



Analysis of Impediments To Fair Housing Choice

City of Dallas, Texas

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ACKNOWLEDGEMENT

The City of Dallas thanks ASK Development Solutions, Inc. and Chris Plummer for the work in providing this Analysis of Impediments (AI). The work was interrupted as the City anticipated the adoption of new regulations and guidance concerning AIs and the City began its work on what would become Housing Plus. The City appreciates and thanks ASK Development Solutions, Inc. and Mr. Plummer for the effort in gathering, compiling, and analyzing data and completing this AI and providing Actions in an interrupted and shortened time period. The City thanks all those who participated in providing information and taking part in the survey.

The Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) required that the City of Dallas submit its AI to HUD by May 1, 2015. The City would have preferred to have waited to prepare and submit its AI until after the Neighborhood Plus was complete and adopted and the new AI regulations in place. Neighborhood Plus analyzes many of same issues as the AI and proposes a number of ideas to address the impediments identified in that study and this AI. The Neighborhood Plus planning effort is still underway as of the AI's due date and the AI may soon be made obsolete by the adoption and implementation of Neighborhood Plus. Likewise, the adoption of the new regulations may require a new AI or other comparable planning report. Nonetheless, the City believes that the issuance of this AI is an important step in the development of Neighborhood Plus and preparation for any new regulations. The AI is being submitted to HUD and to the public for comments. The comments and suggestions may require changes to the AI. The City of Dallas reserves the right to modify, amend, supplement, or replace the AI in the future to reflect new information that becomes available, regulatory changes, or additional progress, data, and analysis made available after adoption of Neighborhood Plus.

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I. INTRODUCTION

Context

Equal access to housing is one of the principles of equality desired for everyone who lives in the United States. Equal access includes protections from discrimination in housing; sale, rental, and financing of dwellings; lending; home appraisal; insurance and accessibility and the freedom for anyone to live where they choose. The City of Dallas, Texas is an entitlement participant in the U.S. Department of Housing and Urban Development's (HUD) federal block grant funding administered through the Community Planning and Development office of HUD. The City, through its Fair Housing Office, contracted with ASK Development Solutions, Inc. to conduct an Analysis of Impediments to Fair Housing Choice (AI) study. The previous AI was completed in July 2007 and covered the period 2007-2012 which coincided with the City's five-year Consolidated Plan for the same period, also required by HUD.

The completion of the current AI was delayed by the City in part to determine if new regulations concerning AIs would be adopted. Information collected in the early stages of the AI process had to be updated and additional information such as the City's pursuit of developing an updated housing policy. A draft will be made available for HUD and public comment in May 2015. The current AI may be revised based upon those comments.

Analysis of Impediments Background

As a recipient of federal block grant funds including Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funds from U.S. HUD, the City of Dallas must certify that it will "affirmatively further fair housing (AFFH)" in accordance with federal regulatory requirements at 24 CFR 91.225(a)(1). The certification means that the City will conduct an analysis of impediments to fair housing choice (AI) within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.¹

In order to meet the certification requirements, the City conducted the AI which is the subject of this report and studied impediments to fair housing choice in the public and private sector. The basis of the AI is the federal Fair Housing Act and equivalent state and local laws.

Fair Housing Laws and Regulatory Framework

The Federal Fair Housing Act (FHA) or Title VIII of the Civil Rights Act of 1968, and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability (physical and mental). The persons represented in the above categories are referred to as "protected classes". The FHA covers most housing types including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the

¹ <http://www.gpo.gov/fdsys/pkg/CFR-2004-title24-vol1/pdf/CFR-2004-title24-vol1-sec91-225.pdf>.

U.S. Government Printing Office retrieved March 20, 2015

use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

Section 808 of the Act says that the authority and responsibility for administering the Act resides with the Secretary of Housing and Urban Development. Among the functions of the Secretary are to prepare an annual report to Congress; and *administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.*

The National Affordable Housing Act of 1990, which governs the HOME program, as amended, {Section 105 (b)(15)} requires jurisdictions to include a certification with the housing strategy certifying that the jurisdiction will *affirmatively further fair housing*. Specifically, Consolidated Plan Regulations at 24 CFR 91.225 (a) state that the following certification must be included in the annual submission to HUD: (1) *Affirmatively furthering fair housing* - Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

The regulations governing the CDBG program also address fair housing requirements. Under 24 CFR 570.506(g) – Records to be maintained - the grantee must maintain fair housing and equal opportunity records containing: a) Documentation of the analysis of impediments; and b) The actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient’s community. Also per 24 CFR 570.601 (a) (2) the Fair Housing Act (42 USC 3601-3620) applies. It states that “in accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to *affirmatively further the policies of the Fair Housing Act*. Furthermore, in accordance with section 104(b)(2) of the Act, for each community receiving a grant under subpart D of this part, the certification that the grantee will affirmatively further fair housing shall specifically require the grantee *to assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records reflecting the analysis and actions in this regard.*”

Finally, the Consolidated Plan certifications include under the Specific CDBG Certifications that the Entitlement Community certifies under “Compliance with Anti- Discrimination Laws” - that the grant will be conducted and administered in conformity with title VI of the Civil Rights Acts of 1964 (42 USC 2000d) , the Fair Housing Act (42UAC 3601-3619), and implementing regulations.

In addition to the abovementioned federal requirements, the City of Dallas is required to comply with any state and local fair housing laws. The State of Texas also prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, disability, or familial status. The Texas Fair Housing Act applies to the sale, rental and financing of residential housing. According to the website of the Texas Workforce Commission, which administers the Act’s provisions, “*the Texas Fair Housing Act covers most housing. In some circumstances, the law exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members. Also, housing developments that*

*qualify as housing for persons age 55 or older may be exempt from the provisions barring discrimination on the basis of familial status.*² The State does not recognize any other protected classes.

The City of Dallas's Fair Housing Office (FHO) is certified by HUD as a substantially equivalent agency and participates in the Fair Housing Assistance Program (FHAP). Substantial equivalence certification takes place when a State or local agency applies for certification and U.S. HUD determines that the agency enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. Locally, the City adopted a sexual orientation ordinance on May 8, 2002 which became effective October 1, 2002. Chapter 46, "Unlawful Discriminatory Practices Relating to Sexual Orientation" prohibits discrimination based on sexual orientation in housing, employment and public accommodations.

Purpose of the AI

The Fair Housing regulations of January 1989 did not include guidelines concerning how to "affirmatively further fair housing." Requirements with review criteria and the areas to be covered by the analysis of impediments to fair housing choice were included in the CDBG regulations published in September 6, 1988. It was not until the Fair Housing Planning Guide was published that affirmatively furthering fair housing was defined. The HUD Fair Housing Planning Guide provides the following definitions and outlines the purpose of the AI.

According to HUD, impediments to fair housing choice are any actions, omissions, or decisions:

1. *That are taken because of* someone's membership in one of the "protected classes and that restrict housing choices or the availability of housing.
2. *That has the effect of* restricting housing choices or the availability of housing choices on the basis of membership in the protected classes.

According to the Guide, policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability, and families with children may constitute such impediments, referred to as "disparate impact."

The AI involves:

- A review of the City's demographic, economic, and housing characteristics;
- A review of a City's laws, regulations, policies, procedures, and practices and how they affect the location, availability and accessibility of housing;
- Public education and outreach efforts, and a community fair housing survey;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes; and
- Identifying any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to overcome the effects of any impediments identified in the AI.³

The Guide states that the purposes of the AI are to:

- Serve as the substantive, logical basis for the fair housing planning;

² Texas Workforce Commission website, <http://www.twc.state.tx.us/partners/housing-discrimination#overview>, accessed April 12, 2015

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-7) March 1996

- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts within a City and beyond.⁴

The Guide provides suggested sources of data and studies, methods to obtain citizen participation, suggested outline, format for fair housing planning, sample of corrective actions and measurable results, and suggestions for complying with fair housing requirements for persons with disabilities. It should be noted that HUD does not require the City to commence a data collection effort in order to complete an AI. HUD allows grantees to use existing available data. Data includes HUD and Federal agency databases and studies, State and local information sources, private housing industry reports, and college university/research. Also, the Guide indicates that data from the Consolidated Plan can be used for the analysis of impediments.

Public Participation in the AI

In accordance with the City Citizen Participation Plan and Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i), the City of Dallas conducted an inclusive community participation process that included input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. The following strategies were used:

1. Fair Housing Surveys -Fair housing surveys targeted to residents, housing service providers/advocates, Realtors, and lending institutions were administered online and in person. Website links to the four fair housing surveys were posted on the City's website and distributed via emails, social media, and flyers. To cater to persons without internet access or computer familiarity, paper surveys were distributed to social service agencies, community centers, at meetings, and at City Hall. The City's Fair Housing Office coordinated the distribution of the surveys. The surveys were used to gather information about the respondents' experiences and perceptions of housing discrimination and their opinions on the fair housing laws, practices, and services in the City. The resident surveys were targeted to persons who resided within the City and were also provided in a Spanish language version.
2. Print and Broadcast Media – The City's Public Information Office promoted the AI requirements, the public meetings and focus groups, and the surveys on the City's government television station, Dallas City News Network, and in newspapers of general circulation, the Dallas Examiner, Greensheet and El Heraldo News. See Appendix #7 for copies of the ads.
3. Public meetings, Presentations and Focus Groups – Meetings were held in September and December 2013 to solicit input on housing discrimination and impediments to fair housing in the City. Eight (8) focus group meetings were held. The focus groups included realtors, lenders, HOME community housing development organizations (CHDOs), chamber of commerce, agencies serving the homeless, persons with disabilities, Civil Rights, advocacy, and faith based organizations, members of the Asian-American community, members of the LGBT (lesbian, gay, bi-sexual, transgender) community, and the Hispanic and Native American community. Four public meetings were also held with the general public, neighborhood associations, the Housing Subcommittee, and the Community Development Commission. Presentations on the AI and the AI process were made at

⁴ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-8) March 1996

these meetings. Additional AI presentations were made by the staff of the City's Fair Housing Office at various venues during the study period.

4. Key Person Interviews – Interviews were conducted with City staff from other departments that related to fair housing issues such as the Housing and Community Services, Planning and Zoning, the Public Information Office, the Office of Financial Services, and the Fair Housing Office. Interviews were also conducted with fair housing and housing related agencies such as the Dallas Housing Authority (DHA), Inclusive Communities Project (ICP), North Texas Fair Housing, and the HUD Fort Worth Regional Office. The key person interviews were used to solicit feedback on fair housing issues in the City, the experience of agencies and organizations working in the housing and community development industry and data regarding housing discrimination complaints.
5. Public comment period – The draft AI was available on the City's website and the Fair Housing Office for public comment from May 7 through June 15, 2015. Comments were received from organizations such as Habitat for Humanity, ICP, and Texas Appleseed. City staff reviewed the comments, included them in the FHO's fair housing file, and followed up with the organizations. Edits were made to the AI based on the comments and other comments will be considered as part of the City's Fair Housing Planning process and development of policies that affect fair housing.

Planning and Research Methodology

The methodology used in conducting the Dallas AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (published by HUD's Office of Fair Housing and Equal Opportunity in 1996); experience conducting AIs for other cities, and the desires of the City's leadership. Revisions to fair housing strategies, easier access to data and improved ways of conducting the AIs has taken place since 1996. However, both HUD and program participants have recognized that the AFFH certification has not been as effective as it could be due to inconsistencies in conducting AI and in implementing the requirements. As a result, HUD published the "Affirmatively Furthering Fair Housing" Proposed Rule in July 2013. The intent of the rule as articulated in the Federal Register Notice is to "refine existing requirements with a fair housing assessment and planning process that will better aid HUD program participants fulfill this statutory obligation and address specific comments raised by the U.S. Government Accountability Office (GAO)."⁵ Much of the proposed new methodology, data sets, formats and instruments are still in development stage. As far as feasible, criteria and areas of focus identified in the proposed rule are used in the development of the AI.

The following approach was used to gather and analyze data for use in identifying impediments to fair housing choice and making recommendations for addressing impediments found:

Task 1 - Community Data Review: Reviewed existing demographic, economic, employment and housing market information for the City using the Decennial 2000 and 2010 U.S. Census summary files; the most up to date 2013 American Community Survey (ACS) that provides more current data between the census periods; and loan applications and denial data from the Home Mortgage Disclosure Act (HMDA).

⁵ Government Printing Office, Federal Register, Volume 78, No. 139, Affirmatively Furthering Fair Housing. Proposed Rule, Published July 19, 2013,

<http://www.gpo.gov/fdsys/pkg/FR-2013-07-19/pdf/2013-16751.pdf> Retrieved March 10, 2015

Task 2 - Regulatory Review: Researched and collected information regarding Dallas’s development regulations, planning and zoning codes, comprehensive plan housing element, building and design codes, housing policies and programs that influence fair housing choice.

Task 3 - Compliance Data Review: Collected and analyzed all available data regarding compliance with local, state and federal Fair Housing Laws, including the Home Mortgage Disclosure Act (HMDA) and the Fair Housing Act and the Community Reinvestment Act (CRA). Consultant also analyzed reported fair housing complaints from HUD, the City of Dallas Fair Housing Office and legal cases in the City, County, and State and nationally that may have a bearing on fair housing practices in the City of Dallas.

Task 4 – Review of Previous Studies: A previous AI was completed in 2007 which identified impediments to fair housing choice and made recommendations. A review was conducted to determine the status of the 2007 recommendations, actions taken, resources invested, and the whether the identified impediments still existed. Other local and regional studies were reviewed to identify impediments to fair housing choice in the City.

Task 5 – Review of Inventory of Affordable, Accessible Housing: Prepared an inventory of all affordable and accessible housing, both owner and renter including location and distribution to determine the incidence of racial, ethnic, and income segregation of housing.

