4%	-	11%	5%	2%	3%	7%	5%	3%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

In some cases, housing challenges experienced by members of protected classes vary by their place of residence.

Geographic differences in housing challenges experienced by African American residents. The proportion of African American residents experiencing a particular housing challenge varies somewhat based on where they live in the region. As discussed in the introduction to this section, sample sizes for African American residents by jurisdiction are small for Galveston, Missouri City and Pasadena. As such, these findings are true for those who responded and may be considered an indicator of the broader experience of African Americans in these communities. Key differences in housing challenges include:

- African American renters with disabilities in the participating jurisdictions are less likely than those in Houston to worry that they will experience a rent increase or eviction for requesting a reasonable accommodation.

- In general, African Americans living in participating jurisdictions are less likely those living in Houston to state they need housing assistance but the waitlist is too long.

- Nearly all African American Section 8 renters in Missouri City, Pasadena and Galveston worry that their landlord will stop taking Section 8.

- Most African American renters in Pasadena worry that if they request a repair their landlord will increase the rent or evict them.

- None of the African American renters living in Missouri City and Galveston have difficulty finding a place to rent due to their criminal history, and African Americans in Harris County are less likely than those in Houston to have difficulty renting due to their background (5% versus 11% in Houston).

Geographic differences in housing challenges experienced by Hispanic residents, including those with Limited English Proficiency. Too few Hispanics in Missouri City and Galveston responded to the survey to report for these jurisdictions, so consideration of jurisdictional differences in housing challenges are reported only for Pasadena and Harris County relative to Houston. All of the Spanish language survey respondents reside in either Pasadena or Harris County. Key differences in housing challenges include:

- Hispanic renters with disabilities living in the participating jurisdictions are more likely to worry that a reasonable accommodation request will result in a rent increase than those living in Houston.

- About half of the Hispanic homeowners in Pasadena (54%) and in Harris County (49%) need home repairs that they cannot afford to make, compared to 41 percent in Houston. This is more pronounced for Spanish speaking residents of Pasadena (71% compared to 49% of Harris County Spanish speakers).

- While the majority of Hispanic renters in the region worry that their rent will increase more than they can pay, those living in Harris County are slightly less likely to have this worry (67% compared to 74% in Pasadena and 75% in Houston).

- Hispanic renters in Harris County (22%) are less likely than those in Pasadena (31%) or Houston (35%) to have a landlord refuse to make repairs despite their requests.

- Pasadena LEP renters (60%) are more likely than those in Harris County (42%) to worry that requesting a repair will result in a rent increase or eviction.

- Hispanic renters with Section 8 in the participating jurisdictions are more likely than those living in Houston to worry that their landlord will stop accepting Section 8.

- Harris County LEP respondents are more likely to want to buy a home but are unable to afford a downpayment (61%) than those in Pasadena (32%).

Geographic differences in housing challenges experienced by households with children under age 18 and large families. With respect to households with children under age 18, the proportion experiencing housing challenges is very similar among Pasadena, Harris County and Houston with a few key differences:

- Households with children under age 18 living in the participating jurisdictions are more likely to worry about their home flooding than those living in Houston.

- Renter households with children living in Harris County (25%) are less likely to have landlords refuse to make repairs than those living in Pasadena (42%) or Houston (35%).

- Households with children living in Pasadena (24%) and Harris County (17%) are less likely to report they need some form of housing assistance than those in Houston (42%). Although the sample size is small, half of the Galveston respondents with children under age 18 state that they need housing assistance.

- Nearly all of the Pasadena and Harris County renter large families that include a member with a disability worry that if they request a reasonable accommodation the landlord will increase the rent or evict the household compared to 10 percent of similar households living in Houston.

Geographic differences in housing challenges experienced by residents with disabilities. The housing challenges reported by residents with disabilities varied by jurisdiction. On some measures, too few Missouri City residents with disabilities responded to report. Some notable geographic differences in housing challenges experienced residents with disabilities include:

- The majority of Galveston (86%) and Pasadena (74%) homeowners with disabilities need home repairs that they cannot afford to make, compared to 47 percent in Harris County and 51 percent in Houston.

- Half (50%) of Pasadena renters with disabilities have landlords who refuse to make repairs despite requests, compared to 29 percent in Harris County, 31 percent in Galveston, and 31 percent in Houston.

- Three in five Galveston residents with disabilities say they need housing assistance, compared to one-third in Pasadena and Houston and 19 percent in Harris County.

Disability-related housing challenges. In addition to the housing challenges depicted in Figure VII-7 and discussed above, residents whose household includes a member with a disability responded to a series of additional housing challenge questions presented in Figure VII-8. As shown, sample sizes for some measures are too small to report for Galveston and Missouri City.

- Broken sidewalks, no sidewalks and poor street lighting limit the ability of residents with disabilities to get around their neighborhood. In Missouri City this impacts nearly three in five residents with disabilities and nearly half in Galveston. Compared to other communities, Harris County residents with disabilities are least likely to be limited by a lack of pedestrian infrastructure, yet one in four experience this limitation.

- Nearly three in five Pasadena renters with disabilities worry that if they request an accommodation for their disability they will face a rent increase or eviction, compared to about one in three in other participating jurisdictions and Houston.

- Among the disability-related housing challenges considered, a landlord's refusal of a service or support animal are the least common.

Stakeholder perspectives. Participants in stakeholder focus groups identified a lack of accessible housing to be a significant challenge in the region.

- Stakeholders noted a lack of accessible, ADA-compliant housing across the region, both market rate and affordable. In addition, many areas of the region lack public transportation and many businesses are not ADA compliant. In many areas, sidewalks are missing or are dilapidated.

- The height requirements for coastal homes make the cost of accessibility prohibitive. A lift or elevator is needed (which can cost $13,000 to $15,000) to enter a home and is not protected from the elements if it is outside the structure, or the slope requirements for a ramp require the ramp to circle the building, increasing the cost significantly.

- Developers do not commonly develop accessible housing without incentives. Stakeholders say ADA-compliant housing is not affordable and is not incentivized. Stakeholders say that for disaster relief funding, the state of Texas requires that visitibility standards be met.

Figure VII-8.
Housing Challenges Experienced by Residents with Disabilities

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting	47%	57%	38%	26%	44%	37%
I can't afford the housing that has accessibility features (e.g., grab bars, ramps, location, size of unit, quiet) we need	8%	25%	29%	27%	42%	34%
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	35%	-	56%	34%	30%	34%
My landlord refused to make an accommodation for me or my household member's disability	-	-	10%	19%	22%	20%
My landlord refused to accept my therapy/companion/emotional support animal	-	-	6%	13%	8%	10%
My landlord refused to accept my service animal	-	-	6%	12%	1%	7%

Note: - Sample size too small to report.

Respondents could select Yes, No or Does Not Apply. The data shown are the percent with a housing challenge among those to whom the issue applies.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Participants in the disability focus group described a number of housing challenges:

- All had difficulty finding housing that met their needs that they could afford. Those with Section 8 vouchers discussed difficulty finding landlords willing to accept the voucher.
- Several participants had been displaced when their apartment building's new owners remodeled the building.
- One resident described being taunted and harassed by front desk staff at her publicly-supported independent living building.

Residents of Pasadena participating in community engagement events discussed the need to:

- Provide more affordable housing that is accessible for person with disabilities;
- Provide housing that can support disabled persons with acute medical needs that are not nursing homes; and
- Housing needs to be in integrated settings.

Displacement & Recent Experience Seeking Housing

This section explores residents' experience seeking a place to rent or buy in the region and the extent to which displacement—having to move when they do not want to move—is prevalent.

Displacement experience. With respect to displacement it is important to note that the displacement experience did not necessarily occur in the current community of residence. Overall, 14 percent of the participants in the resident survey experienced displacement in the past five years. One in five (21%) Galveston residents and 18 percent of Houston respondents experienced displacement. Missouri City had the lowest rate of displacement (7%). As shown in Figure VII-9, residents who are currently precariously housed or homeless[1] are most likely to have recently experienced displacement—nearly 37 percent region wide.

Figure VII-9 also shows three reasons why residents experienced displacement—rent increasing more than they could pay, eviction for being behind on the rent, and natural disaster. Eviction was a factor for nearly two in five precariously housed residents of Harris County and Houston and two-thirds of those in Galveston. Given the difficulty that many residents have in securing a place to rent following an eviction, it is not surprising to see such high proportions of the precariously housed having a recent eviction. Overall, fewer than one in five residents who experienced displacement in the past five years identified a rent increase as the reason for displacement.

[1] Precariously housed/homeless residents include those who are staying with family or friends but not on the lease, those living in transitional housing, hotels or motels, shelters and on the streets.

Figure VII-9.
Displacement Experience and Reasons for Displacement by Jurisdiction Overall, Current Renters and Those Precariously Housed or Homeless

Place of Current Residence	Percent Displaced	Reason for Displacement		
		Rent Increased More Than I Could Pay	Evicted: Behind on the Rent	Natural Disaster
Galveston	**21%**	**15%**	**20%**	**20%**
Renters	32%	20%	13%	20%
Precariously housed/homeless	38%	0%	67%	0%
Missouri City	**7%**	**17%**	**0%**	**17%**
Renters	27%	33%	0%	0%
Precariously housed/homeless	-	-	-	-
Pasadena	**10%**	**17%**	**10%**	**0%**
Renters	20%	20%	13%	0%
Precariously housed/homeless	29%	11%	11%	0%
Harris County	**10%**	**18%**	**27%**	**11%**
Renters	26%	22%	9%	11%
Precariously housed/homeless	34%	26%	38%	11%
Houston	**18%**	**18%**	**27%**	**12%**
Renters	27%	21%	23%	12%
Precariously housed/homeless	39%	18%	39%	9%
Region	**14%**	**18%**	**22%**	**12%**
Renters	26%	21%	19%	12%
Precariously housed/homeless	37%	19%	37%	10%

Note: Displacement did not necessarily occur within current community of residence. - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-10 explores the displacement experience of residents by protected class, income and whether or not the respondent's household has a Section 8 voucher. As shown, rates of displacement vary widely. Those most likely to have experienced displacement include:

- Nearly two in five (36%) large families;
- Nearly three in 10 (29%) households with incomes less than $25,000;
- Nearly three in 10 (28%) African American respondents;
- One in five (22%) households with a Section 8 voucher; and
- One in five (21%) disability households.

Eviction was a factor for at least 30 percent of large families, African American residents and households with incomes less than $25,000.

LEP respondents were about as likely as any regional resident to experience displacement (16% compared to 18%), but for LEP residents, 42 percent experienced displacement because the rent increased more than they could pay, more than twice the rate of the typical regional resident.

Figure VII-10.
Displacement Experience and Reasons for Displacement by Selected Protected Class Characteristics and Household Income

	Percent Displaced	Reason for Displacement		
		Rent Increased More than I Could Pay	Evicted: Behind on Rent	Natural Disaster
Race/ethnicity				
African American	28%	23%	33%	5%
Asian	11%	10%	10%	0%
Hispanic	13%	19%	15%	4%
Native American	14%	20%	30%	20%
White	8%	11%	9%	22%
LEP	16%	42%	5%	5%
Children under 18	20%	21%	31%	10%
Large family	36%	18%	30%	9%
Disability	21%	18%	21%	8%
Section 8	22%	16%	18%	8%
Household Income				
Less than $25,000	29%	19%	32%	5%
$25,000 up to $50,000	16%	24%	15%	10%
$50,000 up to $100,000	8%	12%	1%	22%
$100,000 or more	9%	6%	3%	53%

Note: Displacement did not necessarily occur within current community of residence.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Recent experience seeking housing. Residents who seriously looked for housing in the region in the past five years provided information about their search experience. Overall, 41 percent of survey respondents living in the region seriously looked for housing. As shown in Figure VII-11, this rate varied somewhat by community, with Galveston residents being most likely to have looked for housing and Pasadena residents least likely.

Among those who looked for housing, practices by real estate agents, housing providers and lenders did not vary significantly by community. Regionally, one in five home seekers had landlords not return phone inquiries. More than one in 10 (14%) were told a unit was available by phone but that it was unavailable once the resident showed up in person. One in 10 were denied a mortgage loan or charged a higher interest rate, and 8 percent had a real estate agent show them homes only in neighborhoods where most people had the same race or ethnicity as the respondents ("steering").

Figure VII-11.
Experience Looking for Housing in Galveston, Missouri City, Pasadena or Harris County in the Past Five Years by Jurisdiction

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing in Recent Housing Search	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Respondents who seriously looked for housing in the region in the past five years	53%	40%	34%	36%	46%	41%
Landlord did not return calls asking about a unit	20%	14%	6%	11%	23%	18%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available	6%	11%	8%	9%	19%	14%
A bank or other lender denied my mortgage loan or charged me a high interest rate	14%	14%	18%	10%	10%	11%
The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity.	8%	3%	7%	8%	9%	8%

Note: Includes only those respondents who seriously looked for housing in the past five years. Experience with housing provider occurred in the region, but not necessarily in the resident's current community.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Stakeholder perspectives. A legal issue that has emerged as an issue in the wake of the flooding caused by Hurricane Harvey is that many low-income people do not have clear title to their property, although they may have lived on the property for years. When flooding occurred on properties with residents who had no clear title to the property, it resulted in "disasters on top of disasters" as those without clear title will have little or no disaster assistance.

A contract for deed, where a seller retains the title and receives monthly payments from the home buyer, is another legal risk for low-income home buyers. Stakeholders indicated that these issues are especially prevalent in the Four Corners area.

Another legal issue relates to reverse mortgages, especially for the elderly, which have resulted in housing being devalued. Stakeholders consider this a predatory practice. Language barriers contribute to a lack of understanding about how reverse mortgages work and the risks involved.

Appraisals of property in low-income areas ignore the amenities going in and undervalues properties for homeowners in those areas. Also, stakeholders believe that investors are taking advantage of the equity that low-income owners do have in their property; scams targeting these low-income home-owners are well-known to stakeholders.

Homeowners must request a homestead exemption, which lowers property taxes, but many homeowners are unaware they need to request the exemption.

Figure VII-12 presents the home seeking experience of regional residents for selected protected classes and those with household incomes less than $25,000. Compared to the typical regional resident:

- Households with incomes less than $25,000 (37%), African American residents (36%), residents with disabilities (30%) and large families (27%) are more likely to have landlords not return phone inquiries';

- Households with incomes less than $25,000 (32%), African American residents (31%), residents with disabilities (27%), large families (23%), Native American residents (21%) and LEP residents (20%) are more likely to be told a unit was available by phone but it was unavailable when they showed up in person; and

- LEP residents (20%) and large families (19%) are more likely to have had a mortgage loan denied or be charged a higher interest rate.

Figure VII-12.
Experience Looking for Housing in Galveston, Missouri City, Pasadena, or Harris County in the Past Five Years by Selected Protected Class Characteristics and Household Income

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	African American	Hispanic	Asian	Native American	Disability	Children Under 18	Large Family	LEP	Income <$25,000	Region
Respondents who seriously looked for housing in the region in the past five years	52%	40%	52%	39%	42%	53%	52%	21%	48%	41%
Landlord did not return calls asking about a unit	36%	10%	7%	21%	30%	23%	27%	8%	37%	18%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available	31%	12%	13%	21%	27%	19%	23%	20%	32%	14%
A bank or other lender denied my mortgage loan or charged me a high interest rate	11%	16%	7%	0%	12%	14%	19%	20%	9%	11%
The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity.	13%	5%	2%	7%	13%	10%	9%	4%	11%	8%

Note: Experience with housing provider occurred in the region, but not necessarily in the resident's current community.

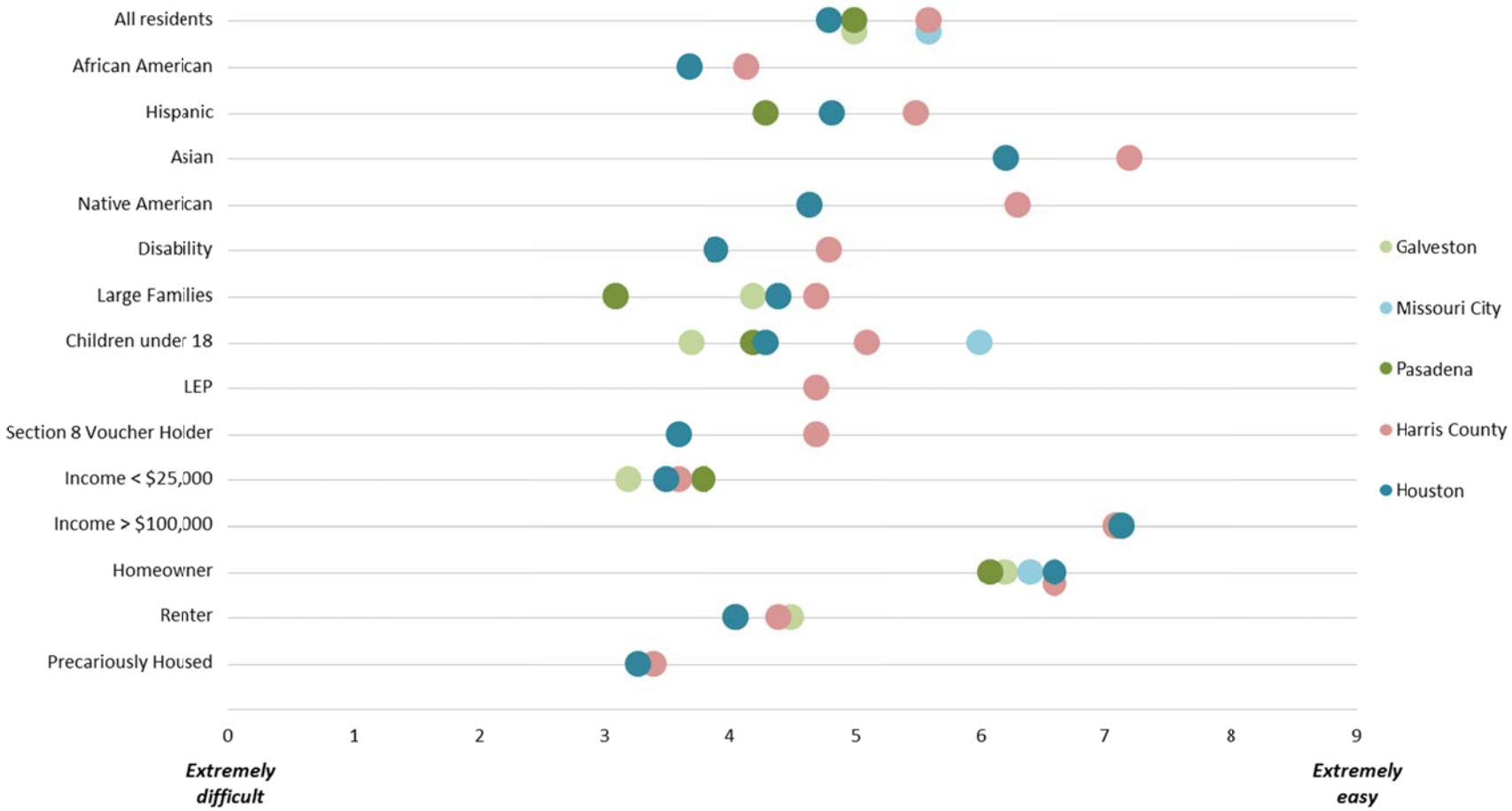
Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Galveston residents attending a community open house suggested that the city or nonprofit organizations should buy vacant homes in Galveston and offer them as affordable homeownership opportunities for local residents. Galveston residents also raised concerns about predatory lending, particularly reverse mortgages being offered to seniors.

Ease of finding safe, quality housing that they could afford. Those who seriously looked for housing in the past five years rated the ease of finding safe, quality housing that they could afford on a scale of 0-9 where a rating of 0 meant it was "extremely difficult" and a rating of 9 meant it was "extremely easy." Figure VII-13 presents these results by jurisdiction for all residents and members of selected protected classes.

- On average, current residents of Harris County and Missouri City had an easier time finding housing that met their needs than other residents of Galveston, Pasadena and Houston.
- Homeowners have an easier time overall than renters.
- Finding housing is more difficult for the lowest income households than the highest.
- African American residents of Harris County and Houston had a more difficult time finding housing than other residents.
- In general, finding housing is more difficult for large families, and large families currently living in Pasadena had the hardest time.
- Families with children living in Harris County and Missouri City had an easier time finding housing than those in Houston, Pasadena and Galveston.
- For households with a member with a disability, finding suitable housing was neither easy nor difficult, on average, for Harris County residents and was more difficult for Houston residents.

Figure VII-13.
In the past five years when you looked seriously for housing to rent or buy in Galveston, Missouri City, Pasadena, or Harris County how easy or difficult was it to find safe, quality housing that you could afford?



Note: Includes only those respondents who seriously looked for housing to rent or buy in Galveston, Missouri City, Pasadena or Harris County in the past five years. Minimum n for inclusion is 10 respondents therefore results are not shown for all jurisdictions for all categories.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Denial of housing to rent or buy. Among those residents who seriously looked for housing in the past five years, about one in five (26%) were denied housing to rent or buy. Those currently living in Houston were most likely to have experienced denial (31%) and Missouri City residents were the least likely (11%). Figure VII-14 presents the proportion of housing seekers who experienced denial and the top five reasons why. It is important to note that the denial of housing to rent or buy did not necessarily occur in the respondents' current community of residence.

- For all but Galveston residents, "bad credit" was the most common reason why home seekers were denied housing to rent or buy and "income too low" was the second most common reason. Among Galveston residents, "income too low" was the top reason followed by "eviction history." Only among Galveston home seekers was "landlord didn't accept the type of income I earn (social security or disability benefit)" among the top reasons for denial.

- "Criminal history (including arrest only)" was a top factor for denial among Galveston, Pasadena and Houston residents seeking housing.

- Missouri City housing seekers also experienced different top reasons for denial than regional residents. These include "landlord didn't allow pets," "other buyer offered a higher price," "foreclosure history," and "I didn't get my rental application in fast enough."

- In Harris County and Houston having Section 8 was among the top reasons for being denied housing to rent.

- Having children was a top reason for denial among current residents of Pasadena.

