



2024 

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



PREPARED FOR:  
OFFICE OF EQUITY & INCLUSION  
FAIR HOUSING DIVISION  
CITY OF DALLAS, TEXAS

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# I. EXECUTIVE SUMMARY

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## A. Introduction

Ensuring equitable access to housing is crucial for fostering inclusive communities upholding the principles of fairness and justice and serving as an economic driver. In Dallas, Texas, a city characterized by its robust economic growth and diverse population, the pursuit of fair housing practices is essential for addressing the needs of all residents. The Analysis of Impediments to Fair Housing Choice serves as a critical tool for identifying barriers that hinder equal housing opportunities and devising strategies to overcome them.

This document examines various factors that impact fair housing in Dallas, including socioeconomic disparities, discriminatory practices, zoning regulations, and accessibility issues. By delving into these complexities, we aim to uncover underlying challenges and propose actionable solutions that promote housing equity for every individual and family in the Dallas community.

Through collaboration with stakeholders, data-driven analysis, and a commitment to transparency, this analysis seeks to lay the groundwork for a more inclusive and accessible housing landscape in Dallas. By addressing impediments to fair housing choice head-on, we can create a future where all residents have the opportunity to live, work, and thrive in a community that values diversity and ensures housing justice for all.

### *Background and History*

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

State or local governments, including the City of Dallas may enact fair housing laws that extend protection to other groups as well. For example, the City of Dallas has enacted a Fair Housing Ordinance makes it illegal to discriminate in residential housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The State of Texas also has a similar law that protects an individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners' insurance free from discrimination based on race, color, national origin, religion, sex, familial status, and disability.

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by the residents of the City of Dallas, assesses their underlying causes, and identifies goals and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact on residents.

The City of Dallas, as an entitlement community under the U.S. Department of Housing and Urban Development (HUD), is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the City:

1. Complete the required Analysis of Impediments to Fair Housing Choice (AI).
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state, and federal law. The federal Fair Housing Act defines impediments as:

*Any actions, omissions, or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability that restrict housing choices or the availability of housing choices.*

The AI is part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals to inform planning processes, such as the Consolidated Plan (designating use of block grant funds), as well as other relevant activities. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment, and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

While housing issues are complex and multi-faceted and affect all residents of the region, the purpose of this AI is to focus specifically on fair housing and related needs and actions. The AI, therefore, examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and disability.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from residents and interested parties, and distribution of draft reports for resident review detailing possible actions to overcome the identified impediments.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its 2015 regulation and Assessment Tool. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including trends and description of demographics; patterns of segregation and integration; identification of racially/ethnically concentrated areas of poverty (“R/ECAPs”); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes (“contributing factors”). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

## **B. Why Assess Fair Housing in Dallas?**

Assessing fair housing in Dallas, Texas, is crucial for several compelling reasons that reflect the community's unique dynamics and needs:

1. **Diverse Demographic Landscape:** Dallas is home to a diverse population with varying socioeconomic backgrounds, cultural heritages, and housing preferences. Assessing fair housing ensures that all residents, regardless of race, ethnicity, income level, or family status, have equitable access to housing options that meet their needs.
2. **Growth and Development Challenges:** As a bustling metropolitan area and a rapidly expanding city in Texas, Dallas faces ongoing challenges related to urban development, housing availability, and affordability. Assessing fair housing helps identify barriers that may hinder residents' ability to secure safe, affordable housing amidst rapid growth and expansion.
3. **Legal Compliance and Accountability:** By conducting fair housing assessments, Dallas adheres to federal, state, and local fair housing laws and regulations. This ensures that the city remains accountable for promoting housing opportunities without discrimination based on protected characteristics such as race, disability, or familial status.
4. **Addressing Discrimination and Inequities:** Assessing fair housing allows Dallas to confront and address discriminatory practices and systemic inequities that may exist within the housing market. By identifying these barriers, the city can implement targeted strategies to dismantle discriminatory practices and promote fair housing practices for all residents.
5. **Community Well-being and Quality of Life:** Access to safe, stable housing is essential for individual and community well-being. Assessing fair housing helps Dallas identify areas where housing conditions may impact health outcomes, educational opportunities, and overall quality of life for residents.
6. **Promoting Economic Opportunity:** Fair housing assessments contribute to economic development by ensuring that housing policies and practices support

economic stability and mobility for all residents. By fostering diverse and inclusive neighborhoods, Dallas can attract businesses, spur economic growth, and enhance community prosperity.

7. **Building Inclusive Communities:** Assessing fair housing fosters inclusive communities where individuals from diverse backgrounds can live, work, and thrive together. By promoting integration and diversity within neighborhoods, Dallas can strengthen social cohesion and cultivate a sense of belonging among all residents.

In essence, assessing fair housing in Dallas is not only a legal requirement but also a proactive step towards building a more equitable, inclusive, welcoming, and thriving community where every resident has access to fair and affordable housing opportunities. By addressing challenges and promoting fairness in housing practices, Dallas can lay the groundwork for a sustainable and prosperous future for all its residents. The City will prepare an Analysis of Impediments to Fair Housing Choice to document the assessment.

#### ***Conducting an Analysis of Impediments to Fair Housing Choice (AI):***

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis and
- Maintaining records reflecting the analysis and actions taken.

#### ***HUD interprets these three certifying elements to entail:***

- Analyzing and working to eliminate housing discrimination in the jurisdiction.
- Promoting fair housing choices for all people.
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published, providing program participants with an approach to more effectively and efficiently incorporated into the planning process the duty of affirmatively furthering the policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of the impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On February 9, 2023, HUD published a Notice of Proposed Rulemaking in the Federal Register entitled “Affirmatively Furthering Fair Housing.” The proposed rule, which builds on and refines HUD’s 2015 rule, would faithfully implement the Fair Housing Act’s statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome segregation patterns, promote fair housing choices, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

### **C. Research Methodology/Community Participation Process**

The 2024 Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout the City of Dallas. This information was collected and evaluated through four general approaches:

- **Empirical Data Research** – the review of existing data and studies.
- **Quantitative Analysis** – the evaluation of objective, measurable, and numerical data.
- **Qualitative Analysis** – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions, and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city’s housing marketplace were drawn from the 2020 census and intercensal estimates. Such data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics, and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2024 Dallas Analysis of Impediments.

## **Community Input**

- **Stakeholder Surveys in conjunction with this Analysis** - a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and receive responses from City of Dallas residents and stakeholders. The survey consisted of 36 distinct questions, allowing a mixture of both multiple-choice and open-ended responses. In all, there were 53 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents is cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the total survey respondents.

Surveys were conducted over a period from July 8, 2024 – July 30, 2024. Paper surveys received were manually entered by the survey administrator into Survey Monkey for tabulation and analysis. To prevent “ballot stuffing,” the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Stakeholder Interviews** – For this update to the Analysis of Impediments, we met with City of Dallas key departments including the public library, Community Care Housing Department, Code Enforcement, and 311 to offer an opportunity to provide feedback of fair housing issues in the community.
- **Public Meetings** – Seven public meetings were held to provide a forum for City of Dallas residents and other interested parties to contribute to this Analysis and the City’s Consolidated Plan. We conducted three virtual meetings and four in person meetings. Combined, there were XXX people in attendance at these meetings including City of Dallas staff from various community facing departments, non-profit representatives, and local residents providing feedback on various housing issues. The meetings were advertised via flyers distributed by the City of Dallas using its various mailing distribution lists and online platforms. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small- group round-table discussions to moderated forums. Notes were taken of the public comments at all meetings.

## **D. Current 2024 Impediments and Contributing Factors**

The following are the identified impediments based on the assessment conducted throughout the 2024 Analysis of Impediments to Fair Housing Choice process. The newly identified impediments to fair housing access and choice represent ongoing issues in Dallas, Texas. Of the previously identified impediments, lack of affordable housing in high opportunity areas,

insufficient housing available in the City of Dallas, lack of public and private investing in certain neighborhoods, insufficient access to opportunity for residents of supported housing and lack of education regarding affordable housing and fair housing enforcement are still present in the city and will continue to be addressed. Below is a list of new impediments the city should begin to focus on.

## **Impediment #1**

### **Insufficient Tenant Protections in the Rental Market**

Affordable, stable, and accessible housing, along with a wide range of housing options, are essential for creating just and equitable communities. However, the power imbalance between renters and landlords increases the risk of housing instability, harassment, and homelessness for tenants, further exacerbating racial inequity. Tenant protections, passed in the form of laws and policies, are critical to preventing evictions and keeping renters stably housed.

### **Contributing Factors**

- **Increased number of Absentee Landlords** – Absentee ownership in residential real estate often refers to a situation where an individual owns a property but does not occupy or directly manage it. The absentee owners may be individuals who have invested in rental properties, inherited properties, or own vacation homes that they do not reside in year-round. One issue with absentee landlords is the potential for neglect and mismanagement of the property. Since the real estate owner is not physically present, issues like deferred maintenance and tenant dissatisfaction can arise. Issues with absentee landlords was mentioned in each needs assessment meeting and sited as a major issue contributing to high housing costs, frequent evictions, and poor housing quality.
- **Inadequate legal safeguards to protect tenant rights** - laws and regulations enacted at the federal, state, or local level to protect tenants' rights and ensure fair treatment in the rental market. When these safeguards are insufficient, tenants may face numerous challenges.
- **Discrimination in the rental market based on source of income** - Renters who receive a verifiable source of legal income, such as social security, child support, SSI and Section 8 vouchers can still face illegal discrimination. Such practices unfairly limit housing options for individuals who are financially capable of paying rent but are discriminated against due to the nature of their income.
- **Excessive Tenant Screening Requirements** - Imposing overly stringent criteria on potential renters, such as high credit scores, extensive background checks, or excessive income verification. These requirements can disproportionately affect lower income individuals, people with past financial difficulties, or those from marginalized communities, making it more challenging for them to secure housing despite being otherwise qualified.

## **Impediment #2**

## Insufficient Fair Housing Education

The lack of sufficient information and awareness about fair housing rights and responsibilities among both housing providers and residents can lead to widespread ignorance of fair housing laws, resulting in discriminatory practices, unintentional violations, and a lack of enforcement. As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

Education and awareness of fair housing laws is imperative to alleviating housing discrimination. The City of Dallas established the Fair Housing Division of the Office of Equity and Inclusion, which supports leadership and staff through education and training in the identification and elimination of systemic barriers to fair and just distribution of resources, access to services and opportunity and proper investigation of housing discrimination complaints. The City is actively conducting outreach throughout the City to reach residents and educate them on their rights and responsibilities related to Fair Housing.

## Contributing Factors

- **Lack of Awareness and Training:** Insufficient or non-mandatory training for housing providers, real estate professionals, and landlords can lead to a lack of understanding of fair housing laws and best practices. Additionally, inconsistent implementation of training programs result in variability in the quality and frequency of fair housing resulting in uneven levels of knowledge among housing professionals.
- **Targeted Outreach is Limited:** The City offers broad based fair housing education outreach, but community feedback suggests that a more targeted approach that aligns with specific community issues would be beneficial. For example, the outreach team initiated a fair housing series with the local high school to educate students on housing rights and responsibilities.
- **Limited English Proficiency:** Educational materials and resources may not be available in multiple languages, leaving non-English-speaking populations underserved. Its also worth noting that educational materials may be written too high level for the average person to understand.
- **Limited Resources:** Fair housing enforcement agencies and community organizations may lack the resources to effectively educate the public and enforce fair housing laws. Additionally, a shortage of funding for educational programs and resources dedicated to fair housing.
- **Accessibility Issues:** Online resources and educational materials may not be accessible to individuals without reliable internet access or technological devices. Also, inadequate physical accessibility of educational resources or events can limit participation by individuals with disabilities.

## Impediment #3

## Displacement of Lower Income Residents in Gentrifying Communities

Gentrification in Dallas, particularly in areas like West Dallas and South Dallas is a significant issue, reshaping the city's landscape and affecting long-term residents in these areas. Historically, many neighborhoods in Dallas, such as West Dallas' Gilbert-Emory area, were home to Black and Latino communities who faced systemic challenges, including redlining and economic neglect. These communities were often located in less desirable areas, such as floodplains or near industrial zones, due to discriminatory housing policies from the 1930s onwards<sup>1</sup>.

In recent years, these same neighborhoods have become targets for redevelopment as Dallas experiences a surge in population and economic growth. These areas are attractive to developers due to their proximity to downtown and other booming districts like Uptown. As a result, the landscape of these neighborhoods is rapidly changing, with modest, long-standing homes being replaced by modern, expensive townhouses and luxury apartments that are often unattainable for lower income families<sup>2</sup>.

The rapid development surge has sharply increased property values and taxes, making it difficult for long-term residents, particularly those on fixed incomes, to afford. This economic strain has caused widespread displacement, forcing many to leave neighborhoods they've lived in for generations. In West Dallas, new homes priced far beyond the reach of current residents (Texas Metro News).

### Contributing Factors

- **Rising Costs:** As neighborhoods gentrify, property values and rents increase, making it difficult for long-term residents, especially renters, to afford to stay in their homes. This displacement disproportionately affects lower income families, the elderly, and minority groups, pushing them out of communities where they have deep roots.
- **Loss of Affordable Housing:** Gentrification often leads to the conversion of affordable housing into higher-end apartments or luxury condos, reducing the overall availability of affordable housing units. This further marginalizes vulnerable populations who already face challenges in securing stable housing.
- **Missed Opportunities for Estate Planning:** A lack of awareness about probate can also mean that individuals miss out on opportunities to plan their estates in a way that minimizes the need for probate, such as through the use of trusts, joint ownership, or payable-on-death accounts.

### Impediment #4

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<sup>1</sup> Texas Metro News - <https://texasmetronews.com/54882/hostile-takeover-west-dallas-homeowners-battle-new-developments-rising-taxes/>

<sup>2</sup> Dallas Observer - <https://www.dallasobserver.com/news/there-goes-the-neighborhood-the-ups-and-downs-of-gentrification-in-dallas-7723959>

## **Housing Affordability Mismatch - Distribution of Renter Households and Affordable Rental Units**

Housing affordability mismatch, particularly for households earning less than \$35,000 annually exists in Dallas. While the availability of affordable rental units improves as household income increases, there is a significant shortfall in affordable housing for lower-income renters. It is important to note that some of the units identified as affordable to people of a particular income level may in fact be occupied by households with higher incomes, reducing the stock available for lower income households. This highlights the critical need for policies and interventions focused on increasing the supply of affordable housing for those in the lowest income brackets to ensure equitable access to safe and stable housing.

### **Contributing Factor**

- **Mismatch Between Supply and Demand** - There is an inadequate supply of affordable housing units which drives up the cost of housing making it difficult for lower income and even moderate-income households to find affordable housing.
- **Overproduction of Luxury Housing** – There is an over supply of high rental housing and the production of affordable housing is lagging behind.
- **Resident Mobility and Choice** – Higher Income residents are able to choose the housing of their liking by selecting housing choices from any income category, including those categorized as affordable to lower income persons.

## E. Glossary of Terms

Throughout this document you will find specialized terms used to describe some of the research and findings. This glossary of terms has been prepared to familiarize the reader with some of the words and the way they are being defined and used in this Analysis of Impediments to Fair Housing Choice.

**Accessibility:** whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers.

**Affirmatively Further Fair Housing (AFFH):** a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated.

**American Community Survey (ACS):** a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

**Americans With Disabilities Act (ADA):** federal civil rights law that prohibits discrimination against people with disabilities.

**Annual Action Plan:** an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan.

**CDBG:** Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

**Census Tract:** small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

**Consolidated Plan (Con Plan):** a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

**Continuum of Care (CoC):** a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals and optimize self-sufficiency among individuals and families experiencing homelessness.

**Data and Mapping Tool (AFFHT):** an online HUD resource combining data from various sources including HUD, the decennial Census data, and the American Community Survey to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

**Disparate Impact:** practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

**Dissimilarity Index:** measures the percentage of a particular group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index were 65, then 65 percent of Black residents would need to move to another neighborhood for Black people and White people to be evenly distributed across all neighborhoods in the city.

**Entitlement Jurisdiction:** a local government that receives funds from HUD for housing and community development.

**ESG:** Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

**Environmental Health Index:** a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

**Environmental Justice:** the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience adverse health effects. Recognizing this history and working to change future environmental planning are essential pieces of environmental justice.

**Exclusionary Zoning:** the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for lower income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

**Exposure Index:** a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

**Fair Housing Act:** a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

**Gentrification:** the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

**HOME:** HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to lower income people.

**HOPWA:** Housing Opportunities for Persons With AIDS. HUD makes grants under the HOPWA program to local communities, states, and nonprofits for projects that benefit lower income people living with HIV/AIDS and their families

**Housing Choice Voucher (HCV):** a HUD rental subsidy issued to a lower income household that promises to pay a certain amount of the household's rent. Prices, or payment standards, are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Participants of the HCV program are free to choose any rental housing that meets program requirements

**Housing Discrimination:** the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lender based on that person's race, class, sex, religion, national origin, or familial status.

**Isolation Index:** a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

**Inclusionary Zoning:** a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

**Jobs Availability Index:** number of jobs per 1000 people within a five-mile radius of the census tract center-point. Index is computed by the UC Davis Center for Regional Change.

**Jobs Proximity Index:** a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

**Labor Market Engagement Index:** a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

**Limited English Proficiency (LEP):** residents who do not speak English as a first language, and who speak English less than “very well.”

**Local Data:** any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey.

**Low Income Housing Tax Credit (LIHTC):** provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

**Low Poverty Index:** a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

**Low Transportation Cost Index:** a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

**Market Rate Housing:** housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

**NIMBY: Not In My Back Yard.** A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly veiled racism.

**Poverty Line:** the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The 2024 US poverty line for a family of three is \$25,820.

**Project-Based Section 8, Project-Based Rental Assistance, PBRA:** a government-funded program that provides rental housing to lower income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

**Public Housing:** housing that is owned and managed by a Public Housing Authority for eligible lower income households.

**Publicly Supported Housing:** housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

**Other Multi-Family Housing:** multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units

include properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

**Reasonable Accommodation:** a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

**R/ECAPs:** Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink.

**Rehabilitation Act (Section 504):** a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

**School Proficiency Index:** a HUD calculation based on 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. The higher the number, the higher the school system quality is in a neighborhood.

**Segregation:** the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

## **II. COMMUNITY CHARACTERISTICS**

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Demographic information in this section primarily relies on data published by the United States Census Bureau. Specifically, the 2020 Decennial Census and American Community Survey (ACS) 2018-2022 5-Year Estimates are used throughout. Supplemental information is also provided through the United States Department of Housing and Urban Development (HUD) Office of Policy Development and Research (PD&R).

The demographic summary provides a current snapshot of the City's residents, housing, employment, education, and land use. This section also includes recent trends regarding these topics. Demographic data and other background information helped form the foundation for this Analysis of Impediments (AI) and AI's of the future.

### **A. Historical Profile**

Dallas, Texas, is a city with a rich and varied history that reflects its growth from a small settlement into a major metropolitan area. Dallas's history reflects a dynamic evolution from a small trading post to a thriving metropolis, with a legacy of resilience, innovation, and cultural growth. Before European settlers arrived, the area around Dallas was inhabited by indigenous peoples, including the Caddo, Wichita, and nomadic tribes such as the Comanche, Kiowa, Tawakoni, and other ancestral tribes. Dallas was officially founded on April 14, 1839, by John Neely Bryan, a lawyer from Tennessee. He chose the site due to its strategic location along the Trinity River and its potential for trade and transportation. The town was officially incorporated, and early settlers established it as a trading post and agricultural center. During the American Civil War (1861-1865), Dallas was a Confederate stronghold. The city's economy was affected by the war, but it began to recover in the post-war years. The arrival of the Texas and Pacific Railway in the 1870s played a crucial role in Dallas's growth, transforming it into a major commercial hub. The city diversified its economy, with significant developments in agriculture, manufacturing, and finance. Dallas saw substantial economic growth due to its oil and cotton industries. The discovery of oil in nearby areas further boosted the local economy. The city expanded rapidly, with significant infrastructure development, including the construction of skyscrapers.

Dallas, like many American cities, faced challenges related to racial segregation and civil rights. The movement brought significant social changes. On November 22, 1963, President John F. Kennedy was assassinated in Dallas. This event profoundly impacted the city and is a pivotal moment in its history. The city's economy continued to diversify, with growth in technology, telecommunications, and finance. Dallas became a major center for business and culture. The establishment of cultural institutions, such as the Dallas Museum of Art and the Dallas Symphony Orchestra, enhanced the city's cultural landscape. The Sixth Floor Museum at Dealey Plaza, the Dallas Museum of Art, the Dallas Zoo, and the Perot Museum of Nature and Science are prominent cultural and educational sites.

Dallas has experienced significant population growth and economic development in the 21st century. It is now a leading global city with a robust economy, diverse industries, and a high quality of life. The city has continued to evolve culturally and socially, with ongoing development in the arts, entertainment, and technology sectors. Dallas is known for its vibrant arts scene, diverse culinary landscape, and as a hub for major sports teams. Dallas has faced challenges such as economic recessions, social issues, and natural disasters but has shown resilience and adaptability in addressing these challenges. Dallas is known for its significant role in sectors like finance, technology, and telecommunications, with major companies headquartered in the city. Dallas is home to several major sports teams, including the Dallas Cowboys (NFL), the Dallas Mavericks (NBA), FC Dallas (MLS), and Dallas WINGS (WNBA) as of 2026.

## **B. Demographic Profile**

The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data and important information used to show the trends in population and household changes over the years. Demographic data was analyzed and obtained from the 2020 U.S. Census 2022 American Community Survey (ACS).

### **Population**

According to ACS estimates, Dallas, Texas, has experienced an 8.90% population increase, with the population increasing from 1,197,816 in 2010 to 1,304,379 in 2020.

### **Age and Sex Over the Years**

According to the 2022 American Community Survey 5-Year Estimates, the median age of Dallas Residents is 33. The largest concentration of residents is in the 25-44 age range, making up 32.41% of the City's population. The next largest cohort is children under 18, representing 25.38 percent of the population. Adults aged 45 -64 represent 22.17 percent of the population.

Regarding sex, females have historically slightly outnumbered males within the city. That trend has continued during the period under review, as women edged out men 50.10% to 49.90% as of the 2022 census, a slight change from 2018 numbers that reflected 50.44 % to 49.56% for women to men.

AGE & SEX POPULATION CHARACTERISTICS						
Age	2018			2022		
	Both Sexes	Male	Female	Both Sexes	Male	Female
	1,318,806	653,609	665,197	1,300,642	648,990	651,652
<b>Under 18 years</b>	334,751	170,301	164,450	317,057	161,576	155,481
<b>18 to 24 years</b>	132,211	65,209	67,002	130,175	63,990	66,185
<b>25 to 44 years</b>	339,539	214,952	211,652	421,600	215,258	206,342
<b>45 to 64 years</b>	292,430	146,012	146,418	288,318	145,857	142,461
<b>65 years and over</b>	132,810	57,135	75,675	143,492	62,309	81,183
<b>Median Age [years]</b>	32.7	32.3	33.1	33.1	32.8	33.5

Table 1: Age & Sex Population Characteristics Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Households

According to the 2022 ACS 5 Year Estimates Survey, there are currently 521,147 households in Dallas, Texas. The data breaks households down by family households or non-family households. A family household typically refers to a group of people, often related by blood, marriage, or adoption, who live together in a single dwelling unit, such as a house or apartment, and share living expenses. Households can also consist of a single person living alone or a group of unrelated individuals who share a residence, called non-family households. The data shows that there were slightly more non-family households than family households residing in the city. In 2022, 42.8 percent of the population has never been married, while 40.10 percent are currently married. Just under 13 percent of the population is divorced or separated and slightly more than 4 percent of the population is widowed. The average household size is 2.46 people per household and the average family size is 3.38 people per household.