Task 6 - Internet Surveys, Direct Surveys, and Personal Interviews: Beginning August 15, 2013 and ending March 2015, online surveys were available to all Dallas residents and industry stakeholders. Surveys were directly administered at meetings or through non-profit agencies and public meetings conducted by both City staff and the consultant to secure input. Responses to fair housing surveys included 330 residents including 33 Spanish language respondents, eight (8) realtors, and 13 housing providers. No lenders responded.

Task 7 - Identification and Analysis of Impediments: The findings were analyzed to determine the existence of impediments to fair housing choice in the City for the study period.

Task 8 – Recommendations and Action Planning

In consultation with City staff, a list of recommended actions and an action matrix was developed for addressing the identified impediments. The recommendations provided in this report are intended to serve as a basis for fair housing planning, monitoring and record keeping. The City will develop a fair housing action plan to address the impediments identified based on its priorities, goals, resources, and community needs. The matrix serves as a tool to assist the City in its planning.

Fair Housing Planning

While fair housing planning (FHP) is not the main purpose of the AI, the Fair Housing Planning Guide identifies three AI components that guide fair housing planning as summarized below:

Component I The AI involves:	Assembling Fair Housing Information Information needs include the following:
A review of the grantee’s laws, regulations, etc.; An assessment of how those laws, etc. affect the location,	Housing policies, practices, and procedures; zoning and land use policies; Fair housing complaints/suits or other data; Demographic

<p>availability, and accessibility of housing; An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; Assessment of the availability of affordable, accessible housing in a range of unit sizes.</p>	<p>patterns; Home Mortgage Disclosure Act (HMDA) data; Results of testing; Results of Fair Housing Initiatives Program (FHIP) grants; Patterns of occupancy in Section 8, Public and Assisted Housing, and private rental housing.</p>
<p>Component 2</p>	<p>Fair Housing Actions</p>
<p>Before developing actions to eliminate effects the grantee should: Ensure diverse groups participate in the developmental process; Create the structure for the design/ implementation of the actions. Steps to take before developing actions: Define objectives with measurable results; For each objective, the jurisdiction should have a set of goals or actions</p>	<p>Fair housing action(s) for each objective; Time period for completion; Resources from local, State, and Federal agencies; Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.</p>
<p style="text-align: center;">Implement Fair Housing Actions</p> <ul style="list-style-type: none"> • Designed achievable actions, designed to address real fair housing problems • Assessed its FHP activities on a regular basis 	
<p style="text-align: center;">Self-Assessment</p> <p>Fair housing planning should include a process for monitoring the progress in carrying out each action and evaluating effectiveness</p>	
<p style="text-align: center;">Changes</p> <p>Fair housing planning should include a process for making “mid-course” corrections, changes, or additions as the planned actions are underway.</p>	
<p>Component 3</p>	<p>Maintenance of Records</p>
<ul style="list-style-type: none"> • The AI • Actions to eliminate identified impediments. • A description of the nature of the chief executive or governing body’s commitment to FHP • A description of the financial and in-kind support for FHP, including funds provided by the jurisdiction. A list of groups participating in the formulation of FHP • Notes from public meetings/forums and citizen comments/input. • Progress reports. 	

Data Limitations

It must be noted that the data gathered for the AI has limitations that affect conclusions reached. It is assumed by the preparers of the AI that all of the data used from official sources, regardless of source, are accurate. All data is not consistent in the level of information provided. For example, more current data sources such as ACS data may not have as many data sets to analysis as the Bicentennial Census. It should be noted that the AI is a point in time study intended to analyze the current fair housing environment within the City of Dallas and identify impediments. Some of the impediments that are identified may need additional research and analysis.

Maps used in the AI represent data by census tracts with an overlay of the City boundaries. Census tract and block group boundaries do not match exactly and in some cases, census tracts are shared by adjacent municipalities. In addition, census boundaries between the 2000 and 2010 censuses may have changed. For the surveys, it must be noted that respondents were asked to respond based on personal knowledge, perceptions, and experience. As such responses may be influenced by the respondents' perception of housing discrimination and fair housing, certain neighborhoods, and understanding of terms. It was noted in several focus groups nationally that there is a greater awareness of discrimination based on race and less awareness of discrimination based on disability especially mental disability. It was noted that in some cases segregation of housing may not be due to lack of inclusive public policy but social and cultural factors that are beyond the City's control. Also, the delay in the completion of the AI may affect the responses received especially if conditions may have changed from the beginning of the survey period to the present. However, the sample size is sufficiently large and the experiences significant enough to guide people's perceptions of fair housing.

The use of studies from other parts of the country may be used to extrapolate potential effects in Dallas but may need more research to verify. Recommendations made by the preparer are intended to serve as a guide to fair housing planning. It is recognized that ultimately the actions to be taken by the City of Dallas will be determined by the City financial and human resources and the City leadership's perceptions of the findings presented and actions that it wishes to take.

Summary of 2007 Impediments and Recommended Actions

The following is a summary of impediments and actions identified in the 2007 AI. A status of the recommendations is included herein showing actions taken by the City, the amounts of CDBG and other funds invested in fair housing activities and whether the impediment still exists. A fair housing action plan was developed in response to the 2007 impediments. Most of the proposed activities were education and outreach related and as such were implemented by the City's FHO. All proposed goals/actions were projected to take place from October 2007 to September 2013.

Previous Impediment #1: Access to information on housing and related services for persons with disabilities.

Action/Goal: Maintain and distribute an updated resource guide in the Fair Housing Office on housing for persons with disabilities and update information annually.

Current status: The City's FHO distributed housing resource guides for persons with disabilities in its housing referral packets annually.

Updated Action(s): The goal has been met and should be maintained.

Previous Impediment #2: Need for education and outreach by the financial institutions on the mortgage lending process to the minority and low income communities.

Action/Goal: 2(a). Coordinate fair housing education and outreach with Consumer Credit Counseling Services (CCCS) home loan counseling programs; and 2(b). Encourage lender education on the mortgage lending process and eligibility.

Current status: Fair housing education and outreach was coordinated with several housing counseling agencies, lenders, and realtors, annually during fair housing month in four of the five years of the plan.

Updated Action(s): The goal has been met and should be maintained but is recommended that these activities be held annually.

Previous Impediment #3: Need fair housing opportunities in affordable housing programs

Action/Goal: 3(a). Maintain and distribute government-assisted housing resource guide to citizens. 3(b). Continue to coordinate fair housing outreach with the City's Housing Department. 3(c). Seek opportunities to provide annual fair housing training for management of government-assisted housing.

Current status: The FHO distributes government-assisted resource guide and conducts ongoing fair housing training. However, coordination of fair housing outreach between other City departments and the Fair Housing Office should be improved.

Updated Action(s): The goal has been partially met but it is recommended that the second goal is to better define and align the roles of other City departments and the Fair Housing Office on fair housing issues.

Previous Impediment #4: Limited opportunities in mortgage financing due to funding and lending procedures.

Action/Goal: 4(a). Develop and implement a fair housing training program for lenders to address barriers; 4(b). Encourage lenders to enhance advertisement activities to racial and ethnic diverse communities on mortgage lending products

Current status: The City's FHO has partnered with lenders and realtors to do fair housing training in mortgage lending. However, no training program for lenders has been initiated.

Updated Action(s): Work with lenders to provide lender fair housing training by the City or in conjunction with existing programs.

Previous Impediment #5: Significant higher declination rate to African American (23.9 percent) and Hispanic (22.2 percent) families when compared to the declination rate for White families (11.9 percent).

Action/Goal: Develop and implement a fair housing training program for lenders to address barriers.

Current status: The status of this action is the same as #4 above.

Updated Action(s): Work with lenders to provide lender fair housing training by the City or in conjunction with existing programs.

Previous Impediment #6: Underrepresented populations in fair housing complaints.

Action/Goal: Enhance fair housing education and outreach to underrepresented populations.

Current status: The FHO has ramped up its education and outreach activities to cover underrepresented populations such as Asians, Hispanics, veterans, the LGBT community, and persons with disabilities. This has been done through the purchase of materials in other languages, use of community newspapers and radios spots, as well as social media. This impediment has been addressed with the actions of the City's FHO. Current activities should be continued.

Updated Action(s): Use the City's government cable channel, fair housing videos from HUD's YouTube channel along with public service announcements to increase coverage.

Previous Impediment #7: Underrepresented populations among public housing residents

Action/Goal: 7(a). Encourage DHA outreach to underrepresented populations. 7(b). Provide fair housing training to DHA staff and resident councils.

Current status: The City's FHO provides fair housing trainings sessions to DHA staff and resident councils on an ongoing basis each year. Some fair housing cases from the DHA suggest a need for more DHA staff training.

Updated Action (s): Establish a memorandum of understanding between the FHO and the DHA for annual staff training, outreach to underrepresented populations, and greater cooperation.

Summary of Current 2015 Impediments and Recommended Actions

Based on the available data and community input, the following is a summary of the current impediments to fair housing choice in both the public and private sectors in 2014-2015 and recommended actions to address them. It must be noted that there are some impediments that were previously identified that are also identified in this current list. For each impediment, actions were formulated as detailed herein.

Affordable Housing

The FHA does not require that communities plan for constructing or assisting in the construction of "affordable" housing nor require that communities be, or advertise themselves as "diverse communities." However, HUD has taken the position that the inclusion of "affordable" housing and promotion of a community as a "diverse community" are steps that communities can take to "affirmatively further fair housing." Protected classes are often over represented in the low- and moderate-income categories and often likely to need "affordable" housing. Taking steps to address the housing needs of lower income persons and to establish respect for a "diverse" community are therefore regarded by HUD as "affirmatively furthering fair housing actions." Barriers to affordable housing are addressed in the City's Comprehensive Plan and it is incorporated by reference. Other jurisdictions address affordable housing in their AIs and any new regulation may require that affordable housing be

addressed. As currently defined by statute, regulation, and the Guide, the lack of affordable housing and related issues are not an impediment but because of the potential impact on fair housing issues, affordable housing is addressed in this AI.

A. Impediment: Lack of affordable housing for Dallas residents.

Overall Action: Increase the production and preservation of affordable housing units.

Action #A-1: Increase the supply of affordable housing for renters and homeowners by supporting inclusive housing projects and leveraging federal, state, and local public funding with private sector funding.

Action #A-2: Improve partnerships with non-profit housing developers, such as CHDO's and Community Land Trusts (CLTs), which are familiar with the development process, aware of neighborhood issues, and that have a mission to improve the lives of low- and moderate-income persons.

Action #A-3: Provide a fast-track permitting and site development review process for affordable housing projects and dedicate staff to move small scale, infill housing projects through development.

Action #A-4: Offer new or continue existing development incentives such as density bonuses, waivers of setbacks, lot widths, and height restrictions, and reduce or waive impact fees in order to increase the supply of buildable lots for infill housing and lower costs for housing development.

Action #A-5: Establish a policy that requires deed restrictions with housing developers to maintain long-term affordability even when federal/state funds are not used in the project.

Action #A-6: Increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate income households.

Action #A-7: Continue and increase leveraging with private sector funds and other public funding for the development of a variety of affordable and accessible housing units suitable for different types of households. Implement policies which encourage the creation, construction, and/or preservation of affordable and accessible housing for families in all areas of the City.

B. Impediment: Lack of accessible housing limiting housing choices for seniors and persons with disabilities.

Overall Action: Increase the number of accessible housing units based on need.

Action #B-1: Determine the need for accessible units and seek out additional resources to fill the gap.

Action #B-2: Review City policies, staff training, and awareness regarding accessibility inspections for new multi-family housing to ensure that builders are meeting accessibility requirements.

Action #B-3: Consider incorporating visitability standards into City building requirements for single-family housing and housing not covered by federal accessibility regulations.

C. Impediment: Poor condition of affordable rental housing in the City especially in neighborhoods with high poverty and low opportunities.

Overall Action: Develop strategies to address rehabilitation needs including repairs and accessibility modifications for rental properties.

Action #C-1: Develop plans to meet needs of target neighborhood through City of Dallas and partnering agencies.

Action #C-2: Adopt and Implement changes to Chapter 27 Code Enforcement.

Action #C-3: Implement risk based multi-tenant property inspection program.

Action #C- 4: Initiate high impact landlord program to bring properties in compliance.

Action #C- 5: Develop Citywide Affordable Housing policy that address quality and location of rental housing.

D. Impediment: Lack of awareness of a reasonable accommodation procedure to provide relief from codes that may limit housing opportunities to individuals with disabilities.

Overall Action: Ensure that persons with disabilities are aware of the procedure by which such persons may request reasonable accommodations or modifications on the basis of disability.

Action #D-1: Coordinate outreach and education about the procedures to seek reasonable accommodations that allows certain deviations from the City's zoning and land use requirements and development standards.

E. Impediment: Historic pattern of concentration of racial/ethnic and low income populations in the City.

Overall Action: Develop a strategy to address historic patterns of concentration.

Action #E-1: Adopt policies that increase the supply of affordable housing for families in all areas and neighborhoods in the City.

Action #E-2: Increase greater coordination and collaboration between the City's Fair Housing Office, the Housing and Community Services, and other Departments in the housing strategy and annual planning process.

Action #E-3: Annually monitor residential concentration by race and/or ethnicity.

Action #E-4: Assess the feasibility of using strategies such as developing housing on smaller non-conforming lots, scattered site infill rental housing and land donation in neighborhoods throughout the City.

F. Impediment: Lending practices may be disproportionately impacting racial and ethnic minority populations based on loan denial rates.