Figure VII-14.
When you looked for housing in Galveston, Missouri City, Pasadena or Harris County in the past five years, were you ever denied housing to rent or buy? Why were you denied? By Jurisdiction of Current Residence

Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Percent denied housing to rent or buy in the region in the past five years					
24%	**11%**	**26%**	**19%**	**31%**	**26%**
Why were you denied housing to rent or buy? (Top 5 Reasons)					
1 Income too low	1 Bad credit	1 Bad credit	1 Bad credit	1 Bad credit	1 Bad credit
2 Eviction history	2 Landlord didn't allow pets	2 Income too low	2 Income too low	2 Income too low	2 Income too low
3 Bad credit (tie)	3 Other buyer offered a higher price	3 Criminal history (including arrest only)	3 I have Section 8	3 Eviction history	3 Eviction history
3 Criminal history (including arrest only) (tie)	4 Foreclosure history	4 Eviction history	4 Eviction history	4 I have Section 8	4 I have Section 8
3 Landlord didn't accept the type of income I earn (social security or disability benefit) (tie)	5 I didn't get my rental application in fast enough	5 I have children	5 Other renter/applicant willing to pay more for rent	5 Criminal history (including arrest only)	5 Criminal history (including arrest only)

Note: Experience of housing denial occurred in the region but not necessarily in the place of current residence. Only four Missouri City residents experienced denial of housing to rent or buy so the reasons for denial are based on a very small sample and should be interpreted cautiously.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-15 considers residents' experience with denial of housing to rent or buy by selected protected class and for households with incomes less than $25,000. As discussed above, 26 percent of home seekers in the region experienced denial of housing to rent or buy. Hispanics experienced a similar rate of denial (25%) and LEP residents were less likely to be denied (16%). African American residents (46%), households with incomes less than $25,000 (44%), large families (42%) and residents with disabilities (40%) were much more likely than the typical resident to experience a denial during their home search.

Income, credit, eviction history, criminal history and having a Section 8 voucher were the most common reasons for denial experienced by these households. Other top reasons for denial experienced by Hispanics include "my immigration status" and "lack of stable housing record." "Size of my family/household" was a top reason for denial among large family households. For residents with disabilities, "landlord didn't accept the type of income I earn (social security or disability benefit)" was a top reason for denial.

Figure VII-15.
When you looked for housing in Galveston, Missouri City, Pasadena or Harris County in the past five years, were you ever denied housing to rent or buy? Why were you denied? By Protected Class

African American	Hispanic	Disability	Large Families	LEP	Income >$25,000
Percent who would move given the opportunity					
46%	**25%**	**40%**	**42%**	**16%**	**44%**
Why would you like to move? (Top 5 Reasons)					
1 Bad credit	1 Bad credit	1 Income too low	1 Bad credit	1 Bad credit	1 Income too low
2 Income too low	2 Income too low	2 Bad credit	2 Income too low	2 My immigration status	2 Bad credit
3 Eviction history	3 Eviction history	3 I have Section 8	3 Eviction history	3 Unable to provide required documentation	3 Eviction history
4 I have Section 8	4 Criminal history (including arrest only) (tie)	4 Eviction history	4 Size of my family/household	4 Race or ethnicity	4 I have Section 8
5 Criminal history (including arrest only)	4 I have Section 8 (tie)	5 Landlord didn't accept the type of income I earn (social security or disability benefit)	5 I have Section 8		5 Criminal history (including arrest only)
	4 My immigration status (tie)				
	4 Lack of stable housing record (tie)				

Note: Experience of housing denial occurred in the region but not necessarily in the place of current residence. Only four LEP residents experienced denial of housing to rent or buy so the reasons for denial are based on a very small sample and should be interpreted very cautiously.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Experience with housing discrimination. Overall, 8 percent of survey respondents felt they experienced discrimination when they looked for housing in the region. This is similar to the 5 percent overall rate of housing discrimination reported by residents of major metropolitan areas in a similar resident survey conducted for the State of Texas Phase 2 AI in 2012. As shown in Figure VII-16, the proportion of residents who believe they experienced discrimination when looking for housing varies widely from 2 percent of those with household incomes of $100,000 or more to 26 percent of residents with Section 8 vouchers.

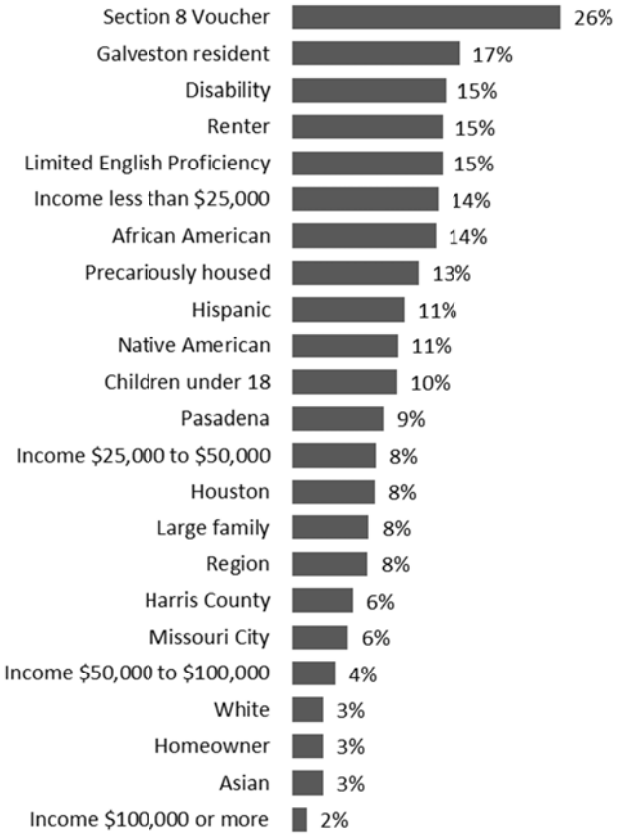
Galveston residents are twice as likely as residents of the region overall to think they have experienced housing discrimination (17% versus 8%). Among protected classes, households which include a member with a disability (15%), respondents with Limited English Proficiency (a proxy for national origin) (15%), and African American residents (14%) are most likely to say they experienced housing discrimination.

Figure VII-16.
When you looked for housing in the region, did you ever feel you were discriminated against?

Note: Experience with housing discrimination occurred in the region, but not necessarily in the place of current residence.

Source:

BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.



Residents who think they experienced housing discrimination when looking for housing in the region had the opportunity to describe, in their own words, the reason for the discrimination. Overall, the greatest proportion of respondents identified as the reason for the discrimination:

- Their or a household member's race or ethnicity (26%);
- Income (11%)—29 percent among Galveston residents and 4 percent in Pasadena;
- Having a Section 8 voucher (10%);

- Familial status, particularly having children (8%); and
- Disability (5%).

Focus group participants with a disability described discrimination as an *"every day issue"* and that residents with disabilities do not have equal opportunity in the region. *"People judge you for how you speak or walk."* Participants discussed that landlords in Houston and Harris County routinely switch out gas appliances for electric appliances when they lease a unit to a person with any disability out of fear that the resident will *"burn down the apartment"* if they have a gas stove.

Stakeholder perspectives on housing discrimination. Stakeholders mentioned several ways in which they have seen discrimination occur. They had differing opinions on whether discrimination existed in the real estate market. Some stakeholders believe that a few real estate agents take advantage of undereducated and non-English-speaking consumers by "steering" them to limited areas. As a result, people that do not speak English tend not use real estate agents or title companies. Other stakeholders did not believe this occurred.

Stakeholders agree that people with physical and mental disabilities face discrimination. Discrimination by family status also exists. Group homes, for example, get pushback from neighborhood residents. Populations most affected by discrimination include: LGBTQ, racial minorities, persons with disabilities, non-English speakers, and immigrants.

Upper middle to upper income white neighborhoods hire private security to patrol. Houston City Council offices get complaints of racial profiling by these security personnel who hassle long-time residents of those areas.

Another issue discussed is source of income discrimination, which is legal in Texas as landlords can refuse to rent to a family using a rental voucher.

Neighborhood and Community

Fair housing choice is more than just choice in a home, it is also about access to opportunity, including proficient schools, employment, transportation, services, and other community amenities that contribute to quality of life. This section explores a number of measures of access to opportunity including equal treatment of all residents, the extent to which residents would welcome different types of people moving to their neighborhood, access to public services, healthy neighborhood indicators, and access to proficient schools, employment and transportation. We conclude with an analysis of indicators of Not-In-My-Backyard (NIMBY) attitudes that may impact land use and planning decisions related to housing.

Equal treatment of residents. When asked "do you feel that all residents in the area where you live are treated equally or the same as residents of other areas in your community?" about half of respondents said yes. This proportion is highest for Harris County residents (63%) and lowest among Galveston residents (41%). Those who are most likely to say that all residents in their community are treated equally are:

- Households with incomes of $100,000 or more (65%);

- LEP respondents (62%); and
- Hispanic residents of Pasadena (55%).

Those least likely to agree that all residents are treated equally are:

- Pasadena Section 8 voucher holders (18%);
- Galveston residents with disabilities (22%);
- Galveston large families (25%);
- Missouri City households with incomes of $50,000 up to $100,000 (26%);
- Galveston households with children (28%); and
- Missouri City African American residents (29%).

Figure VII-17 presents this information by community and for selected respondent characteristics.

Figure VII-17.
Do you feel that all residents in the area where you live are treated equally or the same as residents of other areas in your community? (% Yes)

Higher than Community of Residence (>5ppt)
About the same as Community of Residence (+/- 5 ppt)
Lower than Community of Residence (<5 ppt)

	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
All residents	**41%**	**48%**	**49%**	**63%**	**50%**	**55%**
Race/ethnicity						
African American	35%	48%	29%	48%	42%	43%
Asian	-	-	-	48%	53%	54%
Hispanic	33%	-	55%	60%	49%	55%
Native American	-	-	-	58%	39%	48%
White	44%	44%	51%	68%	55%	60%
LEP	-	-	55%	69%	-	62%
Children under 18	28%	38%	49%	57%	47%	56%
Large family	25%	43%	45%	63%	46%	52%
Disability	22%	50%	36%	57%	43%	46%
Section 8	-	-	18%	49%	42%	43%
Household Income						
Less than $25,000	41%	-	45%	50%	42%	44%
$25,000 up to $50,000	31%	-	39%	59%	47%	50%
$50,000 up to $100,000	33%	26%	59%	63%	52%	57%
$100,000 or more	62%	64%	70%	71%	60%	65%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

At community open house events and the disability focus group, attendees share their opinions and experiences in their community. Discussion topics included:

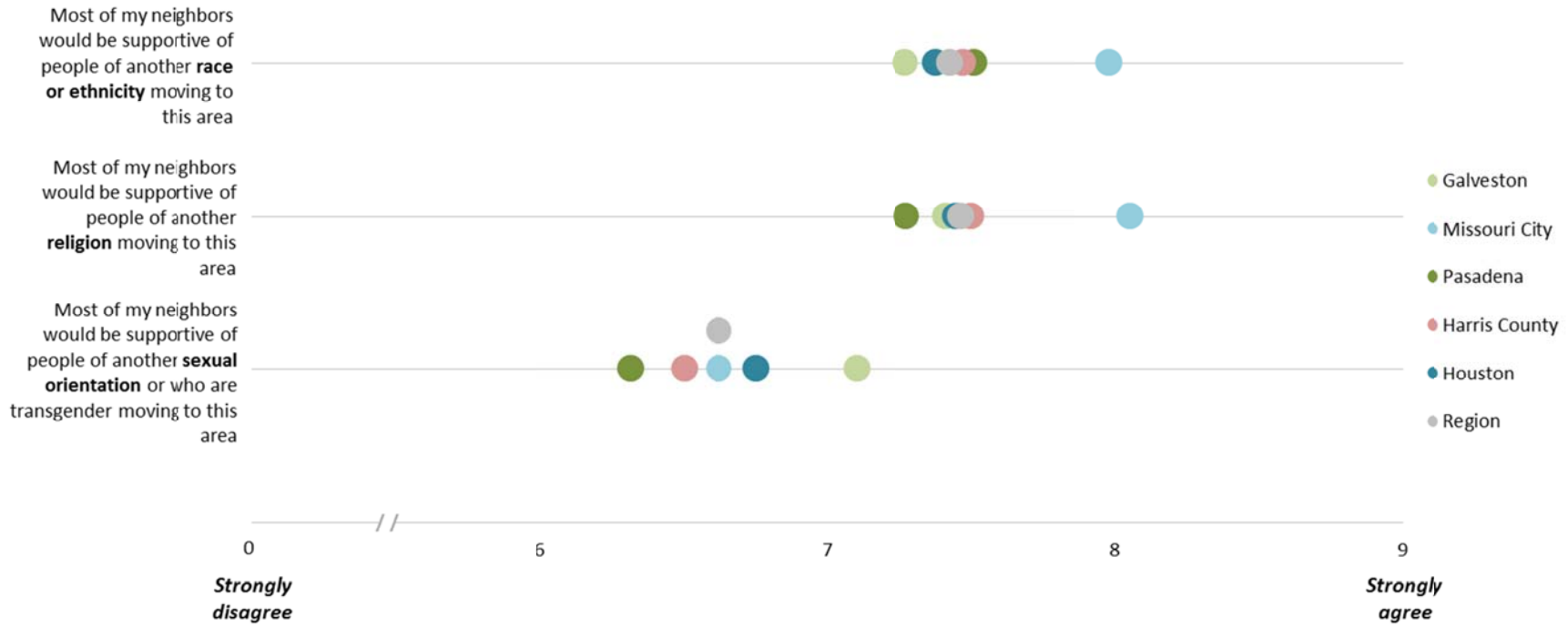
- A sense of some tension between more affluent African American homeowners in Missouri City and Hispanic homeowners who are newer to the city. Some shared a perception that the newer homeowners' choices—cars on the yard, exercise equipment out front—were not in keeping with the neighborhood culture.

- Galveston residents attributed disparities in access to opportunity on the island to socioeconomic status and class rather than racial or ethnic differences. To many, Galveston residents are third class citizens in the region and are isolated from regional opportunities.

- A participant in the disability focus group shared that, *"Every disabled person has been treated bad, been taken advantage of, been discriminated against."* The other participants agreed that this too was their experience.

Respondents were asked to rate their level of agreement with a series of statements on a scale of 0-9 where a rating of 0 means strongly disagree and a rating of 9 means strongly agree. Each statement began with "Most of my neighbors would be supportive of people of another…" followed by "race or ethnicity," "religion," "sexual orientation or who are transgender." As shown, most respondents, regardless of where they live, agree or strongly agree that most of their neighbors would be supportive of these different types of people moving to the area. While still being supportive, the degree of agreement with support is slightly lower for people of a different sexual orientation or who are transgender than for race or ethnicity or religion. Compared to other communities, Missouri City residents more strongly agree about their neighbors' support for people of a different race or ethnicity or religion moving to the community. Attendees at community open house events in Pasadena, Galveston, Missouri City and Harris County had similar views to those of survey respondents.

Figure VII-18.
Most of my neighbors would be supportive of people of another … race or ethnicity, or religion or sexual orientation or who are transgender … moving to this area.



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Public services. Figure VII-19 presents the proportion of residents who believe their neighborhood has lower quality or less access to public services than other neighborhoods in their community. As shown, respondents living in Galveston and Missouri City are most likely to think that their neighborhood has lower quality or less access to public services than residents of Pasadena, Harris County or Houston. Residents of Galveston and Missouri City identified having lower quality or access to commercial services, social services, and infrastructure like sidewalks, paved roads, street lights and storm sewer/adequate drainage in their neighborhoods compared to the typical regional resident.

Figure VII-19.
My neighborhood has lower quality/access… By Jurisdiction
The higher the % the greater the proportion of residents who say their neighborhood has lower quality/access.

Higher % than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower % than Region (<5 ppt)

Percent of Residents with Lower Quality/Access in their Neighborhood	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Sidewalks	39%	38%	30%	30%	31%	31%
Paved Roads	18%	28%	17%	4%	13%	10%
Parks	21%	26%	19%	14%	20%	18%
Clean and Running Water	7%	3%	8%	5%	7%	7%
Street lights	22%	24%	13%	14%	14%	14%
Running/Jogging trails and/or bike paths/lanes	48%	38%	36%	29%	31%	31%
Emergency Medical Services (EMS), Fire and Police Services	5%	8%	6%	5%	7%	6%
Health Services (Hospitals, Doctor's Offices, Pharmacies, Clinics)	10%	20%	8%	7%	12%	10%
Commercial Services (Grocery Stores, Restaurants, Gas Stations, etc.)	22%	29%	9%	8%	14%	11%
Social Services (WorkForce Solutions, Neighborhood Centers, Elderly/Adult Day Care Centers, etc.)	34%	27%	21%	20%	20%	20%
Educational/Cultural Facilities (museum, libraries, etc.)	23%	49%	26%	24%	30%	27%
Garbage/Solid Waste Pick-up	10%	4%	6%	5%	9%	7%
Storm Sewer/Adequate Drainage	29%	29%	24%	17%	24%	21%
Sanitary Sewer/Black Lines	14%	4%	12%	6%	12%	9%
Animal Control	17%	19%	11%	13%	20%	17%

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

At community engagement events in Galveston, resident comments focused on public services, particularly the need to:

- Improve the quality of the city's infrastructure, from sewer and water systems to high speed Internet access;
- Increase availability of supportive services programs such as, job training, drug and rehabilitation services;
- Educate the community about fair housing laws so that people will know their rights; and
- Increase community awareness about local government programs that will benefit or improve their quality of life.

Attendees at the Barrett Station Homecoming and Parade event commented on the need to:

- Increase community awareness about local government programs that will benefit or improve their quality of life;
- Educate the community about fair housing laws so that people will know their rights;
- Work on reducing cost burdens created by increases in water bills, homeowner's insurance and tax assessments for this distressed community.

Residents of Pasadena participating in community engagement events discussed the need to:

- Increase funding for community facilities, such as the public library; and
- Improve street quality (e.g., fix potholes), particularly in the north part of the city.

Attendees at the Missouri City open house event identified:

- A need for increased walkability and more attractive streetscaping and landscaping in Hunters Trail;
- A need for youth programs on the city's East side; and
- Safe housing options needed on the north side of Missouri City near Buffalo Run for people who are homeless and people with disabilities.

Harris County open house attendees discussed a number of public services needs in unincorporated areas:

- A need for emergency shelter or transitional housing; currently resources are located in Houston, but there is a need in the Baytown and Highlands areas.
- A need for publicly supported housing, particularly for low income elderly and disabled residents;

- With the DADS reorganization into Texas Workforce, it is difficult for County residents with mental illness to communicate effectively with the frontline staff who are not sufficiently trained to interact with persons with mental illness.

- Residents with mobility disabilities emphasized the need for accessible transportation and ADA compliant sidewalks in the county, particularly in newer communities. The Harwin area was identified as needing more sidewalks.

As shown in Figure VII-20 African American residents, Native American residents, LEP residents and those with household incomes less than $25,000 are more likely than other groups or regional residents overall to have lower quality or less access to public services.

Figure VII-20.
My neighborhood has lower quality/access… By Selected Protected Class Characteristics and Income
The higher the % the greater the proportion of residents who say their neighborhood has lower quality/access.

Higher than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower than Region (<5 ppt)

Percent of Residents Experiencing a Housing Challenge	African American	Hispanic	Asian	Native American	Disability	Children Under 18	Large Family	LEP	Income <$25,000	Region
Sidewalks	32%	35%	18%	31%	36%	32%	29%	32%	32%	31%
Paved Roads	20%	13%	6%	13%	13%	13%	13%	21%	18%	10%
Parks	25%	21%	16%	27%	21%	22%	23%	23%	25%	18%
Clean and Running Water	13%	9%	1%	7%	9%	9%	10%	16%	11%	7%
Street lights	20%	18%	9%	21%	18%	17%	18%	27%	19%	14%
Running/Jogging trails and/or bike paths/lanes	36%	35%	21%	28%	35%	34%	31%	36%	36%	31%
Emergency Medical Services (EMS), Fire and Police Services	11%	8%	2%	11%	7%	8%	8%	15%	10%	6%
Health Services (Hospitals, Doctor's Offices, Pharmacies, Clinics)	17%	10%	7%	20%	12%	12%	13%	8%	15%	10%
Commercial Services (Grocery Stores, Restaurants, Gas Stations, etc.)	17%	10%	6%	15%	11%	12%	11%	8%	13%	11%
Social Services (WorkForce Solutions, Neighborhood Centers, Elderly/Adult Day Care Centers, etc.)	24%	20%	16%	17%	27%	21%	23%	22%	24%	20%
Educational/Cultural Facilities (museum, libraries, etc.)	33%	28%	23%	36%	32%	29%	29%	24%	30%	27%
Garbage/Solid Waste Pick-up	15%	8%	5%	10%	8%	10%	9%	17%	13%	7%
Storm Sewer/Adequate Drainage	23%	21%	27%	27%	23%	22%	20%	32%	23%	21%
Sanitary Sewer/Black Lines	16%	11%	6%	16%	12%	11%	12%	-	16%	9%
Animal Control	28%	15%	12%	17%	22%	21%	20%	-	24%	17%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

As shown in Figure VII-20, African American residents of the region were more likely than other residents to believe that public service quality or access is lower in their neighborhood than other areas. To understand the nature of this difference African American residents' perceptions of public services are shown by their community of residence in Figure VII-21.

As shown, African American residents of Harris County are as likely as all other residents in the region to consider their public services of lower quality or access with the exception of clean and running water. Much of the difference observed in public services results for African Americans overall (Figure VII-20 on the previous page) are driven by African American residents of Houston.

Figure VII-21.
My neighborhood has lower quality/access… African American Residents,
The higher the % the greater the proportion of residents who say their neighborhood has lower quality/access.

Higher % than Region (>5ppt)
About the same as Region (+/- 5 ppt)
Lower % than Region (<5 ppt)

Lighter shading for Galveston, Missouri City, and Pasadena indicates relatively small sample sizes (see figure note below table for more detail)

Percent of African American Residents with Lower Quality/Access in their Neighborhood	Galveston	Missouri City	Pasadena	Harris County	Houston	Region
Sidewalks	26%	11%	43%	33%	32%	31%
Paved Roads	37%	33%	27%	11%	22%	10%
Parks	25%	44%	27%	19%	27%	18%
Clean and Running Water	11%	10%	14%	13%	13%	7%
Street lights	29%	25%	23%	18%	20%	14%
Running/Jogging trails and/or bike paths/lanes	50%	50%	46%	29%	39%	31%
Emergency Medical Services (EMS), Fire and Police Services	5%	10%	7%	10%	11%	6%
Health Services (Hospitals, Doctor's Offices, Pharmacies, Clinics)	15%	44%	14%	12%	19%	10%
Commercial Services (Grocery Stores, Restaurants, Gas Stations, etc.)	37%	33%	14%	13%	17%	11%
Social Services (WorkForce Solutions, Neighborhood Centers, Elderly/Adult Day Care Centers, etc.)	63%	47%	23%	23%	23%	20%
Educational/Cultural Facilities (museum, libraries, etc.)	21%	63%	39%	23%	36%	27%
Garbage/Solid Waste Pick-up	16%	0%	7%	11%	16%	7%
Storm Sewer/Adequate Drainage	26%	10%	36%	16%	26%	21%
Sanitary Sewer/Black Lines	21%	9%	21%	11%	19%	9%
Animal Control	21%	40%	15%	19%	32%	17%

Note: Data for jurisdictions are African American residents; data for Region include all respondents to the survey. Sample sizes for African American respondents in Missouri City, Pasadena and Galveston are small (n< 20 each) compared to Harris County (n=224) and Houston (n=621). As such, differences from the region for Galveston, Missouri City and Pasadena are shown in lighter shading to remind the reader to interpret the percentages with caution. They suggest differences, but the true estimates are unknown.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Healthy neighborhood indicators. Survey respondents rated their agreement with a number of statements about qualities of their neighborhood. On average, residents of the participating jurisdictions and Houston agree (rating of 6 to 9) that their neighborhood has qualities that indicate a healthy community (Figure VII-22).