HOUSEHOLD TYPE			
	2018		2022
Family Households	48.20%	Family Households	48.90%
Non-Family Households	50.50%	Non-Family Households	49.80%
Total Households	505,816	Total Households	521,147
MARITAL STATUS			
Never married	41.00%	Never married	42.80%
Now married	40.40%	Now married	40.10%
Divorced/Separated	14.10%	Divorced/Separated	12.80%
Widowed	4.60%	Widowed	4.30%
Average household size	2.57	Average household size	2.46
Average family size	3.45	Average family size	3.38

Table 2: Household Type Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The data on households and families provides a detailed overview of the living arrangements and housing tenure within the community. There are a total of 521,147 households, which include various types of family structures and nonfamily households. Of these, married couples account for 184,347 households, which have an average household size of 3.45 individuals. Male householders, where a male is the head of the household without a spouse present, make up 27,584 households, with an average size of 3.44 individuals. Female householders, where a female is the head of the household without a spouse present, account for 74,113 households, with a slightly higher average size of 3.54 individuals. Nonfamily households, which include individuals living alone or with non-relatives, represent the largest category with 235,103 households and a smaller average size of 1.24 individuals.

When focusing on families, there are 286,044 family units in the community. Married couples represent the majority of these families, while male householders account for 27,584 families and female householders make up 74,113 families. The average family size across these categories is relatively consistent, with slight variations between 3.12 and 3.42 individuals.

Housing tenure reveals distinct patterns between owner-occupied and renter-occupied housing. Overall, 41.90% of households are owner-occupied, with married couples having the highest rate of homeownership at 63.60%. In contrast, male and female householders have significantly lower rates of homeownership, at 38.00% and 31.60%, respectively. Nonfamily households have the lowest homeownership rate at 28.70%.

Conversely, renter-occupied housing constitutes 58.10% of the total households. Nonfamily households have the highest percentage of renters at 71.30%, followed by female householders at 68.40% and male householders at 62.00%. Married couples are less likely to rent, with 36.40% living in renter-occupied housing.

This data highlights the diversity of household structures and the varying patterns of housing tenure within the community. The significant number of nonfamily households and the high rate of renter-occupied housing suggest a dynamic housing market and the need for policies that address the unique needs of different household types.

<b>HOUSEHOLD AND FAMILIES</b>					
	<b>Total</b>	<b>Married couple</b>	<b>Male householder</b>	<b>Female householder</b>	<b>Nonfamily household</b>
<b>Total Households</b>	521,147	184,347	27,584	74,113	235,103
<b>Average Household Size</b>	2.46	3.45	3.44	3.54	1.24
<b>FAMILIES</b>					
<b>Total Families</b>	286,044	184,347	27,584	74,113	(X)
<b>Average Family Size</b>	3.38	3.42	3.12	3.37	(X)
<b>HOUSING TENURE</b>					
<b>Owner-Occupied Housing</b>	41.90%	63.60%	38.00%	31.60%	28.70%
<b>Renter-Occupied Housing</b>	58.10%	36.40%	62.00%	68.40%	71.30%

Table 3: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Race and Ethnicity

The population data reveals a diverse racial and ethnic composition. The total population stands at 1,304,379 individuals. The largest racial group is White, comprising 36.10% (470,819 people) of the population. Black or African American residents make up 23.27% (303,577 people), while those identifying as American Indian and Alaska Native represent a smaller portion, at 1.18% (15,376 people).

The Asian population accounts for 3.72% (48,588 people), and Native Hawaiian and Other Pacific Islander residents form a very small group, constituting just 0.05% (687 people). Individuals who identify as "Some other race" make up 19.46% (253,858 people), and those reporting "Two or more races" represent 16.22% (211,474 people).

When examining ethnicity, the data shows that Hispanic or Latino individuals represent 42.40% (553,057 people) of the total population, making them a significant portion of the community. The remaining 57.60% (751,322 people) of the population are classified as Not Hispanic or Latino.

This data highlights the significant racial and ethnic diversity within the community, with a notable presence of Hispanic or Latino individuals and a wide array of racial backgrounds. The diverse makeup of the population underscores the importance of culturally responsive policies and services to meet the needs of all community members.

RACE AND ETHNICITY		
	Number	Percentage
<b>TOTAL POPULATION</b>	1,304,379	100%
White	470,819	36.10%
Black or African American	303,577	23.27%
American Indian and Alaska Native	15,376	1.18%
Asian	48,588	3.72%
Native Hawaiian and Other Pacific Islander	687	0.05%
Some other race	253,858	19.46%
Two or more races	211,474	16.22%
HISPANIC OR LATINO		
Hispanic or Latino	<b>553,057</b>	<b>42.40%</b>
Not Hispanic or Latino	<b>751,322</b>	<b>57.60%</b>

Table 4: Race and Ethnicity Source: U.S. Census Bureau 2020 Decennial, [www.census.gov](http://www.census.gov)

## Origin and Ancestry

According to the U.S. Census Bureau's 2022 5-yr American Community Survey Estimates, there were approximately 309,124 foreign-born individuals in Dallas, Texas. Most of the foreign-born population originated from Latin America, at 75.30%, while another notable portion comes from Asia, at 12%.

US Citizen Status		
Naturalized citizen	86,970	28.10%
Not a citizen	222,154	71.90%
Total Foreign-Born Population	309,124	100%

Table 5: Foreign-Born Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The data provided reflects the distribution of the foreign-born population by their region of birth. Analyzing this data in the context of fair housing can help identify potential disparities in housing access, discrimination risks, and the need for targeted policies to support diverse immigrant populations. The table below shows an overview of the foreign-born population. The total foreign-born population is 309,124 with the largest regional representation from Latin America, with 75.3% of the foreign-born population and Oceania with the smallest percentage of the foreign-born population.

WORLD REGION OF BIRTH OF FOREIGN BORN		
Foreign-born population excluding population born at sea	309,124	100%
Europe	9,701	3.10%
Asia	37,044	12.00%
Africa	27,029	8.70%
Oceania	565	0.20%
Latin America	232,894	75.30%
Northern America	1,891	0.60%

Table 6: World Region of Birth Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The following table presents the ancestry of Dallas residents in 2022. The most common ancestries identified were English (5.40%), German (5.20%), and Irish (4.30%).

<b>ANCESTRY</b>		
<b>Total population</b>	<b>1,300,642</b>	<b>100%</b>
American	51,161	3.90%
Arab	6,930	0.50%
Czech	5,100	0.40%
Danish	1,728	0.10%
Dutch	5,004	0.40%
English	70,742	5.40%
French	15,417	1.20%
German	1,636	0.10%
Greek	67,603	5.20%
Hungarian	1,656	0.10%
Irish	1,446	0.10%
Italian	56,280	4.30%
Lithuanian	23,340	1.80%
Norwegian	869	0.10%
Polish	4,869	0.40%
Portuguese	10,884	0.80%
Russian	1,894	0.10%
Scottish	4,617	0.40%
Slovak	8,706	0.70%
Sub-Saharan African	13,891	1.10%
Swedish	503	0.00%
Swiss	34,316	2.60%
Ukrainian	5,265	0.40%
Welsh	1,539	0.10%
West Indian (excluding Hispanic origin groups)	1,444	0.10%

Table 7: Ancestry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Limited English Proficiency (LEP)

Section 601 of Title VI, the Civil Rights Act of 1964, is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is based on a person's inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in or benefit from federally assisted programs may violate the Civil Rights Act.

The LEP population of Dallas is consistent with the national origin data. Spanish is, by far, the most spoken language among LEP individuals in Dallas, Texas. Although English is predominantly spoken, roughly 18% of the population speak other languages, which suggests a need for accommodations of those non-English speaking residents. The city's two largest non-English speaking populations are Spanish and Asian and Pacific Islander languages.

LANGUAGE SPOKEN AT HOME		
Population 5 years and over	1,208,989	100%
English only	696,750	57.60%
Spanish	440,622	36.40%
Other Indo-European languages	25,480	2.10%
Asian and Pacific Islander languages	25,115	2.10%
Other languages	21,022	1.80%

Table 8: Language Spoken at Home Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## C. Income Profile

The income and poverty profile presents an overview of household income, data elements that include household size, lower income population, and percentage of median family households in poverty. As noted in the table below, the median household income for Dallas increased from \$50,100.00 in 2018 to \$63,985.00 in 2022, while the mean family income also increased from \$82,630.00 in 2018 to \$102,023.00 in 2022.

HOUSEHOLD INCOME				
	2018		2022	
	Total Number of Household s	%	Total Number of Household s	%
Total Households	505,816	100%	521,147	100%
Less than \$10,000	39,959	7.90%	33,353	6.40%
\$10,000 to \$14,999	24,785	4.90%	21,888	4.20%
\$15,000 to \$24,999	56,146	11.10%	39,086	7.50%
\$25,000 to \$34,999	57,663	11.40%	44,819	8.60%
\$35,000 to \$49,999	74,355	14.70%	65,143	12.50%
\$50,000 to \$74,999	89,024	17.60%	95,370	18.30%
\$75,000 to \$99,999	51,087	10.10%	61,495	11.80%
\$100,000 to \$149,999	51,593	10.20%	68,270	13.10%
\$150,000 to \$199,999	22,256	4.50%	34,396	6.60%
\$200,000 or more	38,948	7.70%	57,326	11.00%
Median Household Income	\$50,100.00		\$63,985.00	
Mean Family Income	\$82,630.00		\$102,023.00	

Table 9: Household Income Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing. Since FY 2011, HUD has based its median family income estimates on data from the Census Bureau’s American Community Survey (ACS). Since FY 2012, there has been a 3-year lag between the ACS estimates and the fiscal year for which the income limits are in effect. For example, the FY 2022 median family incomes and income limits were based on the ACS 2019 data. The FY 2023 median family incomes and income limits would ordinarily be based on the ACS 2020 estimates. However, because of the lack of 1-year ACS 2020 estimates described above, HUD intends to instead base the FY 2024 median family incomes and income limits on ACS 2021 data.

The CDBG Program provides annual grants on a formula basis to Entitlement Communities to support viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low-and moderate-income persons. For a project or program to qualify for CDBG funds, 51% of the program beneficiaries must be low- to moderate-income as defined by HUD.

The following table reflects the current HUD income limits for one to eight-person households who earn at or below 80% of the Area Median Income (AMI) for Dallas, TX.

<b>2024 CDBG MAXIMUM INCOME LIMITS</b>			
<b>Household Size</b>	<b>Extremely Low (30%) Income Limits</b>	<b>Very Low (50%) Income Limits</b>	<b>Low (80%) Income Limits</b>
1	\$23,200	\$38,650	\$61,800
2	\$26,500	\$44,150	\$70,600
3	\$29,800	\$49,650	\$79,450
4	\$33,100	\$55,150	\$88,250
5	\$35,750	\$59,600	\$95,350
6	\$38,400	\$64,000	\$102,400
7	\$41,050	\$68,400	\$109,450
8	\$43,700	\$72,800	\$116,500

Table 10: FY 24 Income Limits Summary Source: <https://www.huduser.gov/>

### Percentage of Poverty in Dallas, TX

According to U.S. Census and ACS data; Female head of household, no husband present, families with related children under the age of 5 and 5 to 17 years old whose income was below poverty level was 55.40% in 2022.

POVERTY CHARACTERISTICS						
	All Families		Married-couple families		Female householder, no spouse present	
	Total	% Below Poverty Level	Total	% Below Poverty Level	Total	% Below Poverty Level
Families	286,044	13.90%	184,347	7.90%	74,113	28.80%
With related children of householder under 18 years	148,932	20.40%	86,505	11.50%	48,093	37.70%
With related children of householder under 5 years	28,187	16.80%	17,668	8.70%	7,562	34.60%
With related children of householder under 5 years and 5 to 17 years	34,110	29.30%	20,703	16.80%	10,519	55.40%
With related children of householder 5 to 17 years	86,635	18.10%	48,134	10.20%	30,012	32.40%

Table 11: Family Poverty Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### D. Employment Profile

Data regarding the labor force, defined as the total number of persons working or looking for work and employment, is gathered from the decennial census, and ACS estimates are presented below. The labor force participation increased from 62.40 percent in 2018 to 68.60 percent in 2022. The employed population increased by 0.4 percent during that time while the unemployment rate decreased by 0.2 percent.

EMPLOYMENT				
	2018		2022	
Population 16 years and over	1,015,380	100%	1,017,931	100%
In labor force	694,150	68.40%	698,732	68.60%
Not in labor force	321,230	31.60%	319,199	31.40%
Population 16 years and over	1,015,380	100%	1,017,931	100%
Civilian labor force	693,804	68.30%	697,945	68.60%
<i>Employed</i>	657,910	64.80%	663,340	65.2%
<i>Unemployed</i>	35,894	3.50%	34,605	3.40%
Armed Forces	346	0.00%	1,018	0.10%

Table 12: Employment Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Jobs Held by Residents

According to the 2022 5-year ACS Estimates, 65.46% of Dallas’s residents 16 years of age and over were part of the labor force in 2022. The largest portion of Dallas workers are in management, business, science, and arts occupations, with sales and office occupations coming in second. Service and production occupations combined account for about thirty-three percent of the workforce. The occupational distribution data reflects a well-rounded community with a diverse economy, where a balance of professional, service-oriented, and labor-intensive roles support the overall economic health and resilience of the area. Understanding this occupational landscape is crucial for developing targeted workforce development strategies and ensuring that employment opportunities continue to align with the community's evolving needs.

The following charts illustrate the categories of workers and their occupations.

OCCUPATIONAL CHARACTERISTICS		
Occupations of Residents	Estimated Number of Residents	% Employed by Occupation
Civilian employed population 16 years and over	666,340	100%
Management, business, science, and arts occupations	259,868	39.18%
Service occupations	106,137	16.00%
Sales and office occupations	137,324	20.70%
Natural resources, construction, and maintenance occupations	73,429	11.07%
Production, transportation, and material moving occupations	86,582	13.05%

**Table 13**

Table 13: Occupational Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

WORK CLASS CHARACTERISTICS		
Worker Class	Estimated Number of Residents	% Employed by Worker Class
Civilian employed population 16 years+	663,340	100%
Private wage and salary workers	561,709	84.68%
Government workers	56,972	8.59%
Self-employed workers in own not incorporated business	43,454	6.55%
Unpaid family workers	1,205	0.18%

Table 14: Work Class Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### ***Means of Transportation to Work***

The data on transportation to work highlights the commuting patterns of the community's workforce, comprising 575,936 workers aged 16 years and over. The majority of workers, 80.14% (461,541 people), commute alone in a car, truck, or van, making this the most common mode of transportation. Carpooling is the second most popular choice, with 12.51% (72,070 people) of workers sharing rides. Public transportation, excluding taxicabs, is used by a smaller segment, with 3.10% (17,857 people) relying on buses, trains, or other public transit options to get to work.

### **Time of Departure to Go to Work**

Workers' time of departure is spread across various times of the day, with distinct patterns observed for different modes of transportation. The most common departure window is from 9:00 a.m. to 11:59 p.m., when 25.90% of workers leave for work. Those who drive alone show a similar pattern, with 25.40% departing during this period. Carpoolers are slightly less concentrated in this timeframe at 25.10%, while public transportation users have a higher departure rate of 29.70%, suggesting that public transit schedules might influence their choice to leave later in the morning.

The period from 7:00 a.m. to 7:29 a.m. is another peak departure time, with 13.90% of workers leaving during this window. A significant proportion of carpoolers, 15.80%, also depart during this time, indicating a coordinated effort among carpool participants. Public transportation users show a peak departure time slightly later, between 8:00 a.m. and 8:29 a.m., with 11.30% starting their commute.

### **Travel Time to Work**

Commute durations vary widely across the workforce, with the mean travel time to work averaging 26.4 minutes. Workers driving alone have a slightly lower average commute of 25.6 minutes, while carpoolers experience a longer average commute of 30 minutes. Public transportation users face the longest average travel time at 44.8 minutes, reflecting the additional time often required for transit-related transfers and stops.

The most common commute duration is 30 to 34 minutes, experienced by 17.90% of workers, indicating that a significant portion of the population lives within a moderate distance from their workplace. Shorter commutes of less than 20 minutes are enjoyed by 36.30% of workers, with a notable 16.00% completing their commute in just 15 to 19 minutes.

However, a significant portion of the workforce endures longer commutes. Notably, 7.70% of workers travel 45 to 59 minutes, and 7.20% commute for 60 or more minutes. Among public transportation users, this figure jumps dramatically, with 31.40% experiencing commutes of 60 or more minutes, highlighting the time burden faced by those reliant on public transit.

The data paints a picture of a workforce predominantly reliant on personal vehicles, with a majority of workers opting to drive alone. While carpooling and public transportation are less common, those who use these modes often face longer commutes. The distribution of departure times suggests that many workers aim to avoid peak traffic hours, while public transportation users are more likely to start their commutes later in the morning. The varying commute times underscore the diverse experiences of workers in the community, with some enjoying short, efficient commutes, while others, particularly public transit users, face much longer journeys to their workplaces. These patterns highlight the importance of addressing transportation infrastructure and public transit efficiency to better serve the community's commuting needs.

MEANS OF TRANSPORTATION TO WORK				
	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpoled	Public transportation (excluding taxicab)
<b>Workers 16 years and over in households</b>	575,936	461,541	72,070	17,857
TIME OF DEPARTURE TO GO TO WORK				
12:00 a.m. to 4:59 a.m.	4.80%	4.50%	4.80%	9.90%
5:00 a.m. to 5:29 a.m.	4.60%	4.30%	6.60%	6.10%
5:30 a.m. to 5:59 a.m.	4.40%	4.20%	5.70%	5.10%
6:00 a.m. to 6:29 a.m.	9.40%	9.20%	12.10%	8.90%
6:30 a.m. to 6:59 a.m.	6.90%	7.10%	7.50%	4.90%
7:00 a.m. to 7:29 a.m.	13.90%	13.90%	15.80%	12.10%
7:30 a.m. to 7:59 a.m.	10.30%	10.90%	7.50%	6.90%
8:00 a.m. to 8:29 a.m.	13.30%	13.80%	10.80%	11.30%
8:30 a.m. to 8:59 a.m.	6.50%	6.80%	4.20%	5.10%
9:00 a.m. to 11:59 p.m.	25.90%	25.40%	25.10%	29.70%
TRAVEL TIME TO WORK				
Less than 10 minutes	8.40%	7.60%	6.00%	4.40%
10 to 14 minutes	11.90%	12.00%	9.60%	3.50%
15 to 19 minutes	16.00%	16.50%	14.60%	11.80%
20 to 24 minutes	15.90%	16.30%	16.80%	10.00%
25 to 29 minutes	7.60%	8.20%	6.00%	2.50%
30 to 34 minutes	17.90%	18.50%	18.30%	14.80%
35 to 44 minutes	7.30%	7.50%	7.30%	8.80%
45 to 59 minutes	7.70%	7.60%	9.00%	12.80%
60 or more minutes	7.20%	5.70%	12.50%	31.40%
Mean travel time to work (minutes)	26.4	25.6	30	44.8

Table 15: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Major Employers

The local economy is bolstered by a diverse range of major employers, spanning healthcare, education, government, and industry. The largest employer in the area is UT Southwestern Medical

Center, which provides healthcare services and employs a substantial 28,817 full-time workers. This underscores the critical role that healthcare plays in the local economy, both as a provider of essential services and as a significant source of employment.

Education is another key sector, with the Dallas Independent School District employing 23,271 full-time workers, making it the second-largest employer in the region. The Dallas County Community College system also contributes significantly to local employment, with 8,230 employees. These institutions highlight the importance of education as a cornerstone of the community, serving both the educational needs of residents and as major job providers.

Government entities also feature prominently among the largest employers. The City of Dallas employs 16,000 people, and Dallas County employs 6,500, together forming a substantial portion of the local workforce. These government jobs support a wide range of public services and contribute to the stability of the local economy.

In the commercial sector, Southwest Airlines Co., a major airline headquartered in the area, employs 14,618 full-time workers. This reflects the region's importance as a transportation hub and the airline's significant impact on local employment.

Healthcare remains a dominant sector, with Parkland Health & Hospital System and Medical City Dallas employing 13,000 and 10,974 full-time workers, respectively. Methodist Dallas Medical Center also contributes 6,452 jobs to the local economy. These institutions are vital not only for the health and well-being of the community but also as large-scale employers that drive economic growth.

Lastly, Texas Instruments Inc., a leader in the semiconductor industry, employs 7,722 full-time workers, showcasing the region's strength in high-tech manufacturing and innovation. This highlights the area's role as a center for technological advancement and industrial employment.

Overall, the employment landscape is characterized by a robust mix of healthcare, education, government, and commercial enterprises, each playing a crucial role in supporting the local economy and providing a wide range of job opportunities for residents. This diverse economic base helps to ensure the community's resilience and continued growth.

Company	Primary Services	Full-Time Local Employment
UT Southwestern Medical Center	Healthcare	28,817
Dallas Independent School District	Education	23,271
City of Dallas	Government	16,000
Southwest Airlines Co	Commercial Airline	14,618
Parkland Health & Hospital System	Healthcare	13,000
Medical City Dallas	Healthcare	10,974
Dallas County Community College	Education	8,230
Texas Instruments Inc	Semiconductors	7,722
Dallas County	Government	6,500
Methodist Dallas Medical Center	Healthcare	6,452

Table 16: Major Employers: Source: City of Dallas, <https://www.dallascodev.org/296/Business-Environment>

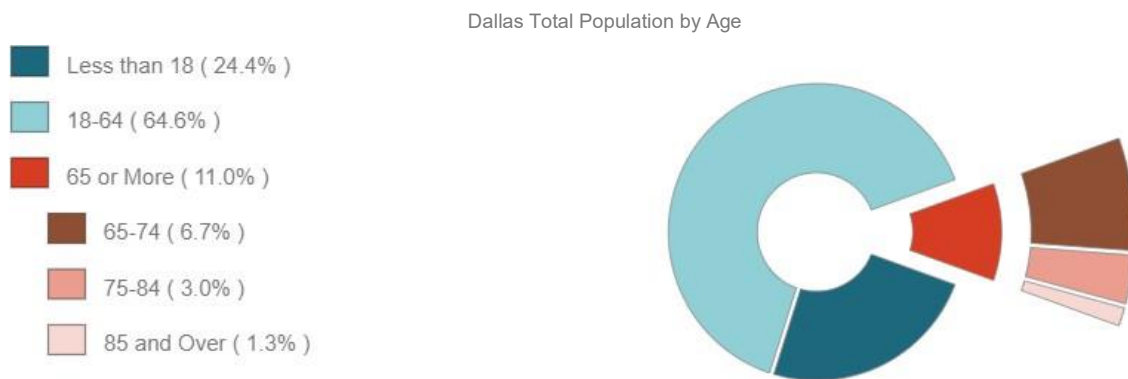
## E. Housing Profile

Fair housing is also concerned with the availability of a range of housing types and prices. This section provides an overview of the housing market and of the dynamics affecting

housing availability by analyzing the characteristics of housing stock, housing conditions, housing market sales, foreclosure data, owner/renter affordability, and housing problems. Housing stock impacts the ability to access adequate housing. This includes the number, type, size, and affordability of units. This is particularly important to low- and moderate-income persons, and persons in protected classes, including disabled persons, families with children, and the elderly.