Overall Action: *Work with lenders in Dallas and request that they review their underwriting standards to determine that loan decisions are being made equitably.*

Action #F-5: Coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

G. Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

Overall Action: *Promote education on reasonable accommodation and support services for persons with mental disabilities.*

Action #G-1: Work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

H. Impediment: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP)

Overall Action: *Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as persons with LEP, Asian Americans, and persons with disabilities including the hearing impaired, and the LGBT community.*

Action #H-1: Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.

Action #H-2: Use the City's cable television channel(s) and social media as a source of fair housing information and public education efforts including the use of public service.

I. Impediment: Residents face challenges accessing public transportation especially special needs population members including persons with disabilities and homeless persons.

Overall Action: *Increase access to public transportation and transit services for low- and moderate income persons and protected class members.*

Action #I-1: Seeking funding opportunities to improve public transportation and infrastructure, the City will ensure that consideration is given to the transportation needs of protected class members and low- and moderate income persons. Attention will be given to the cost of utilizing transit services, service

areas, availability and time of routes, fleet size for alternative transit services such as Dial-A-Ride, and access to employment opportunities.

J. Impediment: “Not in my Backyard” (NIMBYism) sentiment is an impediment to fair housing choice.

Overall Action: Increase education and outreach to dispel myths and false perceptions about affordable housing.

Action #J-1: Focus training and public hearings throughout the City on NIMBYism to provide residents an opportunity to express their concerns and learn about affordable and accessible housing.

Action #J-2

Work with partners throughout the region to raise awareness of the concepts of “housing affordability” and “affordable financing.”

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II. COMMUNITY PROFILE

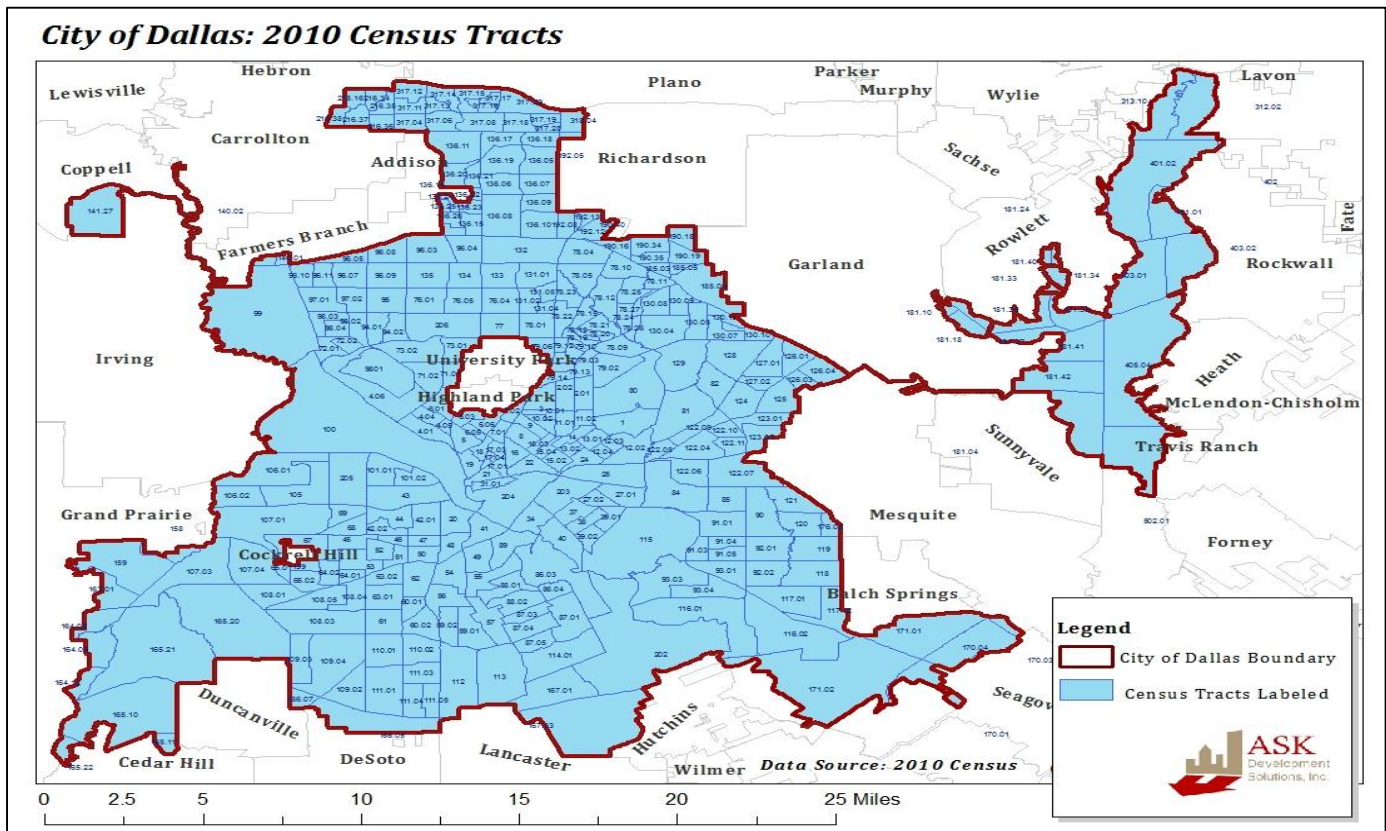
Introduction

The 2010 U.S. Census represents the most recent data from the U.S. Census, and that data is used for this report when possible and available. Some areas of data-gathering, however, requires use of the American Community Survey (ACS) which provides most informational items as the decennial Census, but not always at the lowest geographic levels. The ACS is an ongoing statistical survey that is annually conducted by the United States Census Bureau. The survey gathers information previously contained only in the long form of the decennial census.

The 2010 Census, American Community Survey, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; Community Reinvestment Act (CRA) reports; RealtyTrac data service; official City of Dallas planning and reporting documents, and direct communication with local agencies. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein.

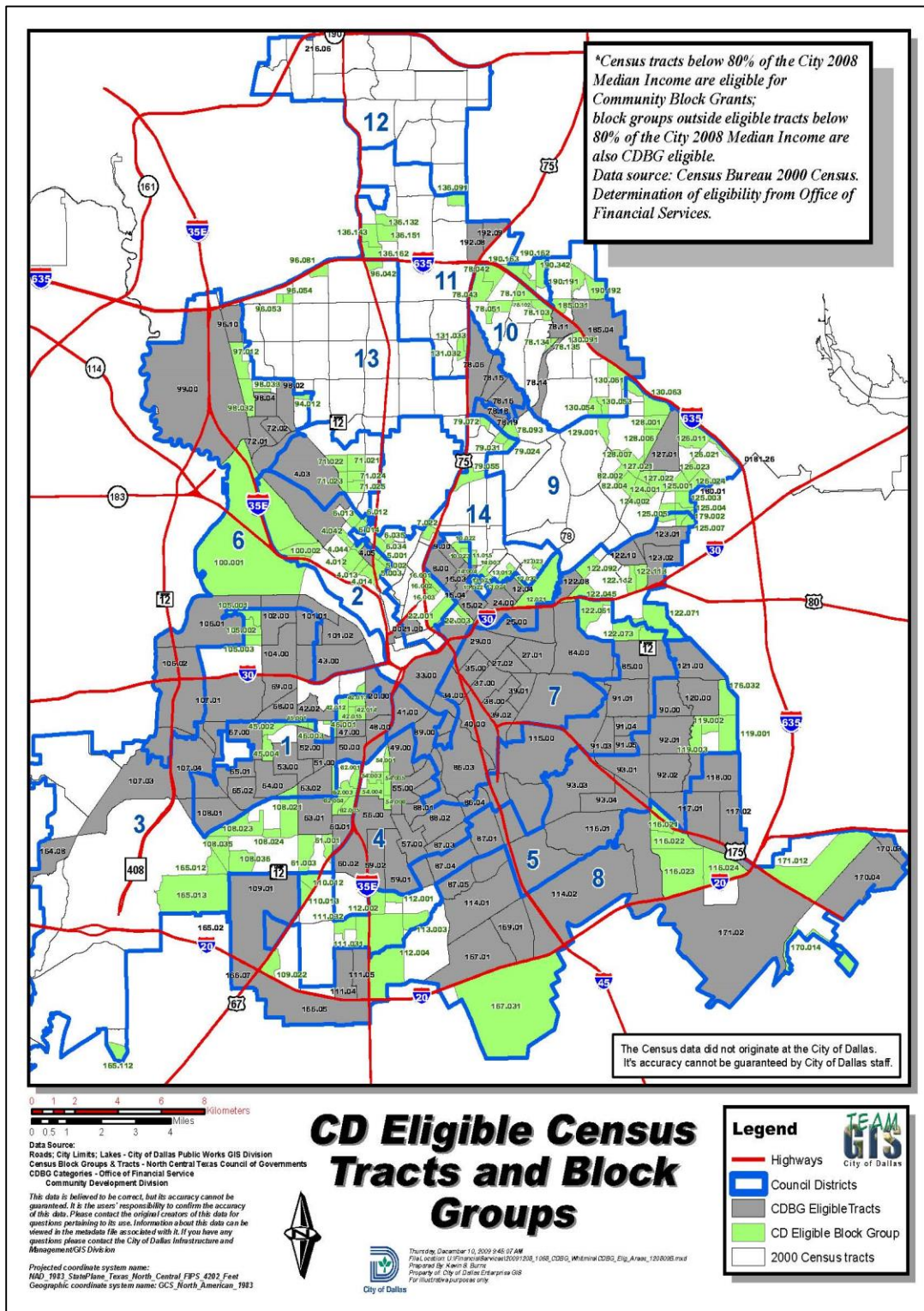
The City of Dallas includes 333 census tracts. Of those tracts, 124 meet the HUD definition of low to moderate income census areas. Maps on the following pages show the Dallas census tract boundaries, and low to moderate income census areas as defined by HUD.

Map 1- 2010 Census Tracts - Dallas, TX



Source: 2010 U.S. Census

Map 2- Low- and Moderate Income Block Groups - Dallas, TX



Population, Race, and Ethnicity

The City of Dallas had a total population of 1,197,816 at the time of the 2010 Census. The 2000 Census reflects a population of 1,188,580. Dallas had a population increase over the ten-year period of 9,236 persons from 2000 to 2010. According to the 2010 Census, the racial makeup of the community was

approximately one-half White (50.7%), but also included populations identifying themselves as Black or African American (25.0%), American Indian and Alaska Native (0.7%), Asian (2.9%), and other races, including two or more (2.6%). Over 42% of the Dallas population identified themselves as being of Latino or Hispanic ethnic origin.

From the 2000 to 2010 Census counts, the Dallas Black or African American population decreased by 2.91%; Asian population grew by 6.68%; American Indian and Alaska Native population grew by 25.14%; and Hispanic or Latino Ethnic Origin population grew by 20.05%. These overall demographic shifts reflect an increased need for fair housing education and outreach as population changes occur.

Table 1. Population, Race, and Ethnicity 2000 and 2010 Census Count Changes - Dallas, TX

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 Change
Total Population	1,188,580	100%	1,197,816	100%	↑ 9,236
Black or African American	307,957	25.9%	298,993	25.0%	↓ 8,964
Asian	32,118	2.7%	34,263	2.9%	↑ 2,145
American Indian and Alaska Native	6,472	0.5%	8,099	0.7%	↑ 1,137
White	604,209	50.8%	607,415	50.7%	↑ 3,206
Two or More Races	32,351	2.7%	31,733	2.6%	↓ 618
Hispanic or Latino Ethnic Origin	422,587	35.6%	507,309	42.4%	↑ 84,722

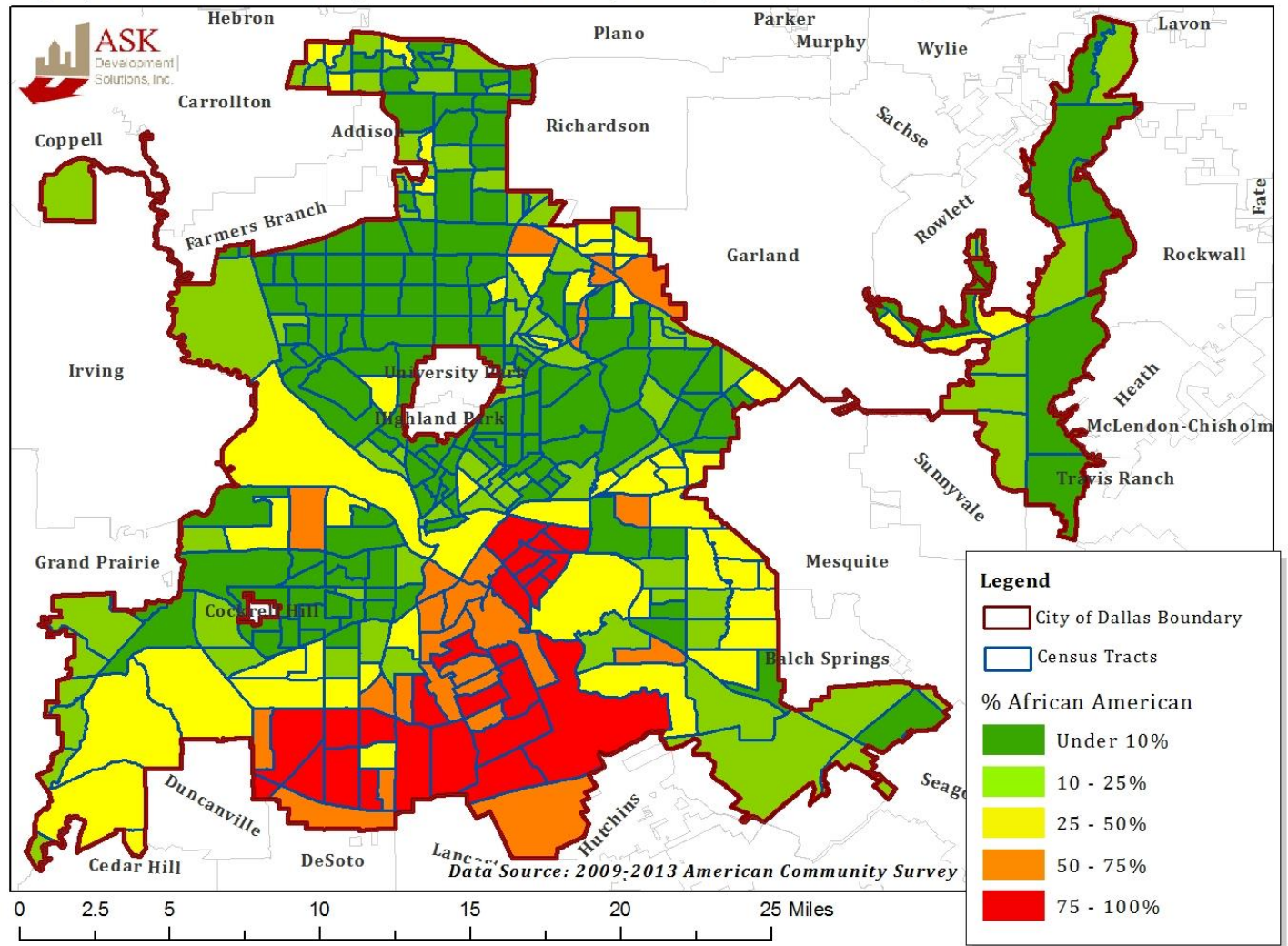
Source: 2000 and 2010 U.S. Census

From the 2000 to 2010 Census counts, the City saw a decline in the following population groups, as a percentage of the total population: Black (.9%), White and Two or More Races (.1% each). The City's Asian population increased by .2%. The City's population of persons of Hispanic or Latino Ethnic Origin population grew by the largest overall percentage at 6.8% of the total population. Maps 3 and 4 illustrate the percentage of Black/African Americans and persons of Hispanic origin by census tract.