- **Quality of parks and recreation facilities.** On average, Harris County residents strongly agree than all neighborhoods in their area have the same quality of park and recreation facilities, the highest average rating among the jurisdictions.

- **Access to grocery stores and fresh food.** Pasadena residents are most likely to strongly agree that their neighborhood has convenient access to grocery stores and fresh food; Houstonians are least likely. At community meetings, Missouri City residents identified a need for grocery access along Texas Parkway and Cartwright corridors. Galveston residents and stakeholders considered parts of the island to be a food desert—the only grocery store on the east end of the island is Arlan's and the center of the city has only one grocery store.

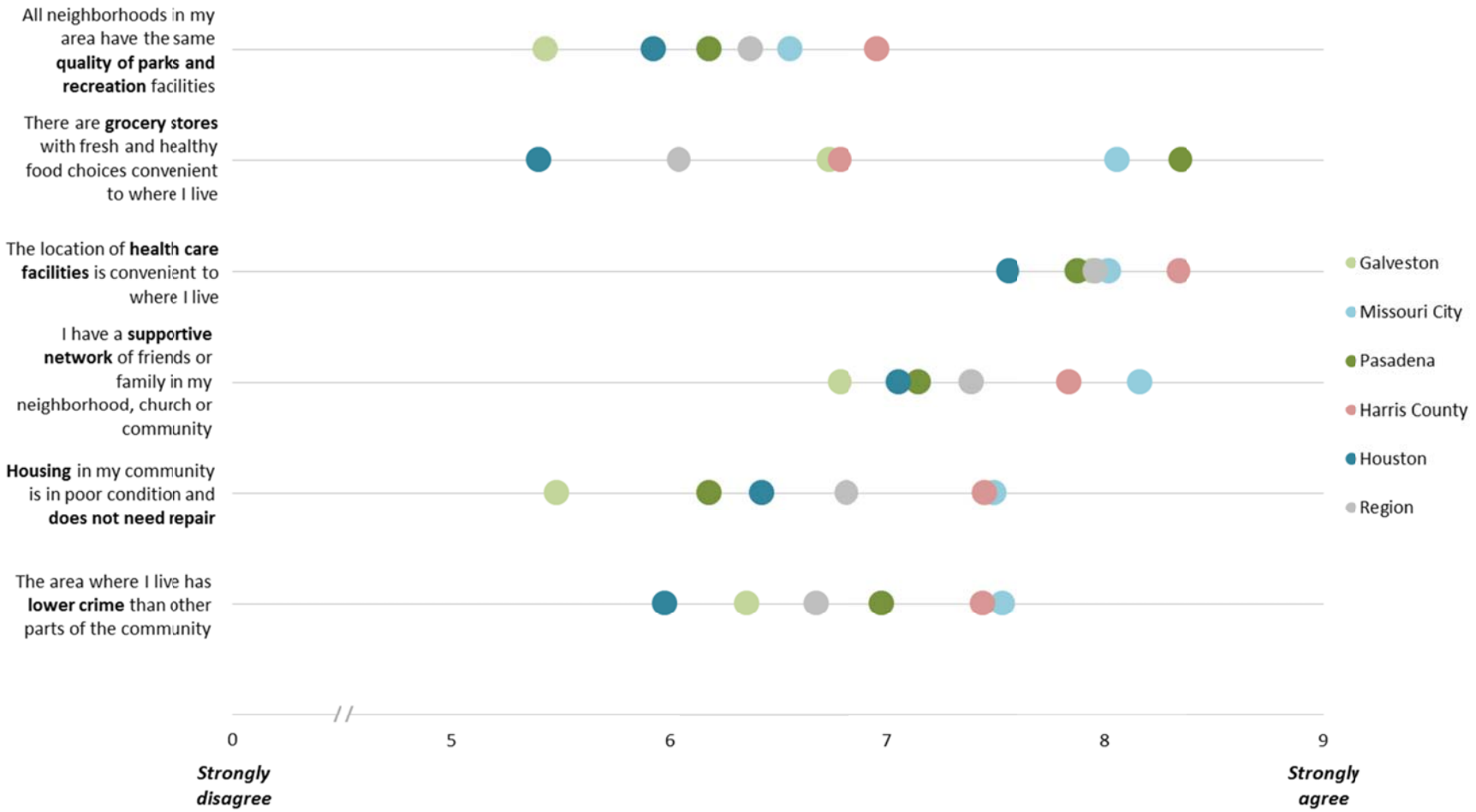
- **Access to health care facilities.** Health care facilities are convenient to most residents and there is little variation among the participating jurisdictions. In contrast, stakeholders discussed the lack of access to medical services in low-income areas across the region. Examples include the 3rd and 5th wards of Houston, Sunnyside (which has no emergency room), and the south side of Pasadena. Stakeholders note that health fairs are not a substitute for primary care. Pasadena residents also expressed a need for medical services—both to provide health care and job opportunities for residents.

- **Supportive network in the community.** Missouri City residents are most likely to agree that they have a supportive network of friends or family in their neighborhood, church or community, and Galveston residents are the least.

- **Housing does not need repair.** Residents of Harris County and Missouri City are most likely to agree that housing in their community is in good condition and does not need repair; Galveston residents are the least likely to agree. In stakeholder focus groups, Galveston stakeholders indicate that much of the housing that is affordable is dilapidated and is managed by absentee landlords.

- **Lower crime.** Harris County and Missouri City residents are more likely than others to agree that the area where they live has lower crime than other parts of the community. Houston residents are least likely to agree.

Figure VII-22.
Resident Perspectives on Healthy Neighborhood Indicators, by Jurisdiction



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-23 examines perspectives of members of selected protected classes and low income households on healthy neighborhood indicators. As with residents of the region overall, on average members of each of the groups considered agree that their neighborhood has the qualities indicated. The degree of agreement varies by group.

- **Quality of parks and recreation facilities.** African American residents, LEP residents, and residents with disabilities are least likely to agree that their neighborhood has the same quality of park and recreation facilities as other neighborhoods. Overall, African Americans living in Houston and Galveston are much less likely than African Americans in Missouri City, and Harris County to agree parks and rec facilities are of the same quality. Families with children are the most likely to agree.

- **Access to grocery stores and fresh food.** Households with incomes less than $25,000 are much less likely than others to agree that grocery stores are convenient to where they live, but even among this group agreement is high. Access to grocery stores among low income residents was highest in Harris County and lowest in Houston, but the overall difference is small.

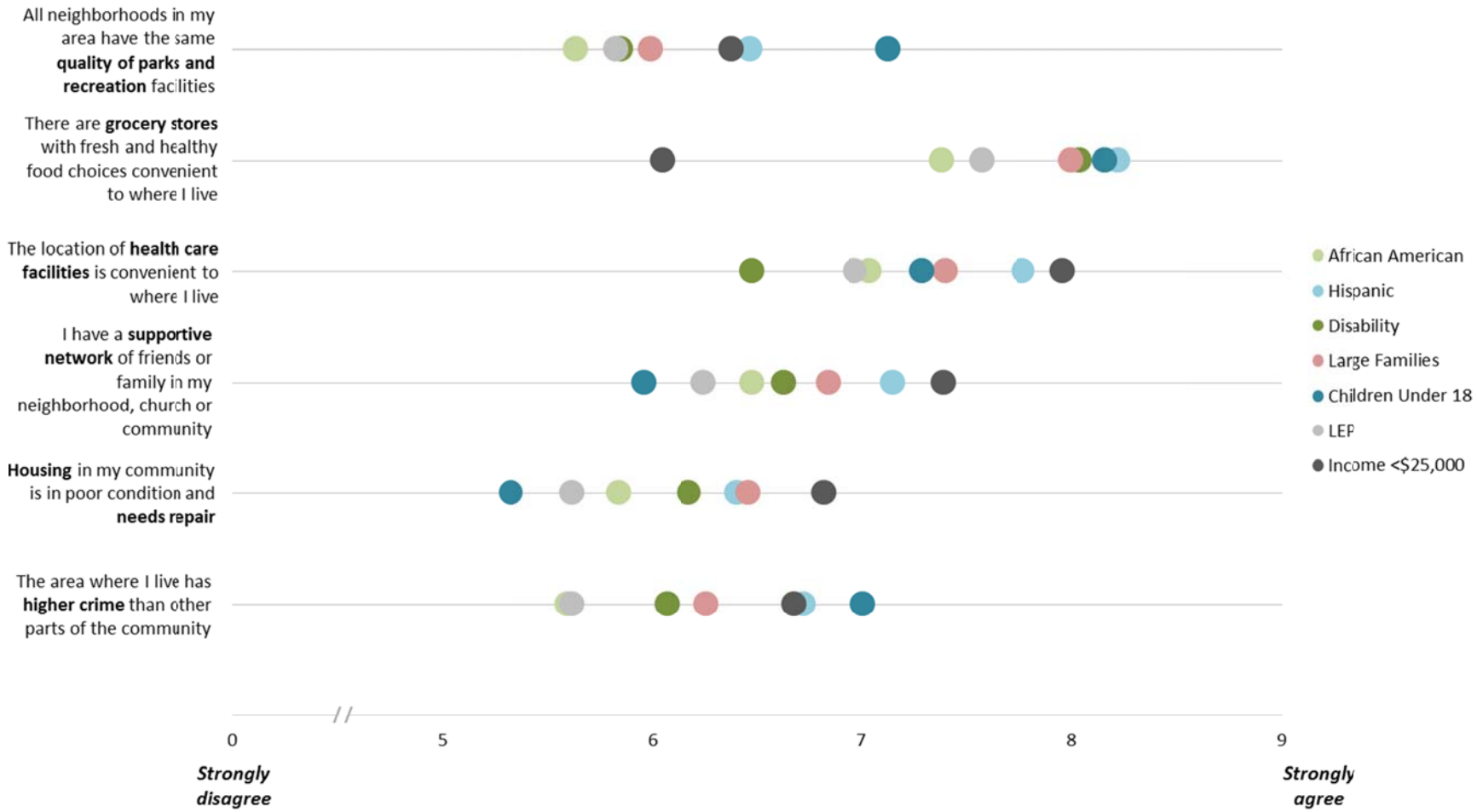
- **Access to health care facilities.** Residents with disabilities are less likely than other households to agree that health care facilities are convenient to where they live. Among households with a member with a disability, those living in Pasadena are least likely to agree that health care facilities are convenient to where they live and are highest in Missouri City and Galveston.

- **Supportive network in the community.** With respect to a supportive network, families with children were the least likely to agree that they have a supportive network in the community and households with the lowest income were most likely to agree. Families with children living in Galveston and Houston are least likely to agree they have a strong supportive network in the community.

- **Housing does not need repair.** Families with children were the least likely to agree that housing in their neighborhood is in good condition and does not need repair; this is the lowest average rating overall. Galveston residents with children are the least likely to agree that housing in their community does not need repair, a much lower rating than similar households in Harris County.

- **Lower crime.** African American residents and LEP respondents were the least likely to agree that their neighborhood has lower crime than other neighborhoods and families with children were the most likely to agree. African American residents of Pasadena and Houston are less likely than African Americans in Harris County to agree that their neighborhood has lower crime than other areas.

Figure VII-23.
Resident Perspectives on Healthy Neighborhood Indicators, by Selected Protected Classes and Low Income Households



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

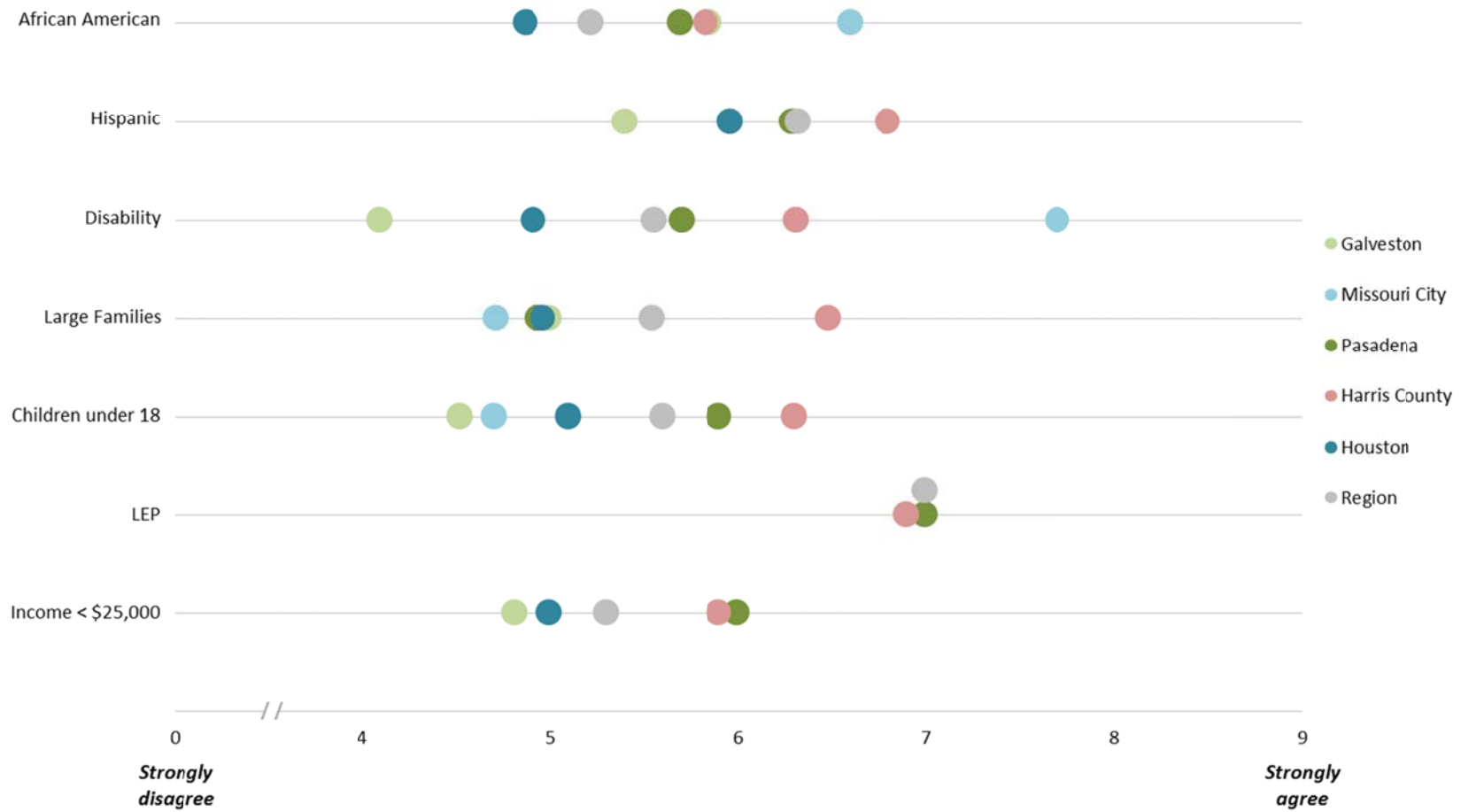
Access to quality schools. Figure VII-24 presents average agreement with the statement "In this area it is easy to find housing people can afford that is close to good quality schools" for selected protected classes and low income households by jurisdiction. In most cases, residents of Harris County were more likely than others to agree that it is easy to find housing people can afford that is close to good schools; Houston residents and Galveston residents were least likely to agree.

Families with children living in Harris County and Pasadena are most likely to agree that it is easy to find affordable housing near good schools, while those living in Galveston and Missouri City are less likely to agree. Large families in Harris County are much more likely than large families living elsewhere in the region to agree that it is easy to find affordable housing near good schools. Households that include a member with a disability, including children with disabilities, have very different perceptions depending on where they live. Those in Missouri City are most likely to agree that it is easy to find affordable housing near good schools, while those in Galveston are much less likely to agree.

Missouri City residents attending the community open house attributed the area's access to proficient schools to school choice. "Schools are not a huge issue because you can choice into other schools."

Stakeholder perspectives on schools. The quality of schools has a significant impact in determining the location of companies and jobs. Stakeholders report that low-income families have few options regarding schools and no transportation to get to better schools. In Houston, inner-city schools are racially divided and are considered lower quality than suburban schools. Throughout the region, families can choose another school if their school is low-performing, but transportation may prevent them from exercising that choice. The number of charter schools has "exploded" in the region, which can lead to school choice for families with transportation. In Houston, schools are "very complicated for parent to figure out." If a family has limited resources, their children must attend a school accessible by bus.

Figure VII-24.
Access to Quality Schools by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
In this area it is easy to find housing people can afford that is close to good quality schools.



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston. Not all groups had a sufficient number of responses to report results.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Access to transportation. Figure VII-25 presents average agreement with the statement, "I can easily get to the places I want to go using my preferred transportation option" for members of selected protected classes and low income households by jurisdiction. When interpreting the results for Galveston, note that the city changed its public transportation service hours after the survey data was collected so these results may not be reflective of the current experience of Galveston residents who prefer to use public transportation. As shown in Figure VII-25, most residents agree that they are able to get to the places they want to go using their preferred transportation method. The exceptions are Pasadena African American residents, Pasadena LEP respondents and Pasadena residents with household incomes less than $25,000.

At community engagement events transportation-related discussion included:

- Resident suggestions to increase funding for transportation services to allow greater access to jobs (Galveston);
- Mixed opinions about transit service in Missouri City—some residents think more options are needed while others think "if you live here, you should buy a car."
- Service cuts to public transit in Galveston resulting from funding losses attributed to the city's population decline. The loss of evening bus service will impact access to employment as well as training opportunities offered at the college during evening hours.

Residents with disabilities who live within the Metro service area gave the transit system high marks with respect to routes, service hours and frequency. *"If you're lucky enough to live in the service area, Metro is great."* Not all communities choose to participate in the transit system; these communities are not an option for residents with disabilities who rely on accessible transit. Paratransit services are only available within the fixed route bus system's service area.

However, while buses are accessible, stops are not necessarily accessible. Residents with disabilities emphasized the need for accessible first and last mile transit connections. They described accessible buses with stops that are not accessible to people with mobility disabilities. *"A lot of stops are just dirt or grass."*

Regardless of where they live in the region, a lack of transportation or transportation challenges was the primary barrier survey respondents with disabilities identified as a barrier to employment, accessing health services and accessing community amenities and facilities.

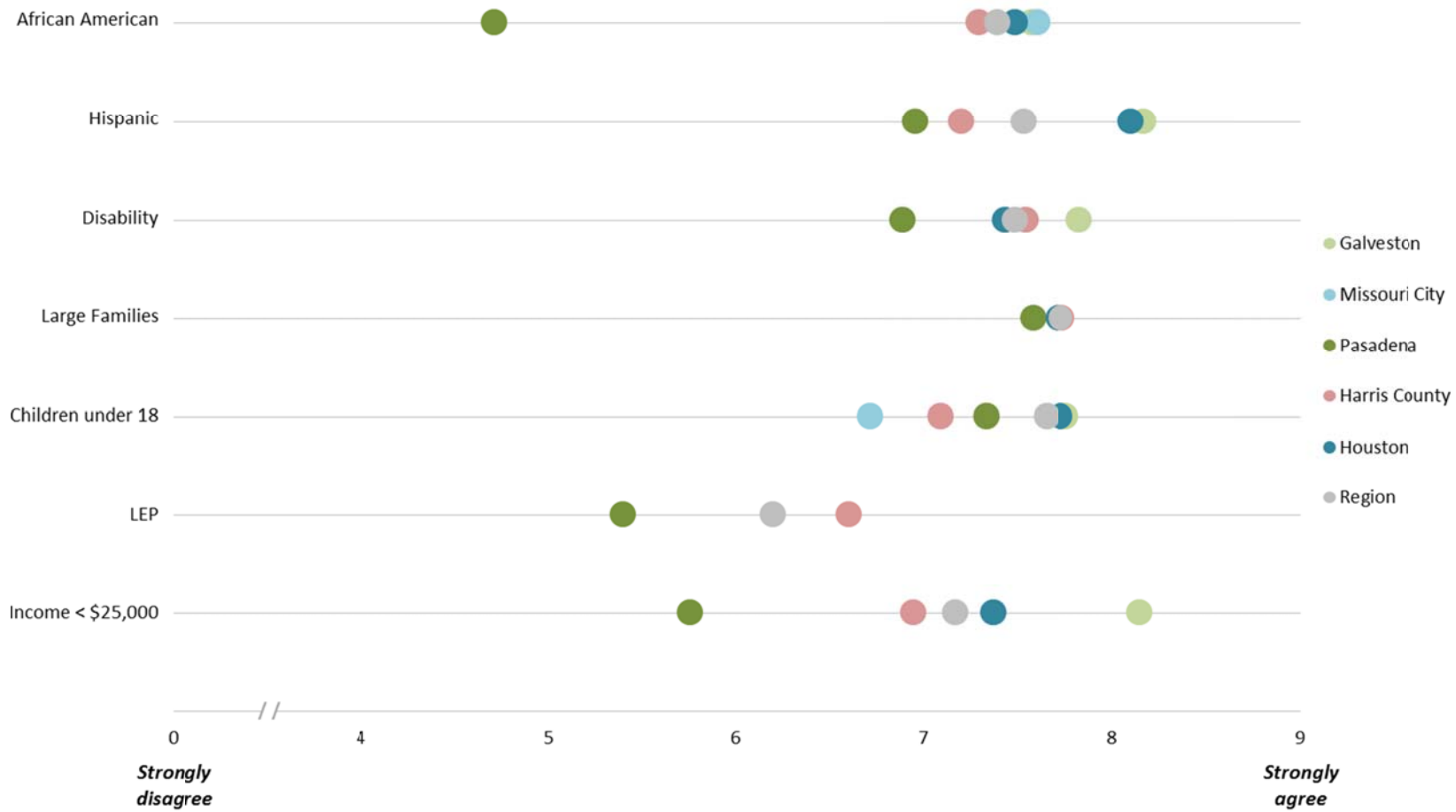
Stakeholder perspectives on access to transportation. The region is very car-dependent and cars are expensive to own and maintain. Access to public transportation varies across the region and is limited outside of downtown Houston. The four transit providers in the region are: Harris County, METRO, Ft. Bend County, and Galveston. In Galveston, public transit is underutilized and service is being reduced. Pasadena, Missouri City, Texas City, and unincorporated areas of Harris County have very limited or no public transportation. Many other suburbs also do not have public transportation.