## Demographics

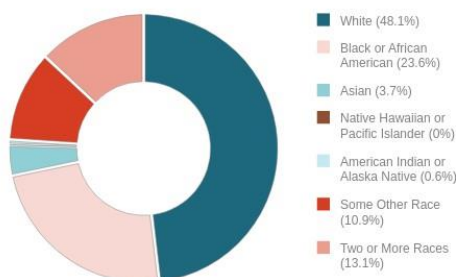
Examining the demographics of the city is key to understanding and addressing the housing needs of the City of Dallas. Data on age, racial composition, disability, and socioeconomic status can provide insight into who lives in the City and help to inform decisions about how to meet diverse needs and allocate resources where most needed. Examining demographic data is also important for identifying mobility trends among different populations into and out of the City. Dallas' total population increase by 7.7 percent since 2012. Nearly 65 percent of the population is between the age of 18 and 64, and only 11 percent are 65 years or older.



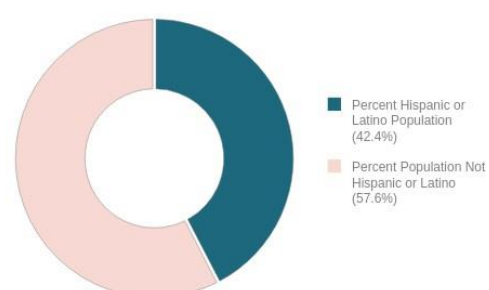
Source: Census  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

The population of Dallas is characterized by diversity in ethnicity and race. While White families make up the majority of residents at 48 percent, there is no one racial group that is comprised of more than 50 percent of the population, with Black families make up about 23 percent of the population. There is a sizeable Hispanic or Latino population in the Dallas area making up about 42 percent of the total population.

Racial Composition



Ethnic Composition 2022



## Characteristics of Housing

A thorough understanding of the characteristics of the housing stock is essential to identify and anticipate potential issues that may need to be addressed. These issues can include poor housing quality, flooding risks, and mismatches between the types of housing units available and the needs of the population. By examining these characteristics, the City can develop targeted strategies to improve housing conditions, ensure safety, and meet the diverse housing needs of their communities.

## Relative Growth of Population and Housing Stock

The chart below illustrates the relationship between population growth and the increase in housing units over a ten-year period, from 2012 to 2022. The data shows that while both population and housing units have experienced growth, the rate of increase in housing units has been more consistent and pronounced compared to the population growth.

- 2012-2017: The population increased significantly, rising from approximately 100 units in 2012 to just over 106 units in 2017. During the same period, housing units also saw a rise, from around 100 units to about 104 units. However, the population growth outpaced the increase in housing units during this period.
- 2017-2022: The growth rate in population appears to have slowed, as the population rose only marginally from around 106 units to approximately 108 units by 2022. Conversely, the number of housing units continued to grow steadily, reaching approximately 110 units by 2022. This indicates a shift where housing unit growth is now outpacing population growth.

This trend suggests a growing emphasis on increasing the housing supply, possibly in response to the earlier population growth. It is also reflective of the proactive approach by the city and local developers to meet future housing demand, ensuring that the availability of housing keeps pace with or even exceeds population growth. This is a positive indicator for addressing housing affordability and availability throughout the city.

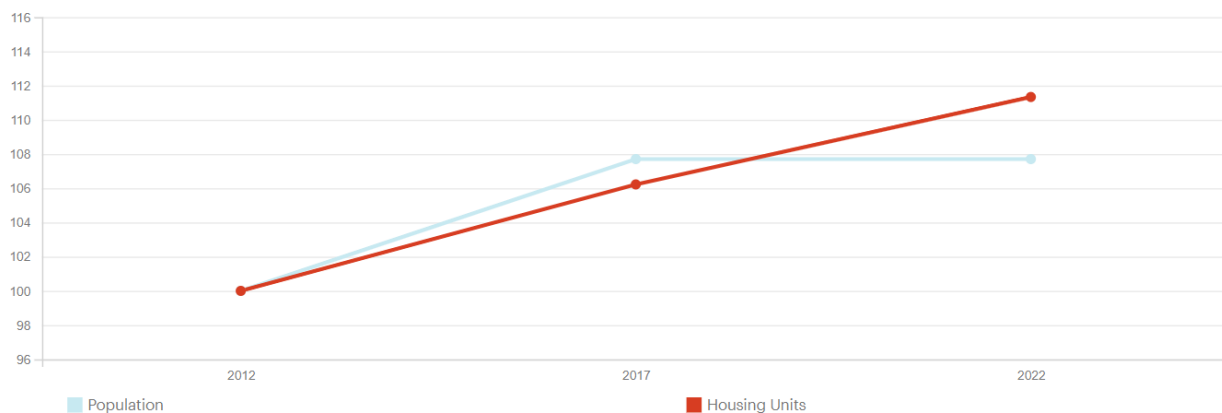


Figure 1: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

## Housing Stock

The data presented provides a comprehensive overview of the physical characteristics of occupied housing units within the analyzed area. As of the latest report, there are a total of 521,147 occupied housing units, with a distinct distribution between owner-occupied and renter-occupied units.

### Occupancy Distribution:

- **Owner-Occupied Units:** Out of the total occupied housing units, 218,575 units, or 42%, are owner-occupied. This indicates that a significant portion of the population has invested in homeownership.
- **Renter-Occupied Units:** The majority of the housing units, 302,572 units or 58%, are renter-occupied. This suggests a higher reliance on rental housing, which could reflect various socio-economic factors, including housing affordability, transient populations, or a preference for renting over ownership.

### Units in Structure:

The distribution of housing units by structure type offers insight into the diversity of housing options available to both owners and renters:

- **1-Unit, Detached:** The most common structure type is the 1-unit, detached housing, which accounts for 44.3% of all occupied units. Of these, a substantial 85.1% are owner-occupied, while 14.8% are renter-occupied. This highlights a strong preference for detached homes among homeowners.
- **1-Unit, Attached:** These units, which include townhouses or row houses, make up 3.9% of the housing stock. A slightly higher percentage of these units are owner-occupied (5.3%) compared to renter-occupied (2.8%).
- **2 Apartments:** Representing 1.6% of the total housing units, this category has a higher proportion of renters, with 2.4% renter-occupied compared to just 0.4% owner-occupied units. This indicates that duplex-style apartments are more commonly rented than owned.
- **3 or 4 Apartments:** These smaller apartment buildings constitute 5.0% of the housing units. They have a similar pattern to the 2-apartment category, with a greater number of renter-occupied units (7.5%) compared to owner-occupied units (1.4%).
- **5 to 9 Apartments:** Mid-sized apartment buildings make up 8.0% of the housing stock. A significant portion of these units are renter-occupied (12.9%), whereas only 1.2% are owner-occupied, indicating that these buildings cater primarily to renters.
- **10 or More Apartments:** Large apartment complexes are a significant component of the housing landscape, accounting for 36.1% of the total units. This structure type shows a stark contrast between owner-occupied (4.9%) and renter-occupied (58.7%) units, underscoring the dominance of rental housing in larger apartment buildings.
- **Mobile Homes:** Mobile homes are the least common housing type, representing just 1.2% of the total occupied units. There is a slightly higher percentage of these homes that are owner-occupied (1.7%) compared to renter-occupied (0.8%), reflecting a niche segment of homeownership within this category.

The data reveals a diverse housing landscape, with a notable split between owner-occupied and renter-occupied units. Detached single-family homes dominate the owner-occupied segment, while larger apartment complexes primarily serve the rental market. The prevalence of renter-occupied units, especially in larger apartment structures, could indicate a need for continued focus on affordable rental housing options and policies that support renters' rights and housing stability.

<b>Physical Housing Characteristics for Occupied Housing Units</b>				
<b>Occupied housing units</b>	<b>521,147</b>	<b>Percent Occupied</b>	<b>Owner Occupied</b>	<b>Renter Occupied</b>
Owner-occupied	218,575	42%	(X)	(X)
Renter-occupied	302,572	58%	(X)	(X)
<b>Units in Structure</b>				
1-unit, detached	230,893	44.3%	85.1%	14.8%
1-unit, attached	20,186	3.9%	5.3%	2.8%
2 apartments	8,116	1.6%	0.4%	2.4%
3 or 4 apartments	25,909	5.0%	1.4%	7.5%
5 to 9 apartments	41,726	8.0%	1.2%	12.9%
10 or more apartments	188,271	36.1%	4.9%	58.7%
Mobile home	6,046	1.2%	1.7%	0.8%

Table 18: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### **Age of Structure**

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original

construction and continued maintenance of the unit. Using this standard, some homes found within the City constructed prior to 1970 may be approaching the end of their utility.

All else being equal, older homes tend to require major capital investment or exhibit lower quality more generally than newer homes, and so it can be helpful to examine the age of the stock. The median year a housing unit was built in Dallas is 1979). In Dallas, 5.3% of the housing units were built before 1940 and 30.1% more between 1940 and 1969. More recently, 22.1% of the housing units have been built since 2000. (The respective percentages for the U.S. as a whole are 12.0%, 24.7% and 22.3%). The City can use housing code violation data and windshield surveys to bolster their understanding of housing quality to determine the nature and extent of quality issues that should be addressed.

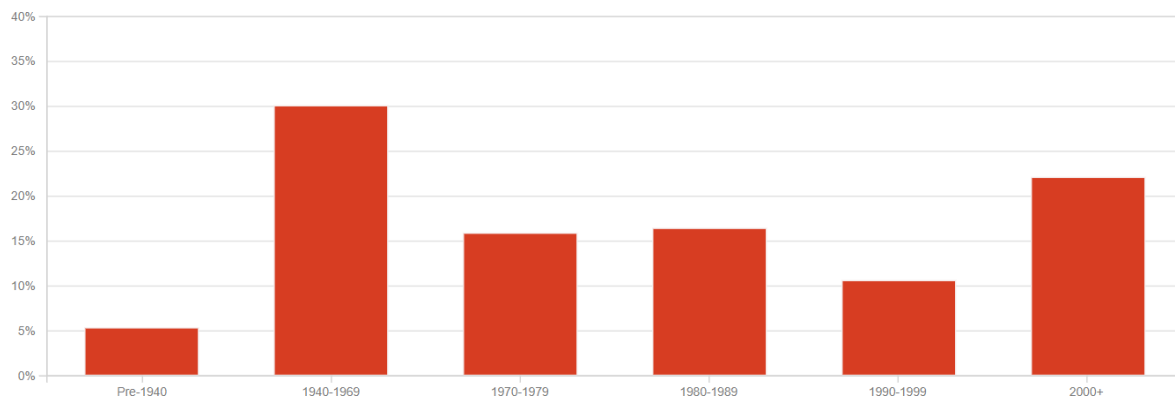


Figure 2: : Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### **Comprehensive Housing Affordability Strategy (CHAS)**

HUD’s Comprehensive Housing Affordability Strategy (CHAS) is a commonly used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. In cases where housing cost is 50% of income or greater, the household is considered severely cost burdened. Cost burdened households have fewer financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

### **Income Categories**

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or More of the

AMI Housing Problem categories are defined below:

“Substandard Housing – lacking complete plumbing or kitchen facilities” is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. The second housing problem identified is households living in overcrowded conditions.

There are two forms of overcrowding defined by HUD:

- **Overcrowded**  
A household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- **Severely Overcrowded**  
A household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

Overcrowding				
Occupants Per Room	Owner	%	Renter	%
1.00 or less occupants per room	476469	93.6	452988	95.9
1.01 to 1.50 occupants per room	15164	4.2	26944	3.1
1.51 or more occupants per room	5094	2.2	16336	1.0
<b>Total</b>	<b>496,727</b>	<b>(X)</b>	<b>496,268</b>	<b>(X)</b>

Table 20: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

The final housing problem identified is cost burden. Cost burden is a fraction of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Housing cost burden greater than 30% of income
- Severe housing cost burden greater than 50% of income
- Housing cost burden greater than 30% of income

Although the 2022 ACS data provides an estimate of the number of households that are cost-burdened, CHAS data provides the number and percentages of households by income level within the City of Dallas that had housing problems as well as the size and type of household. The below analysis is based on this data. The latest available CHAS data is generated from the 2016-2020 ACS data, while dated, provides detailed information about housing cost burdens for all categories.

CHAS data indicates that more renter households disproportionately experience at least one housing problem in comparison to homeowners. Renter households only represent 50 percent of all households, but 60 percent of renter households have at least one housing problem.

Housing Problems by Household Area Median Family Income (HAMFI)			
Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	26,020	66,540	92,560
Household Income >30% to <=50% HAMFI	25,395	55,610	81,005
Household Income >50% to <=80% HAMFI	36,585	67,170	103,755
Household Income >80% to <=100% HAMFI	20,145	31,540	51,685
Household Income >100% HAMFI	108,510	86,970	195,480
<b>Total</b>	<b>216,660</b>	<b>307,835</b>	<b>524,500</b>
Housing Problems Overview 1	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	59,120	146,950	206,070
Household has none of 4 Housing Problems OR cost burden not available no other problems	157,540	160,885	318,425
<b>Total</b>	<b>216,660</b>	<b>307,835</b>	<b>524,500</b>
Severe Housing Problems Overview 2	Owner	Renter	Total
Household has at least 1 of 4 Severe Housing Problems	31,525	82,895	114,420
Household has none of 4 Severe Housing Problems OR cost burden not available no other problems	185,135	224,940	410,075
<b>Total</b>	<b>216,660</b>	<b>307,835</b>	<b>524,500</b>
Housing Cost Burden Overview 3	Owner	Renter	Total
Cost Burden <=30%	162,235	167,145	329,380
Cost Burden >30% to <=50%	28,895	71,575	100,470
Cost Burden >50%	23,095	59,280	82,375
Cost Burden not available	2,430	9,845	12,275
<b>Total</b>	<b>216,660</b>	<b>307,835</b>	<b>524,500</b>
Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Total
Household Income <= 30% HAMFI	69,730	22,840	92,560
Household Income >30% to <=50% HAMFI	61,435	19,570	81,005
Household Income >50% to <=80% HAMFI	45,080	58,680	103,755

Household Income >80% to <=100% HAMFI	12,240	39,445	51,685
Household Income >100% HAMFI	17,590	177,895	195,480
<b>Total</b>	<b>206,070</b>	<b>318,425</b>	<b>524,500</b>

Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	51,710	14,835	66,540
Household Income >30% to <=50% HAMFI	48,195	7,415	55,610
Household Income >50% to <=80% HAMFI	32,025	35,150	67,170
Household Income >80% to <=100% HAMFI	7,750	23,790	31,540
Household Income >100% HAMFI	7,275	79,700	86,970
<b>Total</b>	<b>146,950</b>	<b>160,885</b>	<b>307,835</b>

Income by Housing Problems (Owners only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	18,020	8,005	26,020
Household Income >30% to <=50% HAMFI	13,240	12,155	25,395
Household Income >50% to <=80% HAMFI	13,055	23,530	36,585
Household Income >80% to <=100% HAMFI	4,490	15,655	20,145
Household Income >100% HAMFI	10,315	98,195	108,510
<b>Total</b>	<b>59,120</b>	<b>157,540</b>	<b>216,660</b>

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	68,095	55,195	92,560
Household Income >30% to <=50% HAMFI	56,820	18,090	81,005
Household Income >50% to <=80% HAMFI	37,390	5,970	103,755
Household Income >80% to <=100% HAMFI	8,845	1,385	51,685

Household Income >100% HAMFI	11,700	1,740	195,480
<b>Total</b>	<b>182,850</b>	<b>82,375</b>	<b>524,500</b>
<b>Income by Cost Burden (Renters only)</b>			
	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	50,665	41,920	66,540
Household Income >30% to <=50% HAMFI	44,930	13,370	55,610
Household Income >50% to <=80% HAMFI	26,350	3,255	67,170
Household Income >80% to <=100% HAMFI	5,395	505	31,540
Household Income >100% HAMFI	3,515	230	86,970
<b>Total</b>	<b>130,855</b>	<b>59,280</b>	<b>307,835</b>
<b>Income by Cost Burden (Owners only)</b>			
	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	17,425	13,270	26,020
Household Income >30% to <=50% HAMFI	11,890	4,720	25,395
Household Income >50% to <=80% HAMFI	11,035	2,715	36,585
Household Income >80% to <=100% HAMFI	3,450	880	20,145
Household Income >100% HAMFI	8,190	1,510	108,510
<b>Total</b>	<b>51,990</b>	<b>23,095</b>	<b>216,660</b>

Table 21: HUD CHAS Data, <https://www.huduser.gov/portal/datasets/cp.html#year2016-2020>

## Rental Affordability

A healthy housing market provides a diverse range of housing options, including rental and for-sale homes and homes affordable to people of different incomes. An examination of the percentage of households that rent their homes, and the characteristics of these renter households (age, income, and cost-burden) can help the City understand the needs of renters and the extent to which policy changes may be needed to help ensure those needs are met.

By examining how the data change over time, the City can spot trends, such as increased or decreased rental affordability. Data at the MSA and state levels provide benchmarks that can be helpful for interpreting the city's data. In addition to developing new dedicated affordable rental homes, it is important to consider how both to preserve existing dedicated affordable rental homes and to preserve unsubsidized rental homes that are nevertheless affordable. Since the overall supply of homes for rent can affect rent levels, localities interested in making rental homes more affordable also may wish to focus on reducing barriers to the creation of new supply.

## Renter Housing

The comparison of gross rent data between 2017 and 2022 highlights significant shifts in the rental market, reflecting broader trends in housing affordability and economic conditions over the five-year period.

### Overview of Occupied Rental Units:

- In 2022, there were 309,083 occupied rental units paying rent, a 9% increase from the 284,865 units recorded in 2017. This growth in occupied rental units indicates a rising demand for rental housing over the period.

### Distribution of Gross Rent:

- Less than \$500:
  - In 2022, only 1.1% of rental units fell into this category, down from 1.3% in 2017. This decrease reflects the dwindling availability of low-cost rental options, likely due to inflation and rising housing costs.
- \$500 to \$999:
  - The most dramatic change is observed in this category, where the share of units dropped from 28.8% in 2017 to 14.3% in 2022. This significant decline underscores the shrinking availability of moderately priced rentals as overall rent prices increased.
- \$1,000 to \$1,999:
  - The share of rental units in this range grew from 47.7% in 2022, up from 38.3% in 2017. This category now represents the largest portion of the rental market, reflecting the upward shift in rents as the median rent price rose.
- \$2,000 to \$2,499:

- In 2022, 9.0% of rental units were priced in this range, a sharp increase from 2.7% in 2017. This growth indicates that higher-end rental options have become more common over the period.
- \$2,500 or more:
  - The share of units with rents above \$2,500 also increased, representing 6.4% of the market in 2022 compared to 1.9% in 2017. This rise highlights the expansion of the luxury rental market.

The median rent increased significantly from \$937 in 2017 to \$1,360 in 2022, reflecting a 45% increase. This substantial rise indicates that rents have increased at a rate much higher than inflation, exacerbating affordability challenges for many renters.

The rental market between 2017 and 2022 saw a clear upward shift in rent prices, with a marked reduction in affordable rental options under \$1,000 and a significant increase in higher-cost rental units. The median rent rising from \$937 to \$1,360 illustrates the growing financial burden on renters, particularly those in lower-income brackets. This data suggests that while the rental market has expanded, it has also become increasingly unaffordable for many, highlighting the need for more affordable housing solutions to meet the needs of a diverse population.

<b>GROSS RENT</b>	<b>2022</b>		<b>2017</b>	
<i>Occupied units paying rent</i>	<b>309,083</b>	<b>100 %</b>	<b>284,865</b>	<b>100%</b>
Less than \$500	13,124	1.1	15,512	1.3
\$500 to \$999	46,423	14.3	146,966	28.8
\$1,000 to \$1,999	201,958	47.7	109,055	51.0
\$2,000 to \$2,499	27,872	28.3	7,790	16.0
\$2,500 or more	19,706	(X)	5,542	(X)
<b>No cash rent</b>	6,698	(X)	6,269	(X)
<b>Median (dollars)</b>	\$1,360	(X)	937	(X)

Table 22: Gross Median Rent, US Census, 2022 American Community Survey 5-Year Estimates

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 FMR for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD’s Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and Section 8 Income Limits. The 2023 HUD Fair Market Rents and HOME Rent Limits for the Dallas-Fort Worth-Arlington HUD MSA are shown in the following table.

<b># of Bedrooms Limit</b>	<b>Fair Market Rent</b>	<b>High Rent Limit 80% of Units</b>	<b>Low Rent Limit 20% of Units</b>
----------------------------	-------------------------	-------------------------------------	------------------------------------

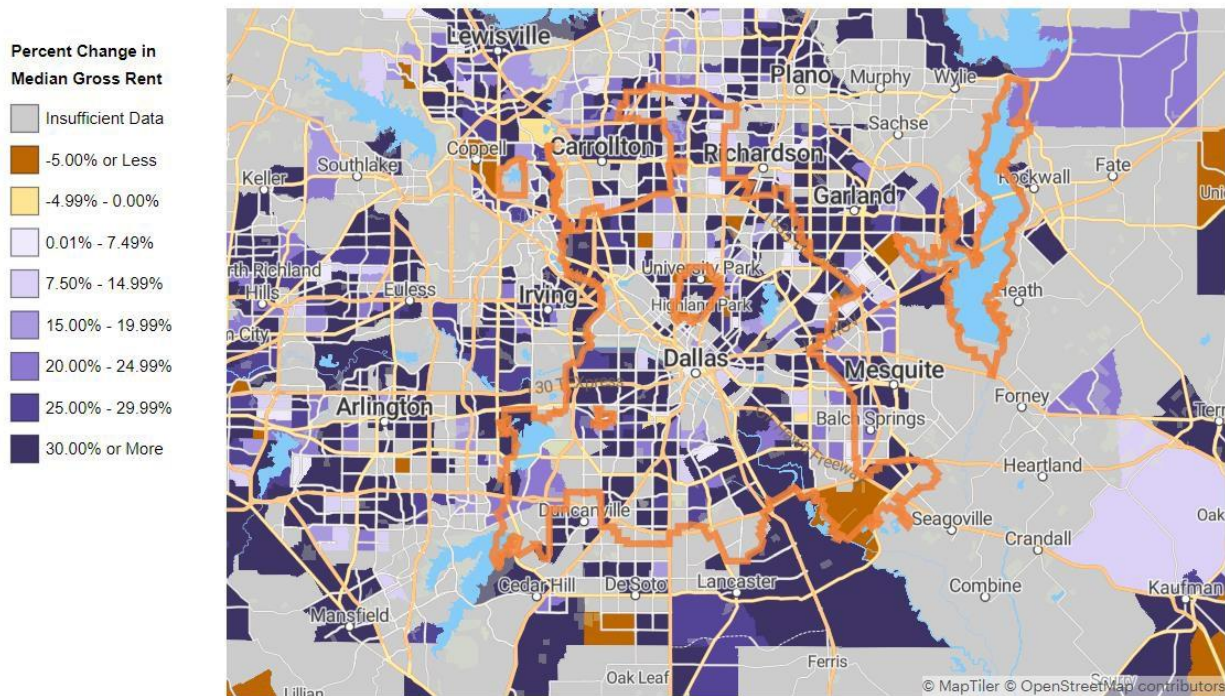
0	\$1,426	\$1,235	\$966
1	\$1,500	\$1,325	\$1,035
2	\$1,758	\$1,592	\$1,241
3	\$2,212	\$1,830	\$1,434
4	\$2,847	\$2,023	\$1,600

**Fair Market Rent, HOME High Rent Limit, and HOME Low Rent Limit**

Table 23: Source: HUD Fair Market Rent, <https://www.hudexchange.info/programs/home/home-rent-limits/>

### Change in Median Rent by Neighborhood

Neighborhood-level data on rent trends can help the City spot large rent increases that could lead to (or be markers of) displacement in certain neighborhood as well as decreases in other neighborhoods that could be signs of continued or growing distress. The map below illustrates the change in median gross rent in Dallas between 2017 and 2022 by census tract. The map below shows how rents within each census tract compared to the +39.3% overall change. As you can see significant rent increases occurred throughout the City with heavy concentration of increases in South and West Dallas.