These overall demographic shifts especially the increase in persons of Hispanic or Latino origin could result in housing discrimination among those groups. As such, the City will proactively increase its fair housing education and outreach to ensure that persons within these protected classes and all City residents are aware of rights and responsibilities under the federal and State's Fair Housing Acts.

Map 3. Percent Black/African American - Dallas, TX

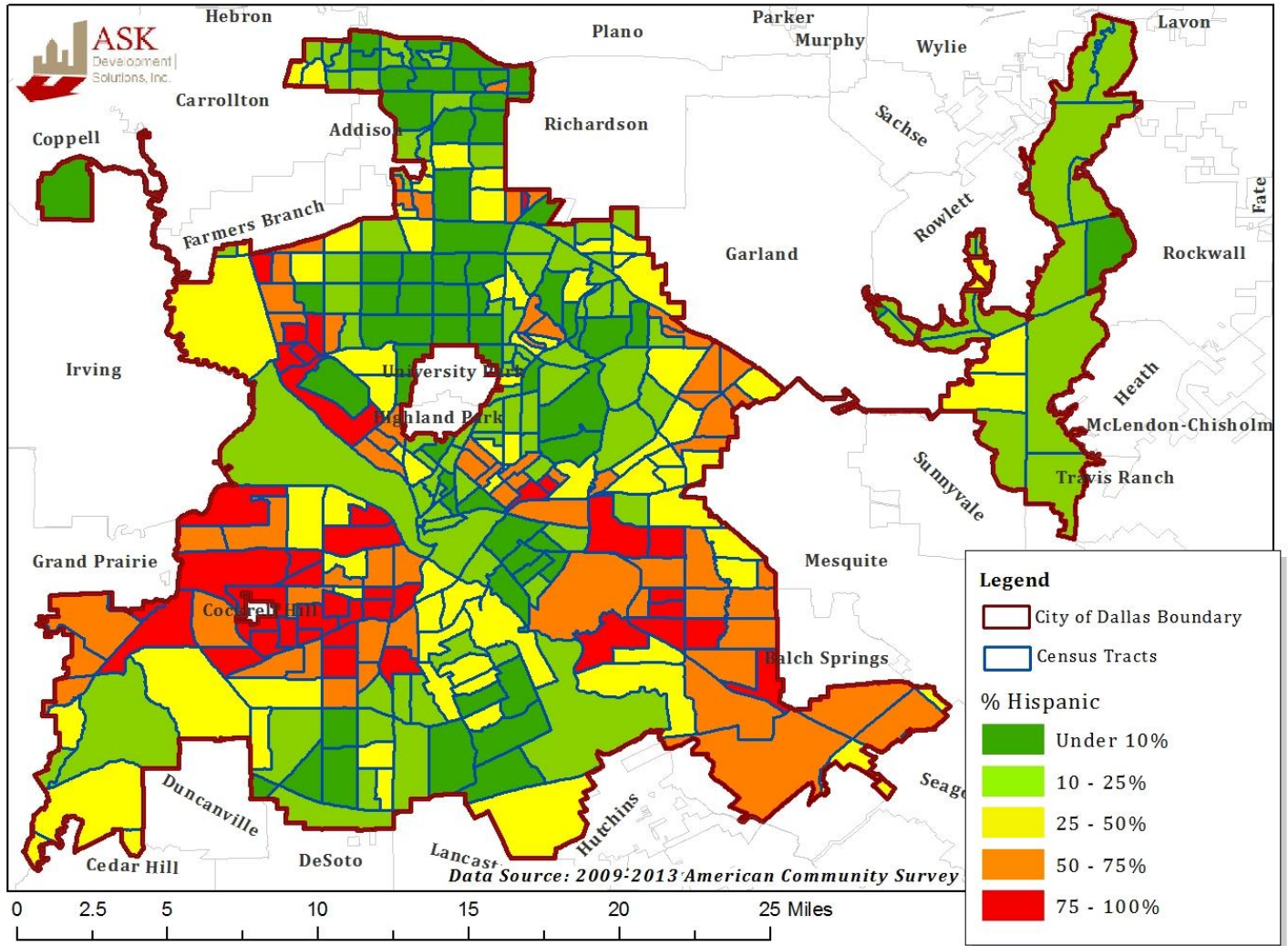
City of Dallas: Percent African American (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Map 4. Percent Hispanic - Dallas, TX

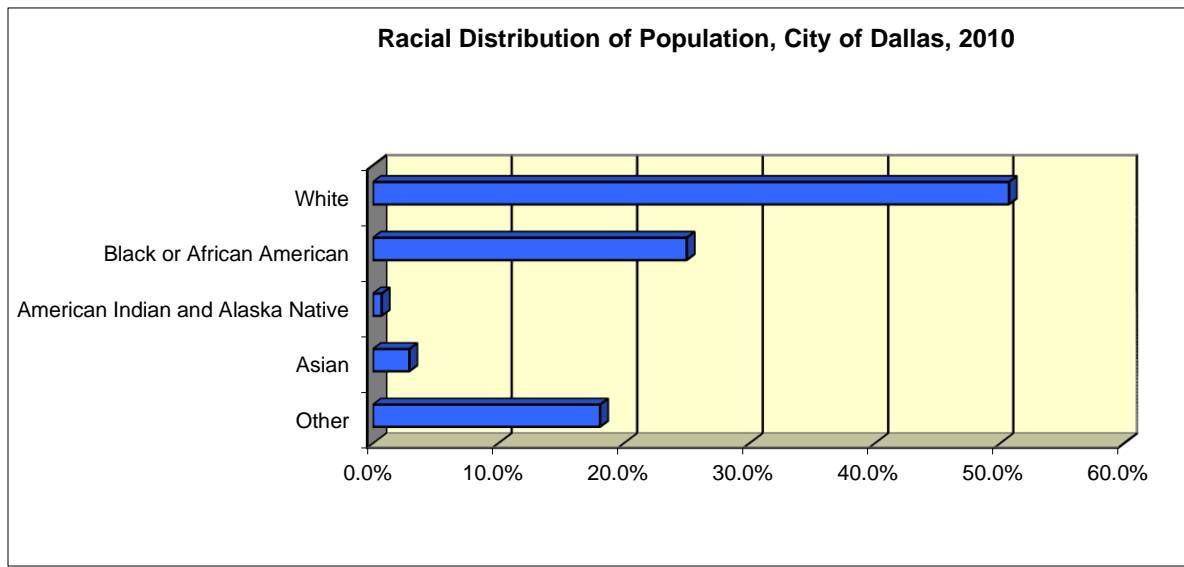
City of Dallas: Percent Hispanic (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

According to the 2013 American Community Survey (ACS), 75.6% percent of the people living in Dallas were native residents of the United States. This was no change in the characteristics of native populations from the 2000 Census count. The majority of Dallas residents (55.8%) residents were living in the state in which they were born. The 2013 ACS indicated that 24.4% percent of the people living in Dallas were foreign born (defined by the ACS as those born outside of the United States). Of the foreign born population, 21.9% were naturalized U.S. citizens, and 78.1% were not U.S. citizens. Within the 2013 Dallas population born outside of the United States, 58.2% entered the country before the year 2000 and 41.8% entered the country in 2000 or later.

Figure 1. Racial Distribution of Population - Dallas, TX



Source: 2010 U.S. Census

Table 2. Gender: 2000 and 2010 Census Change - Dallas, TX

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 % Change
Male	598,991	50.4%	598,962	50.0%	↓ 29
Female	589,589	49.6%	598,854	50.0%	↑ 9,265

Source: 2000 and 2010 U.S. Census

Racially and Ethnically Concentrated Areas of Poverty

The definition of a racially/ethnically-concentrated area of poverty (R/ECAP) as developed by the HUD Office of Policy Development and Research (OPDR) requires R/ECAPs census tracts to have a minority population of 50% or more and an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower). Analyzing the concentration of minorities in high poverty areas assists in the review of access to housing.

The data used for this analysis was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. The tract population, minority percentage, and poverty data is based on 2010 census data. There are 18 census tracts in Dallas that are considered R/ECAP census tracts. There is a total of 120,975 persons residing in the 18 R/ECAP tracts representing 9.9% of the City's total population. Of this amount, 113,062 persons are minorities and account for 13.1% of the share of Dallas' minority population. Table 3 below, provides a list of the R/ECAP census tracts and population data.

Table 3. R/ECAP Census Tracts - Dallas, TX

Census Tract	Tract Median Family Income %	% Below Poverty Line	2013 Tract Minority %	Tract Population	Tract Minority Population
27.01	22.42	71.13	99.39	3033	3013
41	16.22	67.69	99.03	1155	1139
115	31.36	61.61	99.19	3185	3155
205	30.98	60.21	96.93	4820	4672
114.01	27.31	57.5	98.9	4847	4781
86.04	25.02	56.47	98.31	3077	3038
93.04	26.29	54.95	96.96	5812	5711
192.12	38.22	52.65	98.32	3697	3635
203	27.47	51.89	94.08	2568	2416
98.04	31.29	51.88	96.17	7418	7266
192.13	36.72	51.06	78.69	3247	2555
122.08	31.16	47.67	93.77	2766	2676
122.1	40.28	42.75	75.72	3961	3538
96.1	33.23	41.87	98.54	5068	4994
57	47.64	41.1	98.62	4400	4339
202	38.86	40.98	98.69	3678	3630
78.2	52.88	40.53	87.61	5738	5027
88.02	34.77	40.15	99.39	5206	5161
TOTAL				120,975	113,062

Of the racial/ethnic groups in Dallas, 19.0% of the City's African American residents live in R/ECAP tracts. The second largest group is Native Americans with 14.8% of all Native Americans residing in Dallas, living in R/ECAP tracts. This figure is skewed due to the small number of Native Americans living in Dallas. Over 10% of the Hispanic population live in the R/ECAP tracts. Table 4 below provides a breakdown of the minority population by race/ethnicity for the R/ECAP tracts and the share of the total Dallas population.

Table 4. Racially/Ethnically Areas of Poverty as a share of Total Population – Dallas, TX

R/ECAP Tracts	R/ECAP Population	Total Population ⁶	Share in a R/ECAP
Total Population	120,975	1,222,167	9.9%
Non-White:	113,062	864,423	13.1%
Black/African-American	56,349	296,480	19.0%
Hispanic/Latino	53,242	512,077	10.4%
Asian/Hawaiian/Pacific-Islander	1,906	36,318	5.2%
Native American	263	1,781	14.8%
Other/2 or more races	1,202	17,767	6.8%

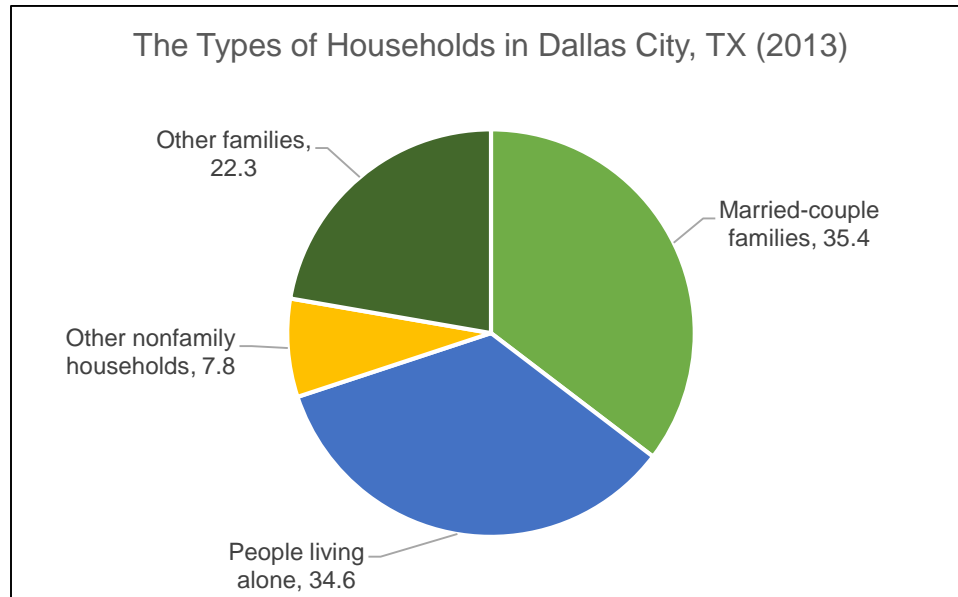
Source: 2014 FFIEC Census Reports (based on 2010 SF 1 census data)

⁶ 2013 ACS 5-Year Estimate

Household Characteristics

According to the 2013 ACS, there were 462,000 households in the City of Dallas. Of all households, 57.6% are family households (households with family members related through birth, marriage, or adoption), and 42.4% are non-family households. The ACS provides the following categories of household types.