Stakeholders agree that jurisdictions in the region attempt to place new low-income housing tax credit (LIHTC) developments near public transportation routes. Houston and Harris County

"suggest" location criteria to target development on high-frequency bus lines. Additionally, Harris County has criteria related to racial and ethnic concentration. However, these criteria do not prevent resolutions of support for the LIHTC developments. Governments strongly encourage and ask, but cannot compel.

As development increases along transit lines, people are priced out of their homes, further exacerbating the availability of affordable housing.

Figure VII-25.
Access to Transportation, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
I can easily get to the places I want to go using my preferred transportation option.



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston. Not all groups had a sufficient number of responses to report results.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Access to employment. Figure VII-26 presents the level of agreement of members of selected protected classes and low income households with the statement, "The location of job opportunities is convenient to where I live." On average, most residents, regardless of their community of residence, agree with this statement. Galveston and Pasadena African American residents and Galveston residents with disabilities are less likely to agree. Residents of Harris County, are more likely to strongly agree with the statement than most residents overall as well as within cohorts.

Attendees at community engagement events frequently raised economic development, access to employment and job training as significant community needs. These included:

- Increase access to jobs and economic development opportunities for community members and local businesses (Barrett Station Homecoming and Parade attendees);
- Need to revitalize Missouri City's downtown core—development and amenities in the last decade have migrated over toward Highway 6, leaving the city center depressed.
- A need for job training and economic development in industries *other* than tourism was a common theme among Galveston residents. Youth job training, which was offered in the past, has not been offered in recent years; residents believe the lack of youth-oriented employment and training opportunities negatively impacts the youth and the community overall. Residents born on the island (BOI) described how the island's economy once thrived with diverse industries that meant good paying jobs for local residents. To these residents, the city's economic development efforts have focused entirely on tourism to the detriment of local residents.
- Galveston residents shared that Houston companies won't hire island residents. There is a perception than islanders will not be reliable due to weather or other commute difficulties.

When asked what was most needed to increase access to employment, residents with disabilities who participated in the survey identified four primary areas of need:

- Access to transportation;
- Outreach to employers to encourage them to hire residents with disabilities;
- Job training, coaching and counseling for residents with disabilities; and
- Reasonable accommodations for employees with disabilities.

Disability focus group participants noted that employers seem to be more willing to accommodate those with visible disabilities, but that residents with hidden, discrete, cognitive or mental disabilities have a more difficult time obtaining accommodations.

Stakeholder perspectives on access to employment. Access to jobs was a significant concern among all stakeholders, but especially so for Galveston stakeholders. Galveston Island does not have a state workforce office located on the island and has many service-related jobs that do not

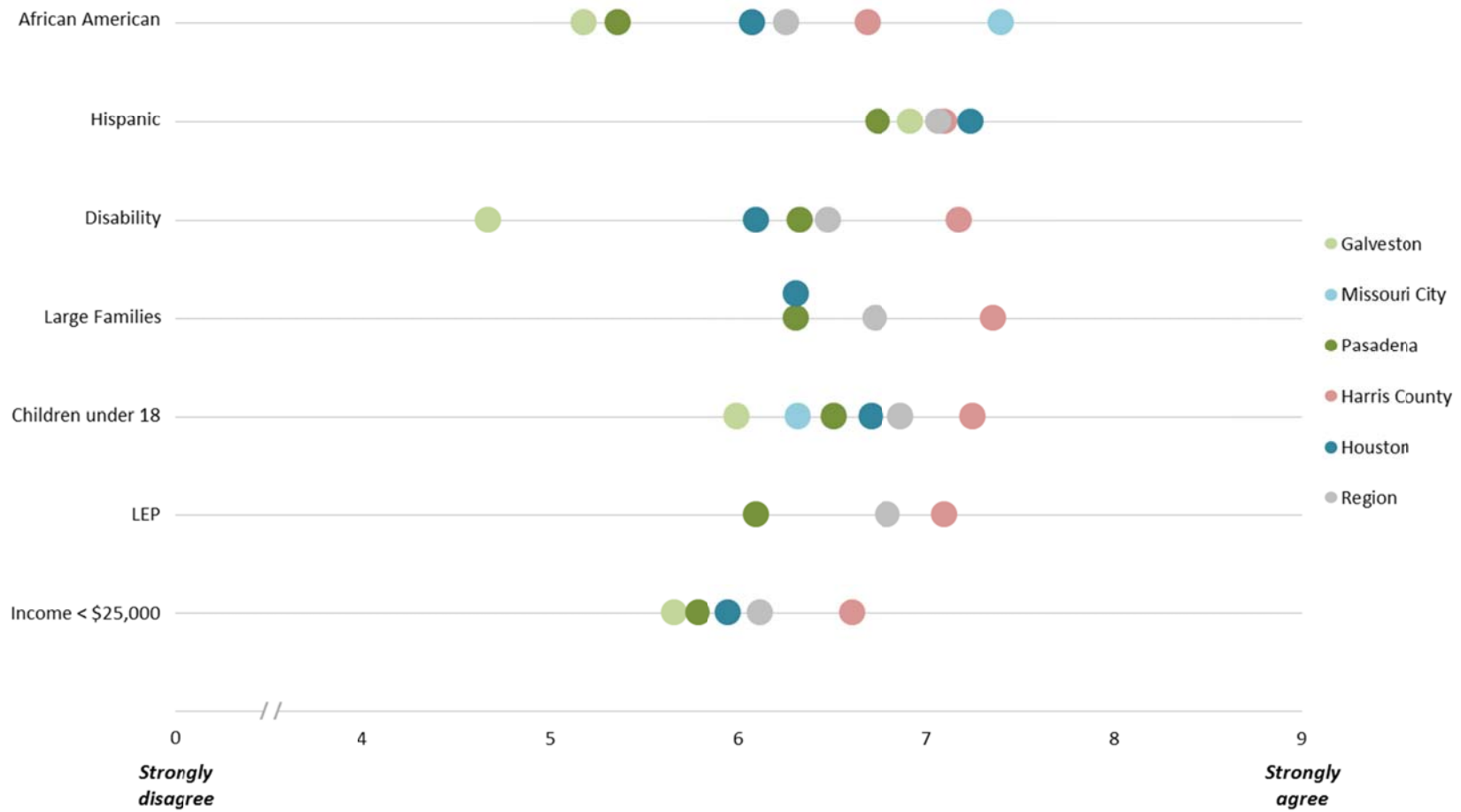
pay a living wage. No jobs are available on the north end of Broadway and stakeholders report a "good ol' boy" system prevents qualified workers from getting jobs.

The tourism industry on the Island employs a "significant" number of people with H1 and J1 visas. These foreign workers live in crowded conditions with "20 people living in a one-bedroom apartment". Stakeholders believe that employers do not have to pay minimum wage to these visa holders. Locals who could do the jobs are not hired as a result.

In the past, the University of Texas Medical Branch (UTMB) at Galveston and the service industry have bused in workers from outside of Galveston. Galveston has a community college, but people do not want to go because there are no opportunities after completing school.

Across the region, according to stakeholders, "you don't see a lot of high quality jobs located in areas that also have a lot of affordable housing." One example is Greenspoint, an area in northern Harris County, where it is not uncommon for residents to take two buses to work for a service sector job in commercial areas that are not located nearby, resulting in commutes of 45 minutes to an hour. The airport is the only nearby large-scale provider of high quality jobs. Galveston participants noted that areas on the island with multifamily housing are not areas of opportunity for jobs or other amenities.

Figure VII-26.
Access to Employment, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
The location of job opportunities is convenient to where I live.



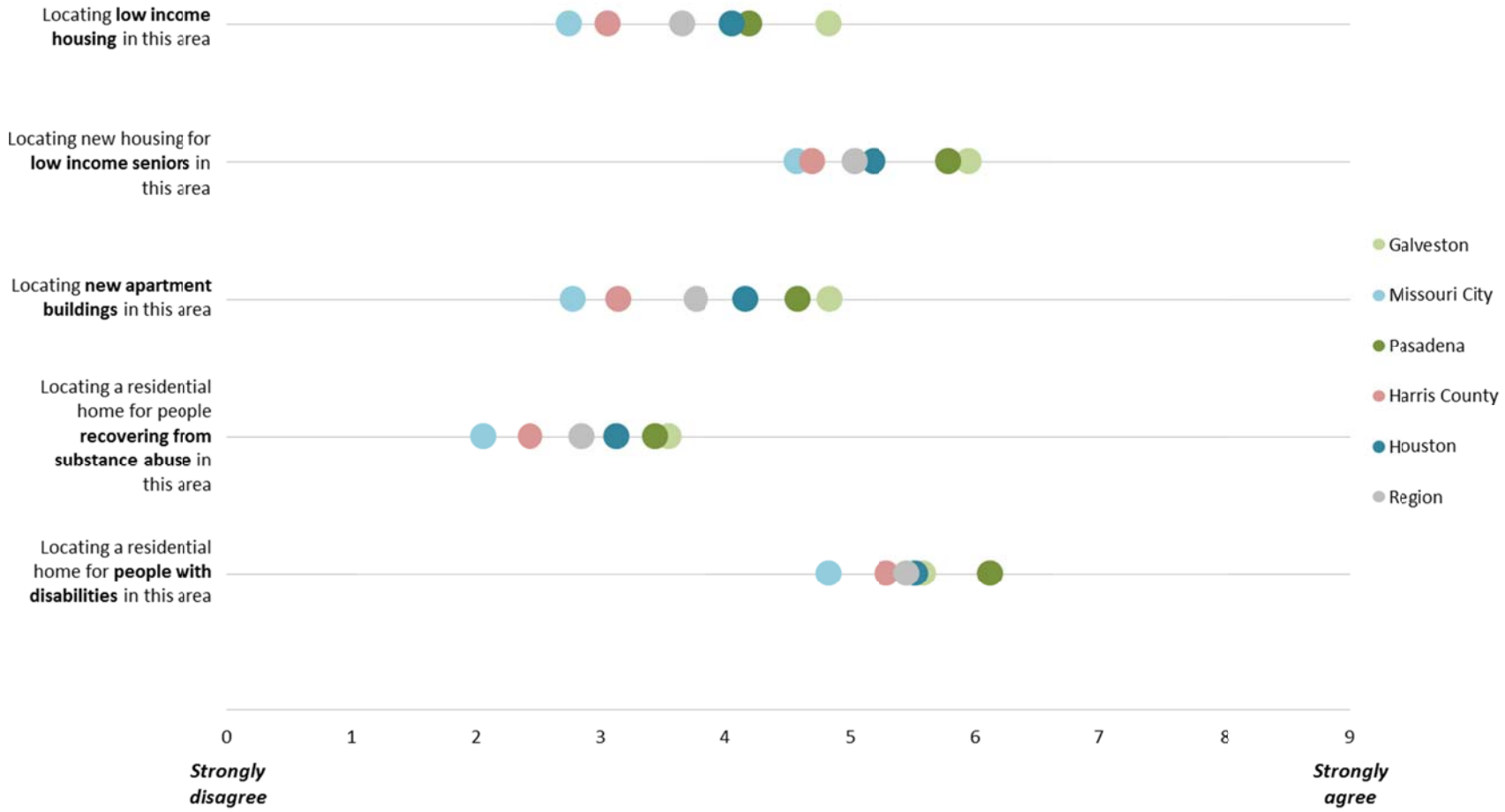
Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

NIMBY. As shown in Figure VII-27, survey respondents' perceptions of community support for different types of housing and housing uses varies by community as well as by the type of housing or use. Residents of the region are weakly supportive, on average, of locating new housing for low income seniors in their area and of locating a residential home for people with disabilities. Most do not agree that their neighbors would support locating housing for people recovering from substance abuse in the area and are only slightly more supportive of low income housing. New apartment buildings in general have low to tepid support. In general, Missouri City and Harris County residents are less likely to think their neighbors would support these housing types than respondents living in Galveston, Pasadena and Houston.

As with survey respondents, a slim majority of attendees at community open house events in Missouri City, Pasadena, Galveston and Harris County thought most of their neighbors would support housing for low income seniors, low income housing and new apartment buildings in their neighborhood and about one-third thought their neighbors would support a residential home for people recovering from substance abuse.

Figure VII-27.
Most of my neighbors would be supportive of locating…low income housing…housing for low income seniors…new apartment buildings…a residential home for people recovering from substance abuse… a residential home for people with disabilities … in this area. By Jurisdiction

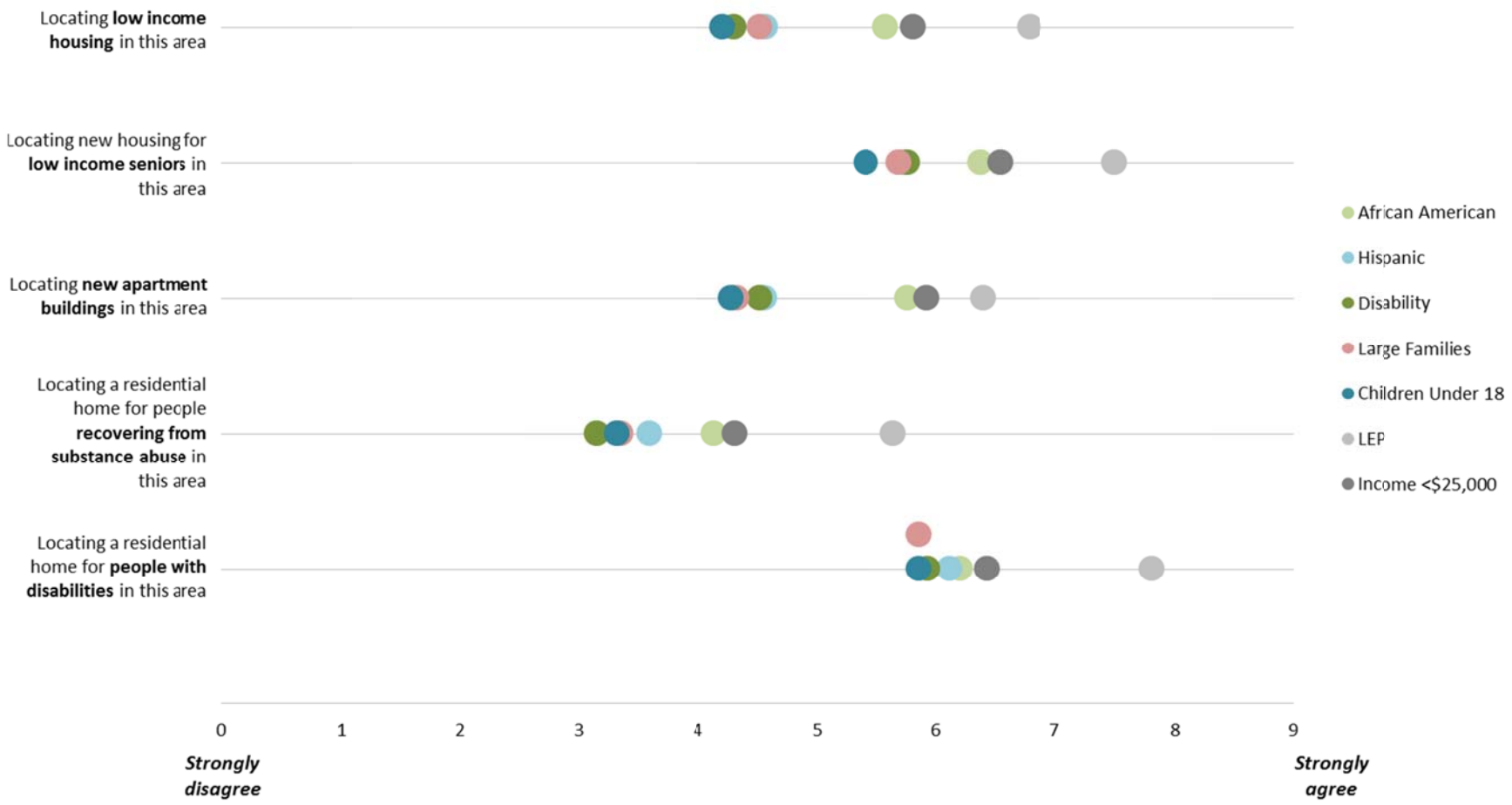


Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston.

Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Figure VII-28 examines perceptions of members of selected protected classes and low income households of neighbor support for housing types and uses. Compared to the typical community resident, African American residents, LEP respondents and households with incomes less than $25,000 are more likely to believe their neighbors would support each of the housing types and uses considered. Although somewhat more supportive than the general population of each housing type, the difference is not significant. As with the general population, members of protected classes are least likely to agree that their neighbors would support housing for persons recovering from substance abuse in their area.

Figure VII-28.
Most of my neighbors would be supportive of locating…low income housing…housing for low income seniors…new apartment buildings…a residential home for people recovering from substance abuse… a residential home for people with disabilities … in this area. By Selected Protected Class Characteristics and Low Income Households



Source: BBC Research & Consulting from the 2017 Galveston, Missouri City, Pasadena, and Harris County Regional AFH Resident Survey.

Housing and Opportunity Priorities

Attendees at pop up and open house community prioritized the housing and other opportunity issues they believed were most important to address. Overall, community members prioritize:

- Accessible housing for disabled persons/elderly (16% of votes);
- Housing options for persons with severe mental illness (10%);
- Housing options for previously homeless people (9%);
- Expanded transit services: hours, routes, service days (9%);
- Housing options for persons with cognitive disabilities (8%);
- Rental housing priced between $500 and $750 (8%);
- Park improvements in certain neighborhoods (8%);
- Rental housing priced below $500 (7%);
- Housing to buy priced below $100,000 (7%);
- Landlords willing to rent to people with bad credit, past evictions or past foreclosures (6%);
- Downpayment assistance to buy a home (5%);
- Landlords willing to rent to people with criminal records (4%); and
- Housing to buy priced between $100,001 and $200,000 (3%).

The priorities—distribution of attendee votes—were similar across all of the community events.

Residents with disabilities who participated in the Harris County open house would prioritize:

- Wheelchair accessibility—door and hallway widths and other types of physical accessibility;
- Safety—lighting, secure building access, protection for visually impaired apartment residents from theft, sensory alarms for deaf and hearing impaired residents; and
- Transportation access, service hours and frequency.

Deaf participants in a focus group mentioned an apartment building in the Dallas-Fort Worth area that is designed for, and operated by, members of the deaf community. They would like to see Harris County pursue a similar development.

Hurricane Harvey

As noted in the introduction to this section, two-thirds of the total survey responses were received after Hurricane Harvey, however nearly all of these responses came from residents of Pasadena, Harris County and Houston. Among these residents, 35 percent sustained damage to their home from the hurricane. The proportion of households reporting different types of damage varied by community:

- Water damage impacted 40 percent of Pasadena and Harris County households and 27 percent of Houston households.
- One in 10 Harris County and Houston households with damage to their home sustained roof damage, compared to 18 percent of Pasadena households.
- Fewer than one in 10 (8%) households experienced wall damage and 4 percent had damaged flooring.

The severity of damage sustained also varied by community—of those with damaged homes, 16 percent of Pasadena residents had damage that made their home unlivable, compared to 49 percent of Harris County residents and 55 percent of Houston residents. At the time the time the survey was conducted, only 13 percent of those with damage to their homes had completed repairs; 45 percent had repairs underway and 36 percent did not know when repairs to their home would begin. Of those who experienced damage to their home, 58 percent had applied for FEMA at the time of the survey and 23 percent had applied for SBA. Only one in 20 (5%) said that they would like to apply for help but were not sure if they would qualify and only 1 percent of respondents were not sure how or where to apply.

Stakeholder participants on Hurricane Harvey. Stakeholders spoke extensively about the how Hurricane Harvey has impacted the region since it made landfall in Texas on August 25, 2017. Recovery from the hurricane is on-going and the full impact not yet known. Hurricane Harvey exacerbated the housing issues already in place and the region is now in a housing crisis. Although this hurricane caused flooding in middle- and upper-income communities that have not flooded historically, stakeholders particularly noted the disproportionate impact on low-income communities, many of which are located in flood plains, saying that the "poorest of the poor were most affected." In addition, groups already experiencing the most discrimination were also disproportionately impacted – racial and ethnic minorities and individuals with disabilities.

Stakeholders report that landlords are taking advantage of the vulnerable situation of renters. Flooding pushed out low-income residents and now property owners are trying to convert the properties to higher income rentals. Rental rates have increased across the region. Many stakeholders and their clients see the flooding as "an excuse to move people out." Greenspoint was provided as a specific example, where 80 percent of apartments flooded, although stakeholders point out this is happening region-wide. Communities that didn't flood have become more valuable. New flood plain regulations as a result of the hurricane will increase housing costs in unincorporated Harris County.

Families lost their homes, cars, and jobs and experienced an overall loss of stability. The hurricane split families, with parents and children finding accommodations separately with friends and family. Families must commute to current schools or enroll their children in new ones.

Debris has also been an issue. Clean-up continues in many neighborhoods, and as of mid-December, some debris had not yet been hauled away by the City of Houston. Brookside, a very low-income area in Harris County where almost everyone flooded, still had no trash pickup. In Pasadena, 4,000 properties were impacted by loss or partial damage and clean-up continues.

The hurricane increased homelessness. People who did not have formal leases could not get FEMA assistance such as hotel vouchers. Stakeholders reported, in general, that residents experienced difficulty in received assistance from FEMA and that this may have a disproportionate impact on protected classes.

Harris County needs to buy out 600 homes from flood plains, but only has funds to buy out 200. Buyouts decrease the tax base and impact property tax collections. In addition to repairing housing, infrastructure improvements are needed, such as improving drainage.

The mainland was more heavily damaged by Hurricane Harvey than Galveston Island. Hurricane Harvey did not have a huge impact on Galveston Island, but exacerbated issues that have not been addressed since Hurricane Ike made a direct hit on the island in 2008. Hurricane Ike did far more damage to Galveston than Harvey.