The National Low Income Housing Coalition’s (NLIHC) “Out of Reach” 2024 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD’s affordability standard of paying no more than 30% of income for housing costs. Data is presented in the Renter Affordability table for the Dallas-Fort Worth-Arlington Metro Statistical Area (MSA).

As noted in the 2024 Out of Reach Report, the NLIHC estimates that the housing wage for a 2-bedroom unit is \$57,990 or \$27.88 per hour. However, working at minimum wage of \$7.25/hour, a worker would need to work 129 hours weekly to afford a modest 1-bedroom rental home at the Fair Market Rent.

**Share of Renter Households Moderately or Severely Cost Burdened**

A moderately cost burdened renter household spends between 30 and 49.9% of their household income on gross rent (defined as monthly rent plus utilities expenses). A severely cost burdened renter household spends 50% or more of their household income on gross rent. Examining how the share of renter households that are cost-burdened changes over time can help the City understand whether affordability problems are easing or worsening. In Dallas, the share of renter households that are moderately or severely cost burdened increased from 45.0% in 2017 to 47.0% in 2022. Additionally, the share of renter households in Dallas that were moderately or severely cost-burdened in 2022 (47.0%) was on par with the share in the Dallas-Fort Worth-Arlington Metro Area, (47.1%), and slightly higher than the share in the United States, (46.5%).

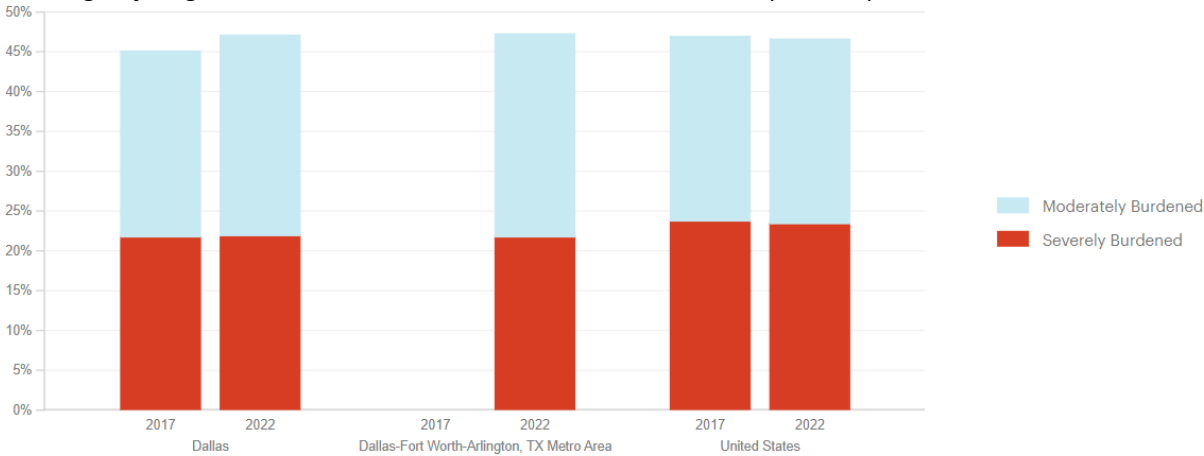


Figure 3: Share of Renter Households Moderately or Severely Cost Burdened  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Dallas, TX

**Share of Renter Households Cost Burdened by Race/Ethnicity**

Across the U.S. there are substantial disparities in rental cost burdens by race and ethnicity. Although data may be limited for some races or ethnic groups, the data shown below examines how the prevalence of both moderate and severe cost burdens vary across population subsets. The data shows that a about 30 percent of American Indian or Alaska Natives experience severe cost burden followed by 23 percent of Black households. These families must dedicate a greater portion of their income to housing as opposed to other resources. Asian families were the least likely to experience cost burden, but the percentage of this group facing cost burden still remains high.

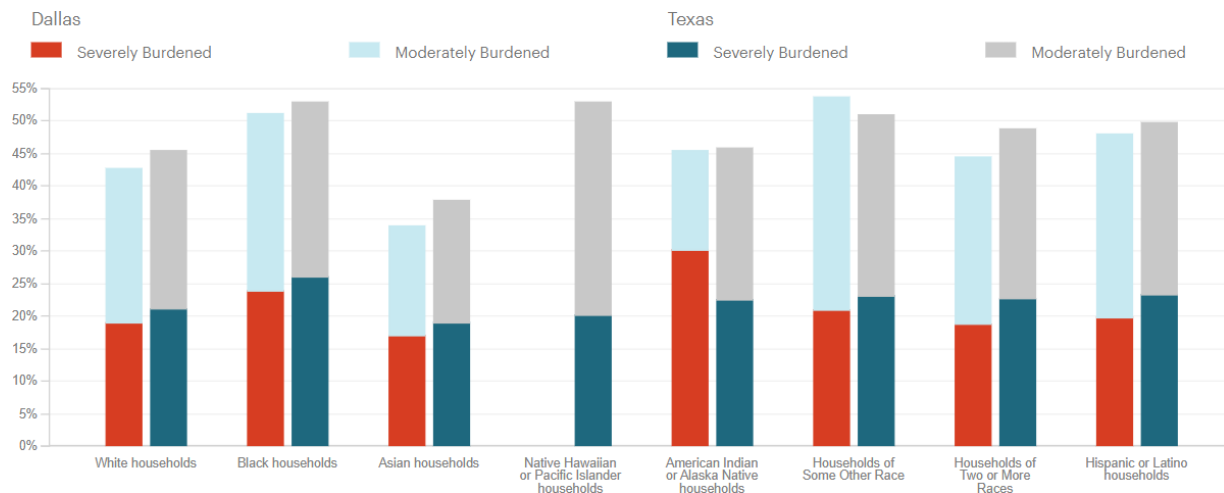


Figure 4: Share of Renter Households Cost Burdened by Race  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Dallas, TX

### Share of Renter Households that are Cost Burdened across Income Ranges

The incidence of housing cost burdens is generally highest for unassisted renter households with the lowest incomes, a key reason federal housing vouchers and federally funded public housing are targeted primarily toward extremely lower income renters. In developing a local housing strategy, it is important to consider both the incidence of moderate- and severe housing cost burdens among households of different income levels and the absolute number of renter households with these problems within each income category. It is also important to consider whether the incidence of housing problems is rising among certain income groups as well as whether there are important gaps not targeted by federal assistance.

In Dallas, renter households with incomes of between \$20,000 - \$35,000 had the highest incidence of cost burden in 2022 (94.2%), followed by households earning less than \$20,000 (72%) and households with incomes between \$35,000 - \$50,000 (70%). As shown in the previous visualization, the share of households rent burdened in Dallas increased overall from 2017 to 2022.



Figure 5: Share of Renter Households that are Cost Burdened across Income Ranges  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Dallas, Texas

### Distribution of Renter Households and Affordable Rental Units by Income

This chart compares the cumulative share of renters below specified income levels to the share of the rental stock affordable to households with these incomes to help in identifying housing supply shortages at different income levels. It is important to note that some of the units identified as affordable to people of a particular income level may in fact be occupied by households with higher incomes, reducing the stock available for lower income households. There are deficits in affordable supply for the lowest income households in nearly all markets, including Dallas.

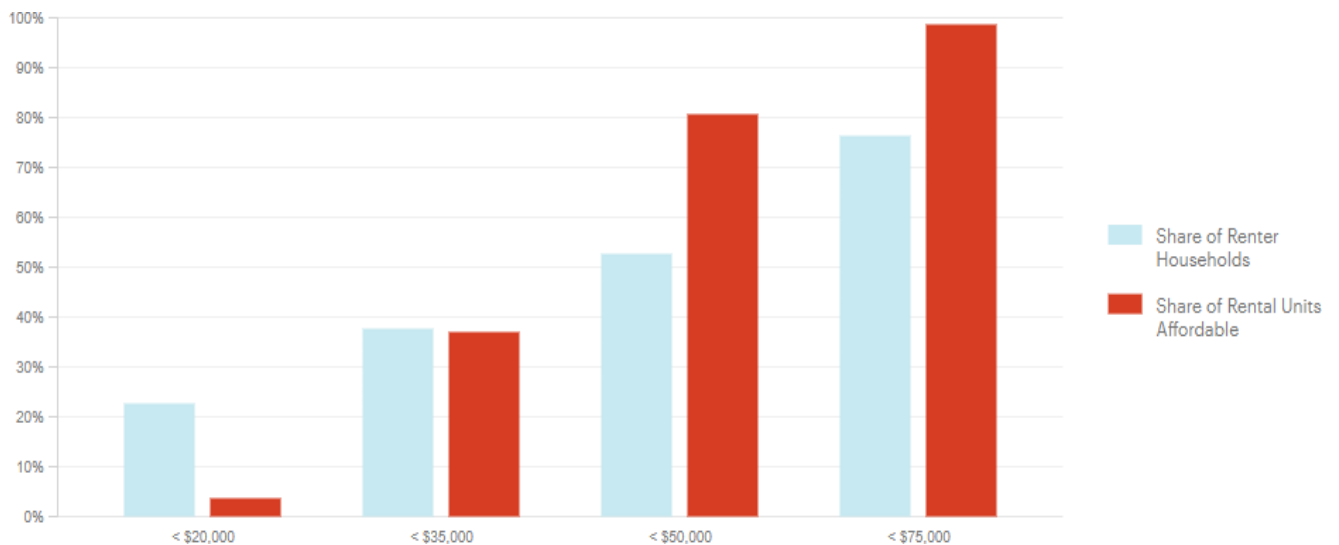
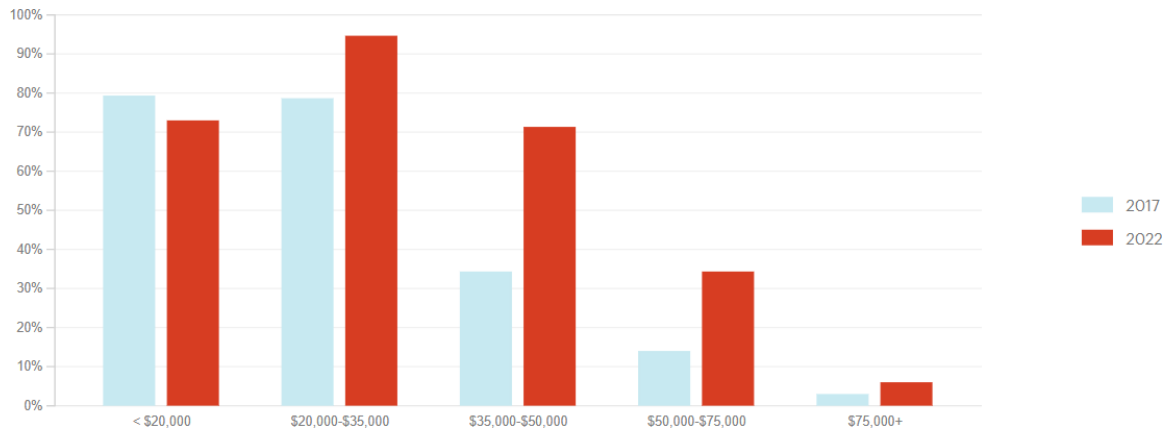


Figure 6: Share of Renter Households that are Cost Burdened across Income Ranges  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Comparison of Trends in Rent and Income (Indexed) 2012 to 2022

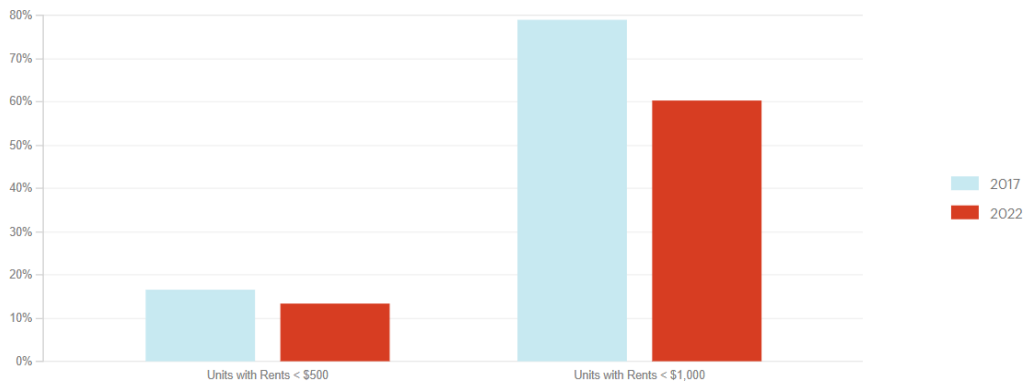
In some communities, rents are rising faster than incomes, contributing to decreased affordability. The monthly median rent in Dallas rose from \$822 in 2012 to \$1,305 in 2022 (growth of 58.8%). During this same period, the annual median family income in Dallas rose from \$45,375 to \$72,504 (growth of 59.8%). This data has not been adjusted for inflation.



Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Change in Stock of Rental Units below \$500 and \$1,000 a Month 2017 to 2022

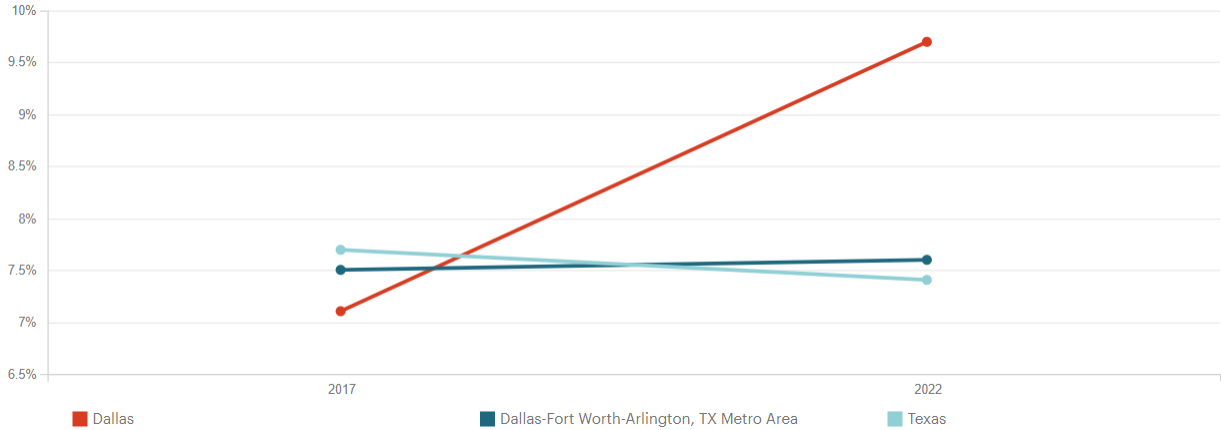
In some localities, there is a noticeable decrease in the availability of low-rent units as property owners either renovate their properties or adjust rents to match the rising market rates. In Dallas, only 3.2% of rental units in 2022 had a monthly rent of \$500 or less, and 21.1% of units rented for \$1,000 or less per month. This marks a significant decline from 2017, when 57.0% of rented units in Dallas had a gross rent of \$1,000 or less. These figures are in nominal dollars and do not account for inflation. According to affordability standards, which define affordable rent as 30% or less of household income, monthly rents of \$500 and \$1,000 are considered affordable for households with annual incomes of \$20,000 and \$40,000, respectively.



Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Change in Rental Vacancy Rates

Since 2017, the vacancy rate in Dallas has risen by 2.6 percentage points, with the number of vacant rental units increasing from 22,683 to 32,804. As of 2022, the rental unit vacancy rate in Dallas was 9.7%, higher than the state of Texas's rate of 7.4% in the same year. Generally, higher vacancy rates suggest a softer housing market with fewer supply constraints. Conversely, decreasing rental vacancy rates may indicate increasing pressure on the local rental housing supply.



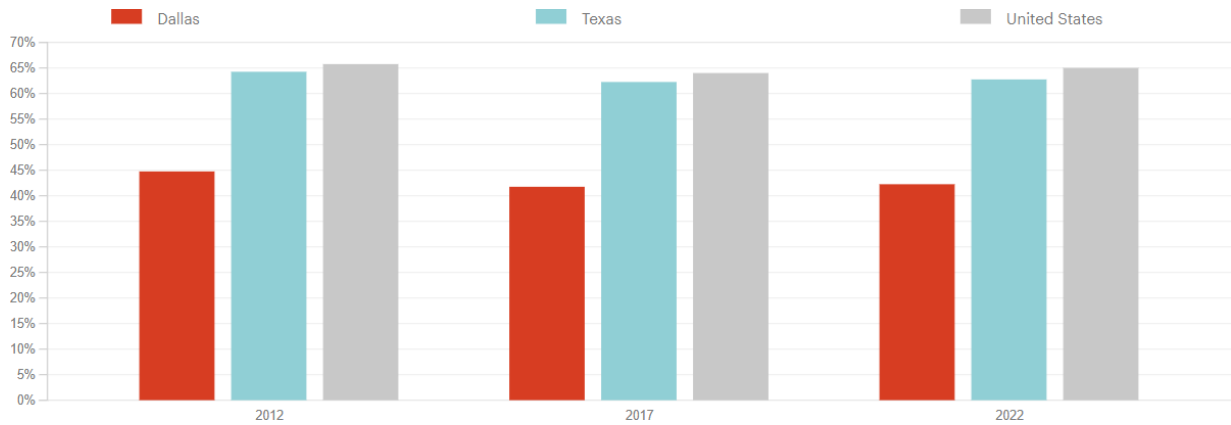
Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Homeownership Affordability

Examining the homeownership rate and the affordability of owner-occupied homes is crucial for developing a strategic approach to increasing homeownership. Localities with homeownership rates that are low compared to the region or state might consider implementing policies to encourage homeownership. Several policy options can help make homeownership attainable for low- and moderate-income households, including community land trusts, deed-restricted homeownership, housing counseling, down payment assistance, and shared appreciation mortgages.

## Homeownership Rate

The state and national averages provide valuable context for understanding Dallas' homeownership rate and its change over time. In 2022, 41.9% of households in Dallas owned their homes, which is lower than both the state of Texas (62.4%) and the United States (64.8%). Between 2017 and 2022, the homeownership rate in Dallas rose by 0.4 percentage points, with the number of homeowners increasing from 206,488 to 218,575.

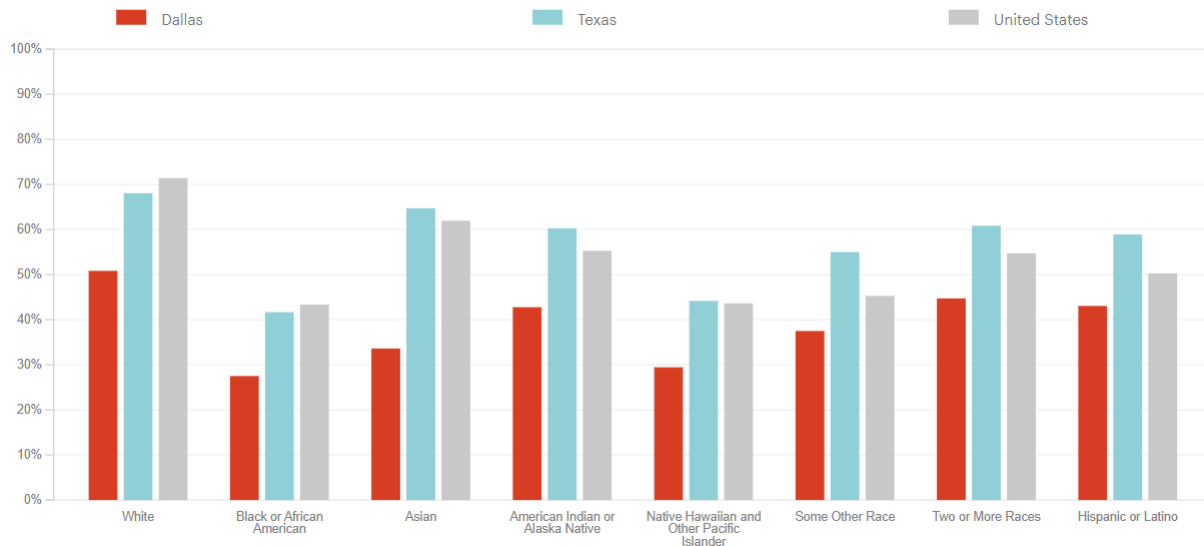


Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

### Homeownership Rate by Race/Ethnicity

Across the U.S., there are significant variations in homeownership rates by race and ethnicity. The City can use these charts to compare homeownership rates by race or ethnicity within city limits to those of the state and the U.S. as a whole, and to understand how trends and disparities in homeownership rates have changed over time.

In Dallas, as of 2022, the homeownership rate for white householders was 50.6%, compared to 67.7% in Texas and 71.1% in the United States overall. During the same period, the homeownership rate for Black or African American householders in Dallas was 27.1%, lower than Texas's rate of 41.4% and the U.S. rate of 43.1%. Refer to the chart for the homeownership rates of other racial and ethnic groups.