Figure 2. Household Characteristics - Dallas, TX



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Since the 2000 Census, average household size in Dallas has increased slightly from 2.58 persons per household (2000 Census) to 2.60 persons per household (2013 ACS). According to the 2013 ACS, among the 462,000 Dallas households, family households represented 57.6% (266,283) of all households, including: 163,723 (35.4%) married couple family households; 28,277 (6.1%) male-headed households; and 74,283 (16.1%) female-headed households. Non-family households comprised a significant amount at 195,717 (42.4%) of all households.

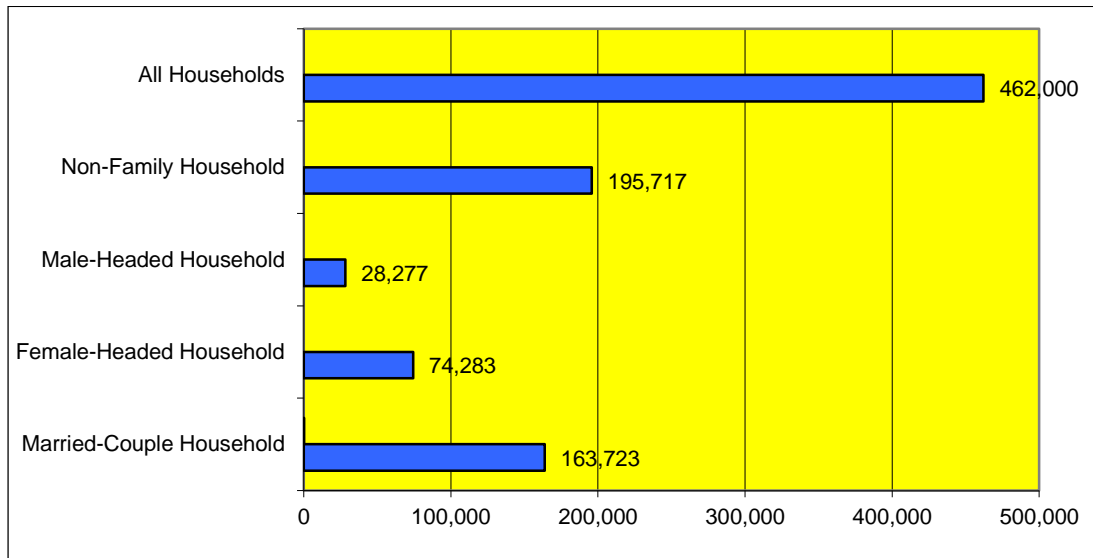
Table 5. Households by Type - Dallas, TX 2013

Household Type	Percent
Total No. of Households	462,000
Family households	57.6%
With own children under 18 years	28.9%
Married-couple family	35.4%
With own children under 18 years	16.7%
Female householder, no husband present, family household	16.1%
With own children under 18 years	9.6%

Household Type	Percent
Male householder, no wife present, family household	6.1%
With own children under 18 years	2.6%
Non-family households	42.4%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Figure 3. Household Types among All Households - Dallas, TX 2013



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Within Dallas households, the 2013 ACS reports that 33,405 grandparents lived with their grandchildren under 18 years old. Of those grandparents, 42.5% of them had financial responsibility for their grandchildren.

Table 6 below provides information on marital status from the 2013 ACS. Among persons 15 and older, 42.6% of the population was married.

Table 6. Marital Status - Dallas, TX 2013

Population 15 years and over	Persons	Percentage
Total	949,280	100.0%
Never married	384,458	40.5%
Now married, except separated	378,763	39.9%
Separated	33,225	3.5%
Widowed	46,515	4.9%
Divorced	106,319	11.2%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Income, Education, and Employment

Income Characteristics

The City of Dallas is located in the Dallas, TX HUD Metro Fair Market Rent (FMR) Area. The Dallas, TX HUD Metro FMR Area contains the following areas: Collin County, TX; Dallas County, TX; Delta County, TX; Denton County, TX; Ellis County, TX; Hunt County, TX; Kaufman County, TX; and Rockwall County, TX. Most of the City of Dallas lies within Dallas County, although small areas are also located in Collin, Denton, Kaufman, and Rockwall counties.

HUD's 2013 Income Limits for the Dallas, TX HUD Metro FMR Area defined Extremely Low (30%) Income Limits as those earning no more than \$20,250; Very Low Income (50%) Income Limits as those earning no more than \$33,750; and Low Income (80%) Income Limits as those earning no more than \$54,000. All figures are based on a household size of four (4) and a 2013 Area Median Income of \$67,500 for the Metro Area. Although Income Limits were available from HUD for other years, 2013 data was used for comparison with 2013 ACS data.

Table 7. Income Limits Summary – Dallas TX HUD Metro FMR Area 2013

FY 2013 Income Limit Category	1 Person HH	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
Extremely Low (30%) Income Limits	\$14,200	\$16,200	\$18,250	\$20,250	\$21,900	\$23,500	\$25,150	\$26,750
Very Low (50%) Income Limits	\$23,650	\$27,000	\$30,400	\$33,750	\$36,450	\$39,150	\$41,850	\$44,550
Low (80%) Income Limits	\$37,800	\$43,200	\$48,600	\$54,000	\$58,350	\$62,650	\$67,000	\$71,300

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

According to the 2013 HUD Income Limits Summary, the median household income in the Dallas, TX Metro Area was \$67,500. Within just the city limits of Dallas, however, there was a lower median household income of \$42,846 (2013 ACS). In 2000, the City of Dallas median household income was \$37,628 (2000 U.S. Census).

Table 8. Median Household Income - Dallas, TX Metro Area

2013 Median Household Incomes Dallas, TX Metro Area	
County Within Dallas, TX Metro Area	Median Household Income
Collin County	\$82,762
Dallas County	\$49,481
Delta County	\$40,375
Denton County	\$74,155
Ellis County	\$61,952

County Within Dallas, TX Metro Area	Median Household Income
Hunt County	\$44,858
Kaufman County	\$61,194
Rockwall County	\$86,119

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

The 2013 ACS further illustrates that of the total 462,000 households in Dallas, 28.7% (132,416) earned less than \$25,000 annually, with another 27.6% (127,669) having earned between \$25,000 and \$50,000. For the middle and upper income brackets in 2013, 16.6% (76,600) earned between \$50,000 and \$75,000; 8.8% (40,705) earned between \$75,000 and \$100,000; and 18.3% (84,610) having earned \$100,000 and up.

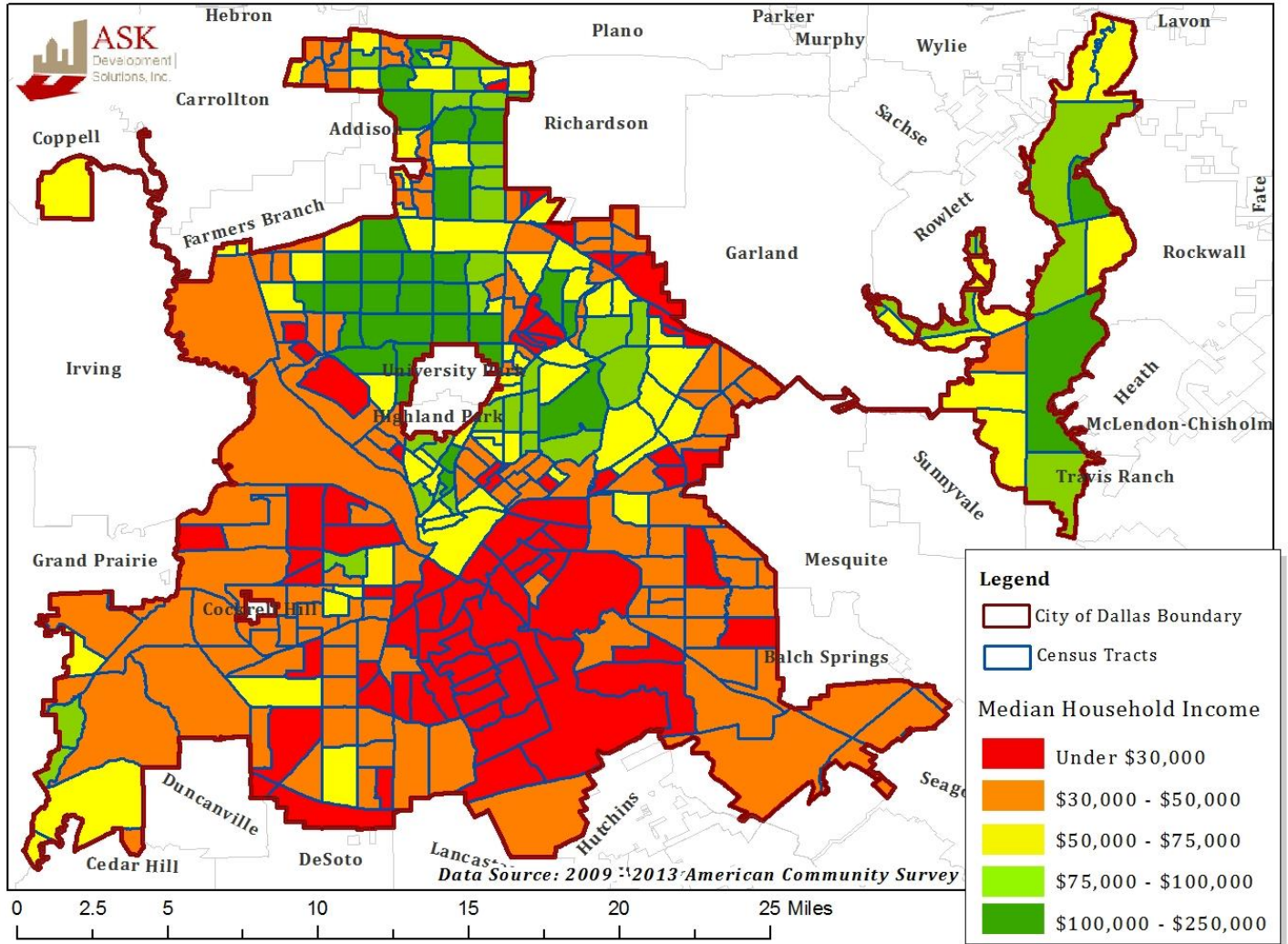
Table 9. Household Income Levels - Dallas, TX

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	43,039	9.3%
\$10,000 to \$14,999	29,616	6.4%
\$15,000 to \$24,999	59,761	12.9%
\$25,000 to \$34,999	59,102	12.8%
\$35,000 to \$49,999	68,567	14.8%
\$50,000 to \$74,999	76,600	16.6%
\$75,000 to \$99,999	40,705	8.8%
\$100,000 to \$149,99	41,192	8.9%
\$150,000 to \$199,999	17,120	3.7%
\$200,000 or more	26,298	5.7%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