In Galveston, Hurricane Harvey did have a disproportionate impact on dilapidated property, which took on water, resulting in mold and rodent infestation, which reduced the availability of affordable rentals. This has led to price gouging for available rentals. Many roads on the island are still in need of repair.

SECTION VIII.

Fair Housing Landscape

SECTION VIII.
Fair Housing Landscape

This section of the AI examines the fair housing landscape in the Greater Houston region, including a review of complaint data, fair housing testing and legal cases related to fair housing violations. The section then evaluates possible public sector barriers to fair housing choice, particularly through zoning and land use regulations.

Fair Housing Law and Enforcement

Federal fair housing law. The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status or disability. The Fair Housing Act covers most types of housing, including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. The Act also contains design and construction accessibility provisions for certain new multifamily dwellings developed for first occupancy on or after March 13, 1991.

The Act exempts owner-occupied buildings with fewer than four units; single family housing sold or rented without the use of a real estate agent or broker; housing operated by organizations and private clubs that limit occupancy to members; and housing for older persons.[1]

HUD has the primary authority for enforcing the Fair Housing Act. Housing discrimination complaints filed with HUD may be done online at (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, which serves Texas residents and is located in Fort Worth (817-978-5900 or 5595 TDD).

HUD must first try to reach a conciliation or settlement between the parties involved in a fair housing complaint. If the complaint is not successfully conciliated, HUD investigates the complaint and determines if there is a "reasonable cause" to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an administrative law judge. Parties to the action can also elect to have the trial held in a federal court, in which case the Department of Justice brings the claim on behalf of the plaintiff.[2]

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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[1] This is a very general description of the Fair Housing Act and the actions and properties covered by the Act. For more detailed information on the Fair Housing Act, please see the full text, which can be found http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

[2] "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws", The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

Texas fair housing law. The state of Texas has adopted Title 15, Fair Housing Practices, Chapter 301, Texas Property Code, also known as the Texas Fair Housing Act which promotes the ability of protected class residents to access low-poverty areas by prohibiting discrimination in housing based on race, ethnicity, nationality, family status, and disability. The Act mirrors the Federal Fair Housing Act (FFHA) and enables the state of Texas to enforce fair housing violations which obstruct access to low-poverty areas to residents based on these characteristics.

In 2015 the Texas state legislature passed a law barring cities from passing laws banning landlords from discrimination based on source-of-income. According to a 2017 article in the Houston Chronicle, housing policy experts widely view such legislation as a barrier to integration and de-concentration of poverty. The law is currently being challenged in the U.S. District Court for the Northern District of Texas on the basis that the law violates the Fair Housing Act by blocking predominantly Non-Hispanic Black public housing voucher holders from securing housing in White neighborhoods.

Texas residents who feel that they might have experienced a violation of the FFHA or state fair housing laws can contact one or more of the following organizations: HUD's Office of Fair Housing and Opportunity in Fort Worth (FHEO) or the Texas Workforce Commission (TWC).

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, they may refer the complaints filed directly with HUD 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 the Garland Housing and Neighborhood Services.

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] The website provides several ways to file a complaint, including filing in person at the Division office in Austin, calling by phone or writing the Division a letter. The site also has a fair housing fact sheet to help the person identify housing discrimination as well as the steps which will follow after a complaint is filed.

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).

Upon TWCCRD's receiving the complaint, they will notify the alleged violator of the complaint and allow the person to submit a response. An assigned investigator will then proceed to determine if there is reasonable cause to believe the law had been violated. The TWCCRD will try to reach a conciliation agreement between the complainant and respondent. If such an

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

agreement is reached there will be no further action unless the conciliation agreement has been breached. In that case, the TWCCRD may request that the Texas Attorney General file suit.

Local fair housing policies and organizations. The Greater Houston Region has a number of fair housing organizations residents can contact to get more information about their fair housing rights and/or how to file a fair housing complaint.

The Greater Houston Fair Housing Center (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.[4]

Other organizations in the region also provide services related to fair housing, including tenants' rights, legal services and housing counseling. These organizations are listed in Figure VIII-1 below.

Figure VIII-1.
Local Nonprofit Fair Housing and Housing Advocacy Organizations, Greater Houston Region

Name	Website	Telephone
Greater Houston Fair Housing Center	www.houstonfairhousing.org	(713) 641-3247
Inclusive Communities Project	www.inclusivecommunities.net	(214) 939-9239
Lone Star Legal Aid	www.lonestarlegal.org	(713) 652-0077
Tenants Council of Houston	www.houstontenants.org	(713) 982-1985
Texas Low Income Housing Information Service	www.texashousers.net	(713) 393-8783
Texas Appleseed	www.texasappleseed.net	(512) 473-2800 x:107

Source: BBC Research & Consulting.

Harris County policies. The following federal and state policies adopted by Harris County to govern the Harris County Community Services Department impact the ability of protected class groups to access low-poverty neighborhoods:

- Title VI of the Civil Rights Act of 1964 (24 CFR 1.4)
- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)
- Title II of the American with Disabilities Act of 1990
- Title IX of the Education Amendments Act of 1972 (24 CFR 3.400)
- Executive Order 11063 (24 CFR 107.20)

[4] http://greaterhoustonfairhousingcenter.cfsites.org/index.php

- Executive Order 11246
- Executive Order 12892
- Executive Order 12898
- Executive Order 13166
- Executive Order 13217
- Age Discrimination Act of 1975 (24 CFR 146.13)
- Title I of the Housing and Community Development Act 1974 (24 CFR 6.4)
- Section 504 of Rehabilitation Act of 1973 (24 CFR 8.22 through 8.27.)
- Architectural Barriers Act of 1968 (24 CFR 570.614)
- Texas Accessibility Standards
- Affirmative Marketing (24 CFR 92.351(a))

By prohibiting discrimination based race, color or national origin in county plans or programs, housing, education, employment and requiring that the county take steps to affirmatively further fair housing, these policies promote the ability of protected class groups to access low-poverty areas.

Pasadena policies. As a recipient of federal funds, Pasadena has adopted a Title VI Non-Discrimination Plan, which promotes the ability of protected class groups to access low-poverty areas by prohibiting discrimination-based disability, Limited English Proficiency (LEP), race or other factors in city programs and activities. The plan states that no minority or low income population suffers "disproportionately high and adverse human health or environmental effect" due to any "programs, policies and activities" undertaken by any agency receiving federal funds.

While the City of Pasadena website states that, "It is the policy of the City of Pasadena not to condone discrimination or support housing discrimination." Pasadena does not have language in the city Code of Ordinances referring to non-discrimination in housing for protected class groups. The absence of this language means that fair housing violations by private individuals or businesses not receiving federal funds are enforceable by state and federal law only.

Missouri City policies. Missouri City has incorporated federal and state policies into the city Code of Ordinances which promote the ability of protected class citizens to access low-poverty areas. This is done in section 33-1 of the Missouri City Code of Ordinances, which adopts by reference Title VIII of the Civil Rights Act of 1968, as amended therein and thereafter, also known as the Fair Housing Act, 42 U.S. 3601 et seq., and Title 15, Fair Housing Practices, Chapter 301, Texas Property Code, as amended herein and thereafter, also known as the Texas Fair Housing Act. These policies prohibit discrimination in housing based on race, ethnicity, nationality, family status, and disability.

Galveston policies. The City of Galveston has adopted language in the city Code of Ordinances, which promotes the ability of protected class residents to access low-poverty areas by

prohibiting discriminatory housing practices and requiring the adoption of procedures which promote access to housing. Relevant sections of the Code are as follows:

Section 12.5-1 of the Code of Ordinances for the City of Galveston includes language protecting the right of protected class groups to adequate housing and declaring that it is the policy of the city to:

> *…bring about, through fair, orderly and lawful procedures, the opportunity for each person to obtain housing without regard to race, color, religion, sex, handicap, familial status, gender identity, sexual identity or national origin.*

Section 12.5-3 and 12.5-5 of the Code of Ordinances prohibits certain discriminatory actions related to the sale or rental of housing and provision of brokerage services based on of race, color, religion, sex, handicap, familial status, gender identity, sexual identity, or national origin. Section 12.5-7 details provisions for the handling of fair housing complaints.

These policies enable the City of Galveston to enforce fair housing violations at the local level.

Fair Housing Complaints and Trends

HUD provided BBC with complaint data for the period from January 1, 2012 through January 31, 2018 for the Greater Houston Region. In the region, 861 complaints were filed over the six-year period. As shown in Figure VIII-2, the most common basis for complaints was disability (56%), followed by race (33%), and national origin (12%). Note that individual complaints may have more than one basis. Note that complaints can have more than one basis for filing.

Figure VIII-2.
Basis of Complaints, Greater Houston Region, January 1, 2012 through January 31, 2018

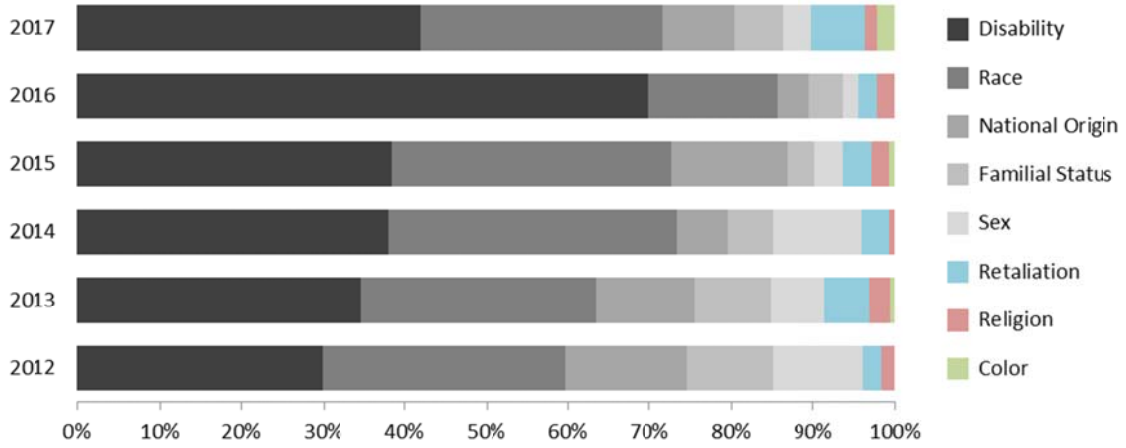
Note:
Nearly one-fifth of all complaints had more than one basis; percent shown is percent of complaints and as such, the percentages sum to more than 100.

Source:
HUD FHEO and BBC Research & Consulting.

	Number	Percent
Disability	480	56%
Race	287	33%
National Origin	101	12%
Familial Status	66	8%
Sex	62	7%
Retaliation	38	4%
Religion	19	2%
Color	5	1%
Total Bases	**1058**	
Total Complaints	**861**	

Figure VIII-3 shows the complaint basis share by year for the Greater Houston region. In most years, complaints based on disability, race and national origin account for the greatest share of complaints—combined they accounted for at least three quarters of all complaints each year. The share of complaints based on familial status ranged from 3 percent to 10 percent between 2012 and 2017. The share of complaints based on sex ranged from 2 percent to 11 percent.

Figure VIII-3.
Basis of Complaints by Year, Greater Houston Region, 2012 through 2017



Source: HUD FHEO and BBC Research & Consulting.

Complaints in Participating Jurisdictions. Figure VIII-4 shows the number of complaints and the complaint count per 10,000 people for each participating jurisdiction. Galveston had the highest number of complaints per capita by far with 5.25 complaints for every 10,000 people. All other participating jurisdictions had per capita complaints below the regional average of 1.45.

A high incidence of complaints can be indicator of fair housing concerns but can also interpreted as a positive indicator of resident awareness of fair housing law. That is, when residents are aware of fair housing laws, they are more likely to report fair housing violations.

Figure VIII-4.
Complaints by Community (Number and Per Capita), January 1, 2012 through January 31, 2018

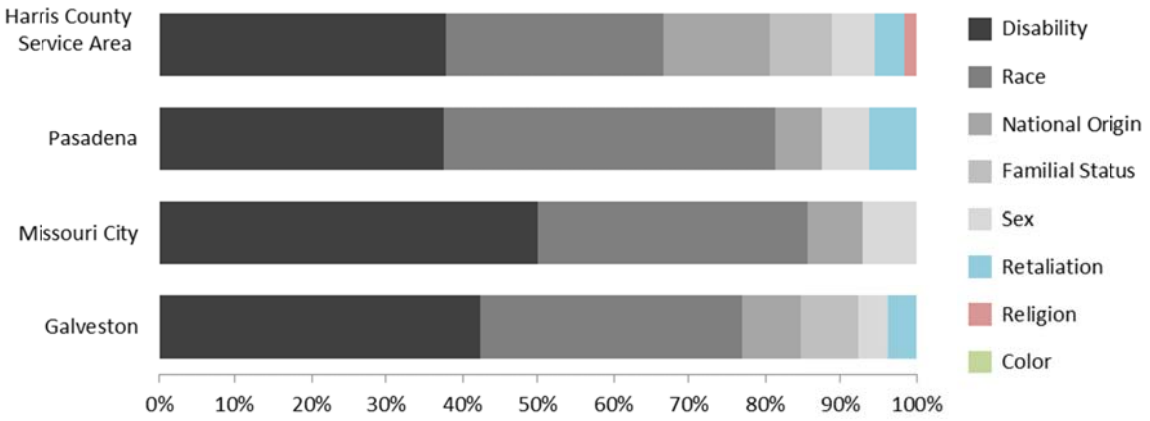
Source:

HUD FHEO, 2010 Census and BBC Research & Consulting.

	Total Complaints 1/1/12 - 1/31/18	Average Num. of Complaints per Year	Complaints per 10,000 Residents
Region	861	144	1.45
Harris County service area	149	25	0.85
Pasadena	13	2	0.89
Missouri City	9	2	1.19
Galveston	22	4	5.25

Figure VIII-5 examines the bases of complaints in the participating jurisdictions. Disability was the most common basis for complaints in The Harris County service area (38%), Missouri City (50%), and Galveston (42%). However, in Pasadena, race accounted for the greatest share of complaints (44%).

Figure VIII-5.
Basis of Complaints for Participating Jurisdictions, January 1, 2012 through January 31, 2018



Source: HUD FHEO and BBC Research & Consulting.

Disposition of complaints. Of the 861 complaints filed in the Greater Houston Region between January 1, 2012 and January 31, 2018, 280 (34%) complaints ended in conciliation or settlement and another 98 complaints (12%) were withdrawn by the complainant after resolution. In other words, 46 percent of complaints ended in some type of resolution in favor of the complainant.

Forty-four percent of all complaints resulted in a no cause determination, which occurs when HUD determines that there was no evidence of violation of the Federal Fair Housing Act. The remaining nine percent of complaints were closed or dismissed for a variety of reasons, including complainant failed to cooperate or withdrew the complaint without resolution, complaint dismissed for lack of jurisdiction, FHAP judicial dismissal, and litigation ended with no discrimination found.

Fair housing violations in settled complaints. Figure VIII-6 shows the reasons the conciliated, settled, and resolved complaints were filed. Data are shown for the region overall and for the participating jurisdictions combined.

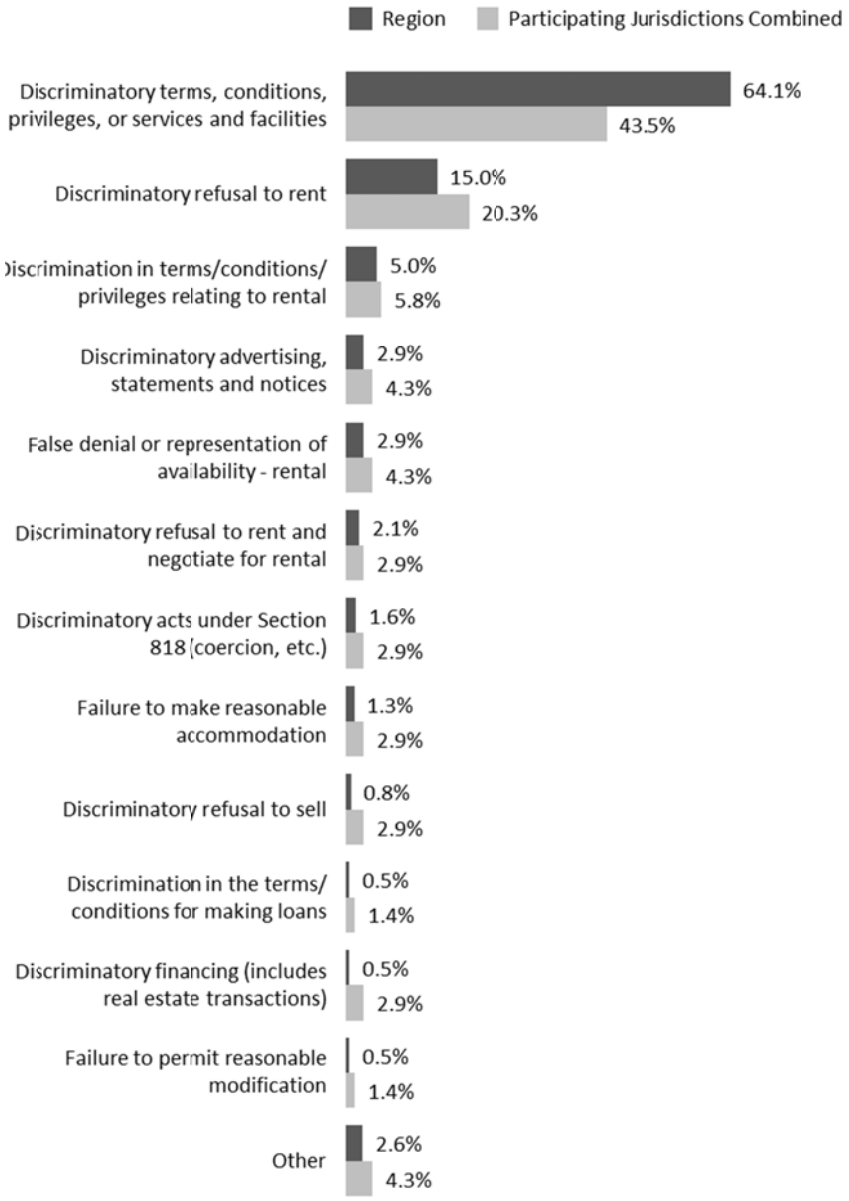
The most common reason in both the region and the participating jurisdictions was "discriminatory terms, conditions, privileges, or services and facilities," accounting for 64 percent of the settled complaints in the region and 44 percent of the settled complaints in the participating jurisdictions. The next largest issue found was "discriminatory refusal to rent."

"Failure to make reasonable accommodations" and "failure to permit reasonable modification" collectively represented 2 percent of the settled complaints in the region and 4 percent of the settled complaints in the participating jurisdictions.

Figure VIII-6.
Settled Complaints by Reason Filed, January 1, 2012 through January 31, 2018

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

Source:
HUD FHEO and BBC Research & Consulting.



Legal Cases

This section describes fair housing legal actions that were brought and/or resolved during the past eight years (since 2010) and represent major fair housing legal actions in the Greater Houston Region. The primary sources for the cases include: 1) the National Fair Housing Advocate case database;[5] 2) the U.S. Department of Justice, Civil Rights Division;[6] and 3) legal documents. The purpose of the legal summaries that follow is to highlight, in a non-technical way, recent legal findings that concern fair housing laws.

[5] http://www.fairhousing.com

[6] 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 required, 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 (FHAST form). The FHAST 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 FHAST 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.

Ojo v. Farmers Group., Inc.(2011). Patrick Ojo, an African American resident of Houston, Texas and carrier of a Farmer's Group homeowners insurance policy, sued Farmer's on behalf of himself and other racial minorities alleging that Farmer's "credit-scoring systems employ several "undisclosed factors" which result in disparate impacts for minorities and violate the federal Fair Housing Act." The case was originally filed in 2009 but the district court ruled that the Texas Insurance Code preempted Ojo's FHA claim—essentially that the insurance code, which authorizes the use of race-neutral credit score factors, supersedes the disparate impact claim under the FHA. On appeal, a Ninth Circuit panel held that Texas law did not reverse-preempt Ojo's FHA claim and ordered the case reheard en banc (before all judges of a court rather than by a panel of judges). The court ruled that the Texas Insurance Code is void of any language creating a cause of action for a racially disparate impact and held that "Texas law does not prohibit an insurer from using race-neutral factors in credit-scoring to price insurance, even if doing so creates a racially disparate impact."

The Inclusive Communities Project, Inc. v. Texas Department of Housing and Community Affairs, et al (2012). In 2010, Inclusive Communities Project, Inc. (ICP) filed a lawsuit against TDHCA claiming that the manner in which TDHCA distributed housing tax credit in the Dallas area violated federal Fair Housing laws. Specifically, ICP contended that TDHCA had engaged in intentional racial discrimination and that as a result there had been a disproportionate lack of awards in predominantly white Census tracts and a disproportionately high amount of awards of housing tax credits in predominantly African American Census tracts. After various court actions, a March 20, 2012 order found that the Plaintiff failed to prove that the Department intentionally discriminated in the allocation of LIHTCs, but did find that, while unintentional, the allocation of LIHTCs in the Dallas area resulted in a disparate (discriminatory) impact and directed the Department to file a remedial action plan.

TDHCA filed a remedial plan (Remedial Plan) which focused on scoring items that will promote greater interest in "high opportunity areas," areas of greater wealth and lower poverty. Because

TDHCA believed it to be a policy set out in the federal statute which created the LIHTC program Internal Revenue Code (IRC) §42, the proposed remedial plan also provided for corresponding incentives for applicants seeking to develop housing, which is a necessary part of a concerted revitalization effort in a qualified Census tract (QCT). The court, in a subsequent order, adopted much of the proposed remedial plan but rejected TDHCA's view of the requirements of the IRC regarding preferences for revitalization deals in QCTs. On November 8, 2012, the court entered a final Memorandum Opinion and Order and Judgment.

The case was appealed and heard by the Supreme Court of the United States in 2015. The Supreme Court hearing focused only on whether the disparate impact claim applies under the Fair Housing Act and concluded that disparate impact is part of the intent of the federal fair housing law. Though the court's decision upheld the application of disparate impact under the FHA, it also imposed limitations on its application in practice. Specifically, the Court held that racial imbalance alone—even if statistically significant—is not sufficient to sustain a claim. It put the burden on plaintiffs to establish a "robust" causal connection between the practice in question and the alleged disparities. It also noted that justification is "not contrary to the disparate-impact requirement, unless … artificial, arbitrary, and unnecessary."