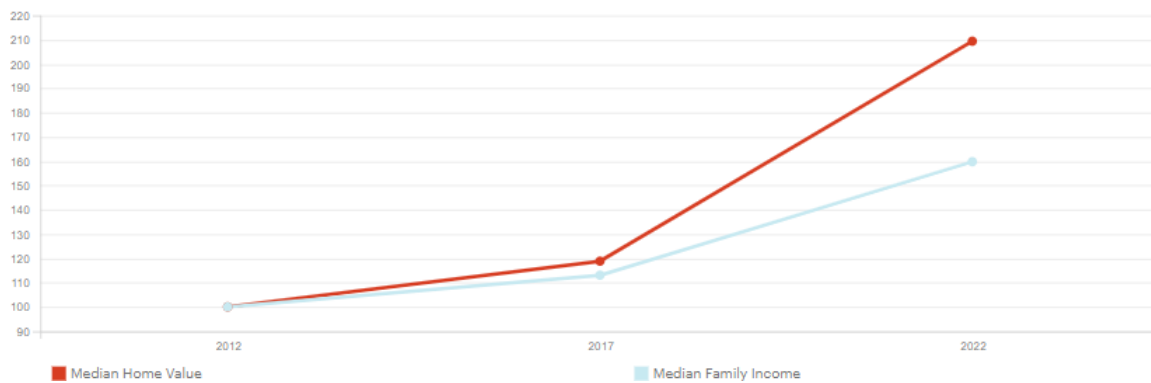


Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Comparison of Trends in Median Home Values and Median Family Incomes

Median home values in Dallas have increased by \$141,400 in nominal dollars since 2012. As of 2022, the median home value in Dallas was \$270,700, reflecting a 109.4% increase since 2012. During the same period, median family income in Dallas grew from \$45,375 in 2012 to \$72,504 in 2022, a growth of 59.8%. Current local real estate data estimates that the median home value is \$315,154.

Median Home Value Versus Median Family Income (Indexed) 2012 to 2022



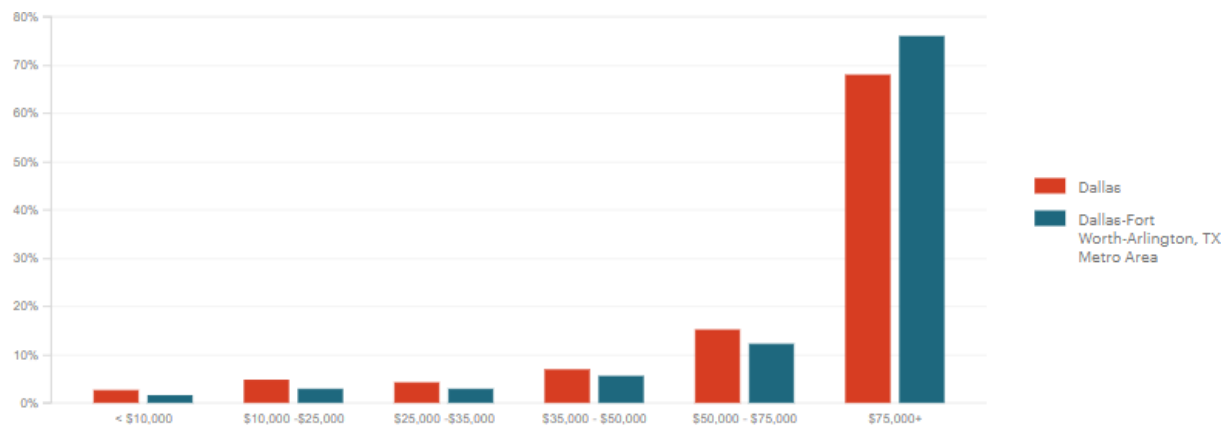
Source: [Census](#)

2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Distribution of Homeowners with Mortgages by Income

This chart highlights the relative incomes of homeowners with mortgages in Dallas compared to those in the Dallas-Fort Worth-Arlington, TX Metro Area. When the incomes of homeowners with mortgages are lower in the city than in the broader region, it generally indicates that homes in the area are more affordable than in the region.

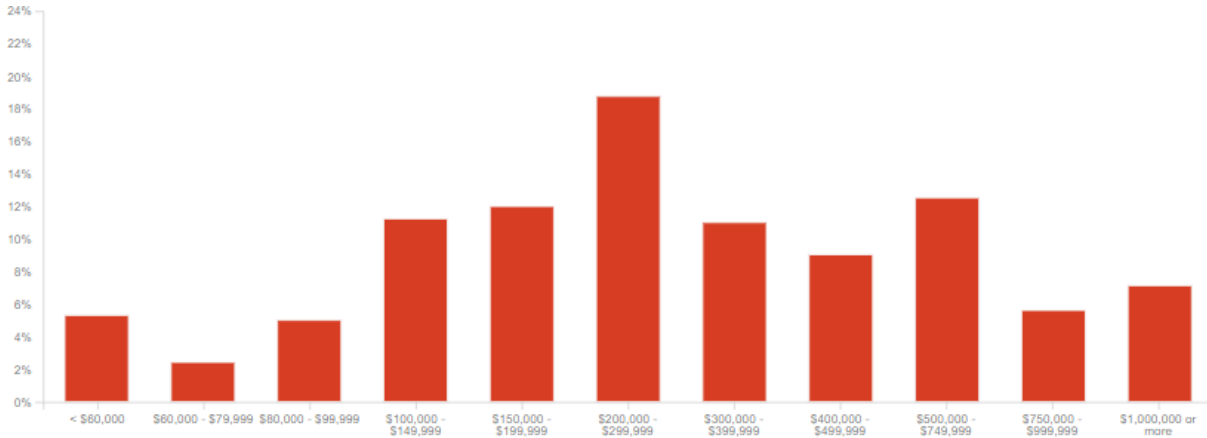
In Dallas, as of 2022, 6.8% of homeowners with a mortgage earned under \$25,000 annually, compared to 4.1% of homeowners in the Dallas-Fort Worth-Arlington, TX Metro Area. Additionally, 67.8% of homeowners with mortgages in Dallas earned over \$75,000 annually, which is lower than the 75.8% share for the Dallas-Fort Worth-Arlington, TX Metro Area. For context, the Area Median Income for the City of Dallas is \$86,200.



Source: [Census](#) 2008-2012 - 2018-2022 Data Contains: Dallas, TX

## Distribution of Reported Home Values 2022

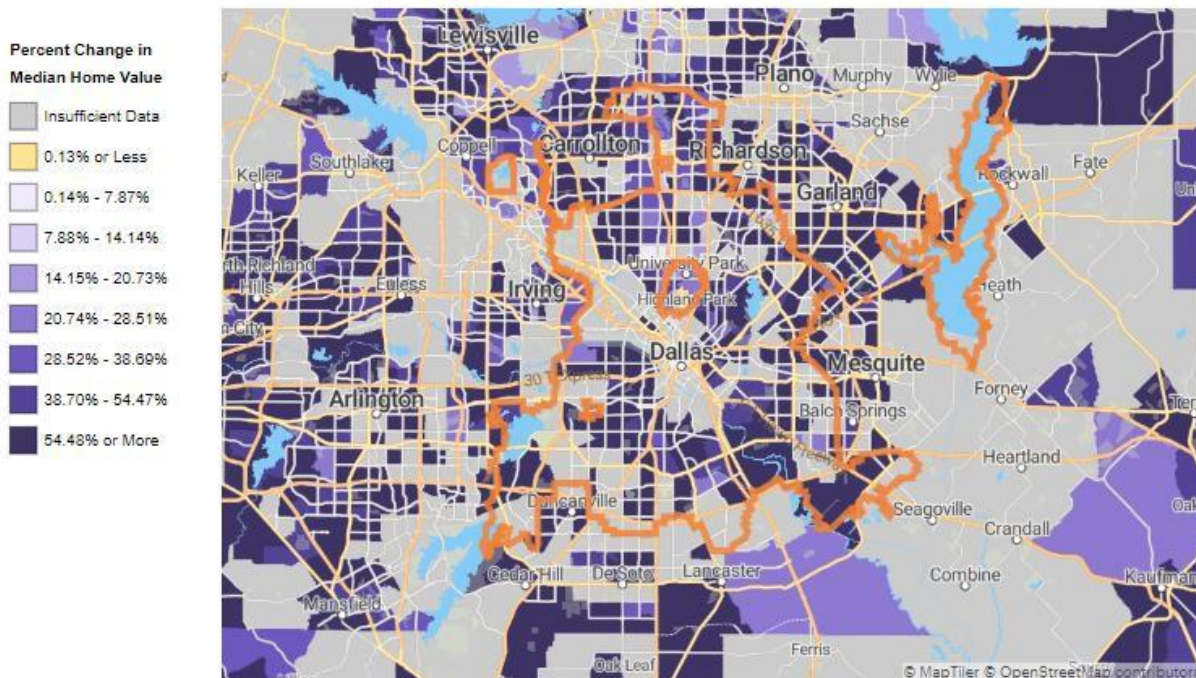
This chart displays the distribution of reported home values for owner-occupied homes in Dallas. The area median income (AMI) for Dallas was \$97,400 in 2022. Generally, households earning 60%, 80%, 100%, and 120% of the AMI in Dallas could afford homes valued at approximately \$175,320, \$233,700, \$292,200, and \$350,640, respectively.



Source: [Census](#)  
2008-2012 - 2018-2022 Data Contains: Dallas TX

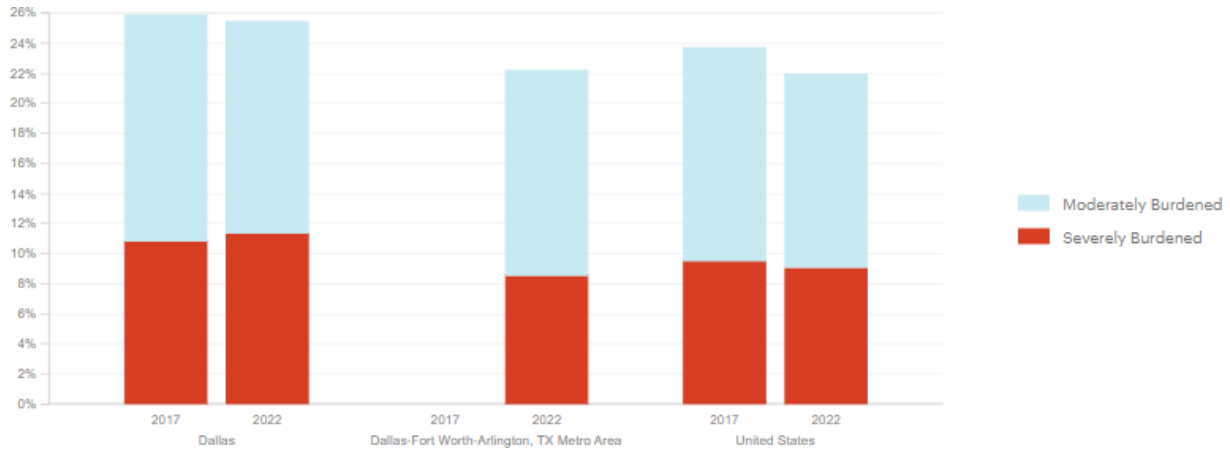
## Change in Median Home Value by Neighborhood

Recent trends in home prices can assist in designing and targeting programs and policies to neighborhoods experiencing the most significant changes in housing prices. The map below illustrates the change in median home prices in Dallas by census tract between 2017 and 2022. Use this map to compare how home prices within each census tract in Dallas changed relative to the overall increase of 75.8%.



### Share of Owner Households Moderately or Severely Cost Burdened

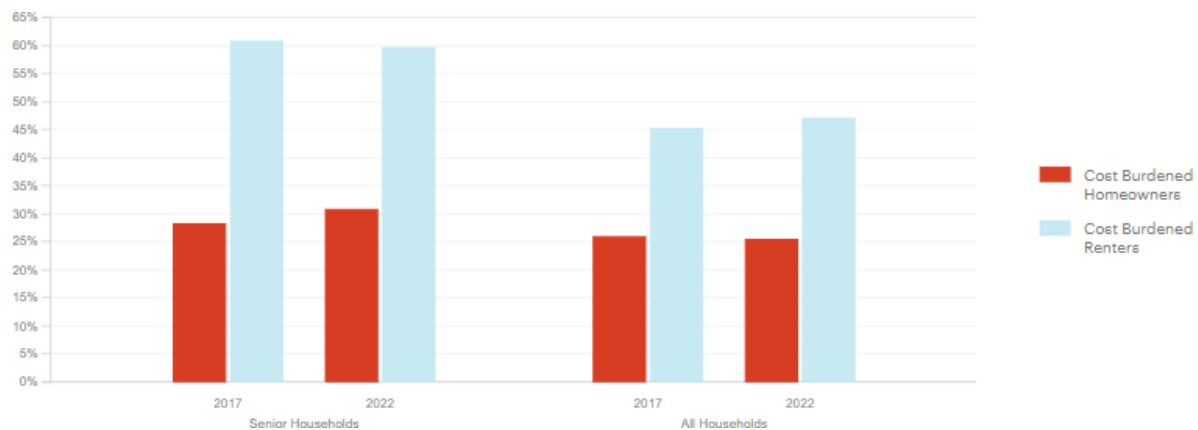
In Dallas, the percentage of owner households that were moderately or severely cost burdened decreased slightly from 25.8% in 2017 to 25.4% in 2022. This rate remains higher than the 22.2% seen in the Dallas-Fort Worth-Arlington, TX Metro Area, and also higher than the national rate of 21.9% of cost-burdened homeowners in 2022.



Source: Census, 2008-2012 - 2018-2022 Data Contains: Dallas, TX

### Cost Burdened Senior Households 2017 to 2022

This chart examines whether cost burdens are greater among senior households than the general population in the city. In Dallas, as of 2022, a larger share of senior renter households are burdened (59.4%) than are renter households overall (47.0%). For senior homeowners, the same relationship exists. To determine whether the trends in cost-burden for senior households are similar to or different from the trends for all households, compare the left set of bars to the right set of bars.



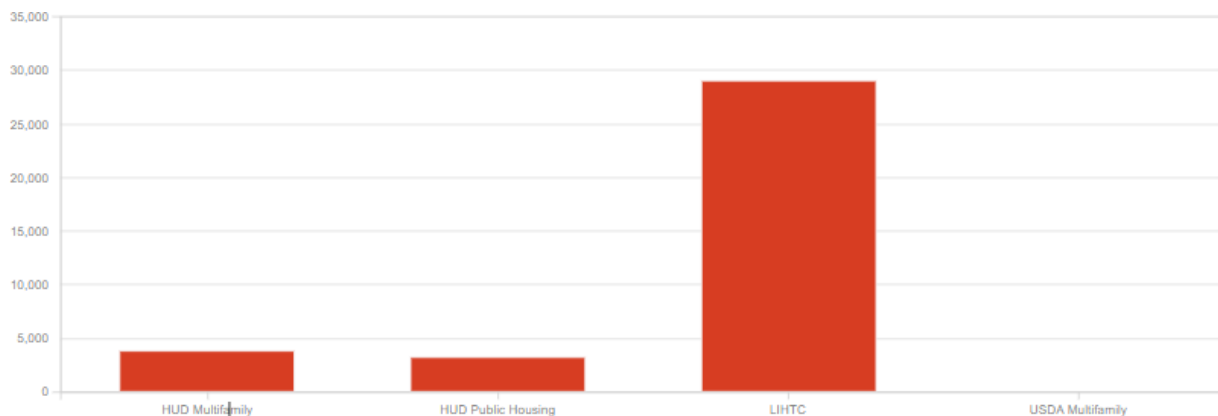
Source: Census  
 2013-2017 - 2018-2022 Data Contains: Dallas, TX

### Dedicated Affordable Housing

There are two main types of affordable housing: (a) dedicated affordable housing that comes with binding rent and/or income restrictions to ensure it is occupied by lower income households and (b) market affordable housing – units that rent or sell at an affordable price but have no binding restrictions. This section focuses on the first type, providing information about the amount and location of dedicated affordable housing in the city. Surveying the landscape of existing affordable housing in the city can help clarify gaps left by federal subsidies and identify the extent to which existing dedicated affordable housing units may be at risk of loss from the subsidized inventory as federal regulatory agreements expire.

### Federally Subsidized Housing Units

In 2021, the inventory of federally subsidized rental housing in Dallas included 35,923 units and comprised 11.9% of Dallas’s total rental stock. Of these subsidized units, 3,161 are HUD public housing units. Remaining units are privately owned and receive federal subsidies. In addition to the federally subsidized rental programs tracked here, some the city may also have rental units that are subsidized by state or local sources. Not included in this inventory are approximately 7,920 Housing Choice Vouchers, the majority of which are tenant-based (assigned to individuals who may use them in rental housing of their choosing) and a portion of which may be project-based (tied to specific units). Tenant-based vouchers may be used in Low Income Housing Tax Credit properties or in other privately-owned units that meet voucher program criteria.



Source: HUD Multifamily DB, HUD’s Picture of Subsidized Households, LIHTC, USDA

### Racial Disparities in Housing

There is growing recognition of the continuing effects of these policies and practices, and of ways to counter resulting housing disparities. Disaggregating housing data by race and ethnicity assists the City’s policymakers and practitioners in identify housing disparities in the community and begin to design policies to address them.

Several measures of racial and ethnic disparities in housing are included in this report. This section highlights and consolidates these measures—which include variations in rental and homeowner affordability by race and ethnicity, and common measures of

spatial disparities such as average neighborhood poverty rates and the dissimilarity index, which measures residential segregation. The following measures are related to racial and ethnic disparities in housing.

- Poverty Level and Trend by Race and Ethnicity 2012 - 2022
- Share of Renter Households Moderately or Severely Cost Burdened by Race and Ethnicity, 2020
- Homeownership Rate by Race and Ethnicity, 2022
- Homeownership Rate Trend by Race and Ethnicity, 2012 - 2022
- Average Neighborhood Poverty Rate for Federally Subsidized Housing by Subsidized Housing Type, 2020
- Race and Ethnicity by Neighborhood, 2022
- Dissimilarity Index, 2020
- Average Neighborhood Poverty Rate by Race/Ethnicity, 2020

#### **D. Segregation Analysis**

##### **Dissimilarity Index**

The dissimilarity index measures the degree of residential segregation between two groups within a jurisdiction by comparing their distribution across neighborhoods. The index ranges from 0 to 100, where 0 indicates total integration and 100 indicates complete segregation. An index value of 0 means both groups are evenly distributed across all neighborhoods, while a value of 100 means complete separation, requiring 100% of one group to move to achieve balance.

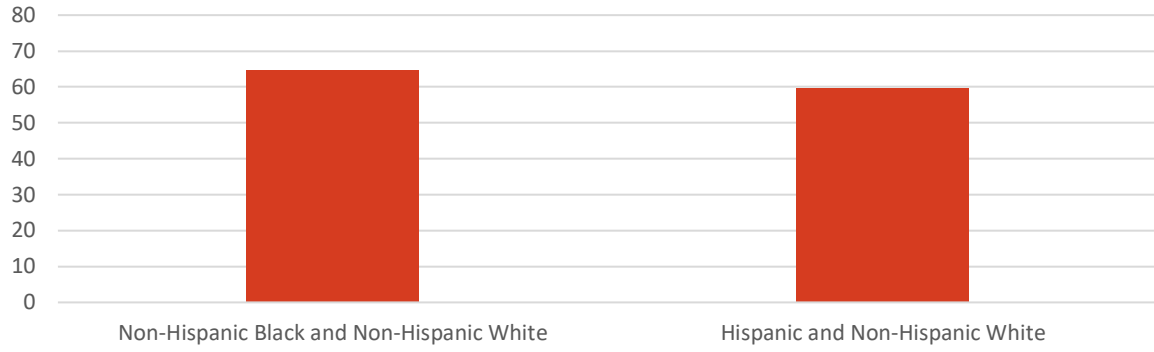
Generally, index values between 0 and 30 indicate low segregation (more integrated communities), values between 31 and 60 indicate moderate segregation, and values between 61 and 100 indicate high segregation. This index is calculated at the Core-Based Statistical Area (CBSA) level, where white residents and Black, Latino, and/or Asian residents each make up at least 5% of the total CBSA population.

In Dallas, the dissimilarity index value was:

- 64.8 for Non-Hispanic Black and Non-Hispanic White residents (indicating high segregation),
- 59.6 for Hispanic and Non-Hispanic White residents (indicating moderate segregation).

Understanding and addressing segregation by race, ethnicity, and income can help cities create more integrated and equitable communities.

## Dissimilarity Index



Source: Census  
2018-2022 Data Contains: Dallas, TX

### III. ACCESS TO OPPORTUNITY

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Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services, and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.”<sup>1</sup> Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.<sup>2</sup>

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, “comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities,” according to the Institute.

#### Overview of HUD-Defined Opportunity Factors

HUD developed opportunity indicators to identify communities with disparate access to opportunity and identify protected classes experiencing disparate impacts of unfair

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<sup>1</sup> Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

<sup>2</sup> Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: [huduser.org/Publications/pdf/Phase1\\_Report.pdf](http://huduser.org/Publications/pdf/Phase1_Report.pdf)

housing choice. The opportunity index includes scores for: poverty, education, employment, transportation, and environmental health. The following sections provide definitions of each opportunity indicator as defined in HUD’s AFFH-T Data Documentation and describe local findings. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity.

### A. Low Poverty Index

The Low Poverty Index measures poverty in a community, a higher score represents a more prosperous community with lower poverty levels. This indicator measures family poverty rates and the receipt of public assistance, such as cash welfare.

The table below shows Poverty Index scores across race and ethnicity. In general, the Black and Hispanic communities are the least prosperous and experience the most poverty, while the White and Asian/Pacific Islander non-Hispanic communities are the most prosperous and experience the least poverty in the city and the Dallas-Fort Worth-Arlington, TX Region.

LOW POVERTY INDEX		
	(Dallas, TX CDBG) Jurisdiction	(DFW MSA) Region
<b>Total Population</b>		
White, Non-Hispanic	58.23	65.65
Black, Non-Hispanic	20.34	40.76
Hispanic	22.05	38.02
Asian or Pacific Islander, Non-Hispanic	44.91	67.50
Native American, Non-Hispanic	35.66	57.08
<b>Population below federal poverty line</b>		
White, Non-Hispanic	39.61	50.39
Black, Non-Hispanic	14.55	24.80
Hispanic	18.86	27.99
Asian or Pacific Islander, Non-Hispanic	31.26	53.12
Native American, Non-Hispanic	22.22	35.97

Table 25: Low Poverty Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## B. School Proficiency Index

The School Proficiency Index measures the quality of the school systems in a community. The higher the score, the higher the school system met HUD’s definition of proficiency. This indicator 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.

<b>SCHOOL PROFICIENCY INDEX</b>		
	<b>(Dallas, TX CDBG) Jurisdiction</b>	<b>(Dallas-Fort Worth- Arlington, TX) Region</b>
<b>Total Population</b>		
White, Non-Hispanic	57.05	64.13
Black, Non-Hispanic	31.14	41.36
Hispanic	37.18	44.49
Asian or Pacific Islander, Non-Hispanic	53.45	68.03
Native American, Non-Hispanic	44.19	57.59
<b>Population below federal poverty line</b>		
White, Non-Hispanic	48.65	54.17
Black, Non-Hispanic	29.75	34.09
Hispanic	36.37	39.74
Asian or Pacific Islander, Non-Hispanic	48.63	58.16
Native American, Non-Hispanic	40.57	45.76

Table 26: School Proficiency Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## C. Labor Market Engagement Index

The Labor Market Engagement Index measures a community’s level of employment, labor force participation, and educational attainment in a community, the higher the score, the higher the opportunity for engagement in the labor market.

The table below shows the Labor Market Engagement Index scores across race and ethnicity. In the table below, white non-Hispanic, Asian, or Pacific Islander non-Hispanic, and Native American non-Hispanic communities have the most labor market engagement even when in poverty. The Black non-Hispanic and Hispanic communities have the least labor market engagement. Comparatively, the numbers in the DFW region follow the same pattern.