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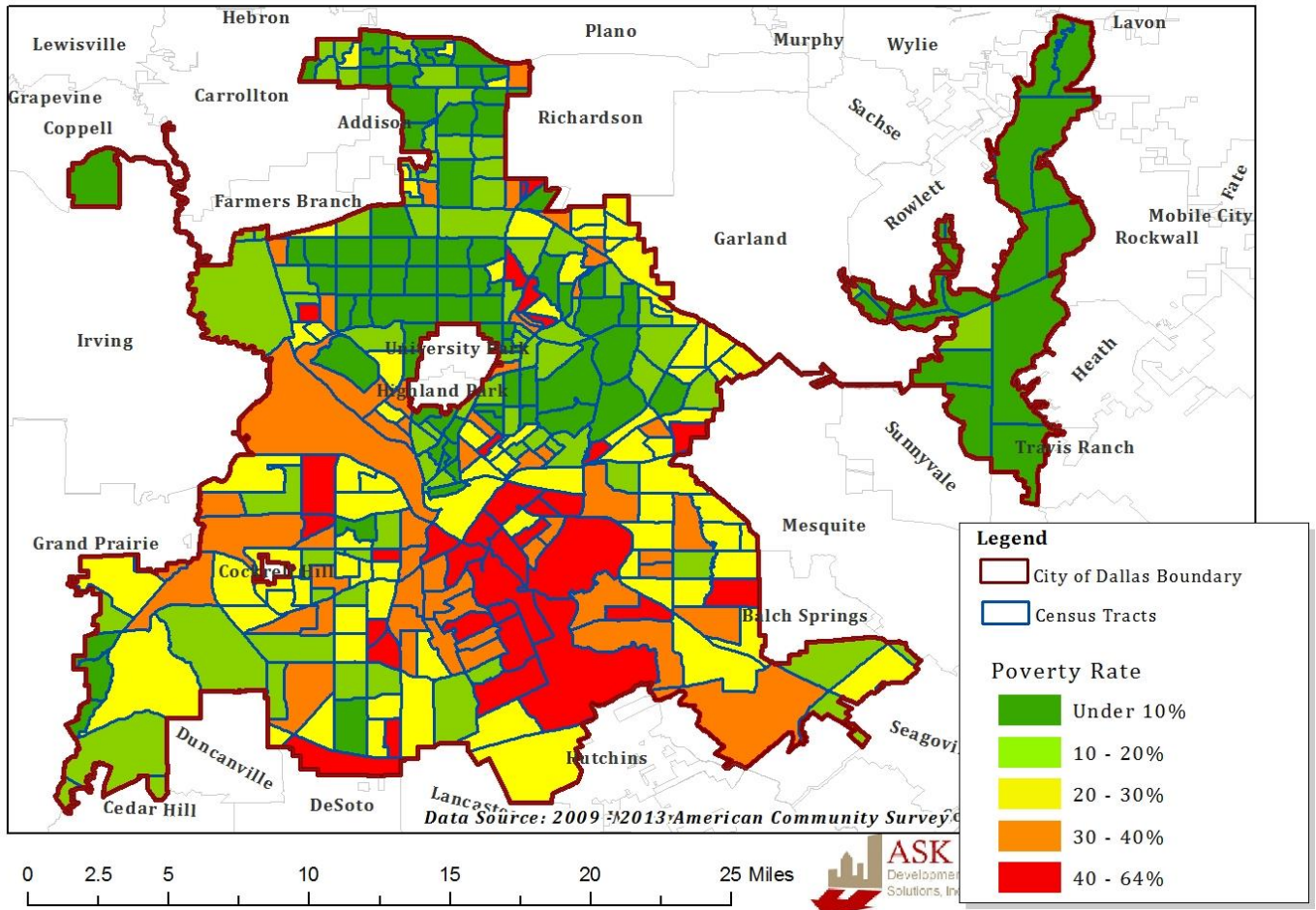
City of Dallas: Median Household Income (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Per the **2013 ACS**, of the estimated 1,204,744 person Dallas population, 23.8% subsist below the poverty level. This reflects an increase of 6% from 2000, when 17.8% of the population was below poverty level. In 2013, people ages 65 years and over had experienced an overall lower rate of poverty at 14.8%. Family households experienced an overall lower rate of poverty in 2013 at 20.3%, and married-couple families had a significantly lower rate of persons living below the poverty level at 12.2%. Female-headed households experienced poverty at the greatest rate of all groups: 37.9% of female households with no husband present and 47.7% of female households with related children less than 18 years old.; and 44.4% of female households with related children less than 5 years old only. This is measurement is particularly stark when compared to their incidence in the total population (female headed households with children make up 9.6% of all Dallas households).

City of Dallas: Poverty Rate (Averages 2009-2013)



Source: U.S. Census, 2009-2013 ACS

Of the 462,000 Dallas households in 2013, approximately 19.5% received Social Security income; 4.5% received Supplemental Security Income; 1.8% received cash public assistance income; 9.4% received retirement income; and 14.6% received Food Stamp/SNAP benefits.

Table 10. People Living below the Poverty Level - Dallas, TX

All People	23.8%
Under 18 Years	37.0%
Related Children Under 18 Years	36.9%
Related Children Under 5 Years	38.1%
Related Children 5 to 17 Years	36.3%
18 Years and Over	19.1%
18 to 64 Years	19.7%
65 Years and Over	14.8%
People in Families	23.8%
Unrelated Individuals 15 Years and Over	23.8%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

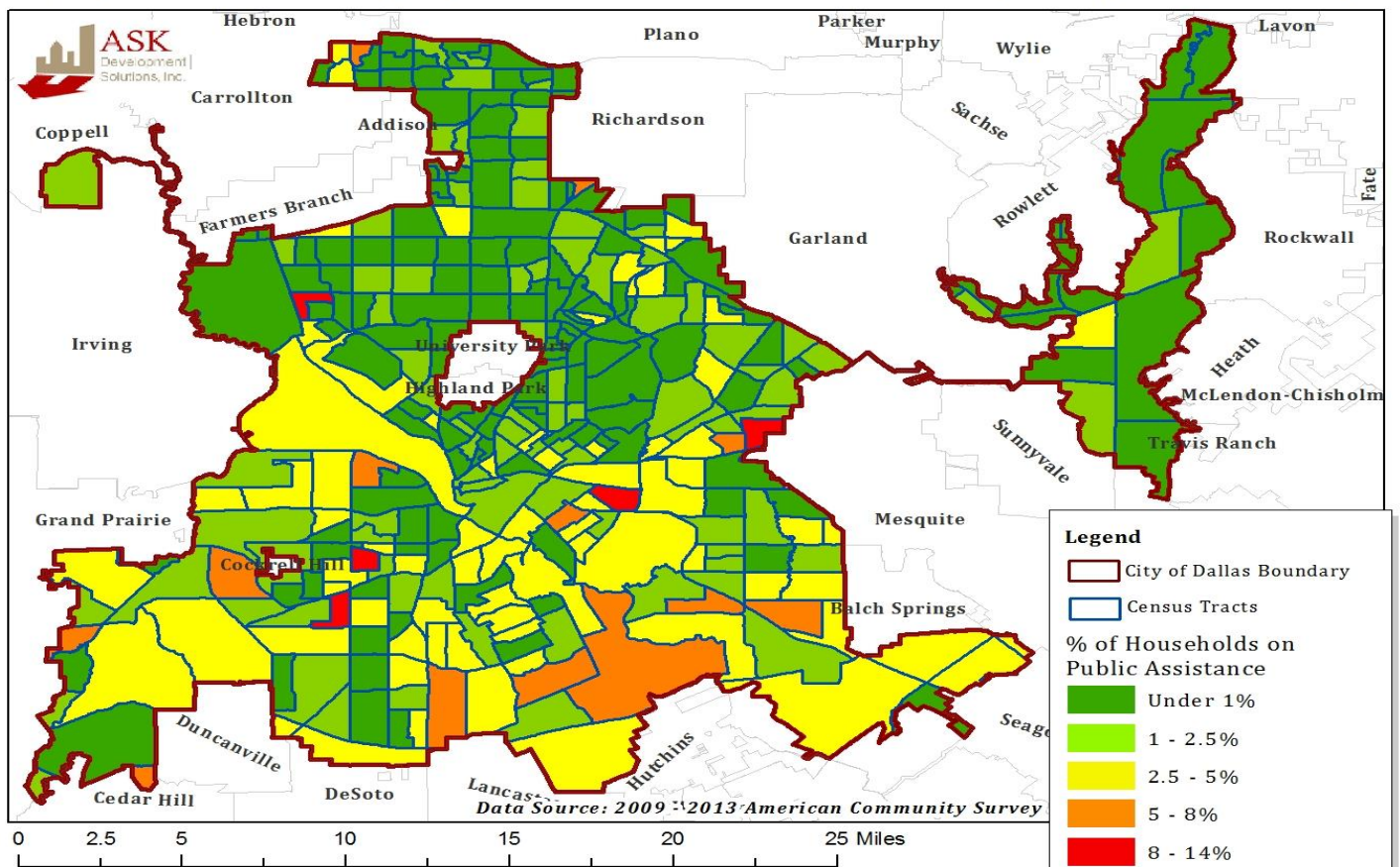
Table 11. Families Living below the Poverty Level – Dallas, TX

All Families	20.3%
With Related Children Under 18 Years	30.0%
With Related Children Under 5 Years Only	24.2%
Married Couple Families	12.2%
With Related Children Under 18 Years	19.0%
With Related Children Under 5 Years Only	13.9%
Families With Female Householder, No Husband Present	37.9%
With Related Children Under 18 Years	47.7%
With Related Children Under 5 Years Only	44.4%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Map 7. Percentage of Households on Public Assistance, Dallas, TX

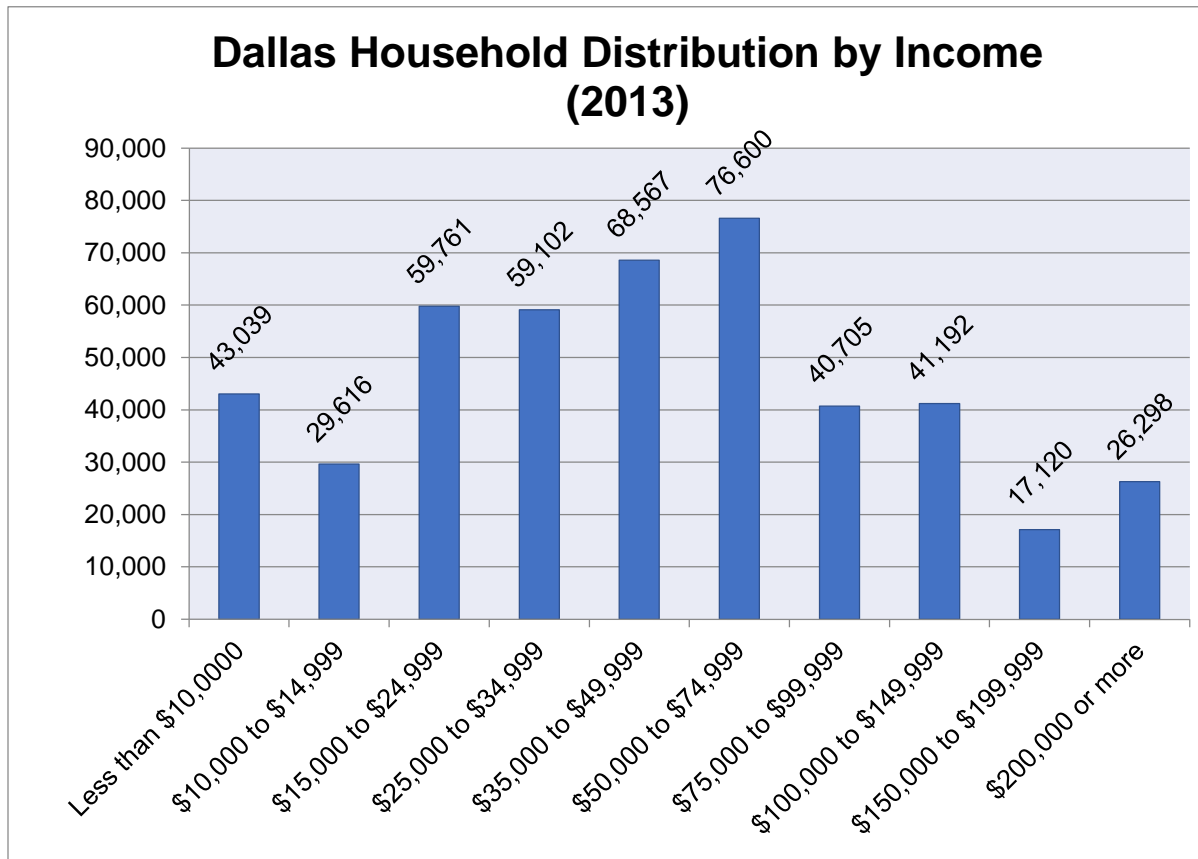
City of Dallas: Percentage of Households on Public Assistance (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

The following figure depicts the income distribution of all households in the City of Dallas.

Figure 4. Household Distribution by Income - Dallas, TX



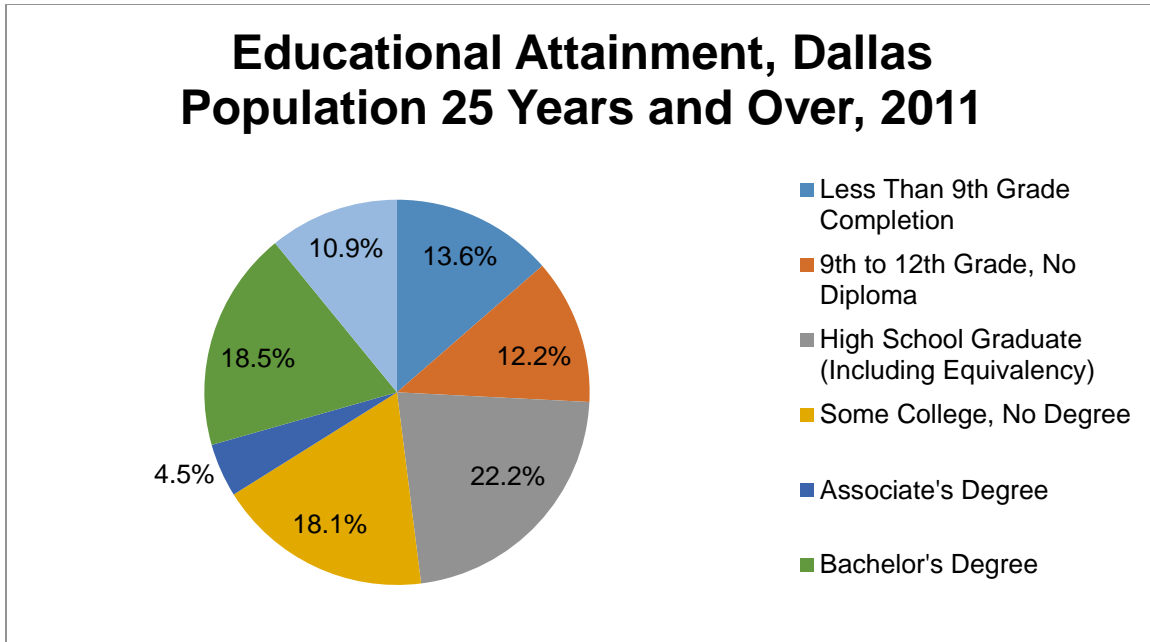
Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Educational Attainment

Within the 2013 Dallas population of persons 25 years and over, 22.2% of people had at least graduated from high school (including equivalency), 18.5% had a bachelor's degree, and 10.9% had a graduate or professional degree. Of the same population (25 years and older), 25.8% had less than a high school education diploma. See Figure 5, below.