Galveston Open Gov't Project v. HUD (2014) and McCardell v HUD (2015). Galveston Open Gov't Project (GOGP), along with individual plaintiffs, filed this lawsuit to enjoin the rebuilding of Galveston Housing Authority (GHA) units at Cedar Terrace and Magnolia Homes asserting that the construction of those units would perpetuate segregation in Galveston and fails to affirmatively further fair housing opportunities. The court ruled that neither GOGP nor individual plaintiffs who were housing choice voucher holders had sufficient standing to file the case and they were dismissed from the case. However, one plaintiff, Trysha McCardell, was found to have standing and the case proceeded as McCardell v HUD.

Trysha McCardell filed the case as a resident of Galveston and a neighbor to the planned rebuild site of the GHA units. She claimed that the planned redevelopment would "deprive her of the social and economic benefits that result from living in an integrated community." The court ruled in favor of the defendants in summary judgement on the basis that the 11th Amendment, which bars suits brought by private citizens against a state in federal court, does apply in this case because Congress did not make a clear intent to do away with sovereign immunity under the Fair Housing Act. In other words, the safe harbor provision precluded a Fair Housing Act claim based on the housing authority's decision to rebuild demolished housing on the same segregated site. As such, the court is limited to considering whether HUD reviewed and approved a proposed site but the court does not have jurisdiction to evaluate HUD's determination.

Fair Housing and Land Development Codes

The zoning, building, and subdivision codes and regulations, of Harris County and the cities of Missouri City, Pasadena, and Galveston were reviewed to identify potential barriers to fair housing choice and reasonable accommodation under the federal Fair Housing Amendments Act (FHAA) and the Americans with Disabilities Act (ADA).

The FHAA and ADA require that local codes not limit fair housing choice to the individuals and households listed in the FHAA. Land development codes cannot contain standards, definitions,

or procedures that result in different treatment in housing on the basis of race, sex, religion, national origin, color, physical or mental disability, or familial status (households with children under the age of 18). As well, land development codes that include regulations that increase development costs, e.g., through density or design requirements that make residential development overly expensive, can limit the supply of affordable housing. This has a direct effect on minority families and persons with disabilities because they are disproportionately represented among those who benefit from lower cost housing. Limits or prohibitions on multifamily housing or restrictions on household occupancy are other examples of how land development codes affect individuals and groups protected under FHAA.

As well, FHAA and ADA also require that "reasonable accommodations" be allowed when necessary to permit persons with disabilities an equal opportunity to use a dwelling unit. This means that persons with disabilities have the right to request and be granted modifications to existing local regulations and standards to make a residence or building accessible to them.

Some of the key factors in land development codes that most commonly result in barriers to fair housing choice and reasonable accommodation include:

- Site Standards: Large lots or excessive setbacks between structures or from streets that can increase development costs, e.g., special infrastructure;
- Density Limits: Restriction on or prohibition of multifamily housing, low floor area ratios (FAR) for multifamily or mixed-use development, or low density requirements;
- Use-Specific Standards: Special site or operational requirements for group homes for protected classes, e.g., persons with disabilities, that are not required for other residences or groups;
- Public Services: Additional requirements for infrastructure or essential municipal services not required for other residences or dwelling units;
- Definitions and Occupancy: Definitions of family or occupancy limits that prohibit or limit the number of unrelated persons in a household;
- Procedures: Review procedures, public hearings, or notice requirements for different housing types, housing for protected classes, or low-income housing;
- Housing Choice: Limits or prohibitions on alternative affordable housing options such as accessory dwelling units, modular or manufactured homes, and mixed-use developments;
- Spacing: Minimum distance between group homes for protected classes, e.g., persons with disabilities, that are not required for other residences or groups;
- Reasonable Accommodation: Regulations inhibiting modifications to housing for persons with disabilities or their ability to locate in certain neighborhoods; and
- Codes: Local land development codes and standards that are not aligned with federal and state regulations governing fair housing and reasonable accommodation.

Matrix of Indicators of Land Development Code Barriers and Impediments to Fair Housing. A matrix listing types of regulations and policies in land development codes that are indicators of impediments to fair housing was developed to show where potential barriers to fair housing may exist. The land development policies, including zoning and subdivision regulations, of each of the four communities participating in this AI were examined against this matrix. Building codes were reviewed to determine nationally recognized building codes are adopted and the relationship of those codes to HUD-accepted codes (called "safe harbor" codes).

The matrix (Figure VIII-7) groups the indicators into four categories based on the common barriers to fair housing choice listed above and drawn from the questions in HUD's Fair Housing Planning Guide, Chapter 5, related to public policies and actions and zoning laws and policies. A review of comprehensive plans, where adopted, other ordinances affecting land development, and floodplain regulations was beyond the scope of this analysis.

Figure VIII-7.
Indicators of Land Development Code Barriers and Impediments to Fair Housing

INDICATOR	HARRIS COUNTY	MISSOURI CITY	PASADENA	GALVESTON	TABLE NOTES/ COMMENTS
CODES					
1. Zoning Code	**No zoning regulations**	**Yes**	**No zoning regulations**	**Yes**	**2**
Do zone districts allow a range of density and dwelling unit types? (Supports the placement of new or rehabilitated housing for lower-income households in a wide spectrum of neighborhoods)	No zoning adopted per state law. Without zoning there is no overall land use regulation to encourage and preserve land areas for a range of housing types and affordability levels	Zone districts allow for low and mid-density housing, including single-family detached and attached (e.g., townhomes) and mid-density multifamily. Higher density is missing. See density category below	Without zoning there is no overall land use regulation to encourage and preserve land areas for a range of housing types and affordability levels. Without zoning the subdivision process is used to implement the desirable neighborhood development, which may inhibit the range of lot sizes and housing types	Zone districts allow for an array of housing and density, including single-family detached and attached (e.g., townhomes), multifamily, and mixed-use development	
2. Building Code	**Yes**	**Yes**	**Yes**	**Yes**	**3, 4, 5, 6**
Are nationally recognized building codes adopted? (Indicates that FHAA and ADA requirements for accessibility are followed)	IFC 2012 IBC 2012, chapters 2 – 10 Note: Chapter 11 of the 2012 IBC is not adopted. This chapter requires buildings comply with the accessibility requirements of ICC/ANSI A117.1, Accessible and Usable Buildings and Facilities, which is a HUD-recognized standard. Because Chapter 11 is not adopted, accessibility standards that comply with FHAA may not be followed	IBC, 2015 IEBC, 2015 IECC, 2015 IPMC, 2015 IRC, 2015 While the 2015 IBC is not HUD-recognized, Chapter 35 references the ICC/ANSI A117.1, accessibility standard, which is a HUD-recognized standard	IBC, 2015, plus city amendments IECC, 2015, plus city amendments IRC, 2015, plus city amendments NEC, 2017, plus city amendments While the 2015 IBC is not HUD-recognized, Chapter 35 references the ICC/ANSI A117.1, accessibility standard, which is a HUD-recognized standard	IBC, 2012 IEBC, 2012 IECC, 2012 IPMC, 2012 IRC, 2012 While the 2012 IBC is not HUD-recognized, Chapter 11 references ICC/ANSI A117.1, accessibility standard, which is a HUD-recognized standard	Note: Further analysis is needed to determine whether the accessibility standards in adopted codes are being enforced
3. Equal Levels of Infrastructure and Municipal Services	**Yes**	**Yes**	**Yes**	**Yes**	
Are essential municipal services treated equally by development type and occupancy class? (Indicates equal treatment of facilities for FHAA-protected groups)					No special requirements for infrastructure or public services were identified the in land development codes reviewed
SITE STANDARDS					

4. Large Lot Sizes, Dimensions, or Dwelling Unit Size	**No**	**Yes**	**No**	**No**	
Are there large lot size, setbacks, or lot widths or minimum standards for size of dwelling units? *(Contributes to increased development costs and discourages attached or multifamily housing)*		Lot widths for townhomes and patio homes are slightly above average for this type of development and may decrease the range of options available for this housing type. This may be a barrier to the production of these housing types and thus limit the amount of lower cost housing available.	Note: Patio homes and townhomes have a minimum living area of 800 sq. ft. and 900 sq. ft., respectively, per dwelling unit. This is not an excessive size requirement that results in higher-cost dwelling units because of only large units can be built. However, any size requirement may impact affordability by decreasing the flexibility to create a range of housing sizes to serve a wide spectrum of residents.		
5. Requirements Favoring Low Density	**N/A**	**Yes**	**Yes**	**No**	
Are the maximum densities, Floor Area Ratios (FAR) or building heights low? *(Indicator that certain housing types and densities cannot be achieved in a wide spectrum of neighborhoods)*	No regulations. Building size and height and number of dwelling units on a site are regulated by IFC and IBC building spacing requirements and building placement requirements of Harris County Floodplain Management Regulations effective January 2018	While density ranges generally are appropriate for a variety of housing types, requirements of the more restrictive zone district prevail where a housing type is permitted in a less restrictive zone district. This may inhibit production of different housing types within each zone district. The MF-2 district has the highest density of only20 du/acre, and building height is limited to 45 feet. A building height of 75 feet may be achieved in the R-6 zone with review by the Board of Adjustment but the maximum density is only 15 du/acre. A mix of uses may be permitted through the Planned Development (PD) process, but is not allowed by right in any zone district	Multifamily is restricted to a maximum of 3 stories and .40 FAR, and the maximum allowed density of 18 du/acre. The max story and .40 FAR combined with parking design requirements (multilevel parking is not permitted for multifamily) could make it difficult to achieve the maximum density.	Density ranges allow a wide variety of housing types in an array of building styles and mix of uses. This encourages a diverse mixture of housing in a wide spectrum of neighborhoods	

6. Site Improvements for New Construction	**No**	**Yes**	**No**	**No**	
Are there special design requirements for buildings or site improvements that increase development costs? (Contributing factor in increased construction costs and increased housing costs which disproportionately affect lower-income households)		New multifamily and condo buildings must comply with specific architectural standards for design and materials. This can add cost to the development and decrease affordability			
7. Spacing or Dispersal Requirements	**No**	**No**	**No**	**Yes**	
Are there minimum distances required between group homes or other housing for FHAA protected individuals or groups? (Indicates exclusion or limits to housing choice for FHAA protected groups)				Homeless shelters must be separated by ½ mile. This may conflict with FHAA protection for certain groups depending the circumstances of the shelter and types of services offered	
8. Single Family Development Pattern	**Yes**	**No**	**No**	**No**	
Do development codes favor single-family lot development over cluster development? (Indicates lack of housing options for a wide spectrum of residents)	While subdivision regulations allow multifamily structures there are no distinct subdivision standards for patio homes, townhomes or other development options for residential	Zoning code includes patio home, townhome, condo, and multifamily zone districts	Separate subdivision standards for patio home, and townhome, and specific ordinance regulating multifamily development which provide clear path for development of these housing options	There is a variety of zoning districts and development patterns allowed by codes.	
USES AND DEFINITIONS					
9. Multifamily Units	**Yes**	**Yes**	**Yes**	**Yes**	
Are multifamily units allowed? *(Exclusion of or prohibition of multifamily residences indicates limited housing options)*	Codes neither expressly allow nor prohibit. Including language in the subdivision regulations and other relevant codes will clarify that a diversity of unit types is allowed and there is no prohibition or exclusion of any type. This is particularly important in the absence of a zoning code.		Legislation is adopted that allows different types of attached and multifamily units. This clearly indicates that a diversity of unit types is allowed and there is no prohibition or exclusion of any type. This is particularly important in the absence of a zoning code.		
10. Accessory Dwelling Units (ADUs)	**Not specified**	**Not specified**	**Not specified**	**Yes**	
Are ADUs allowed? (Indicates flexibility in code for a wide array of housing options)		More than one principal building is allowed if all setbacks are met			
11. Mobile/Manufactured Homes	**No specific regulations**	**Yes**	**Yes**	**Regulations unclear**	

Are mobile or manufactured homes allowed? (Indicates flexibility in code for a wide array of housing options)		Allowed only in the MH, Manufactured Home, zone district, except for temporary placement during construction. All uses in R-2, R-3, R-4, and R-5 also allowed in MH zone district	Allowed on 5,000 sq. ft. lot or in Manufactured Home Park. The MH Park must be a minimum of 5 acres and meet minimum standards for open space and infrastructure. These standards are not unusual and parallel standard subdivision requirements	Manufactured Housing Development deleted as a use but code retains definition of "Industrial homes" (10/17 draft Land Development Code). It is unclear where this housing type is allowed since it is not listed as a use or included in the descriptions of the zone districts	
12. Facilities for Persons with Disabilities and Other FHAA Groups Allowed in a Wide Array of Locations	**No regulations**	**Regulations unclear**	**No regulations**	**Regulations unclear**	**7**
Are facilities for FHAA protected individuals or groups excluded from residential zone districts either by use or occupancy restrictions?(If excluded indicates disparate treatment)		Assisted Living Facilities are regulated under the Code of Ordinances Chapter 18. Business but not listed in zoning code. Institutions for some FHAA groups are listed as exempt from Special Use Permit review, but are not listed as allowed in any zone district		Facilities licensed by the state are allowed in all zone districts by right except homeless shelters, family care homes, and nursing/convalescent homes	Several state laws govern various types of group care facilities and their location (see Table Note 7). It is unclear how local land development codes treat these facilities because different terminology may be used in the local codes and the state term is not listed as a use
13. Definition of Family	**No definition**	**Yes**	**No definition**	**No definition**	
Is there a definition of family and does it allow unrelated individuals, including persons with disabilities to share the same residence?					"Family" may be defined in other code sections. Where the land use regulations do not define "family", this can cause confusion over how that term applies to residences. The term should be defined for land use regulations and be consistently defined to allow for unrelated persons living together in residential settings

14. Occupancy Limits or Requirements	**No regulations**	**None in zoning code**	**Yes**	**None in zoning code**	**8**
Are there occupancy limits on the number of persons residing in a dwelling unit? *(Indicates exclusion of for group or congregate living facilities for persons protected under FHAA)*			Section 16.5-Housing, Section 14, limits number of occupants by number of bedrooms in a residence. The maximum may be increased by the code enforcement officer to comply with FHAA standards		Except as noted for Pasadena, occupancy limits would defer to adopted building and life/safety codes
POLICIES AND PROCEDURES					
15. Special review, public hearing, or notice?	**No regulations**	**Yes**	**No regulations**	**Yes**	**9**
Is public input required for exceptions to zoning and land-use rules? *(Indicates different treatment of an FHAA protected class if the process is not the same for all applicants)*		Although a Special Use Permit (SUP) is not required for institutions serving some FHAA-protected classes (specifically elderly, mentally-impaired persons, or physical-impaired persons) it is unclear if an SUP is required for other FHAA-protected classes, such as persons with HIV/AIDS.		A Special Use Permit is required for Homeless Shelters in some zone districts. Depending on the circumstances, a homeless shelter may be protected under FHAA	
16. References to Fair Housing Act and Americans with Disabilities Act	**No**	**Yes**	**No**	**Yes**	
Do local codes include language that indicates they are instituting regulations that adhere to the provisions of these acts? (Indicates that federal and state provisions are being followed)		FHAA and Chapter 301 Texas Property code are adopted by reference. ADA is used for parking and sidewalk standards		Chapter 125, Fair Housing, of the Code of Ordinances states the city's commitment to fair housing and expands the right to fair housing beyond the classes protected by FHAA. The Texas Accessibility Standards are referenced for parking standards	A best practice in land development codes, such as subdivision, is to include a purpose to provide housing choice for residents and to comply with applicable federal and state law regarding housing choice
17. Able to modify or vary zoning and building standards for reasonable accommodation in residences	**Unclear**	**Unclear**	**Unclear**	**Unclear**	
Do regulations allow persons with disabilities to make modifications to residences for reasonable accommodation? (Indicates flexibility to make housing accessible to disabled persons)	There is no clear process for a reasonable accommodation request. Such a request would be processed under the procedures and criteria as for any modification to the adopted building codes listed above	The zoning code provides a process for requesting a variance, however the criteria for granting a variance do not align with a modification solely for reasonable accommodation.	There is no clear process for a reasonable accommodation request. Such a request would be processed under the procedures and criteria as for any modification to the adopted building codes listed above	The zoning code provides a process for requesting a variance, however the criteria for granting a variance do not align with a modification solely for reasonable accommodation.	

Source: BBC Research & Consulting.

Table Notes:

1. Galveston review is based on the 10/2017 Draft Land Development Regulations

2. Counties do not have the authority to zone (except in a few areas where authorized by the state). In Texas the power to zone property is delegated from the state and constitutes the exclusive authority of a municipality to zone.

3. Acronyms: IBC: International Building Code; IEBC: International Existing Building Code; IECC: International Energy Conversation Code; IFC: International Fire Code; IPMC: International Property Maintenance Code; IRC: International Residential Code

4. Year indicates the edition adopted by local code. Amendments to these codes made by local ordinance are not within scope of this review, except where noted.

5. Note: IECC requires energy efficient materials, which may increase initial costs but will reduce long-term costs to homeowners and renters. IEBC addresses remodeling, repair, or alteration of existing buildings, which can reduce costs for older buildings.

6. Harris County amended floodplain regulations (effective January 1, 2018) establish higher floor elevations for buildings in the floodplains. This change may impact reasonable accommodation for persons with disabilities. A review of the amended floodplain regulations is beyond the scope of this analysis.

7. Harris County adopted an order on 8/25/09 to apply the International Residential Code, 2008, to single-family and duplex residential construction as authorized by Texas Local Government code Title 7, Chapter 233, Subsection F.

8. Texas Human Resources Code Chapter 123 states that a "community home for persons with disabilities" that meets the qualifications of Chapter 123 is a "use by right that is authorized in any district zoned as residential." Note this does not cover all protected classes under FHAA.

9. Texas Human Resources Code Chapter 123 limits the number of people residing in a "community home for persons with disabilities" to not more than six persons with disabilities and two supervisors for facilities licensed under Chapter 123.

10. Harris County Affordable Housing Standards, January 2017 apply to all affordable housing projects funded by Harris County Community Services Department. Section 2.6 requires written notification of a new multifamily development to all neighborhood organizations within a two mile radius of the proposed development.

11. Texas Government Code Section 2306.6705, Subchapter DD, Low Income Housing Tax Credit Program, requires notice of an LIHTC proposal be sent to any neighborhood organization on record with the state or county in which the development is to be located and whose boundaries contain the proposed development site.

12. Notice requirements can result in denial of a project that otherwise would not be subject to the same notice requirement if it was not an affordable housing development.

Primary Findings and Potential Issues:

1. No Zoning in Counties

The State of Texas grants authority to municipalities to create zone districts and regulate land development in those zone districts. This includes building height, setbacks, lot coverage, and density. However zoning powers are not granted to counties, with a few exceptions for specific listed areas of counties in specific areas of the state. Counties other than these listed counties have limited power to guide development and in the absence of zoning, private deed restrictions and covenants usually govern land use and development. Counties are authorized to enforce private restrictions for a subdivision or development that are recorded in real property records. This authorization includes enforcement of private restrictions on uses, setbacks, lot size, type and number of buildings or other structures that may be built within a particular subdivision or development. Counties are specifically prohibited from enforcing restrictions relating to race or any other restriction that violates the state or federal constitution (Texas Property Code, Sec. 203.003(b)). However, in the absence of zoning with its over-arching application of zone districts with accompanying use and density standards, it is difficult to identify discrepancies in how the language of private deed restrictions and covenants may be interpreted and enforced by the county. While zoning may have language and standards that adversely impact individuals and groups protected by the FHAA, this language is reviewed and modified to comply with current federal and state regulations. Zoning codes allow for the equal application of rules and standards in all areas with the same zone district designation, regardless of its location.

The lack of zoning in counties also may lead to unequal housing choices for individuals and groups protected under FHAA. Zoning is an important land use tool that indicates where and how a community provides for a range of zone districts for various housing types at different densities. Without zoning it may be difficult for a county to respond to the fair housing and accessibility needs of its residents.

Also of note is the extra-territorial jurisdiction authority of cities authorized by Texas Local Government Code, Sec. 212.003. This allows a municipality to extend subdivision and platting regulations into the extraterritorial jurisdiction of the municipality. However, it does not allow cities to impose zoning on areas within their extraterritorial jurisdiction that is not in their corporate limits.

2. Regulations of Specific Housing Types by Texas Statutes

Texas state statutes regulate specific types of housing that are relevant to FHAA. This includes:

- Manufactured Homes - Texas Occupations Code Chapter 1201
- Assisted Living Facilities - Texas Health and Safety Code Chapter 247
- Boarding Home - Texas Health and Safety Code Chapter 260
- Convalescent and Nursing Homes - Texas Health and Safety Code Chapter 242

- Group Homes – Texas Health and Safety Code Chapter 591
- Homeless Shelters – Texas Local Government Code Section 244 (applicable only to cities with a population over 1.6 million)
- Community Homes – Texas Human Resources Code Chapter 123

The local codes reviewed in this analysis are generally inconsistent in the use of terms listed above related to group or congregate living facilities. This makes it difficult to know how these types of facilities are regulated in the zoning codes or other applicable local regulations, regardless of what they are called at the local level. One issue is whether the terms used in the local codes are related to state statutes. A second issue is whether or not the state statutes are applied to the types of facilities and residences that are listed in local zoning codes and ordinances. A third issue is, where there is a zoning in place, whether these uses are allowed in residential zone districts. While local jurisdictions may be deferring to state statutes in lieu of identifying these uses in their own regulations, not including them leaves their status unclear and subject to interpretation. A fourth issue is that these facilities may be regulated or referenced in other sections of the local code of ordinances. For example, Chapter 18 of the Missouri City Code of Ordinances provides for the enforcement of state licensing requirements for Assisted Living Facilities (as authorized by Texas Health and Safety Code Chapter 247) but there is no "assisted living facility" listed as a use in the city's zoning code (Appendix A of the Code of Ordinances). Finally, the state regulations for Community Homes state that the use and operation of a community home that meets the qualifications of Chapter 123 is a use by right and is authorized in any district zoned as residential. None of the zoning codes reviewed in this analysis define community homes or identify this facility as a use by right in any zone district.

Local zoning codes should be aligned with state statutes by specifically referencing all applicable state statutes, using the same or substantially similar terms for group and congregate living facilities, including definitions of these facilities, listing these facilities as uses, and identifying the zone districts where they are allowed.

Local regulations for manufactured and mobile homes are better aligned with state statutes, likely due to Section 1201.004 stating that the definitions used in Chapter 1201, Manufactured Housing, are binding on all political subdivisions of the state, including home rule municipalities. Local zoning, building and subdivision ordinances should be reviewed to ensure they are congruent with the provisions and definitions of Chapter 1201.