<b>LABOR MARKET INDEX</b>		
	<b>(Dallas, TX CDBG) Jurisdiction</b>	<b>(Dallas-Fort Worth- Arlington, TX) Region</b>
<b>Total Population</b>		
White, Non-Hispanic	76.08	64.13
Black, Non-Hispanic	30.92	47.43
Hispanic	36.60	45.88
Asian or Pacific Islander, Non-Hispanic	65.29	74.22
Native American, Non-Hispanic	52.58	59.68
<b>Population below federal poverty line</b>		
White, Non-Hispanic	59.07	54.67
Black, Non-Hispanic	25.35	33.78
Hispanic	35.14	39.32
Asian or Pacific Islander, Non-Hispanic	53.20	61.88
Native American, Non-Hispanic	37.89	43.77

Table 27: Labor Market Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

#### **D. Transit Index**

The Transit Index measures the utilization of public transportation in a community. Transit access describes the accessibility of amenities using public transit. The higher the score, the more likely residents in that community utilize public transit. This indicator estimates transit trips taken by families that: are a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)).

Table 28 shows the Transit Index scores across race and ethnicity. Based on these parameters, transit use is consistent across racial and ethnic communities with the Hispanic community below the poverty line with the highest score, while regionally Black Non-Hispanic and Hispanic communities have the highest score.

	(Dallas, TX CDBG) Jurisdiction	(Dallas-Fort Worth- Arlington, TX) Region
<b>Total Population</b>		
White, Non-Hispanic	83.85	58.29
Black, Non-Hispanic	76.98	64.92
Hispanic	79.63	67.34
Asian or Pacific Islander, Non-Hispanic	86.85	68.38
Native American, Non-Hispanic	81.19	58.98
<b>Population below federal poverty line</b>		
White, Non-Hispanic	82.69	60.18
Black, Non-Hispanic	77.52	69.55
Hispanic	80.93	71.11
Asian or Pacific Islander, Non-Hispanic	86.73	71.75
Native American, Non-Hispanic	83.29	64.35

Table 28: Transit Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### E. Low Transportation Cost Index

The Low Transportation Cost Index estimates transportation costs for families that are a 3- person single-parent family with income at 50% of the median income for renters for the region. The table below shows the Low Transportation Cost Index scores across race and ethnicity.

LOW TRANSPORTATION COST INDEX		
	(Dallas, TX CDBG) Jurisdiction	(Dallas-Fort Worth- Arlington, TX) Region
<b>Total Population</b>		
White, Non-Hispanic	77.84	58.48
Black, Non-Hispanic	73.75	65.10
Hispanic	75.29	66.42
Asian or Pacific Islander, Non- Hispanic	82.51	64.52
Native American, Non-Hispanic	76.70	59.69
<b>Population below federal poverty line</b>		
White, Non-Hispanic	79.11	63.13
Black, Non-Hispanic	74.22	69.67
Hispanic	76.69	70.18
Asian or Pacific Islander, Non- Hispanic	83.39	70.78
Native American, Non-Hispanic	79.20	66.56

Table 29: Low Transportation Cost Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### F. Jobs Proximity Index

The Jobs Proximity Index measures the distance of job locations from a community. Greater weight is given to larger employment centers. The competition for a job location measured by labor supply is inversely weighted. Table 30 shows the Jobs Proximity Index scores across race and ethnicity. In this table, we see that the Black, Hispanic, and Native American population lives closest to where they work, followed by the White and Asian/Pacific Islander Non-Hispanic population in both CDBG areas and the DFW region.

JOBS PROXIMITY INDEX		
	(Dallas, TX CDBG) Jurisdiction	(Dallas-Fort Worth- Arlington, TX) Region
<b>Total Population</b>		
White, Non-Hispanic	75.62	42.17
Black, Non-Hispanic	54.50	41.92
Hispanic	62.15	50.36
Asian or Pacific Islander, Non-Hispanic	76.67	48.33
Native American, Non-Hispanic	66.30	41.36
<b>Population below federal poverty line</b>		
White, Non-Hispanic	67.57	47.03
Black, Non-Hispanic	55.40	49.09
Hispanic	65.10	56.19
Asian or Pacific Islander, Non-Hispanic	71.51	56.80
Native American, Non-Hispanic	69.39	53.21

Table 30: Jobs Proximity Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## G. Environmental Health Index

The environmental health index measures the environmental quality of a community. The higher the score, the less exposure a community has to harmful environmental toxins. The index measures the potential for exposure to harmful toxins within a community, as determined by the

Environmental Protection Agency’s Toxic Release Inventory by volume and toxicity.

Table 31 shows Environmental Health Index scores for Dallas communities, across race, ethnicity, and poverty. In this table, we see that the Hispanic community has the greatest exposure to environmental toxins. For communities below the federal poverty level, the White, Asian Pacific Islander, and Native American, Non-Hispanic community below the poverty line has the least exposure to environmental toxins, while the Black and Hispanic community below the poverty line has the most risk of exposure to environmental toxins. Looking at the indices overall, White, Non-Hispanic population tends to live in more prosperous communities, have access to higher-quality schools, and have the most labor market engagement. Black non-Hispanic and Hispanic communities are the least prosperous, have the least access to quality schools, and have the lowest labor market

engagement. Understanding the disproportionality of opportunity access within White, Non-Hispanic communities compared to minority communities will help inform the location of housing that is accessible to minority communities to ensure they are also given access to housing within higher opportunity neighborhoods.

ENVIRONMENTAL HEALTH INDEX		
	(Dallas, TX CDBG) Jurisdiction	(Dallas-Fort Worth- Arlington, TX) Region
<b>Total Population</b>		
White, Non-Hispanic	34.94	45.19
Black, Non-Hispanic	37.66	42.50
Hispanic	36.88	41.34
Asian or Pacific Islander, Non-Hispanic	34.04	41.19
Native American, Non-Hispanic	36.45	45.07
<b>Population below federal poverty line</b>		
White, Non-Hispanic	36.42	45.24
Black, Non-Hispanic	37.75	40.78
Hispanic	36.10	40.05
Asian or Pacific Islander, Non-Hispanic	34.75	39.34
Native American, Non-Hispanic	33.02	41.47

Table 31: Environmental Health Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## IV. LOCAL OPPORTUNITY FACTORS

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services, and amenities, which are critical factors to consider when measuring fair housing choice. This section provides an overview of federal and local data sources and stakeholder and community feedback to examine access to opportunity for the City’s protected classes.

This section will discuss access to education, affordable transportation, employment opportunities, environmental health, housing quality, exposure to lead-based paint, and broadband access. Measuring these opportunity factors provides insight into communities’ quality of life and informs fair housing needs for protected classes.

### A. Unemployment

Household income is a determining factor of where people can afford to live and the quality of housing conditions they can afford to have. Quality jobs provide access to sufficient household income and improve housing choice. The tables below show employment status over time and by gender and race/ethnicity. Employment status is assessed for the population over 16 years and over. Persons in the age group of 16 to 64 years who are seeking employment or currently working are participating in the labor force. An individual who is not actively seeking a job is not considered to be participating in the labor force and thus is not part of the unemployment calculation.

The City of Dallas unemployment rate remained relatively consistent from 2019 to 2023 aside from the spike in 2020 due to the COVID-19 pandemic.

UNEMPLOYMENT RATES IN Dallas , TX					
YEAR	2019	2020	2021	2022	2023
Unemployment Rate	3.3%	7.2%	5.1%	3.6%	3.7%

Table 32: Unemployment Source: U.S. Bureau of Labor Statistics, <https://data.bls.gov/pdq/SurveyOutputServlet>



The 2022 unemployment data reveals important insights into how different demographic groups experienced joblessness during the year. The rates are broken down by sex, race, and Hispanic or Latino origin, providing a clear picture of disparities and trends within the labor market.

Females experienced a slightly higher unemployment rate at 4.8%, indicating a minor gender gap in joblessness, with women facing marginally higher unemployment than men at 4.5%.

White individuals had an unemployment rate of 4.00%, which is below the national average, indicating relatively better job security among this group. American Indian and Alaska Native Alone had an unemployment rate of 3.50%, the lowest among the racial categories, suggesting better employment outcomes relative to other groups.

The unemployment rate for Asians and those with two or more races was 4.50% and 4.4% respectively, aligning closely with the overall average, indicating moderate employment stability.

The unemployment rate for Black or African American individuals was significantly higher at 7.30%, highlighting racial disparities in employment. Individuals identifying as "Some other race alone" experienced a 5.70% unemployment rate, reflecting higher joblessness than most other racial groups.

The unemployment rate for individuals of Hispanic or Latino origin was 4.80%, which is close to the overall average but slightly higher than the rate for non-Hispanic individuals at 3.60%.

2022 UNEMPLOYMENT RATE	
<b>SEX</b>	
Male	4.5%
Female	4.8%
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>	
White alone	4.00%
Black or African American alone	7.30%
American Indian and Alaska Native alone	3.50%
Asian alone	4.50%
Native Hawaiian and Other Pacific Islander alone	0.00%
Some other race alone	5.70%
Two or more races	4.40%
Hispanic or Latino origin (of any race)	4.80%
Not Hispanic or Latino	3.60%

Table33: Unemployment Rate Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## B. Occupation by Industry

The data provided outlines the distribution of the civilian employed population aged 16 years and over across various industry sectors. The total number of employees in the area amounts to 663,340, offering a comprehensive view of the local job market's composition.

### Key Industry Sectors:

- **Educational Services, Health Care, and Social Assistance:** This sector is the largest employer, with 118,346 individuals, representing 17.8% of the workforce. This high percentage underscores the critical role that education and healthcare play in the local economy, likely driven by a combination of public and private institutions.
- **Professional, Scientific, Management, and Administrative Services:** The second-largest sector employs 107,617 people, accounting for 16.2% of the workforce. This

sector's prominence suggests a strong demand for specialized skills and professional services, contributing to the area's economic diversity.

- **Construction:** With 70,343 employees, making up 10.6% of the workforce, the construction industry is a significant contributor to local employment. This may indicate ongoing development and infrastructure projects, reflecting economic growth and urban expansion.
- **Retail Trade:** Retail trade is another major sector, employing 68,398 individuals, which constitutes 10.3% of the workforce. The substantial presence of retail jobs highlights the importance of consumer spending and the service economy in the area.
- **Finance, Insurance, Real Estate, and Rental and Leasing:** This sector employs 63,866 people, or 9.6% of the workforce. Its size suggests a well-developed financial services industry, supported by a robust real estate market.
- **Arts, Entertainment, Recreation, Accommodation, and Food Services:** Representing 9.2% of the workforce, with 60,705 employees, this sector is indicative of a vibrant cultural and hospitality industry. This sector's size is reflective of the area's attractiveness to tourists and residents alike, contributing to the local economy.
- **Manufacturing:** The manufacturing sector employs 47,957 individuals, accounting for 7.2% of the workforce. Although not the largest sector, manufacturing remains a crucial component of the local economy, likely producing goods for both local consumption and export.
- **Transportation, Warehousing, and Utilities:** With 43,854 employees, or 6.6% of the workforce, this sector plays a key role in supporting other industries through logistics, distribution, and essential services.
- **Other Services (Except Public Administration):** This diverse sector includes 31,225 employees, representing 4.7% of the workforce. It covers a wide range of services, highlighting the broad array of job opportunities available beyond the primary industries.
- **Wholesale Trade:** This sector employs 19,538 people, or 2.9% of the workforce. It functions as a critical intermediary between manufacturers and retailers, facilitating the distribution of goods.
- **Information:** The information sector, including media, telecommunications, and data services, employs 13,831 individuals, making up 2.1% of the workforce. Its presence indicates a growing demand for information services, essential in a digital economy.

- **Public Administration:** With 13,096 employees, public administration accounts for 2.0% of the workforce. This sector's size reflects the importance of government and public services in the area.
- **Agriculture, Forestry, Fishing and Hunting, and Mining:** The smallest sector, with 4,564 employees (0.7% of the workforce), suggests that these industries have a minimal presence, likely due to the area's urbanization and industrial focus.

The employment landscape in the area is diverse, with a strong emphasis on education, healthcare, professional services, and construction. These sectors dominate the job market, providing stability and growth potential. Meanwhile, traditional industries like agriculture and mining play a smaller role, reflecting a more urban and service-oriented economy. The variety in employment opportunities across different sectors indicates a balanced economic environment, capable of supporting a wide range of job seekers with varying skills and qualifications.

JOB INDUSTRY		
Industry Sector	Number of Employees	Percent
<b>Civilian employed population 16 years and over</b>	<b>663,340</b>	<b>100%</b>
Agriculture, forestry, fishing and hunting, and mining	4,564	0.70%
Construction	70,343	10.60%
Manufacturing	47,957	7.20%
Wholesale trade	19,538	2.90%
Retail trade	68,398	10.30%
Transportation and warehousing, and utilities	43,854	6.60%
Information	13,831	2.10%
Finance and insurance, real estate, rental and leasing	63,866	9.60%
Professional, scientific, management, administrative	107,617	16.20%
Educational services, health care and social assistance	118,346	17.80%
Arts, entertainment, recreation, accommodation, and food services	60,705	9.20%
Other services (except public administration)	31,225	4.70%
Public administration	13,096	2.00%

Table 34: Occupation by Industry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### C. Minimum Wage

The current minimum wage in the Dallas-Fort Worth-Arlington, TX metropolitan area is \$7.25 per hour. The state minimum wage is the same for all individuals, regardless of how many dependents they may have. According to MIT, a living wage is an hourly rate that an individual in a household must earn to support himself or herself and their family.

The assumption is the sole provider is working full-time (2080 hours per year). Based on MIT's Living Wage Calculator, Dallas minimum wage is \$15.53 below the \$22.78 living wage for one adult with no children and \$29.22 below the living wage for two working adults with one child, within the Dallas city limits. Considering these large gaps between minimum and living wages, households with adults earning minimum wage would need additional assistance in securing housing in Dallas.

1 ADULT				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$22.78	\$37.91	\$46.89	\$60.90
Poverty Wage	\$7.24	\$9.83	\$12.41	\$15.00
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

Table 35: Living Wage- 1 Adult Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Dallas, TX \(mit.edu\)](#)

2 ADULTS (1 WORKING)				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$30.80	\$36.47	\$40.64	\$43.77
Poverty Wage	\$9.83	\$12.41	\$15.00	\$17.59
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

Table 36: Living Wage-2 Adults 1 Working Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Dallas, TX \(mit.edu\)](#)

2 ADULTS (BOTH WORKING)				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$15.40	\$21.08	\$25.78	\$30.00
Poverty Wage	\$4.91	\$6.21	\$7.50	\$8.79
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

Table 37: Living Wage-2 Adults Working Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Dallas, TX \(mit.edu\)](#)

### D. Educational Attainment

Educational attainment is a key factor in future wages and economic opportunities. Dallas, TX, has a diverse educational landscape. Around 88-90% of residents over 25 years old have completed high school or equivalent education. Dallas is home to several notable higher education institutions, including the University of Texas at Dallas, Southern Methodist University, Dallas Baptist University, Texas Woman's University, University of North Texas at Dallas, and Dallas College. The percentage of Dallas residents

with a bachelor's degree or higher is around 40-45%. This is reflective of a city with a strong economy and numerous higher education institutions.

EDUCATIONAL ATTAINMENT				
	Male	Female	Male	Female
	18 to 24 years		25 years and over	
Less than 9th grade	12,083	9,483	51,129	44,081
9th to 12th grade, no diploma	(X)	(X)	38,106	36,031
High school graduate (includes GED)	22,534	21,525	92,219	93,132
Some college, no degree	19,965	21,340	68,893	76,369
Associate degree	(X)	(X)	18,207	23,353
Bachelor's degree	9,408	13,837	94,035	97,870
Graduate or professional degree	(X)	(X)	60,835	59,150
	63,990	66,185	423,424	429,986

Table 38: Educational Attainment: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### E. Broadband Access

Throughout the United States, there is a significant digital divide; a gap between those who have ready access to the internet and computers and those who do not. The divide is perpetuated by limitations that are geographical as well as financial, where persons cannot afford to pay a monthly service fee for Broadband service (an internet connection fast enough to stream a video). Nationwide, less than half of households living on or under \$20,000 are connected. This lack of internet access in communities supports a deficit in opportunity, education, and other prospects. From a fair housing perspective, ensuring that residential broadband is available to housing projects both within and in the outskirts of the city will support community viability and improve the quality of life for residents.

Broadband access in Dallas, TX, is quite robust, with a range of options available for residents. Most urban and suburban areas in Dallas have access to high-speed broadband options, including fiber-optic and cable services. Some more remote or less developed parts of the Dallas area may have more limited broadband options or rely on slower DSL connections. Dallas has various public Wi-Fi hotspots, including in libraries, parks, and some public buildings. Internet service providers include: AT&T, Spectrum (Charter Communications), Frontier, Suddenlink, and Google Fiber. There are ongoing initiatives to improve broadband access in underserved and lower-income areas to address the digital divide and ensure equitable access to high-speed internet. Overall, Dallas is well-served by a range of broadband providers, offering high-speed internet to most of its residents.

Source: Federal Communications Commission (FCC) Fixed Broadband Deployment, <https://fundingmap.fcc.gov/home>

## F. Environmental Justice and Health

Historically environmentally hazardous sites have been disproportionately placed in historically disadvantaged communities, leading to exposure to hazardous materials and a higher risk of health problems. The location of these dangerous environmental sites corresponds with housing segregation and zoning, placing high intensity uses near areas zoned multifamily or redlined communities. Environmental Justice and fair housing advocacy both seek to address racial segregation, disparities in access to political power, municipal fragmentation, boundary-drawing around resources, disinvestment, and administrative silos.

Environmental justice and health are significant issues in Dallas, TX, as in many urban areas. The city's approach to these concerns involves addressing environmental inequities, ensuring equitable access to resources, and mitigating health risks associated with environmental factors. Dallas has faced challenges with ozone levels and particulate matter, which can disproportionately affect lower income and minority communities. Air pollution is a notable concern, particularly in areas with high traffic and industrial activity. The city and local organizations monitor air quality. Disparities in water access and quality can be more pronounced in underserved communities. Issues like contamination from industrial runoff or aging infrastructure can impact water quality. Dallas Water Utilities maintains a superior rated water system from the Texas Commission on Environmental Quality and has robust maintenance, rehabilitation and replacement programs for drinking water, wastewater and stormwater systems. Proximity to hazardous waste sites and industrial facilities can pose health risks, particularly for nearby residents who may be from historically marginalized communities. There are regulations and monitoring programs to manage and mitigate risks associated with hazardous materials. The urban heat island effect, where urban areas become significantly warmer than their rural surroundings, can impact health and increase energy consumption. The city has initiatives to increase green spaces, such as parks and urban tree planting programs, to combat the heat island effect and enhance overall environmental quality. Dallas continues to work on improving environmental conditions and addressing disparities to enhance public health and achieve greater environmental justice for all its residents.

## V. ANALYSIS OF PUBLIC POLICY IMPEDIMENTS

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### A. Overview of Fair Housing Public Policy

Since 1968, the Fair Housing Act has prohibited explicit and implicit discriminatory practices through land use policies, building codes, public services, and other public and private practices, such as conditional or special use permits and real estate broker steering, that limit access to fair housing choice for members of protected classes.<sup>3</sup> Though examples and effects of such practices vary from jurisdiction to jurisdiction, in general, public and private policies should aim to further fair housing goals and proactively address potentially discriminatory practices and trends. The following sections examine public and private policy areas and their potential impact on fair housing choice in the City of Dallas, TX.

### B. Comprehensive Plan Overview

Zoning ordinances and land use regulations are designed to regulate the development and use of property, in some cases, the promotion or preservation of other factors, such as community character, site and location of services, housing typology, and the overall planning process, may deter fair housing choice by limiting housing choice and access to protected classes.<sup>4</sup>

Dallas' current (and first) citywide comprehensive plan, forwardDallas! (2006), provides policy guidance for the city. The policy section of this plan originally contained 7 sections (or "Elements") that set the strategic framework for various aspects of the city including land use, urban design, transportation, environment, economic development, neighborhoods, and housing.

#### **Impediments:**

Over the last 18 years, most Elements have been updated by newer, more detailed policy documents that responded to changing demographics, systems, and the environment. Unfortunately, the Land Use and Urban Design Elements have not been updated since 2006, even though it is standard practice to update these policies every 5-10 years. An update of this plan, ForwardDallas 2.0, is currently underway and focuses exclusively on Land Use and Urban Design. Dallas city council is expected to review and possibly adopt the plan Fall of 2024.

- Some key issues from the 2006 plan are as follows:
  - Legacy racial inequities in land use such as segregation and adjacencies to incompatible and harmful land uses have not been addressed.

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<sup>3</sup> HUD, History of Fair Housing. Available at: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/abouttheo/history](https://www.hud.gov/program_offices/fair_housing_equal_opp/abouttheo/history)

- Land use patterns do not respond to and reflect the region’s current and changing growth demands.
- Local neighborhood plans developed during the past 18 years have not been integrated into city land use policy
- Lack of clear development design standards has led to inappropriately scaled new housing development in older communities, contributing to a loss of neighborhood character and gentrification in some cases.
- Unclear and sometimes contradictory guidance for development in single family communities.

Land use and fair housing are closely interconnected, as land use policies and practices can significantly impact housing availability, affordability, and access for different population groups. As the City is currently reviewing and possibly adopting new land use guidance, it is important for the City to consider the limitations outlined above as key issues with the land use guidance. Racial inequities in land use could result in discriminatory effects, even if the policies are not explicitly discriminatory.

### **C. Zoning Ordinance & Building Codes**

Zoning ordinances and land use regulations are designed to regulate the development and use of property, in some cases, the promotion or preservation of other factors, such as community character, site and location of services, housing typology, and the overall planning process, may deter fair housing choice by limiting housing choice and access to protected classes.

The City of Dallas, Texas, has a comprehensive set of zoning ordinances and building codes designed to guide land use, development, and construction within the city. The zoning ordinances of Dallas are detailed in the City of Dallas Development Code, which governs how land in the city can be used and developed. The main objectives are to ensure compatible land uses, control the density and intensity of development, and promote orderly growth. Dallas is divided into various zoning districts, each with its own regulations. These districts include residential, commercial, industrial, and mixed-use zones. Each district has specific rules regarding permitted uses, building heights, setbacks, and lot sizes. The Development Code specifies what types of activities and structures are allowed in each zoning district. Certain areas may be subject to additional regulations or design guidelines through overlay districts. These are special zones that provide additional controls to address specific issues, such as historic preservation or transit-oriented development.

Zoning Ordinances are enforceable in courts of law by the local community and warrant closer attention to ensure that the ordinances help the community “affirmatively further fair housing” and do not, either intentionally or unintentionally, serve as “impediments to

the exercise of fair housing choice". Dallas Development Code covers key areas that have an impact on fair housing choice including zoning, building regulations, accessibility standards, and other policies and practices. The zoning code may set limits on the number of unrelated individuals who can occupy a residence, based on the definition of "family." This is intended to prevent overcrowding and ensure compliance with residential standards. Definitions and regulations may also address special housing situations, such as group homes or residential care facilities, which may not fit the traditional family definition but are recognized as valid uses under zoning laws. Definitions are periodically reviewed to ensure they are inclusive and do not unfairly restrict the rights of individuals or groups. Adjustments may be made to better reflect modern living arrangements and family structures.