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Figure 5. Educational Attainment - Dallas, TX



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

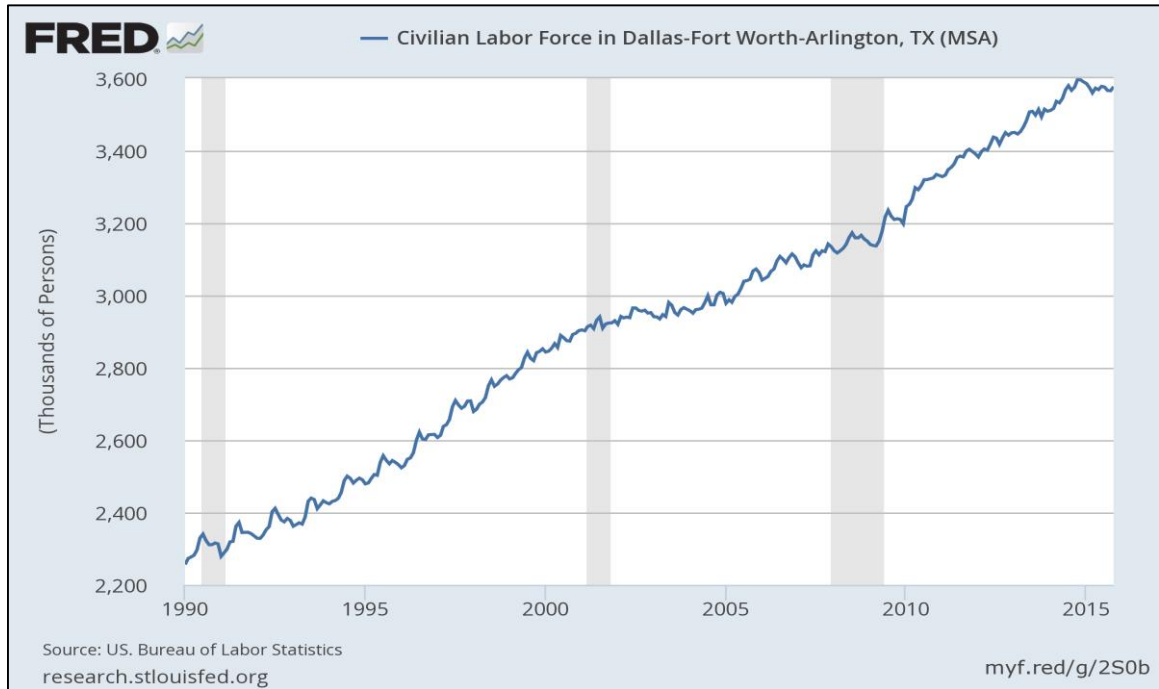
The total school enrollment for the population aged 3 years and over in Dallas was 308,086 according to the 2013 ACS. School enrollment is broken down into the following categories: 6.6% in nursery school/preschool; 6.5% in kindergarten; 44.0% in elementary school (grades 1-8); 19.4% in high school; and 23.3% in college or graduate school.

Employment

As of 2013, the Dallas population aged 16 years and over numbered 934,1272 persons, of which approximately 67.7% (632,404) was in the labor force and 61.3% (572,620) was employed. This reflects some change since 2000 when Dallas had 904,860 persons aged 16 and over. In 2000, 65.1% (588,623) of those persons was in the labor force and 60.7% (549,191) was employed.

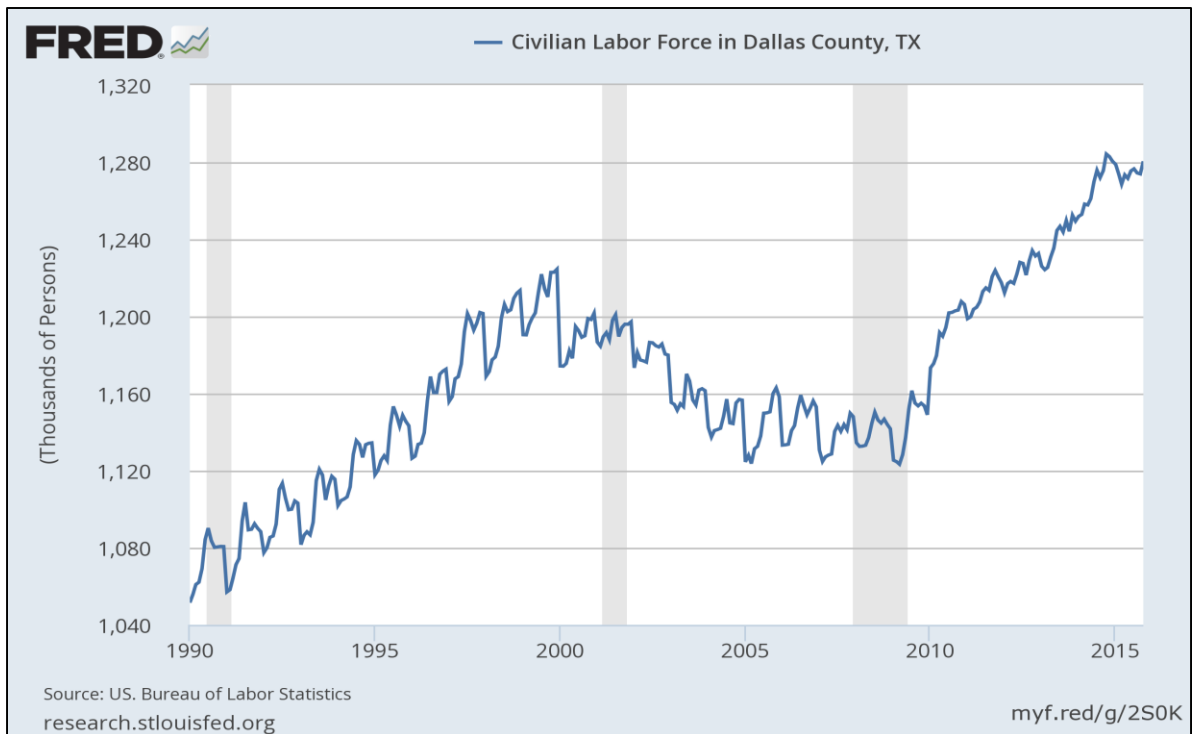
The following figures give a larger view of the labor force changes within the Dallas-Fort Worth-Arlington, TX MSA, as well as Dallas County (of which Dallas belongs to both), from 1990 to October 2015. The civilian labor in Dallas County was highest in the late 1990's and early 2000's. There was a sharp decline in the labor force in 2000 and the number of persons continued to fluctuate until 2010. The number of persons in the civilian labor force has been continuously increasing since January 2010; reaching 1,280,474 persons in October 2015.

Figure 6. Civilian Labor Force: 1990 - 2015 - Dallas-Fort Worth-Arlington, TX MSA



Source: Federal Reserve Bank of St. Louis, Missouri

Figure 7. Civilian Labor Force: 1990 – 2015 – Dallas County, TX

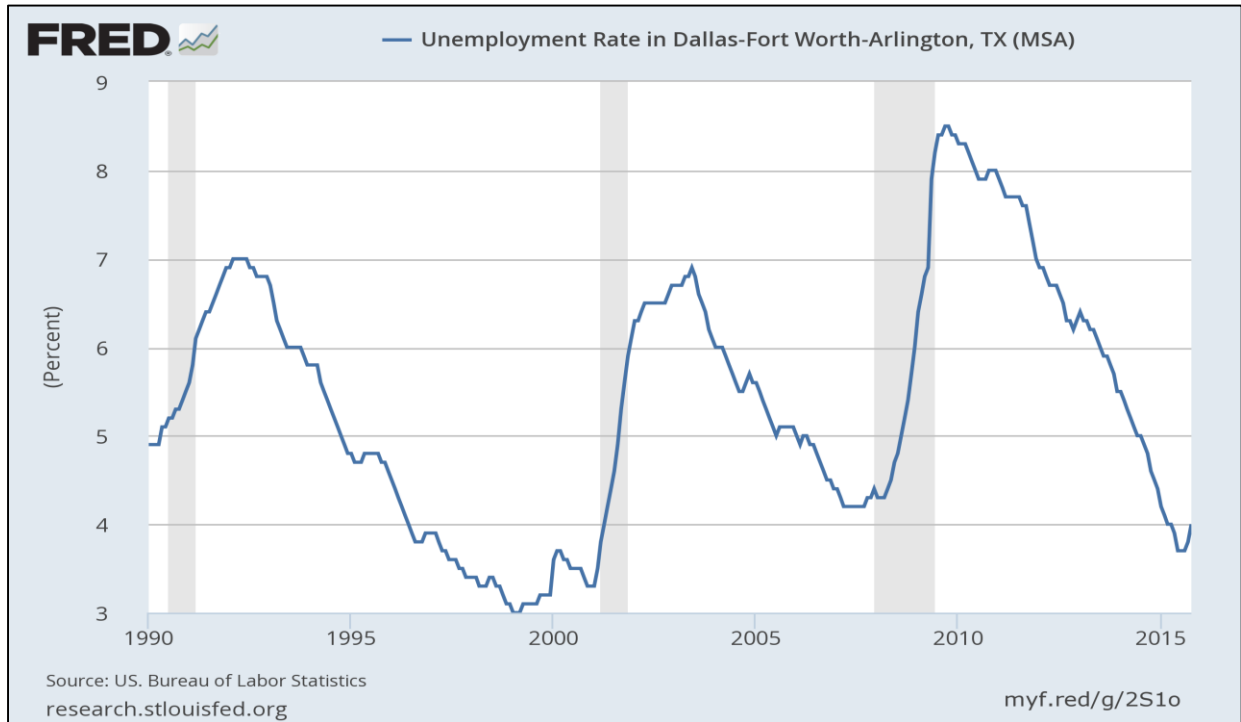


Source: Federal Reserve Bank of St. Louis, Missouri

The national economic downturn in recent years has also affected the Dallas area. Unemployment in Dallas County rose significantly from 4.0% in July 2000 to 7.8% in July 2003. A similar trend reoccurred almost a decade later when the unemployment rate fell to 4.2% in April 2007 and rose to its highest

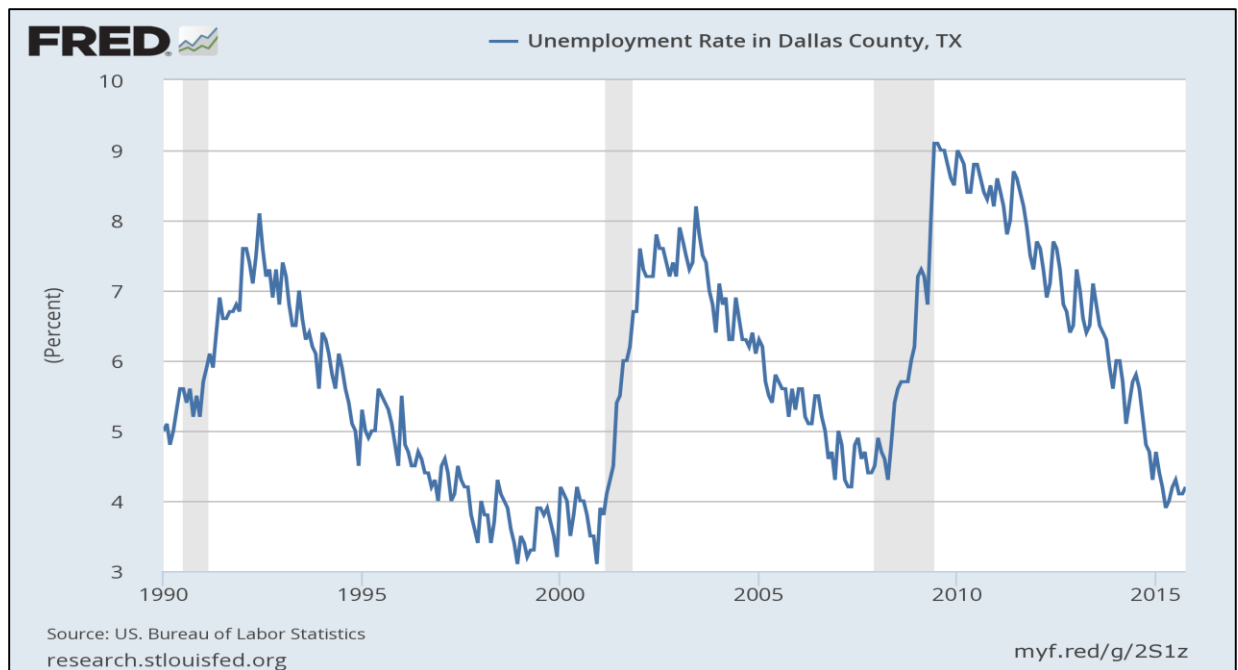
point in 25 years reaching 9.1% in July 2009. Since that time unemployment has been on the decline and was 4.2% as of October 2015. Further illustration of these regional trends can be found in the following figures. Map 8 shows the unemployment rate in the City of Dallas by census tract.