3. Inconsistent Terms and Allowed Uses in Local Codes

The local codes are generally internally inconsistent in terminology for housing facilities with various levels of living assistance or care, many of which could include FHAA protected groups. Galveston proactively included "personal care homes" as a use and allows this use in all zone districts. The zoning code defines this use as "a facility for four or more persons licensed under state law (specifically under the Department of Aging

and Disability Services[7]) and defers generally to "state law" for use standards. However Galveston includes in its zoning definitions "assisted living facility", which is a facility licensed under Texas Health and Safety Code Chapter 247. This is not listed as a use in any zone district, but since it has its own definition, it also is not clear that it is allowed as Personal Care Home. Missouri City allows through a special use permit an "institution, other than an institution that qualifies as a child care facility, for children; elderly persons; mentally-impaired persons; or physically-impaired persons", but is silent regarding an institution that does qualify for those listed groups. This makes it unclear how such institutions, which appear to cover some FHAA protected groups, are treated by the zoning code.

4. Group Homes Are Not A Recognized Use in Local Codes

Although "group homes" are recognized and defined in Texas state statutes, none of the zoning codes reviewed or other land development regulations in the four communities covered by this analysis specifically include "group home" as a use. Group homes are regulated by Texas Health and Safety Code Chapter 591, and are defined as "a residential arrangement, other than a residential care facility, operated by the department or a community center in which not more than 15 persons with mental retardation voluntarily live and under appropriate supervision may share responsibilities for operation of the living unit." Chapter 591 establishes a licensing system for group homes but does regulate how local jurisdictions treat group homes in terms of zoning or land use decisions. However past litigation regarding whether group homes are classified as a residential use or a commercial use is important to note. Generally, courts have required that group homes with the characteristics of single family homes (size and number of people) must be treated as a residential use. This means group homes should be allowed by right or as special use permit in at least one residential zone district.

Local zoning codes should clearly include group homes as a use and generally should allow group homes in a broad range of zone districts, including at least one (and preferably all) residential zone district. Group homes can be allowed by right provided that they comply with the zone district's standards regulating scale, character, and parking. Ignoring group homes in local codes could result in a request for "reasonable accommodation" under FHAA. Failure to provide "reasonable accommodation" could be a violation of federal law. (See also item 7. Lack of Clear Procedures for Reasonable Accommodation, below.)

Where no zoning is adopted, an ordinance stating that group homes are allowed in residential areas would clarify that group home facilities for FHAA-protected persons are treated as residential uses.

[7] As of September 1, 2017, the Department of Aging and Disability Services (DADS) functions were moved to the Department of Health and Human Services.

5. Density May Restrict Housing Choice

Density can be an issue if zoning favors only large lot, low-density development or if other standards do not allow the mid- or high-density ranges set in specific zone districts. In the first case, housing choice is limited to higher-priced lots with single-family homes and in the second case the range of housing cannot be achieved resulting in fewer and higher cost housing than intended. Both of these situations directly affect persons with lower incomes and may disproportionately affect persons with disabilities and minorities since they usually make up a greater percentage of lower-income households.

Since Harris County is limited in its authority to regulate development, density is not addressed in local ordinances. Lot size, building height, and lot coverage, all determine density, but are not regulated in the county. Although the county subdivision regulations indicate that a subdivision is to be approved in accordance with an adopted comprehensive plan, it is unclear whether Harris County has an adopted plan.[8] If there is an adopted comprehensive plan, it should be reviewed, updated to reflect state and federal fair housing goals, and used to provide context for subdivision approvals.

Although Pasadena does not have zoning, it has adopted specific subdivision regulations for multifamily, townhome, and patio home development. Since municipalities are not restricted in the same manner regarding the implementation of land development standards, Pasadena can and does regulate density through its specialized subdivision codes. Density of up to 18 dwelling units per acre is allowed for multifamily structures and up to 16 dwelling units per acre for townhomes. Patio homes do not have a density standard, but given the Patio Home Subdivision requirements, will likely be developed with a net density of six dwelling units per acre. With these density ranges, there may be a "density gap" that precludes middle-density housing developments of between two and eight units.

In some cases, building height, floor area ratio (FAR), lot coverage, and parking requirements may not be well matched to achieve the envisioned density and housing-type (e.g. multifamily). For example, in Pasadena multifamily is restricted to a maximum of three stories, cannot exceed .40 FAR, and cannot build multi-level parking for the multifamily building. These requirements make it difficult to achieve the maximum allowed density of 18 dwelling units per acre.

Both Missouri City and Galveston manage density and land use through zoning. Zone district typologies allow for different types of single-family detached, single-family attached (i.e., duplex, townhome) as well as mid-rise multifamily. The density ranges allowed and zoning districts described in Missouri City's zoning code, up to 20 dwelling units per acre, accommodate the densities associated with infill development and do not exclusively favor large lot or single-family detached development. Galveston's zoning

[8] A review of comprehensive plan is beyond the scope of this analysis.

code does not indicate density maximums for its zone districts but lot sizes and building heights are inclusive of a range of housing types at a variety of densities.

Finally, well-intentioned on-site requirements also can be detrimental to reaching desired densities, add development costs and decrease housing affordability. The parking requirements in the Pasadena patio home subdivision standards result in a de facto parking requirement of three on-site spaces per dwelling unit. This is because two parking spaces per dwelling unit are required in the driveway in addition to at least one parking space contained within a required garage or carport.[9] The minimum on-site parking of three spaces per patio home is above average for this type of housing. This type of standard increases development costs and impacts housing affordability for a housing type that is intended to increase housing options to a broader range of residents. All land development codes should be carefully reviewed to identify similar standards that may unintentionally limit the stated development densities or housing types intended in a zone district or comprehensive plan.

6. Inclusionary Zoning Authority is Limited

Inclusionary zoning is tool for local governments to encourage the creation of affordable housing units in conjunction with new development. Development incentives and/or density bonuses are established in the zoning code and are available to a developer in exchange for the developer providing affordable units. Incentives can include smaller lot sizes for single-family detached dwellings, parking reductions, fee waivers, or impact fee discounts. Density bonuses generally allow a greater number of dwelling units or floor area ratio. Usually the developer is required to build the affordable units as part of the proposed development, at another location, or pay into a fund that is earmarked for affordable housing. Inclusionary programs can be mandatory or voluntary. The most common inclusionary tool is to allow a density bonus (more units or more floor area than allowed in the zone district without the affordable component) in exchange for a certain number of affordable housing units. A municipality can set its own ratios for how much to increase density in exchange for a certain number of affordable units. These ratios are unique to each community since development costs, market demand for affordable housing units, and affordability levels (income to housing cost) are different in each community.

The inclusionary zoning authority of Texas municipalities is limited by state statutes. Texas Local Government Code Section 214.905 states that a municipality cannot adopt a maximum sale price (except in limited circumstances). In addition, rent control is not available as a general tool for Texas cities or counties to promote housing affordability. In addition, Local Government Code Section 214.902 prohibits municipalities from establishing rent control except in the event of a disaster and only with approval of the governor.

[9] The code requires a carport or garage but does not specify how many spaces must be in the carport or garage. It is assumed that a minimum of one space would be provided in the required carport or garage.

However, Texas Local Government Code Section 214.905 authorizes municipalities to "create incentives, contract commitments, density bonuses, or other voluntary programs designed to increase the supply of moderate or lower-cost housing units." Mandatory requirements for affordable housing are not allowed under the state statute, but voluntary programs that allow a developer to choose whether or not to take advantage of the offered incentives in exchange for affordable housing units are allowed.

Of the three municipalities in the analysis only Galveston incorporates an inclusionary housing incentive in its zoning code. The HDDZ overlay district (Height and Density Development Zone) allows a building's floor area ratio (FAR) and height to increase in exchange for a combination of detailed "community benefits". Inclusionary affordable housing and inclusionary workforce housing are two of eleven "community benefits" that earn a prescribed increase in the allowed FAR. The amount of increase in FAR is the same for either type of unit and the total increase in FAR is capped. The developer can voluntarily choose to take advantage of this incentive program and can choose other options than inclusionary housing to receive an increase in FAR. The type of dwelling unit (i.e., number of bedrooms) to be provided through the incentive program is not specified in the zoning code.

For inclusionary programs to be effective, inclusionary units produced need to equally benefit different FHAA protected classes. All studio apartments do not supply housing for and benefit families. It is important that a mix of dwelling units types are made available through inclusionary zoning practices. The Galveston zoning code does not specify the type of dwelling units to be provided, but states that a separate "Inclusionary Housing Policy" will govern inclusionary housing.

Although Pasadena does not have zoning, as a municipality it can, and does, regulate density, lot size, lot coverage, FAR, and building height through a series of ordinances governing different types of housing development. Augmenting these regulations with an inclusionary component could help encourage middle-density development of between two to eight dwelling units. It also can help encourage in-fill development.

Missouri City's zoning code does not contain any inclusionary zoning provisions. However a voluntary inclusionary program could bolster both the production of middle-density housing units (between two to eight dwelling units) as well as smaller lot single-family detached units. For example, including an incentive to reduce minimum lot size from 5,000 square feet to 4,000 square feet could increase production of affordable single-family detached units.

Inclusionary zoning is not available to counties in Texas since counties are not authorized to implement zoning. However other developer incentives that are unrelated to zoning, such as reduced fees or streamlined permit review, may be possible tools for Harris County.

7. Lack of Clear Procedures for "Reasonable Accommodation"

None of the land development regulations reviewed contained a process to request a reasonable accommodation. In jurisdictions where a zoning code is adopted (namely Missouri City and Galveston), a reasonable accommodation request would defer to the variance procedure. The criteria for granting a variance request are based on a hardship related to the land or site that is pre-existing, not caused by the applicant, and is unique to the property. A reasonable accommodation request usually is based on the unique circumstances of the individual and the need for modifications in order to allow the individuals with disabilities to use the housing. Criteria for approval based on the unique circumstances of a building or site, as used for most variance hearings, are not adequate to address reasonable accommodation requests.

A complication in taking reasonable accommodation requests through the variance process of the zoning code is that a public hearing is required before an appointed board. Although all variances are processed in the same manner, the unique nature of a reasonable accommodation request could raise concerns about unequal treatment. Whenever a public hearing is required there is potential for discriminatory treatment resulting from public input that may include speculation about the disabilities and the impact on neighborhoods and safety. As well, it is unlikely, based on the criteria generally used to decide variance cases, that the reviewing board will be able to approve the request.

In addition, there may be layers of regulations and standards that require a separate review process based on a request for reasonable accommodation. In Galveston, for instance, exterior alterations to a Galveston Landmark and to structures in an historic overlay district must be reviewed for compliance with the Historic Design Standards. Some historic building alterations—including wheelchair ramps—can be reviewed and approved administratively, but some accommodations, such as lifts visible from the right-of-way, require a public hearing before the Landmark Preservation Commission. This could subject the applicant who is requesting reasonable accommodation to two public hearings, open to the same potential for speculative public input described above. While each process on its own may not be overly lengthy or complex, it may be both discouraging and costly to negotiate both processes. As well, designing an exterior feature to meet the Historic Design Standards could be disproportionately costly to an applicant requesting a modification for reasonable accommodation.

In Harris County review and approval of a reasonable accommodation devolves to the adopted building and life/safety codes. However, it is unclear how review among these codes and any other codes that may affect development, such as the subdivision regulations, are coordinated for a reasonable accommodation request. The same is true for Pasadena, where specialized subdivision regulations govern different housing types. The process to make modifications to the standards and requirements of these regulations for a reasonable accommodation is unclear.

SECTION IX.

Fair Housing Goals and Priorities

SECTION IX.
Fair Housing Goals and Priorities

This section presents goals for how participating jurisdictions can address the fair housing challenges identified in this AI. This section begins with an assessment of past goals, actions and strategies.

Assessment of Past Goals, Actions, and Strategies

A summary of actions taken by each participating jurisdiction to address fair housing barriers is provided below. The information below is based on Comprehensive Annual Performance and Evaluation Reports (CAPERs) and information provided by jurisdictions for this analysis.

Harris County. The Harris County Community Services Department's previous Fair Housing Plan, which was developed as a part of the PY2013-2017 Consolidated Plan lists six impediments to Fair Housing: 1) Need to combat overt discrimination and lack of Fair Housing Knowledge; 2) Lack of affordable housing development; 3) The need to reduce areas of concentration; 4) The need to improve lack of quality community amenities; 5) Presence of community opposition towards affordable housing (NIMBYism); and 6) Barriers created by credit and financial institutions. Over the past five program years, the County has made efforts to address those barriers through the following strategies and activities:

- Strategy One: Aggressively combat overt discrimination and lack of fair housing knowledge.
  - Provide fair housing outreach and marketing information
  - Provide fair housing information and policies in additional languages (English and Spanish).
  - Provide training and education to providers and staff.
  - Coordinate fair housing activities within Harris County and the region.
  - Encourage expanded testing and data collection.
- Strategy Two: Promote housing choice
  - Expand the supply of affordable housing options.
  - Preserve, rehabilitate, and increase the supply of quality affordable housing units.
  - Increase the availability of accessible and larger housing units.
- Strategy Three: Reduce areas of minority and poverty concentration
  - De-concentrate areas of poverty and minority concentration.

- Strategy Four: Improve the quality of public facilities
    - Encourage the expansion of transit services.
    - Ensure quality infrastructure
    - Ensure quality public facilities
- Strategy Five: Combat NIMBYism and opposition to affordable housing
    - Provide education and outreach activities in order to counteract negative effects from NIMBYism and other community opposition.
    - Encourage the development of local ordinances that are more inclusive of affordable housing
- Strategy Six: Overcome financial barriers to home ownership
    - Provide financial education and outreach services housing.
    - Provide relief in areas of heavy foreclosure activity.[1]

Pasadena. According to the City of Pasadena's 2016 CAPER, recent fair housing activities have primarily focused on education and outreach:

"The City of Pasadena continuously promotes Fair Housing Choice through the participation in trainings, seminars, community events and workshops. Informational materials are available to all residents and provided to all program participants. During Fair Housing Month, each April, the City displays posters and advertisements throughout City building sand social media sites. In Program Year 2016 the City of Pasadena completed Fair Housing Outreach in the Community in collaboration with other City Departments and/or community organizations. During these Fair Housing outreach initiatives, staff provided HUD Fair Housing pamphlets, AFH Surveys and materials to the public and provided a brief presentation overview of fair Housing including the AFH in English and Spanish."[2]

Missouri City. Missouri City outlined a comprehensive Action Plan to address fair housing barriers as part of its 2013-2017 Consolidated Plan and associated AI. Planned actions included:

- Review local codes ordinances and regulations to address impediments
    - Review fair housing ordinances of other Texas cities and determine the benefits of developing such an ordinance.
    - Review neighborhood deed restrictions to determine any discriminatory or unfair wording and requirements.

[1] 2016 Harris County CAPER Fair Housing Narrative Statement. Available online at: csd.harriscountytx.gov/Pages/CAPER.aspx

[2] 2016 City of Pasadena CAPER. Available online at: www.ci.pasadena.tx.us/users/0003/docs/FINAL%20Scanned%20CAPER.pdf

- Continue to maintain a Fair Housing Officer in the Development Services Department who will be responsible for receiving and responding to complaints and inquiries about fair housing issues and violations.
- Continue to maintain a log of fair housing complaints and information requests which will include the date, individual complainant/ inquirer, detailed information, City actions and recommendations.
- Maintain a log of all fair housing activities carried out by City staff and subrecipient non-profits as part of the documentation for the certification of affirmatively furthering fair housing choice.

- Continue to work with Fort Bend County, surrounding cities and Houston-Galveston Area Council in the development of a regional transportation plan.
- Continue to provide infrastructure and facility improvements and upgrades to CDBG Target Areas, which are those neighborhoods of lowest income and highest minority concentration.
- Continue to use CDBG funds to support housing rehabilitation efforts, with an emphasis on repairs and improvements to homes owned and occupied by the elderly and disabled.
- Continue to refer code enforcement violations to the Fort Bend CORPS for assistance to low- to moderate-income homeowners in bringing deteriorating housing up to City codes.
- Adopted a method to review and consider reasonable accommodations for group homes that do not otherwise qualify under state statute for the exemption to the zoning ordinance.
- Deannexed a property to allow for a multi- family development without the need to alter the existing zoning ordinance.
- A townhome development and a multi-family development for residents 55 and older are currently pending through the zoning process (2012).
- Continue to refer individuals with fair housing complaints to either the Houston office of HUD, Lawyers Care or Lone Star Legal Aid.
- Continue to provide Fair Housing information to the various social service agencies in the area, requesting that they advocate for their program participants in fair housing issues.
- Ensure that Fair Housing information is available at the public library and at the reception area of City Hall.
- Send information to homeowners associations regarding fair housing issues and programs that can assist in maintaining quality and accessible neighborhoods.
- Annually review the current Analysis of Impediments and Fair Housing Plan and will determine if new issues have arisen that require City attention.

- Assist complainants regarding fair housing violations in completing the official complaint forms and will direct them to the Fair Housing division of the Houston field office of the U.S. Department of Housing and Urban Development.

- Continue to encourage Section 3 businesses to bid on construction and maintenance jobs with the City and will give preference to construction contractors who are Section 3-qualified when they are able to meet the other qualifications of capacity, quality workmanship, insurance, bonding, and equipment.

- Provide information on Section 3 regulations to public service agencies and advocacy groups to educate them about methods they and their Section 3 program participants can take to secure employment at a livable wage.

- Develop and maintain a list of all Section 3 businesses and all employers who hire Section 3 employees and will ensure that bid packets are provided to those businesses.

- Continue to support the efforts of the Literacy Council of Fort Bend County as it provides literacy education and GED training to improve the employability and incomes of its program participants.[3]

Galveston. In the 2016 CAPER, the City of Galveston identified the following actions taken to overcome the effects of identified impediments to fair housing choice:

- City staff regularly attends Fair Housing Training sponsored by HUD. The City promotes Fair Housing through the distribution of education materials and posting posters in City offices and public buildings. The City has translators available to assist limited English Proficient homeowners.

- The City allocates CDBG and HOME funds to housing rehabilitation programs and nonprofit housing agencies to help alleviate the housing difficulties encountered by low- to-moderate income residents. Community Housing Development Organizations (CHDOs) access HOME and other funds for housing rehabilitation and new affordable housing construction.

- On August 14, 2015, City staff participated in a Back to School Fair hosted by the Galveston Independent School District. A total of 50 residents visited the City's booth and received information on the City's housing rehabilitation and reconstruction programs, as well as information on first-time homebuyer assistance. City staff also distributed 80 Fair Housing informational booklets.

- As part of the City's annual Fair Housing Celebration, on April 15, 2016, City staff and Galveston Housing Authority read "When Chocolate Milk Moved In" to four (4) kindergarten classes at Coastal Village Elementary. City staff also used puppets to illustrate the book. This

[3] 2011 Missouri City Community Development Block Grant Program Fair Housing Plan with the Analysis of Impediments to Fair Housing Choice. Available online at: www.missouricitytx.gov/DocumentCenter/Home/View/1040

book taught the kids the importance of love and diversity in the community and how to welcome newcomers to the neighborhood.

- On April 20, 2016, City staff co-hosted a Landlord Reception with Galveston Housing Authority at the Island Convention Center. This event was geared toward our current and potential landlords. Ada Thomas from HUD FHEO gave an overview of the Fair Housing requirements for landlords. Over 30 residents and landlords were in attendance.

- On April 27, 2016, staff attended a Fair Housing Conference at Gulf Coast Community Services Association. This conference focused on housing discrimination based on disability, specifically, the impact of housing discrimination on individuals with an invisible illness or mental disability.

- On April 28, 2016, staff attended an Affirmatively Furthering Fair Housing (AFFH) Educational Seminar at United Way Community Resource Center. This seminar focused on the new rules under AFFH, what program participants are required to do to meet their AFFH duties and to make informed policy decisions.

- On May 11, 2016, staff facilitated an informational presentation for the City employees in the Sanitation Department to advise them of the City's Housing Assistance Program and the benefits of homeownership. The Sanitation employees are generally some of the lowest paid employees of the City. Our presentation focused on how the City's program could help them purchase their first home and how a home is an asset that generates equity and potential wealth and that can be passed down through generations of family members.[4]

Harris County Housing Authority. In the 2018 Draft PHA Plan, HCHA outlines their efforts to build inclusive and sustainable communities free from discrimination:

- Build energy-efficient and location-efficient communities that are healthy, affordable, and diverse;

- Currently exploring options to develop two new affordable housing communities in high opportunity areas;

- Continue to ensure HCHA's payment standards account for rental differences throughout Harris County and to encourage clients to move into areas with high performing schools.[5]

These efforts illustrate HCHA's attentiveness to access to opportunity issues—particularly school quality—for their clients. Over the past five years, HCHA has completed three affordable developments and is in process of financial closing for another; and has increased its number of VASH vouchers. It is also working to re-launch its Family Self-Sufficiency program.

[4] 2016 City of Galveston CAPER. Available online at: www.galvestontx.gov/DocumentCenter/Home/View/4784

[5] HCHA Draft Annual PHA Plan for FY 2018. Available online at: hchatexas.org/wp-content/uploads/Draft-2018-PHA-Plan.pdf

Galveston Housing Authority. In the 2018 Draft PHA Plan, GHA outlines their efforts to build inclusive and sustainable communities free from discrimination:

- PHA Goal 1: Ensure equal opportunity and affirmatively further fair housing:
    - Collaborated with multiple municipalities/housing authorities to contract a consultant for research and development of Assessment of Fair Housing;
    - Undertook affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status;
    - Ensured that the waiting list was free from discrimination based on the varying factors above;
    - GHA has certified that it has taken affirmative measures, including displaying a statement on the Home page of our website www.ghatx.org;
    - Conducted AFFH training for staff including Section 504;
    - Conducted Fair Housing Workshop open to all Galveston citizens and officials in partnership with the City of Galveston during Fair Housing Month;
    - Abided by GHA's policies and procedures when admitting persons to housing from the waiting lists, including admitting based on established preferences;
    - Undertook affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status;
    - Ensured that maintenance concerns were addressed properly in the order in which they were received and without bias based on the varying factors above;
    - Undertook affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required;
    - Ensured that persons with disabilities were accommodated where necessary and to the greatest extent feasible;
    - Continued to use mechanism for clients to notify GHA of need for reasonable accommodation; and
    - Each employee signs a Code of Ethics Statement which includes an Equal Opportunity Non-Discrimination Statement at the time of the employee orientation.
- PHA Goal: Seek ways to address blight and deconcentrate poverty
    - Continued to work with GHA's mixed income management partner to promote income mixing and deconcentrate poverty through GHA's redevelopment plans; and

- Worked with the Texas General Land Office and HUD as they implement the plan to use scattered sites as part of the overall redevelopment plan.[6]

Summary of Fair Housing Issues and Contributing Factors

The primary fair housing issues in the region and the contributing factors include:

- **Segregation persists.** Segregation does exist in the region and in each participating jurisdiction—by race, ethnicity, national origin and language. Segregation appears to be most severe for African American residents relative to non-Hispanic white residents.