Definitions considered in this review are:

### **Family**

The City of Dallas defines "family" in various contexts, primarily within zoning ordinances and housing regulations. The definition is important for determining the occupancy limits and usage of residential properties. In the context of Dallas zoning ordinances, "family" is often defined for purposes related to occupancy limits, residential use classifications, and regulations. According to the Dallas Development Code, a common definition of "family" includes:

- **A Group of Individuals:** A group of individuals who live together as a single housekeeping unit and are related by blood, marriage, or legal adoption.
- **Unrelated Individuals:** In some cases, the definition may also encompass a group of unrelated individuals who live together as a single housekeeping unit, which is sometimes referred to as a "functional family."

The definition of "family" must comply with federal fair housing laws, which prohibit discrimination based on familial status. Local regulations must align with these broader legal requirements. Residential occupancy often references the term "single housekeeping unit" that implies that the individuals live together in a way that resembles a traditional family unit, sharing common living areas and maintaining a single housekeeping arrangement.

### **Group Living Facilities**

The City's Development Code defines handicap as (i) a physical or mental impairment that substantially limits one or more major life activities, (ii) a record of a physical or mental impairment, or (iii) being regarded as having a physical or mental impairment. The Development Code does not restrict housing opportunities for individuals with disabilities nor deny housing with supportive services. The code does include restrictions for senior

housing for persons 55 years of age or older, which is in compliance with Federal law on housing for older persons. The Development Code includes three group living facilities (i.e. group residential facilities, handicapped group dwelling unit, and retirement housing) classified as residential use and serving older adults and persons with disabilities.

### **Group Residential Facility**

The code defines a group residential facility as an interim or permanent residential facility that provides room and board to a group of persons who are not a “family”, whether the facility is operated for profit or charges for the services it offers. Group residential facilities do not include:

- Facilities that negotiate sleeping arrangements daily
- Dwelling unit occupied exclusively by families.
- Any other use specifically defined in the code.

Group residential facilities have density restrictions that allow up to 160 dwelling units or suites per net acre or 320 beds per net acre. This use must comply with statutory licensing requirements. When located at least 1,000 feet from all other group residential facilities and handicapped group dwelling units, the use is permitted by right in the clustered housing, multifamily, central area, and mixed-use districts; otherwise, by SUP only in the same districts.

### **Handicapped Group Dwelling Unit**

The code defines a handicapped group dwelling unit as a single dwelling unit that is the domicile of not more than eight handicapped persons who are not a “family”, and who are persons living together as a single housekeeping unit. The code allows up to two supervisory personnel to reside on the premises. Supervisory personnel are counted as part of the eight total occupants only if they reside at the dwelling and typically such personnel do not reside there. Thus, in the typical dwelling, up to eight handicapped persons reside at the dwelling.

Handicapped group dwelling units are permitted by right in all residential districts and in the central area and MU-1 districts so long as they are at least 1,000 feet from all other handicapped group dwelling units and group residential facilities; otherwise, by special use permit only in the same districts. Additional provisions in the code state that no certificate of occupancy is required for the use. The code also states that the use liberalizes current restrictions on the number of unrelated persons who may reside together in a dwelling unit for the exclusive benefit of handicapped persons seeking to permanently reside together as a single housekeeping unit. The City of Dallas’ policies on handicapped group dwelling units has been challenged in court and found to be non-discriminatory.

## Retirement Housing

The code defines retirement housing as a residential facility principally designed for persons 55 years of age or older that does not include a convalescent or nursing home, hospice care, or related institutions. The maximum number of dwelling units or suites per net acre is 160 in the townhouse, clustered housing, and multifamily districts. The code defines adult day care facilities as a facility that provides care or supervision for five or more persons 18 years of age or older who are not related by blood, marriage, or adoption to the owner or operator of the facility. This use is permitted by right in retail, industrial, mixed-use, and several commercial districts. Adult day care facilities require a special use permit in residential districts.

The Dallas Building Code sets the standards for construction and renovation to ensure safety, health, and structural integrity. The building codes are part of the Dallas Construction Code and include requirements for both residential and commercial buildings. Dallas follows the International Building Code IBC, which provides standards for building design and construction, including structural integrity, fire safety, and accessibility. For residential buildings, the International Residential Code IRC provides guidelines on construction practices, including plumbing, electrical systems, and energy efficiency. Before construction or major renovations, property owners must obtain permits from the Dallas Building Inspection Division. Inspections are conducted at various stages of construction to ensure compliance with code requirements. Dallas has adopted energy codes that align with or exceed the standards set by the state of Texas, focusing on energy efficiency and sustainability in building design and construction. The City of Dallas may adopt amendments to the IBC and IRC to address local conditions or needs. These amendments are incorporated into the Dallas Building Code.

The Dallas Building Inspection Division enforces building codes through inspections. Inspectors check for compliance with structural, safety, and mechanical standards. Failure to adhere to zoning ordinances or building codes can result in fines, orders to correct violations, or other enforcement actions. Building codes and zoning ordinances are periodically updated to reflect new standards, technologies, and community needs. The City of Dallas periodically reviews and revises these codes to ensure they remain current. Updates to zoning and building codes often involve public input through city council meetings, public hearings, and advisory boards.

The City of Dallas Development Code appears to be in compliance with the federal regulations governing fair housing. The city's Zoning Ordinance does not appear to contain any specific discriminatory language; however, the definitions should be reviewed, and consideration should be given to revising the definition of family, as well as including additional definitions for: "Fair Housing Act", "Americans with Disabilities

Act”, “Handicap”, and “Reasonable Accommodation.” The City of Dallas should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy would allow the city flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

#### **D.Home Mortgage Disclosure Act (HMDA)**

Homeownership provides a path towards building wealth and gaining long-term housing stability. At the same time, lower income households and protected classes continue to lack access to fair lending opportunities or lag behind in the economic benefits associated with homeownership due to the lingering effects of historic lending practices and policies that systematically excluded members of protected classes from homeownership opportunities. The following section analyzes current lending patterns within the City of Dallas and the greater metropolitan area to assess overall access to home lending for protected classes to identify potential barriers to fair housing.

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford, including equal access to homeownership opportunities. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which home loan lenders are meeting the housing needs of Dallas residents.

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda/](http://www.ffiec.gov/hmda/). The most recent HMDA Data is that of 2023, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Dallas-Plano-Irving Metropolitan Division (MD). The MD includes the following areas: Dallas, Plano, and Irving.

Home lending patterns are established using the latest available data from the Home Mortgage Disclosure Act (HMDA) for the Dallas-Plano-Irving Metro Division (MD) 2023. The MD is the smallest available geographic unit in the 2023 HMDA dataset, which also provides a broader understanding of the regional lending trends occurring in the Dallas-Plano-Irving area. The following section analyzes current lending patterns within Dallas and the greater metropolitan area to assess overall access to home lending for protected classes to identify potential barriers to fair housing.

### Loan Origination, Type, and Purpose

The data shows a decline in the number of originated mortgages from 2021 to 2023. Specifically, there was a 41.25% decrease from 2021 to 2022, followed by an additional 27.39% decrease from 2022 to 2023. This results in a total decrease of approximately 57.34% over the two years. It should be noted that, housing trends were significantly impacted during this time because of the COVID-19 pandemic. Nevertheless, an impact on housing still exists. The reduction in mortgage originations can indicate several things, such as tighter lending standards, rising interest rates, or economic challenges that make it harder for individuals to qualify for or afford mortgages. As mortgage originations decline, more households may be forced to rent rather than buy, increasing pressure on the rental market. This has contributed to the housing affordability mismatch, since there is not a corresponding increase in affordable rental units.

#### All Originated Mortgages, Dallas, TX 2023

Year	All originated mortgages	% Change from Previous Year
2021	220,529	X
2022	129,551	-41.25
2023	94,073	-27.39
<b>TOTAL</b>	<b>444,153</b>	X

Table 41: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

During 2023, over 68.53 percent of all lending activity in Dallas was in the form of conventional loans, which are private loans that are not backed by a governmental entity. Nationally, conventional loans comprise 75 percent of all lending activity.<sup>5</sup> A smaller percentage of conventional loans in Dallas may signal market gaps in the local private lending market and possibly indicate a lack of savings and income for residents in Dallas. Only 21.20 percent are FHA loans, which are mortgages issued by lenders approved by

<sup>5</sup> Conventional Loans," Consumer Financial Protection Bureau. Available at: <https://www.consumerfinance.gov/owning-a-home/loan-options/conventional-loans/>

the Federal Housing Administration (FHA) and insured by the FHA. These loans have lower down payment requirements and other underwriting criteria that make them more accessible to borrowers with limited assets or lower credit scores.<sup>6</sup> FSA/RHS loans help bridge the geographic and economic gap in rural housing markets and make up about 10 percent of all loans. Ensuring that these loans are accessible to minority and lower income borrowers in rural areas is essential for equitable housing outcomes. Last, VA loans make up less than one percent of all loans originated and could be attributed to potential barriers in access or a small eligible pool of applicants.

Loan Type	# of Records	\$ Amount	Percent of Total
Conventional	74,896	\$32,733,350,000	68.53%
FHA	14,242	\$4,814,460,000	21.20%
FSA/RHS	4,828	\$2,152,430,000	10.18%
VA	107	\$22,905,000	0.09%
<b>Loan Purpose</b>			
Home Purchase	71,505	\$31,605,425,000	76.01%
Home Improvement	4,503	\$727,285,000	4.79%
Refinancing	3,898	\$3,800,260,000	4.14%
Cash Out Refinancing	9,666	\$2,561,400,000	10.27%
Other Purpose	4,468	\$1,020,170,000	4.75%
Not Applicable	33	\$8,605,000	0.04%
<b>TOTALS</b>	<b>94,073</b>	<b>\$39,723,145,000</b>	<b>100%</b>

Table 42: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

A market that relies more heavily on conventional loans is an indicator of a healthy lending and real estate market, as borrowers and lenders opt for more conventional loans. However, a shift from government- backed mortgages may also signal a narrowing of options for borrowers from protected classes that have been historically left out of the private mortgage market and homeownership. In the case of Dallas, data indicates that there is a fairly balanced market that responds to the financial need of all borrowers in the area. In addition to home purchase loans, cash-out or refinancing products were key components of the local lending market. Approximately 20 percent of the lending activity was for refinancing or cash-out purposes while home improvement loans were just under one percent.

Based on the 2022 HMDA data, which relies on self-reporting, most loans were given to Non-Hispanic Whites in the Dallas-Plano-Irving MD. White borrowers originated 49.48 percent of all loans. The 2022 data shows a disparity in lending practices on the basis of race as evidenced by the percentage of loans originated to the ethnic and racial makeup of the City. White families make up 36 percent of the population but were approved for nearly 50 percent of loans originated. Such discrepancies could highlight a disparity in

<sup>6</sup> Let FHA Help You,” U.S. Department of Housing and Urban Development. Available at: <https://www.hud.gov/buying/loans>

access to capital for communities of color in the Dallas area, which could limit access to homeownership, and in turn long-term wealth and stability. For example, Hispanic families make up about 42 percent of the population and only originated about 15% of all loans in Dallas. It’s also worth noting that the derived variable provided by HMDA combines borrower and co-borrower characteristics, about 3 percent of loans reported as “Joint” where the borrower and co-borrower stood for a combination of White and non-White races that could not be classified under one of the other race categories.

**Disposition of Loan Applications, by Race of Applicant, 2023 Dallas-Plano-Irving MD**

Race (Not Hispanic or Latino)	# of Loan Originated	Total Amount	Percent of Loans
American Indian or Alaska Native	593	\$176,275,000.00	0.63%
Asian	17,686	\$7,830,900,000.00	18.80%
Black or African American	10,193	\$3,372,275,000.00	10.84%
Native Hawaiian or Other Pacific Islander	119	\$43,835,000.00	0.13%
White	46,551	\$16,092,085,000.00	49.48%
Free Form Text Only	25	\$7,495,000.00	0.03%
Race Not Available	15,982	\$11,074,900,000.00	16.99%
Joint	2,690	\$1,038,900,000.00	2.86%
2 or more minority races	234	\$86,480,000.00	0.25%
<b>TOTALS</b>	<b>94,073</b>	<b>\$176,275,000.00</b>	<b>100%</b>

Table 43: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

Hispanic or Latino borrowers were underrepresented in the home lending activity of the area in 2023. As the table below highlights, Hispanic or Latinos borrowers were only about 15 percent of all lending activity of the area but makeup about 42 percent of the population. Moreover, the totals loan amount for Hispanic or Latino borrowers was significantly lower than the total loan amounts for Non- Hispanic or Latino borrowers.

**Disposition of Loan Applications, by Ethnicity of Applicant, 2023 Dallas-Plano-Irving MD**

Ethnicity	# of Loan Originated	Percent of Loans	Total Amount
Hispanic or Latino	14,562	\$4,051,690,000.00	15.48%
Not Hispanic or Latino	61,473	\$23,609,945,000.00	65.35%
Joint	3,801	\$1,391,505,000.00	4.04%
Free Form Text Only	64	\$21,590,000.00	0.07%
Ethnicity Not Available	14,173	\$10,648,415,000.00	15.07%
<b>TOTALS</b>	<b>94,073</b>	<b>\$39,723,145,000.00</b>	<b>100%</b>

Table 44: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

In addition to challenges based on race and ethnicity in the local lending market, there is also a gender gap in lending activity. As the table below demonstrates, female borrowers represented approximately 18 percent of all lending activity in 2023 and male borrowers represented 39 percent of all loans. It should be noted that when females represent slightly more than half of the population. It is worth noting that the HMDA dataset also provides data on Joint applications with male and female co-applicants, which accounted for about 39 percent of the lending activity in the area.

**Disposition of Loan Applications, by Sex of Applicant, 2023**  
**2023 Dallas-Plano-Irving MD**

Sex	# of Loan Originated	Percent of Loans	Total Amount
Female	17,555	18.66%	\$244,520,000
Joint	37,079	39.42%	\$639,460,000
Male	32,112	34.14%	\$654,195,000
Sex Not Available	7,327	7.79%	\$340,750,000
<b>TOTALS</b>	<b>94,073</b>	<b>100%</b>	<b>\$1,878,925,000</b>

Table 45: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**Loan Denials**

In addition to overall application numbers, a closer look at denial rates per loan type, loan purpose, and borrower demographics helps to reveal potential disparities in the home lending market. As the table below highlights, conventional loans represent the largest percent of denials across all loans and have the highest rates of denials within each of the loan types. Within the individual loan type, about 90 percent of conventional loans were denied, while government-backed FHA have denial rates of just under 8 percent.

**Loan Application Denials, Loan Type, 2023**  
**2023 Dallas-Plano-Irving MD**

Loan Type	# of Applications Denied	Amount	% of all Denials
Conventional Loan	29,126	\$6,585,650,000	90.16%
FHA	2,436	\$808,200,000	7.54%
VA	713	\$299,725,000	2.21%
USDA	29	\$8,445,000	0.09%
<b>TOTALS</b>	<b>32,304</b>	<b>\$7,702,020,000</b>	<b>100%</b>

Table 46: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

Across the 2023 Dallas-Plano-Irving MD, minority borrowers did not have a disproportionate percentage of denial rates within each race or ethnicity for all lending activity in the area. This includes home purchase, home improvement, refinancing, and other purpose loans.

**Total Denials by Derived Race and Ethnicity, 2023**  
**2023 Dallas-Plano-Irving MD**

Race/Ethnicity	# of Applications Denied	% of all Denials
<b>RACE</b>		
2 or more minority races	21	0.40%
American Indian or Alaska Native	209	3.97%
Asian	122	2.32%
Black or African American	163	3.10%
Free Form Text Only	9	0.17%
Joint	132	2.51%
Native Hawaiian or Other Pacific Islander	25	0.48%
Race Not Available	1,370	26.04%
White	3,211	61.02%
<b>ETHNICITY</b>		
Hispanic or Latino	2328	44%
Not Hispanic or Latino	1,744	33%
Ethnicity Not Available	884	17%
Free Form Text Only	13	.25%
Joint	293	6%

Table 47: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**Loan Denial Reasons for Home Purchases**

In addition to general denial rates based on the loan type, loan purpose, and borrower characteristics, an assessment of the primary reasons provided for application denials helps to understand potential barriers keeping borrowers from accessing homeownership opportunities. The following section examines denial reasons through the lens of race and ethnicity to reveal potential barriers to fair housing choice in the home buying market for protected classes.

The reasons for loan denials were consistent among demographic groups with debt-to-income ratio, credit history, and unverifiable information being among the top reasons in 2023. For some borrowers, a debt-to-income ratio was the primary reason given by financial institutions for denial of an application. It is worth pointing out that though Hispanic or Latino borrowers made up only a fraction of the lending activity. The denial reasons given for the group reflected similar trends noted in other demographic groups with debt-to-income and credit history being the top reasons for loan denial.

## Discussion of Results

As data from this chapter has shown, discrepancies in the home lending market have improved for communities of color in the 2023 Dallas-Plano-Irving MD since the last Analysis of Impediments to Fair Housing Choice. Based on HMDA data, recent lending activity does reflect the racial composition of the area and does not represent that ethnic composition of the area. Hispanic borrowers are underrepresented and White borrowers overrepresented in the local market. Moreover, denial rates by ethnicity are disproportionately impacting communities of color, regardless of income. Female and Hispanic borrowers, in particular, are experiencing hurdles in effectively securing a home loan in the area.

The 2023 HMDA data also reveals that issues related to debt-to-income ratios and credit history are the main reasons for loan denials in the area. Other factors, such as adequate collateral, down payments, and mortgage insurance, are playing a drastically less significant role in loan denials. Though these denial reasons are affecting all borrowers, in some cases, such as with debt-to-income ratios, the effects are experienced more pronouncedly by Asian and Native Hawaiian or Other Pacific Islander borrowers. When borrowers from communities of color are able to secure a loan, their average loan amounts are often lower than those from White borrowers. Such differences highlight the ongoing struggle for communities of color in securing adequate capital to access the home buying market in the area and ultimately build lasting family wealth.

Looking ahead, Dallas will continue to monitor these lending patterns to tailor local programs to meet the needs of all residents and encourage greater financial security and homeownership opportunities in the jurisdiction.

## **VI. FAIR HOUSING TRENDS AND COMPLAINTS**

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Understanding fair housing trends and complaints is critical in assessing housing access free from discrimination. This section reviews the fair housing enforcement process and fair housing complaints filed at the local and federal levels to assess trends, emerging issues, and potential barriers to fair housing access, enforcement, and education in the context of Dallas.

The City of Dallas is committed to furthering fair housing efforts by promoting fair and equal housing opportunities for its residents. It is committed to highlighting the Fair Housing Law, Title VIII of the Civil Rights Act of 1968 by continuing to address discrimination in our community and to support programs that will educate the public about the right to equal housing opportunities.

It is the City's policy to provide services without regard to race, color, ancestry, religion, national origin, age, gender, marital status, familial status, source of income, sexual orientation, or disability. This commitment extends to all grant-funded housing programs provided by the City.

### ***What is Housing Discrimination?***

Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

### ***Affirmatively Furthering Fair Housing***

The Fair Housing Act has two goals: to end housing discrimination and to promote diverse, inclusive communities. The second goal is referred to as Affirmatively Furthering Fair Housing (AFFH), and it embodies our strongly held American values of fair access and equal opportunity.

The Affirmatively Furthering Fair Housing provision was part of the Fair Housing Act when it was passed by Congress in 1968. Through that provision, Congress directed HUD to make sure that neither the agency itself, nor the cities, counties, states, and public housing agencies it funds, discriminate in their programs. Further, Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish.

## ***Fair Housing Complaints***

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination," as well as a "Charge of Discrimination," and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

## ***Complaints Filed With HUD***

Region VI of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout New Mexico, Texas, Oklahoma, Arkansas, Louisiana. The mission of the FHEO is to protect individuals from housing, public accommodation, and employment discrimination, as well as hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of, housing, public accommodations, hate violence and employment.

Complaints filed with HUD are classified by race, national origin, disability, familial status, religion, sex, and retaliation bases. FHEO investigates complaints which may be of one or both of the following types:

- Discrimination under the Fair Housing Act (including housing that is privately owned and operated)
- Discrimination and other civil rights violations in housing and community development programs, including those funded by HUD.

Complaints involving discrimination under the Fair Housing Act may be applied in cases where one's discrimination in renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities are violated. The filing of these complaints may be against property owners, property managers, developers, real estate agents, mortgage lenders, homeowner associations, insurance providers, and others who affect housing opportunities.

Complaints involving discrimination in housing and community development programs may be based on the violation of rights because of discrimination and other violations of civil rights in HUD programs. For example, the failure to ensure meaningful access by persons with limited English proficiency. Applicable laws include:

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

Complaints may be filed against any recipient or sub-recipient of HUD financial assistance, including states, local governments, and private entities operating housing and community development and other types of services, programs, or activities. At the time of this report, complaint data has not been received.

### ***Complaint Trends***

According to the National Fair Housing Alliance 2023 Fair Housing Trends Report, the number of complaints filed nationwide in 2022 was 33,007, which was the highest

number of reported complaints of housing discrimination in a single year<sup>3</sup>. Additionally, there was a startling uptick in hate crime offenses and the number of reported victims of hate crimes.<sup>4</sup> There was a 15.3 percent increase in the number of housing-related hate crimes.

Overall, the 2023 National Fair Housing Trends Report shows that private fair housing organizations continue to address the majority of housing discrimination complaints reported throughout the country. The report also revealed that private, non-profit fair housing organizations provide the largest support for people alleging housing discrimination. These groups processed 73.94 percent of complaints filed in 2022 compared to 5.80 percent processed by HUD, 20.15 percent by FHAP agencies, and 0.11 percent by DOJ. The report also revealed that discrimination based on disability accounted for the majority (53.26 percent) of complaints filed with FHOs, HUD, and FHAP agencies.

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<sup>3</sup> NFHA, <https://nationalfairhousing.org/resource/2023-fair-housing-trends-report/>

However, the report also showed in 2022, there were 2,490 complaints based on sex, the highest number recorded since 2005 when NFHA began collecting data specifically on sex complaints. Similarly, the report also revealed there was an uptick in all the “other” categories of complaints regarding source of income, marital status, age, and domestic violence with significant increases in complaints regarding source of income and domestic violence.

## **VII. REVIEW OF PRIOR AND CURRENT FAIR HOUSING ACTIONS**

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### **Affirmatively Furthering Fair Housing**

Affirmatively Furthering Fair Housing requires overcoming historic patterns of segregation, promoting fair housing choice, and fostering an inclusive community. Identifying Dallas' barriers to fair housing calls for the development of comprehensive strategies and timely actions to overcome existing impediments.

The Analysis of Impediments assesses previous actions taken and current conditions that may continue to restrict housing choice for people protected under State and federal fair housing laws.

With such an assessment in mind, this section presents the previously identified impediments to fair housing choice and a summary of the actions taken to address those challenges. The analysis and its results will help outline the underlying conditions and trends still relevant in Dallas.