  Contributing factors *to segregation include historical settlement patterns, distribution of attainable/affordable housing (both market-rate and publicly assisted housing), land use and zoning regulations, disparities in mortgage lending, and economic factors.*

- **Disparities in housing needs.** African American and Hispanic households experience housing problems at higher rates that non-Hispanic whites in the region and in all participating jurisdictions. Large family households also experience housing problems at relatively high rates. Non-Asian minorities also have a harder time accessing capital for home purchase loans, home improvement loans and refinances. Non-Asian minority borrowers who are successful in getting a loan are more likely to receive subprime (higher than average) interest rates on their loans.

  Contributing factors *to disparities in housing needs include lower homeownership rates among most minority groups, availability affordable units in a range of sizes, lack of private investments in specific neighborhoods, and lending discrimination.*

- **Disparities in access to opportunity.** In the region and in each jurisdiction, non-Hispanic white and Asian residents tend to live in higher income areas farther from industrial and commercial centers with better schools but fewer public transportation options. African American and Hispanic residents tend to live in poorer areas which are closer to jobs and public transportation, but which have lower performing schools, less labor market engagement, and more air pollution. Disparities persist even when comparing income-similar residents of different races/ethnicities.

  - Disparities in access are most striking when considering exposure to low poverty areas, employment access (labor market engagement and/or jobs proximity), and school quality.
  - Places with access to Metro have good access to transportation, including for people with disabilities. However, lack of participation in Metro (i.e., Pasadena, Missouri City) eliminates those communities as a place to live for residents with disabilities or lower income residents who rely on public transportation.

[6] GHA Draft Annual PHA Plan for Fiscal Year 2018. Available online at http://www.ghatx.org/pub_info_agencyplan.html

- There are differences in access to public services experienced by African American survey respondents; most of these are driven by the experience of African Americans living in Houston. However, results do suggest that investment in Galveston, Missouri City and Pasadena neighborhoods with sizeable African American populations are lacking when compared to other neighborhoods in these communities.
- Access to jobs was a significant concern among all stakeholders, but especially so among Galveston stakeholders. Job training was highlighted as a need for the disability population region-wide.
- Economic disinvestment in Pasadena and Missouri City is located in areas of minority concentration. In both communities, private investment has moved further from the downtown core where there is a higher proportion of Hispanic and African American residents toward outlying areas.

Contributing factors *to disparities in access to opportunity include availability of affordable units in a range of sizes, limited support for multifamily housing, NIMBYism, lack of private investments in specific neighborhoods, lending discrimination, land use and zoning laws, limited/lack of public transit in certain areas.*

- **Barriers to housing choice for people with disabilities.** There is a shortage of affordable accessible housing for those with mobility as well as sensory disabilities—in all participating communities. Difficulty finding landlords who accept vouchers or disability benefits as income amplifies the difficulty residents with disabilities face finding suitable affordable housing. In addition, renters with disabilities face barriers in requesting reasonable accommodations including landlords who refuse to accommodate requests and residents who worry that their request may result in retaliation and/or eviction. Owners with disabilities need repairs they cannot afford to make—particularly in Galveston and Pasadena. Access to opportunity could be improved for people with disabilities by improving accessible infrastructure (primarily missing/dilapidated sidewalks), increasing employment supports (coaching/training/counseling), and transit expansion into additional neighborhoods and communities.

  Contributing factors *include a lack of accessible, ADA-compliant housing across the region, (both market rate and affordable); a lack of landlords willing to accept Section 8 vouchers and disability income; a lack of information available to Section 8 voucher holders to help them find landlords who do participate in the voucher program; lack of fair housing knowledge/compliance among landlords; lack of public transportation in many neighborhoods; and sidewalks are missing or are dilapidated.*

- **Location and utilization of publicly assisted housing.** Disparities by race/ethnicity in program utilization relative to eligible households are evident in the region as well as in each jurisdiction. Generally, African American residents are overrepresented among housing program participants relative to their representation among all households earning less than 50 percent of Area Median Income (AMI). Conversely, Hispanic households tend to be underrepresented among program participants.

Patterns in location of publicly supported housing programs indicate that a relatively high proportion of location-specific housing program units (LIHTC, project based section 8 and other multifamily) are located in areas with high poverty. Housing choice voucher holders are less likely than other program participants in Harris County (excluding entitlements) and in Pasadena to live in R/ECAPs. However, voucher holders expressed challenges accessing areas of high opportunity because landlords are unwilling to accept vouchers.

Contributing factors *include lack of affordable housing in a range of unit sizes, NIMBYism, source of income discrimination, state Qualified Allocation Plan for LIHTC siting, land use and zoning regulations, and distrust of public institutions among immigrant populations.*

- **Lack of fair housing capacity.** Survey responses, focus group input, and complaint data indicate potential discrimination in the rental market. In addition, local land use and zoning policies could be more explicit in their compliance with fair housing laws and language.

  - Eight percent of resident survey respondents felt they experienced discrimination when they looked for housing in the region; rates are highest among households which include a member with a disability (15%), respondents with Limited English Proficiency (a proxy for national origin) (15%), and African American residents (14%).
  - Hispanic renters and LEP households worry about retaliation if they request a repair from their landlord (particularly in Pasadena). Minority residents with a disability are worried if they request an accommodation for their disability their rent will increase or they will be evicted.
  - Local land use codes are internally inconsistent and are inconsistent with state codes in their use of terms relating to specific housing types, including group homes. City and county policies are lack clear procedures for requesting reasonable accommodations.

  Contributing factors *include perceived and actual housing discrimination, lack of fair housing knowledge among landlords, and land use and zoning regulations.*

Goals Development

This section presents goals for how the four jurisdictions participating in the AI—Harris County, Pasadena, Missouri City, Galveston—and the Harris County Housing Authority (HCHA) and the Galveston Housing Authority (GHA), can address the fair housing challenges and contributing factors identified in this AI.

To the extent possible, the goals and strategies address those challenges that disproportionately affect certain protected classes. However, given the pressures in the existing housing market—and because the jurisdictions cannot apply housing preferences for certain protected classes without violating the Fair Housing Act—many of the goals and strategies will improve access to housing for all residents with housing challenges, and to the extent allowable, focus on the protected classes with the greatest housing needs.

In developing the goals, the participating partners recognized that the public sector faces some limitations in how it can influence housing prices. The public sector's primary "sphere of influence" lies in:

- Using its regulatory authority to encourage a range of housing prices and types;
- Funding/managing the development of housing that contains affordability restrictions; and
- Making resources available—monetary, staff, land, existing buildings—and working with partner organizations to address housing challenges.

The Federal Fair Housing Act (FHA) can make it challenging to specifically direct funding to address the housing needs of specific protected classes. Other than senior housing, housing for persons with disabilities, and larger units that can accommodate families, housing cannot be specifically reserved for members of a protected class, even if they face disproportionate housing needs. Yet the public sector can be mindful of how its decisions and allocation of resources can negatively or positively affect certain protected classes.

The following matrices show the goals and action items the County, participating jurisdictions, and Housing Authorities will employ during the next five years to address priority fair housing challenges.

Figure IX-1.
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

	REGIONAL FAIR HOUSING GOALS	FAIR HOUSING ISSUES/IMPEDIMENTS TO BE ADDRESSED BY GOAL	METRICS, MILESTONES, & TIMELINE	PARTICIPATING PARTNERS
1	**Improve regional collaboration in fair and affordable housing planning:** - Consider a regional housing strategy - Increase communication around priorities and developer incentives - Coordinated approach for promoting inclusivity and diversity of housing stock in all communities	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) The City of Houston and Harris County currently hold pipeline meetings for coordinating PSH units and ESG funders partners meet regularly to discuss cooperative strategies. Expand these meetings by inviting other jurisdictions to attend and expand discussion to include units for Very Low Income and Low Income Residents (2018-2019). 2) Formalize regional approach through a regional housing strategic plan that includes housing diversity and inclusivity as well as LIHTC development (2023) 3) Hold a regional affordable housing and access to opportunity symposium (2025)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
2	**Boost residents access to residential capital throgh partnerships with local lenders and by providing credit counseling and financial literacy classes.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity	1) Identify partnership opportunities with local lenders and collaborate on affirmative marketing and increasing access to residential capital for underserved residents (2019) 2) Provide and/or partner with local service providers to provide credit counseling and/or financial literacy classes. (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
3	**Continue to support fair housing outreach and education through:** - Fair housing training events and training - Fair housing materials in multiple languages and mediums - Landlord/tenant resources - Enhanced media outreach especially during Fair Housing Month each year - Materials available in languages other than English	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Fair housing training events and training (annually) 2) Fair housing materials in multiple languages and mediums (consistently available) 3) Landlord/tenant resources (consistently available) 4) Enhanced media outreach especially during Fair Housing Month each year (annually) 5) Materials available in languages other than English (consistently available)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
4	**Collaborate with local fair housing organizations to conduct regional fair housing testing as a tool for fair housing enforcement and to better understand private discrimination in the housing market.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Partner with regional and local fair housing organizations to evaluate feasibility and cost of testing efforts (2019). 2) Support fair housing testing efforts financially and/or through coordination/collaboration. (2022)	Harris County, Galveston, Missouri City, Pasadena
5	**Continue and strengthen regional transportation planning:**	Segregation; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Lack of Fair Housing Capacity		
	- Promote the benefits of transit to help reduce NIMBYism in outlying communities.		1) Strengthen ties with transportation agencies and work with METRO and H-GAC on outreach/education when possible (ongoing) 2) Identify opportunities to educate local political leaders on the economic benefits of transit and the need for transit connections. (ongoing)	Harris County, Galveston, Missouri City, GHA
	- Conduct further study and outreach to understand transit needs and potential strategies. Use this strategy to inform regional engagement.		1) Evaluate gaps in information related to transit (2018-2019) 2) Devise and implement outreach plan to fill infomration gaps (2020) 3) Development of transit strategy (2021)	HCHA
	- Increase access to transit resources for residents with disabilities with local service provider partnerships.		Maintain relationships with existing partners (Transportation RIDES Program), collaborate on future transportation related efforts in the City and provide funding to partners if/when possible (ongoing).	Pasadena
6	**Increase access to job training resources for residents with disabilities through existing partnerships with regional and local service providers and employers.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities	Maintain relationships with existing partners, collaborate on potential solutions, provide funding to partners if/when possible (ongoing).	Harris County, Galveston, Missouri City, Pasadena, GHA

Figure IX-1 (Continued).
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

	LOCAL FAIR HOUSING GOALS	FAIR HOUSING ISSUES/IMPEDIMENTS TO BE ADDRESSED BY GOAL	METRICS, MILESTONES, & TIMELINE	PARTICIPATING PARTNERS
1	**Expand the supply of affordable housing options, with a focus on extremely low income households and on larger affordable housing units (2- and 3-bedroom units or larger), and/or express support of affordable development (e.g., LIHTC).**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing	1) Continue to fund rental assistance and/or affordable housing development (ongoing) 2) Express support for affordable developments that include units with 2 or more bedrooms (ongoing) 3) Establish and/or maintain relationships with regional affordable housing developers to express support of affordable and/or LIHTC developments within jurisdiction (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA
2	**Continue to assist low income homeowners, improve housing quality, and increase housing accessibility through housing rehabilitation, repair and accessibility grant programs.**	Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing	Continue to fund programs that stabilize low income homeowners, improve housing quality, and increase accessibility (ongoing).	Harris County, Galveston, Missouri City, Pasadena
3	**Develop community priorities for siting LIHTC developments (and/or other publicly assisted housing) and work to promote community support of such developments in high opportunity areas.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Identify optimal locations for LIHTC and evaluate potential barriers to LIHTC developmetn in those areas (2021) 2) Proactively conduct outreach and education in those areas to promote openness to LIHTC (2022) 3) Partner with LIHTC developers to assist with community outreach for specific development projects (ongoing)	Harris County, Missouri City, HCHA, GHA
4	**Develop policies and procedures that support balanced housing opportunities, including affordable/workforce housing (e.g., adopt an anti-NIMBY policy).**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Harris County should review its anti-NIMBY plan and update as necessary (2019) 2) Other jurisdictions should develop comparable policies (2019) 3) Circulate and promote policy as appropriate (2020-2025)	Harris County, Galveston, Missouri City, Pasadena, HCHA
5	**Promote economic investment (public and private) in distressed areas that have high minority concentrations:**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing		
	- Explore partnerships with lenders such as community development financial institutions (CDFIs) that serve the region to discuss potential partnership opportunities for 1) Developing the capacity of small businesses in distressed areas and 2) Are committed to helping transform distressed communities.		1) Identify CDFIs currently operating in jurisdiction and establish regular communication channels and/or meetings to discuss partnership opportunities (2020) 2) Evaluate the potential for leverage, acquisition, or other appropriate fund (2022)	Harris County, Missouri City
	- Identify areas where new construction of affordable housing could serve as an economic catalyst for revitalization. Use land banking as allowed under law to acquire such parcels for affordable housing development and/or advocate for the use of TRZ dollars for affordable housing in improvement districts		Work to identify opportunities and locations (2019-2021) If opportunities arise and as desired by jurisdiction, use land banking as allowed under to acquire strategic parcels (ongoing).	Harris County, Galveston, Missouri City, HCHA, GHA
	- Include affordable housing as a component of revitalization efforts and consider implementation of neighborhood-specific plans or a Comprehensive Plan that incorporates affordability planning		1) Build energy-efficient and location-efficient communities that are healthy, affordable and diverse. 2) Build communities that are affordable for very low income households without concentrating poverty.	HCHA
	- Prioritize City development incentives to support infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.		Review and create/adjust incentives as necessary (2022)	Galveston, Pasadena
6	**Continue to encourage housing choice voucher participants to use vouchers in high opportunity areas**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Maintain data and maps on areas with "high opportunity" characteristics, including quality schools, access to jobs, etc. (ongoing) 2) Continue programs and procedures to encourage use of vouchers in those areas (ongoing)	Harris County, Galveston, Missouri City, Pasadena, HCHA, GHA

Figure IX-1 (Continued).
Fair Housing Plan – Harris County, Galveston, Missouri City, Pasadena, Harris County Housing Authority, and Galveston Housing Authority

7	**Incentivize landlord participation in HCV and other affordable housing programs through a multifamily rehabilitation and accessibility improvement program using HUD and other affordable housing and community development funds.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Continue to actively market HCV and other affordable housing program participation through property owner networks (ongoing) 2) Offer rehab incentives to encourage participation as funding allows (ongoing) 3) Continue to encourage HCV participants to use vouchers in high opportunity areas by offering higher payment standards of the FMR.	Harris County, Galveston, Missouri City, HCHA, GHA
8	**Review city/county policies for requesting a reasonable accommodation for fair housing compliance and evaluate improvements that could help affirmatively further fair housing for people with disabilities.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	Review development regulations for clarity on process to request reasonable accommodation and evaluate potential barriers, including applicability of variance process (2019) *Note: see Section VIII page 25 of this AI for additional details and examples.*	Harris County, Galveston, Missouri City, Pasadena
9	**Review zoning/land use/development regulations to ensure that a diversity of housing choices is allowable throughout residential districts.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Review density, lot size, building height, and lot coverage regulations; subdivision regulations; and parking requirements for barriers to density and affordability (2021) 2) For communities with zoning, evaluate district typologies for barriers to housing diversity (2021) *Note: see Section VIII pages 22-23 of this AI for additional details and examples.*	Harris County, Galveston, Missouri City, Pasadena
10	**Review zoning/land/development regulations use to improve consistency between local codes and state regulations of specific housing types impacting protected class populations.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Evaluate consistency and application of the following state-code terms in local regulations: "Manufactured Homes," "Assisted Living Facilities," "Boarding Home," "Convalescent and Nursing Homes," "Group Homes," Homeless Shelters," and "Community Homes." (2020) 2) Ensure that local codes explicitly reference state statutes related to the types of homes listed above (2020) *Note: see Section VIII pages 19-21 of this AI for additional details and examples.*	Galveston, Missouri City, Pasadena
11	**Consider incentives to promote accessibility and universal design to improve accessibility/adaptability in new construction.**	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities; Location and Utilization of Publicly Assisted Housing; Lack of Fair Housing Capacity	1) Evaluate existing regulation to assess if/how it inhibits accessibility and universal design (2019) 2) Evaluate incentives (e.g., density bonuses, fee waivers, etc.) for developments that provide increased accessibility/adaptability. (2021)	Harris County, Galveston, Missouri City, Pasadena, HCHA

Appendix VI
SF424 and Certifications

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Pasadena, TX

* b. Employer/Taxpayer Identification Number (EIN/TIN): 74-6001846

* c. Organizational DUNS: 0502999400000

d. Address:

* Street1: P.O. Box 672

Street2:

* City: Pasadena

County/Parish: Harris

* State: TX: Texas

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 77501-0672

e. Organizational Unit:

Department Name: Community Development

Division Name: Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mrs.

* First Name: Melissa

Middle Name:

* Last Name: Quijano

Suffix:

Title: Director of Housing and Community Development

Organizational Affiliation:

* Telephone Number: 713-475-4894

Fax Number: 713-475-7037

* Email: MQuijano@ci.pasadena.tx.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

*** 12. Funding Opportunity Number:**

B-18-MC-48-0019

*** Title:**

Community Development Block Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

2018 CDBG Program for Public Facilities and Infrastructure Improvements, Public Service Programs and Program Administration.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: TX-29 * b. Program/Project: TX-29

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2019

18. Estimated Funding ($):

* a. Federal	1,652,416.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,652,416.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. "By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Mr.
* First Name:	Jeff
Middle Name:	A.
* Last Name:	Wagner
Suffix:	
* Title:	Mayor, City of Pasadena, TX
* Telephone Number:	713-475-5501
Fax Number:	
* Email:	TheMayor@ci.pasadena.tx.us
* Signature of Authorized Representative:	
* Date Signed:	8/13/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
[signature]	Mayor, City of Pasadena, TX
APPLICANT ORGANIZATION	**DATE SUBMITTED**
City of Pasadena, TX	8/13/18

SF-424D (Rev. 7-97) Back

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Pasadena, TX

* b. Employer/Taxpayer Identification Number (EIN/TIN): 74-6001846

* c. Organizational DUNS: 0502999400000

d. Address:

* Street1: P.O. Box 672

Street2:

* City: Pasadena

County/Parish: Harris

* State: TX: Texas

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 77501-0672

e. Organizational Unit:

Department Name: Community Development

Division Name: Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mrs.

* First Name: Melissa

Middle Name:

* Last Name: Quijano

Suffix:

Title: Director of Housing and Community Development

Organizational Affiliation:

* Telephone Number: 713-475-4894

Fax Number: 713-475-7037

* Email: MQuijano@ci.pasadena.tx.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

*** 12. Funding Opportunity Number:**

M-18-MC-48-0220

*** Title:**

Home Investment Partnerships Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

2018 HOME Program for Housing Rehabilitation Program, CHDO and Program Administration.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: TX-29 * b. Program/Project: TX-29

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2019

18. Estimated Funding ($):

* a. Federal	544,284.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	65,000.00
* g. TOTAL	609,284.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Mr.
* First Name:	Jeff
Middle Name:	A.
* Last Name:	Wagner
Suffix:	
* Title:	Mayor, City of Pasadena, TX
* Telephone Number:	713-475-5501
Fax Number:	
* Email:	TheMayor@ci.pasadena.tx.us
* Signature of Authorized Representative:	
* Date Signed:	8/13/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
[signature]	Mayor, City of Pasadena, TX
APPLICANT ORGANIZATION	**DATE SUBMITTED**
City of Pasadena, TX	8/13/18

SF-424D (Rev. 7-97) Back

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Pasadena, TX

* b. Employer/Taxpayer Identification Number (EIN/TIN): 74-6001846

* c. Organizational DUNS: 0502999400000

d. Address:

* Street1: P.O. Box 672

Street2:

* City: Pasadena

County/Parish: Harris

* State: TX: Texas

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 77501-0672

e. Organizational Unit:

Department Name: Community Development

Division Name: Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mrs.

* First Name: Melissa

Middle Name:

* Last Name: Quijano

Suffix:

Title: Director of Housing and Community Development

Organizational Affiliation:

* Telephone Number: 713-475-4894

Fax Number: 713-475-7037

* Email: MQuijano@ci.pasadena.tx.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

*** 12. Funding Opportunity Number:**

E-18-MC-48-0019

*** Title:**

Emergency Solutions Grants Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

2018 ESG Program for services to Homeless Persons, Assistance to Shelters, Rapid Re-housing, Homeless Prevention and Program Administration.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: TX-29 * b. Program/Project: TX-29

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2019

18. Estimated Funding ($):

* a. Federal	138,429.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	138,429.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Mr.
* First Name:	Jeff
Middle Name:	A.
* Last Name:	Wagner
Suffix:	
* Title:	Mayor, City of Pasadena, TX
* Telephone Number:	713-475-5501
Fax Number:	
* Email:	TheMayor@ci.pasadena.tx.us
* Signature of Authorized Representative:	
* Date Signed:	8/13/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
[signature]	Mayor, City of Pasadena, TX
APPLICANT ORGANIZATION	**DATE SUBMITTED**
City of Pasadena, TX	8/13/18

SF-424D (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1 No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2 If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3 It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

8/13/18
Date

Mayor, City of Pasadena, Texas

Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation –It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan --Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan –It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds –It has complied with the following criteria:

1 Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2 Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2018, 2019 and 2020 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3 Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or

charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force --It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and,
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws --The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint --Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws --It will comply with applicable laws.

Signature/Authorized Official

8/13/18
Date

Mayor, City of Pasadena, Texas

Title

OPTIONAL CERTIFICATION CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

8/13/18
Date

Mayor, City of Pasadena, Texas

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance --If the participating jurisdiction intends to provide tenant-based rental assistance:

> The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs --it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance --before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

8/13/18

Date

Mayor, City of Pasadena, Texas

Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG

are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

8/13/18
Date

Mayor, City of Pasadena, Texas

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.