Effective Tuesday, September 8, 2020, HUD's "Preserving Community and Neighborhood Choice" Final Rule officially repealed HUD's 2015 housing rule known as "Affirmatively Furthering Fair Housing" or AFFH and the 1994 Analysis of Impediments to Fair Housing Choice (A.I.) where they appear in regulation. HUD's new housing rule is intended to lessen the paperwork burden on local grantees and empowering entitlement communities by giving them maximum flexibility in designing and implementing sound policies that reflect local needs by eliminating overly burdensome, intrusive, and inconsistent reporting and monitoring requirements.

HUD's new rule will still require that grantees commit to "use funds to take active steps to promote fair housing," however, the grantee AFFH certifications will be deemed sufficient provided the grantee took any action during the relevant time period related to promoting fair housing.

### **Previous Impediments to Fair Housing Choice**

The previously identified barriers to fair housing choice in Dallas' 2019 Assessment of Fair Housing are listed below. The barriers identified are not listed in any order or priority. The analysis and status of these impediments are based on the data available at the time and the feedback provided by community members and stakeholders. An analysis of past and existing trends is further addressed in other sections of this document.

As presented in the 2019 Assessment of Fair Housing, the barriers identified in 2019 provided the City a path forward in furthering fair housing protections in the jurisdiction. Assessing the status of these actions helps to inform the current trends that may continue to limit fair housing choice in Dallas.

The following are detailed descriptions of the impediments as presented in the City of Dallas 2019 Analysis of Impediments:

IMPEDIMENT	DESCRIPTION AND ACTIONS UNDERTAKEN
<p><b>Lack of Affordable Housing in High Opportunity Areas</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Source of Income Discrimination</li> <li>• Persistent Geography of Inequity</li> </ul> <p><b>Goal</b></p> <p><b>Increase access to affordable housing in high-opportunity areas.</b></p> <ul style="list-style-type: none"> <li>• Recommendation #1-A: Establish Housing Trust Fund to support aggressive affordable housing development and deep income targeting strategies in high-opportunity areas and non-segregated areas.</li> <li>• Recommendation #1-B: File amicus curae brief in support of lawsuit challenging the Texas law prohibiting municipal source of income protection ordinances.</li> <li>• Recommendation #1-C: Provide mobility counseling and search assistance to help families make informed housing choices based on data and other information on neighborhood opportunity.</li> <li>• Recommendation #1-D: Create outreach programs and provide financial/programmatic incentives for landlords in high-opportunity areas.</li> <li>• Recommendation #1-E: Establish and fund a set of incentives based on successful best practices, including consideration of risk pools, paid deposits and application fees, double deposits, and single point of contact for problems.</li> </ul> <p><b>Remediation of Impediments</b></p>
<p><b>Insufficient Affordable Housing available in the City of</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Loss of naturally occurring affordable housing due to gentrification, demolition, and conversion to higher-end units.</li> <li>• Lack of home repair resources for homeowners with limited income.</li> </ul>

## Dallas

- Exponential growth in the DFW region impacts demand for housing and inflates the market.

### Goal

- Recommendation #2-A: Promote reforms to current zoning regulations, including the development of voluntary inclusionary zoning policies connected to deep income targeting strategies in all new or renovated housing projects in high-opportunity areas.
- Recommendation #2-B: Develop strategies to retain expiring LIHTC projects as affordable housing.
- Recommendation #2-C: Proactively lock in affordable housing in gentrifying areas (i.e. LIHTC developments, TIFs).
- Recommendation #2-D: Draw from the Montgomery County model to develop right of first refusal program for housing authorities to purchase buildings being sold for the purpose of conversion to condominiums.
- Recommendation #2-E: Develop programs to protect homeowners and affordable rental units from rapidly rising valuation and taxes in gentrifying neighborhoods (Market Segmentation analysis for property appraisal: Travis County model).
- Recommendation #2-F: Develop strategies to monitor and support existing affordable housing in gentrifying communities, including addressing problems arising from rapidly increasing property valuations and taxes (i.e. neighborhood change index).
- Recommendation #2-G: Consider expanded home repair programs to include single- and multifamily housing, owner-occupied and rental property.

	<ul style="list-style-type: none"> <li>• Recommendation #2-H: Continue to develop mixed-income housing that preserves and increases the quantity of high-quality affordable housing.</li> <li>• Recommendation #2-I: Expand special tax districts (TIFs, etc.) that provide funds for affordable housing development.</li> </ul> <p><b>Remediation of Impediments</b></p> <ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>Lack of Affordable, Accessible Housing for Persons with Disabilities</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Lack of availability of accessible units.</li> <li>• Restrictive zoning codes to develop or repurpose housing for older adults and persons with disabilities.</li> <li>• Lack of education on universal design for newly constructed housing.</li> <li>• City streets and sidewalks lacking accessibility features</li> </ul> <p><b>Goal</b></p> <ul style="list-style-type: none"> <li>• Recommendation #3-A: Amend local zoning codes to incentivize the construction of accessible units in higher density, mixed-use locations and to allow for a broader range of affordable housing options for older adults and protected classes, including accessory dwellings and cohousing.</li> <li>• Recommendation #3-B: Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request.</li> <li>• Recommendation #3-C: Expand the use of PBVs for development of housing for persons with disabilities, including development of single-family homes for shared housing in coordination with Medicaid supportive service programs (Home and Community-based Services).</li> </ul>

- Recommendation #3-D: Form a partnership to deliver training sessions on fair housing accessibility issues to local code enforcement officials, design professionals and property owners.
- Recommendation #3-E: Develop programs to promote universal design (for housing accessibility) in new construction and renovation.
- Recommendation #3-F: Continue to survey public infrastructure (sidewalks, crosswalks, business entrances, etc.) for accessibility and allocate ample funds to bring public areas up to code.

#### **Remediation of Impediments**

- The City updated its requirements for the development of public infrastructure. The Dallas Sidewalk Master Plan, completed in June 2021, used a data-driven strategic methodology that scored and prioritized sidewalk projects based on considerations of equity, places of public accommodation, street classification, citizen requests, pedestrian safety, and activity areas. Through this work, twelve focus areas were identified with \$30M of inventory priority sidewalk projects that showed the highest concentration of priority and is aimed at improving the city-wide pedestrian experience.
- The City adopted the Infrastructure Investment Fund to make targeted investments in infrastructure that further a specific area plan and/or to work with private partners to realize private investment and drive new economic activity in historically underserved areas. The IIF, administered by the Office of Economic Development, is capitalized by ongoing collection of windfall funds from expiring TIF districts or sub-districts. For a period of ten (10) years after a TIF district or sub-district expires, the value of the total annual increment contributed by the City in the TIF districts or sub-district's last year is to be earmarked within the General Fund into the IIF. For the initial year of the IIF, \$5,987,811 was approved by City Council in the FY 2023-2024 General Fund budget to be transferred in late Spring 2024 to the IIF (from the expired Cedars TIF District and the expired City Center Sub-district of the City Center TIF District).

<p style="text-align: center;"><b>Lack of Public or Private Investments in Certain Neighborhoods</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Patterns of neighborhood inequity and disinvestment.</li> <li>• Vacant land</li> <li>• Inequity in transportation, economic development opportunities, and housing</li> </ul> <p><b>Goal</b></p> <p>Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement.</p> <ul style="list-style-type: none"> <li>• Recommendation #4-A: Ensure meaningful community engagement in identifying alternate uses for vacant and derelict land to support food access, recreation and green space in underserved communities.</li> <li>• Recommendation #4-B: Revise boundaries of designated focus areas in housing policy to target racially segregated census tracts, R/ECAPs and/or the most distressed real estate markets.</li> <li>• Recommendation #4-C: Advocate for the participation of housing policymakers/PHAs in the development of the Transportation Improvement Program as well as Title VI and Environmental Justice analyses.</li> <li>• Recommendation #4-D: Revise economic development policies and incentives to prioritize efforts to attract and support businesses that provide well-paying jobs in lower opportunity and R/ECAP areas.</li> <li>• Recommendation #4-E: Collaborate with transportation agencies to create innovative programs that provide affordable transportation options in lower opportunity areas and R/ECAPs and for HUD-assisted families.</li> <li>• Recommendation #4-F: Adopt racial/ethnic impact statement.</li> </ul>
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<p><b>Insufficient Access to Opportunity for Residents of Supported Housing</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Community investments can increase access to opportunity (jobs, services, recreation, etc.) in higher poverty areas with higher levels of ethnic segregation.</li> </ul> <p><b>Goal</b></p> <p>Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.</p> <p><b>Remediation of Impediments</b></p>
<p><b>Lack of Education Regarding Affordable Housing and Fair Housing Enforcement</b></p>	<p><b>Contributing Factor</b></p> <ul style="list-style-type: none"> <li>• Lack of awareness about both the fair housing resources available and tenants' rights</li> <li>• Insufficient dissemination of materials and outreach</li> <li>• Insufficient fair housing enforcement</li> </ul> <p><b>Goal</b></p> <p>Increase access to information and resources on fair and affordable housing</p>

Table 48: Source: City of Dallas 2019 Analysis of Impediments

## VIII. IMPEDIMENTS TO FAIR HOUSING CHOICE

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The following are the identified impediments based on the assessment conducted throughout the 2024 Analysis of Impediments to Fair Housing Choice process. The newly identified impediments to fair housing access and choice represent ongoing issues in Dallas, Texas. Of the previously identified impediments, lack of affordable housing in high opportunity areas, insufficient housing available in the City of Dallas, lack of public and private investing in certain neighborhoods, insufficient access to opportunity for residents of supported housing and lack of education regarding affordable housing and fair housing enforcement are still present in the city and will continue to be addressed. Below is a list of new impediments the city should begin to focus on.

### **Impediment #1**

#### **Insufficient Tenant Protections in the Rental Market**

Affordable, stable, and accessible housing, along with a wide range of housing options, are essential for creating just and equitable communities. However, the power imbalance between renters and landlords increases the risk of housing instability, harassment, and homelessness for tenants, further exacerbating racial inequity. Tenant protections, passed in the form of laws and policies, are critical to preventing evictions and keeping renters stably housed.

#### **Contributing Factors**

- **Increased number of Absentee Landlords** – Absentee ownership in residential real estate often refers to a situation where an individual owns a property but does not occupy or directly manage it. The absentee owners may be individuals who have invested in rental properties, inherited properties, or own vacation homes that they do not reside in year-round. One issue with absentee landlords is the potential for neglect and mismanagement of the property. Since the real estate owner is not physically present, issues like deferred maintenance and tenant dissatisfaction can arise. Issues with absentee landlords was mentioned in each needs assessment meeting and sited as a major issue contributing to high housing costs, frequent evictions, and poor housing quality.
- **Inadequate legal safeguards to protect tenant rights** - laws and regulations enacted at the federal, state, or local level to protect tenants' rights and ensure fair treatment in the rental market. When these safeguards are insufficient, tenants may face numerous challenges.
- **Discrimination in the rental market based on source of income** - Renters who receive a verifiable source of legal income, such as social security, child support, SSI and Section 8 vouchers can still face illegal discrimination. Such practices unfairly limit housing options for individuals who are financially capable of paying rent but are discriminated against due to the nature of their income.

- **Excessive Tenant Screening Requirements** - Imposing overly stringent criteria on potential renters, such as high credit scores, extensive background checks, or excessive income verification. These requirements can disproportionately affect lower income individuals, people with past financial difficulties, or those from marginalized communities, making it more challenging for them to secure housing despite being otherwise qualified.

### Goal

To ensure that tenants have access to safe, affordable, and stable housing, and are protected from exploitation, unfair practices, and eviction without just cause. By strengthening tenant protections, the aim is to create a more equitable rental market where tenants' rights are upheld, and landlords are held accountable for maintaining livable conditions and fair treatment.

### Recommendations

1. Strengthen tenant protection laws to ensure fair treatment in the rental market. Consider including laws that address issues like excessive rent increases, excessive tenant screening requirements, source of income protection, eviction without cause, or failure to maintain safe living conditions.
2. Continue to advocate for the changes at the state level to revise current state law that prohibits jurisdictions from enacting laws to protect against source of income discrimination.
3. Encourage and provide financial support for resources and services available to help tenants navigate the rental market, assert their rights, and resolve disputes with landlords. Insufficient support systems can leave tenants vulnerable and unable to effectively address issues that arise.
4. Implement eviction prevention programs to assist renters facing eviction stay in their homes.
5. Incentivizing Landlords: Offering incentives to landlords, such as tax breaks or subsidies, for accepting tenants with non-traditional income sources can encourage more inclusive rental practices.
6. Public Awareness Campaigns: Educating landlords, property managers, and the public about the illegality and unethical nature of source of income discrimination can reduce its occurrence. Public campaigns can also inform tenants of their rights and the resources available to them.

7. **Enforcing Fair Housing Laws:** Strengthening and enforcing local, state, and federal fair housing laws that prohibit discrimination based on source of income can help protect renters from unfair treatment.
8. **Monitoring and Accountability:** Implementing a system to monitor rental practices and hold discriminatory landlords accountable can deter unfair practices. This could involve regular audits, reporting requirements, and penalties for non-compliance.

## **Impediment #2**

### **Insufficient Fair Housing Education**

The lack of sufficient information and awareness about fair housing rights and responsibilities among both housing providers and residents can lead to widespread ignorance of fair housing laws, resulting in discriminatory practices, unintentional violations, and a lack of enforcement. As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

Education and awareness of fair housing laws is imperative to alleviating housing discrimination. The City of Dallas established the Fair Housing Division of the Office of Equity and Inclusion, which supports leadership and staff through education and training in the identification and elimination of systemic barriers to fair and just distribution of resources, access to services and opportunity and proper investigation of housing discrimination complaints. The City is actively conducting outreach throughout the City to reach residents and educate them on their rights and responsibilities related to Fair Housing.

### **Contributing Factors**

- **Lack of Awareness and Training:** Insufficient or non-mandatory training for housing providers, real estate professionals, and landlords can lead to a lack of understanding of fair housing laws and best practices. Additionally, inconsistent implementation of training programs result in variability in the quality and frequency of fair housing resulting in uneven levels of knowledge among housing professionals.
- **Targeted Outreach is Limited:** The City offers broad based fair housing education outreach, but community feedback suggests that a more targeted approach that aligns with specific community issues would be beneficial. For example, the outreach team initiated a fair housing series with the local high school to educate students on housing rights and responsibilities. The City's Fair Housing Outreach team should seek to provide more opportunities that are target specific groups to achieve fair housing goals. The City should continue to seek opportunities to support residents of protected classes in seeking housing.

- **Limited English Proficiency:** Currently, the city translates materials into the top 5 languages including English and Spanish. The city should continue this practice ensuring that there is a mechanism to update the documents into additional languages and that the materials are written at a basic level of understanding.
- **Limited Resources:** Fair housing enforcement agencies and community organizations may lack the resources to effectively educate the public and enforce fair housing laws.
- **Accessibility Issues:** Online resources and educational materials may not be accessible to individuals without reliable internet access or technological devices.

### Goal

To increase access to fair housing information for tenants, landlords, real estate professionals, and housing providers. The aim is to eliminate discrimination in housing, promote equitable access to housing opportunities, and foster inclusive communities where everyone has the right to choose where they live without facing prejudice or bias.

### Recommendations

- **Public Awareness Campaigns:** Launching widespread campaigns to inform the public about fair housing rights and how to recognize and report discrimination.
- **Enhancing Outreach to Targeted Populations:** Continue to focus on reaching underserved and marginalized communities, such as racial and ethnic minorities, people with disabilities, immigrants, and lower income individuals, who are more likely to face housing discrimination.
- **Training for Housing Providers:** Offering mandatory training programs for landlords, property managers, and real estate professionals to ensure they understand and comply with fair housing laws.
- **Community Outreach:** Increase engagement with community organizations, advocacy groups, and local leaders to spread awareness and provide fair housing education at the grassroots level.
- **Support for Victims:** Providing accessible legal resources for individuals who believe they have experienced housing discrimination, including guidance on how to file complaints.
- **Monitoring and Evaluating Education Programs:** Regularly assess the effectiveness of fair housing education initiatives to identify gaps, refine strategies, and ensure that the programs are meeting their intended goals.

### **Impediment #3**

#### **Displacement of Lower income Residents in Gentrifying Communities**

Gentrification in Dallas is a significant issue, reshaping the city's landscape and affecting long-term residents in these areas. Historically, many neighborhoods in Dallas, such as West Dallas' Gilbert-Emory area, were home to Black and Latino communities who faced systemic challenges, including redlining and economic neglect. These communities were often located in less desirable areas, such as floodplains or near industrial zones, due to discriminatory housing policies from the 1930s onwards<sup>7</sup>.

In recent years, these same neighborhoods have become targets for redevelopment as Dallas experiences a surge in population and economic growth. These areas are attractive to developers due to their proximity to downtown and other booming districts like Uptown. As a result, the landscape of these neighborhoods is rapidly changing, with modest, long-standing homes being replaced by modern, expensive townhouses and luxury apartments that are often unattainable for lower income families<sup>8</sup>.

The rapid development surge has sharply increased property values and taxes, making it difficult for long-term residents, particularly those on fixed incomes, to afford. This economic strain has caused displacement, forcing many to leave neighborhoods they've lived in for generations. New homes priced far beyond the reach of current residents (Texas Metro News).

#### **Contributing Factors**

- **Rising Costs:** As neighborhoods gentrify, property values and rents increase, making it difficult for long-term residents, especially renters, to afford to stay in their homes. This displacement disproportionately affects lower income families, the elderly, and minority groups, pushing them out of communities where they have deep roots.
- **Loss of Affordable Housing:** Gentrification often leads to the conversion of affordable housing into higher-end apartments or luxury condos, reducing the overall availability of affordable housing units. This further marginalizes vulnerable populations who already face challenges in securing stable housing.
- **Missed Opportunities for Estate Planning:** A lack of awareness about probate can also mean that individuals miss out on opportunities to plan their estates in a way that minimizes the need for probate, such as through the use of trusts, joint ownership, or payable-on-death accounts.

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<sup>7</sup> Texas Metro News - <https://texasmetronews.com/54882/hostile-takeover-west-dallas-homeowners-battle-new-developments-rising-taxes/>

<sup>8</sup> Dallas Observer - <https://www.dallasobserver.com/news/there-goes-the-neighborhood-the-ups-and-downs-of-gentrification-in-dallas-7723959>

## Goal

To ensure that as neighborhoods undergo revitalization and development, existing residents—particularly those who are lower income—are not forced out of their homes and communities due to rising costs, property values, and changing demographics. The aim is to promote inclusive development that benefits all residents, preserves affordable housing, and maintains the cultural and social fabric of the community.

## Recommendations

### 1. Preserve Affordable Housing:

- a. Protect Existing Affordable Units by implementing policies to safeguard existing affordable housing from being converted into market rate units or demolished.
- b. Increase Affordable Housing Stock by encouraging the development of new affordable housing units through incentives for developers.

### 2. Support Homeowners:

- a. Provide grants or low-interest loans to help lower income homeowners maintain and improve their properties, allowing them to stay in their homes.

### 3. Support Displaced Residents:

- a. Right to Return Policies: Create policies that give displaced residents the first opportunity to return to their neighborhoods once development is completed.

### 4. Foster Economic Empowerment:

- a. Job Training and Placement: Offer job training and employment programs to help lower income residents benefit from new economic opportunities created by gentrification.
- b. Support for Small Businesses: Provide assistance to local small businesses to help them survive and thrive in gentrifying areas, preserving the community's economic diversity.

### 5. Preserve Cultural Identity:

- a. Cultural Preservation Initiatives: Support efforts to maintain the cultural and historical identity of neighborhoods, including funding for local arts, cultural programs, and historic preservation.

## Impediment #4

### Housing Affordability Mismatch - Distribution of Renter Households and Affordable Rental Units

Housing affordability mismatch, particularly for households earning less than \$35,000 annually exists in Dallas. While the availability of affordable rental units improves as

household income increases, there is a shortfall in affordable housing for lower-income renters. It is important to note that some of the units identified as affordable to people of a particular income level may in fact be occupied by households with higher incomes, reducing the stock available for lower income households. This highlights the critical need for policies and interventions focused on increasing the supply of affordable housing for those in the lowest income brackets to ensure equitable access to safe and stable housing.

### **Contributing Factor**

- Mismatch Between Supply and Demand - There is an inadequate supply of affordable housing units which drives up the cost of housing making it difficult for lower income and even moderate-income households to find affordable housing.
- Resident Mobility and Choice – Higher Income residents are able to choose the housing of their liking by selecting housing choices from any income category, including those categorized as affordable to lower income persons.

### **Goal**

To reduce the gap between the availability of affordable rental units and the distribution of renter households that need them while balancing fair housing goals.

### **Recommendations**

#### **1. Increase the Supply of Affordable Housing**

- a. Incentivize affordable housing development by continuing to support programs like the Low-Income Housing Tax Credit (LIHTC) to encourage more affordable development for households earning less than \$35,000. The City should continue to vet applications through its Fair Housing Assessment Tool to ensure proper siting of affordable housing encourages equity and fairness.
- b. Zoning Reforms: The City should continue to implement zoning to allow for higher-density housing, mixed-use developments, and the conversion of underutilized properties into affordable housing.
- c. Public-Private Partnerships: Collaborations between government, non-profits, and private developers can result in affordable housing solutions, including mixed-income developments that integrate affordable units with market-rate housing.

#### **2. Preserve Existing Affordable Housing**

- a. Fund the rehabilitation of existing affordable housing units to prevent them from deteriorating or being lost to gentrification or redevelopment.

#### **3. Improve Accessibility to Affordable Housing**

- a. Support the availability and usability of housing vouchers, such as Section 8, to help lower income renters afford units in the private market. Increasing the value of vouchers to better match market rates can help renters access units in a broader

range of neighborhoods. Educate landlords on the community impact of discriminating based on source of income.

#### **4. Support Lower Income Renters**

- a. Continue to provide rent subsidies and assistance programs through direct rent subsidies to lower income households to reduce their cost burden and help them stay in their homes.
- b. Offer financial literacy programs and emergency assistance to help renters manage their finances and avoid eviction.

#### **5. Address Geographic Mismatch**

- a. Improve public transportation options and infrastructure in areas with affordable housing to make them more accessible to job centers, schools, and other essential services.
- b. Provide assistance to lower income renters who need to move to areas with better access to affordable housing and employment opportunities.

#### **6. Monitor and Enforce Fair Housing Laws**

- a. Strengthen enforcement of fair housing laws to prevent discrimination in the rental market, ensuring that all households have equal access to affordable housing options.

#### **7. Community Engagement and Education**

- a. Work with community organizations and residents to identify local housing needs and develop targeted solutions that address specific challenges in different neighborhoods.

#### **8. Policy Advocacy and Reform**

- Support policies at the local, state, and federal levels that promote affordable housing, tenant protections, and fair housing enforcement.
- Develop and implement comprehensive housing plans that align affordable housing development with broader community development goals, ensuring that growth benefits all residents.

## **IX. CONCLUSION**

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Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Dallas, TX. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The City will work diligently toward achieving fair housing choices for its residents using the recommendations to address the identified

impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The City has an important role to play but cannot, on its own, bring about the change necessary to remove these impediments to fair housing choices.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the age of housing stock, unequal distribution of resources, disparities in lending practices, and affordable housing location. Implementation of the recommendations can assist the city in achieving the reality of an open and inclusive region that truly embraces fair housing choices for all its residents.