Figure 8. Unemployment Rate: 1990 - 2015 - Dallas-Fort Worth-Arlington, TX MSA



Source: Federal Reserve Bank of St. Louis, Missouri

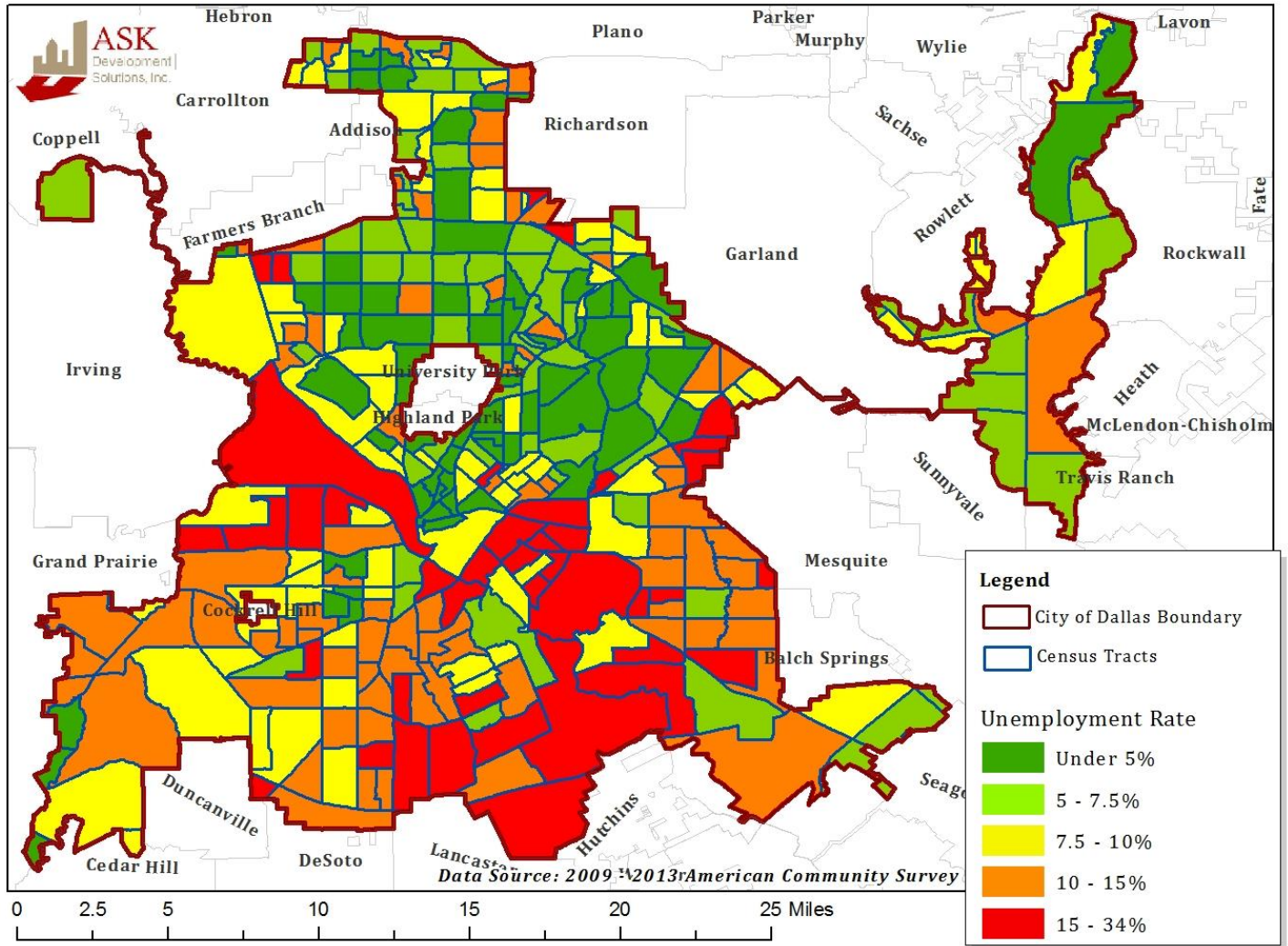
Figure 9. Unemployment Rate: 1990 - 2015 - Dallas County, TX



Source: Federal Reserve Bank of St. Louis, Missouri

Map 8. Unemployment Rate - Dallas, TX

City of Dallas: Unemployment Rate (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

The City of Dallas has job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2013 ACS, the six top industries provide employment for almost three-quarters of the City's civilian employer population 16 years and over:

Education, Healthcare, and Social Assistance	101,349 (17.7%)
Professional, Scientific, Waste Management Services	85,770 (15.0%)
Retail Trade	62,235 (10.9%)
Arts, Entertainment, and Recreation	59,111 (10.3%)
Construction	58,000 (10.1%)
Finance and insurance, and real estate and rental and leasing	53,878 (9.4%)

Dallas has a well-developed economic base that provides employment opportunities not only for the citizens of Dallas, but also for commuters from the surrounding communities. Due to its position within a major metropolitan area, the following chart describes employers within the Dallas/Fort Worth (DFW) region, as reported by the Dallas Regional Chamber of Commerce. According to the Texas Workforce

Commission (TWC), the 200 largest public and private employers in the DFW region comprise less than half of 1% of all firms (116,820) in the region, accounting for 26.2% of the region's employment (762,856 jobs). The following table lists the major employers within Dallas and its environs based on the North American Industry Classification System (NAICS).

Table 12. Major Employers by NAICS Sector- Dallas, TX

Company	Employees	Headquarters
Extraction and Construction		
Energy Transfer Partners	3,000	Dallas, TX
Austin Industries	1,800	Dallas, TX
Naturalite Inc.	1,600	Terrell, TX
Potter Concrete	1,500	Dallas, TX
Furmanite Corp.	1,400	Richardson, TX
Manufacturing		
Lockheed Martin Aeronautics Company	13,647	Bethesda, MD
Texas Instruments Inc.	9,700	Dallas, TX
Raytheon Co.	7,440	Lexington, MA
Bell Helicopter Textron, Inc.	7,300	Hurst, TX
L-3 Communications	4,150	New York, NY
Transportation and Utilities		
AMR Corp.	25,150	Fort Worth, TX
Energy Future Holdings	8,000	Dallas, TX
FedEx Corp.	7,500	Memphis, TN
Southwest Airlines Co.	6,000	Dallas, TX
Burlington Northern Santa Fe Co.	3,100	Fort Worth, TX
Trade		
Wal-Mart Stores Inc.	32,800	Bentonville, AR
Kroger Co.	8,375	Cincinnati, OH
Target Corporation	8,375	Minneapolis, MN
Albertsons Inc.	8,300	Boise, ID
J.C. Penney Company, Inc.	7,500	Plano, TX
Information		
AT&T	16,600	Dallas, TX
Verizon Communications Inc.	14,000	New York, NY
Nortel Networks	3,900	Richardson, TX
Sprint Nextel Corp.	3,850	Reston, VA
Sabre Holdings Corp.	2,800	Southlake, TX
Financial Activities		
Countrywide Home Loans	11,170	Calabasas, CA
Citigroup Inc.	11,000	New York, NY
JPMorgan Chase	8,900	New York, NY
Bank of America Corp.	7,750	Charlotte, NC

Company	Employees	Headquarters
Fidelity Investments	4,200	Boston, MA
Professional and Business Services		
Perot Systems Corp.	3,000	Plano, TX
ACS Inc.	2,500	Dallas, TX
Ernst & Young LLP	1,450	New York, NY
KPMG LLLP	1,200	New York, NY
Benemax	1,200	Irving, TX
Education and Health Care Services		
Dallas Independent School District	19,871	Dallas, TX
Texas Health Resources	17,000	Arlington, TX
Baylor Health Care System	16,000	Dallas, TX
HCA, Inc.	12,130	Nashville, TN
Fort Worth Independent School District	13,031	Fort Worth, TX
Leisure and Hospitality		
Brinker International Inc.	8,728	Dallas, TX
CG Management LLC	4,000	Irving, TX
Pizza Hutt, Inc.	3,900	Dallas, TX
Consolidated Restaurant Operations	3,800	Dallas, TX
Carlson Restaurants Worldwide	2,500	Carrollton, TX
Public Employers		
The City of Dallas	13,000	Dallas, TX

Source: Dallas Morning News 2008 Top 200, Dallas Business Journal; 2008 Book of Lists, Fort Worth Business Press; Book of Lists, and Greater Dallas Chamber 2008 Consolidated Survey.

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Transportation and Commuting

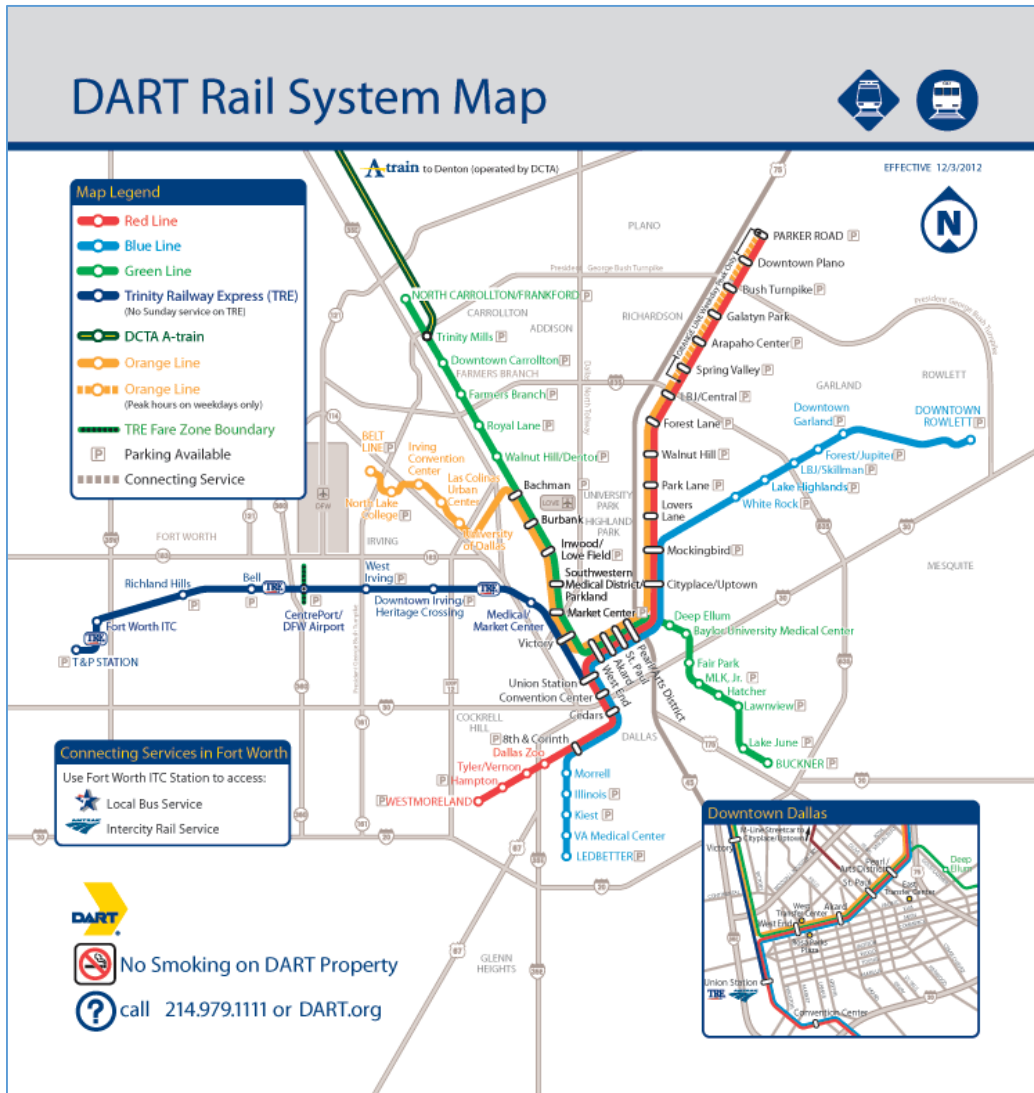
Transportation

Dallas Area Rapid Transit (DART) serves Dallas and 12 surrounding cities with public transit services. A network of DART Rail, Trinity Railway Express (TRE) and bus services moves more than 220,000 passengers per day across a 700-square-mile service area. DART operates local and express bus routes serving Addison, Carrollton, Cockrell Hill, Dallas, Farmers Branch, Garland, Glenn Heights, Highland Park, Irving, Richardson, Rowlett, Plano and University Park. Bus route 500 serves Belt Line Station on the DART Rail Orange Line, DFW Airport, area hotels along Plaza Drive, and TRE's CentrePort/DFW Airport Station. It operates seven days a week between the Belt Line Station and DFW Terminal A with most trips also connecting to Trinity Railway Express (TRE) service at CentrePort/DFW Airport Station. Buses depart every 15 minutes during rush hours, 20 minutes during the mid-day, and 30 minutes in the late evenings and meet every Orange Line train. Buses to CentrePort/DFW Airport Station are available Monday through Saturday when TRE trains are in operation.

The DART Rail System provides service to work, shopping and entertainment destinations in Dallas, Carrollton, Farmers Branch, Garland, Irving, Plano and Richardson. The TRE commuter line links DART customers to DFW International Airport and downtown Fort Worth. Free parking is available at most rail stations, and most are served by DART bus routes. Popular shopping and entertainment destinations near DART Rail stations in Dallas include North Park Center and Upper Greenville Avenue (Park Lane Station), West Village (Cityplace/Uptown Station), Mockingbird Station, the Dallas Museum of Art (St. Paul Station), American Airlines Center (Victory Station), West End Historic District (West End Station), Fair Park (Fair Park Station and MLK, Jr. Station), the Dallas Convention Center (Convention Center Station) and the Dallas Zoo (Dallas Zoo Station).

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Map 8. DART Rail System Map



DART offers two basic two-hour fares - \$2.50 for all DART buses and trains (including DART On-Call and FLEX service) and TRE service between Union Station and CentrePort/DFW Airport Station and \$5.00 for Regional service, which includes all DART buses and trains, all TRE trains plus The T in Fort Worth and DCTA in Denton County.

DART oversees a free RideShare computerized match list program to put residents in touch with other commuters who want to share the ride. In addition, the DART Vanpool allows 15 passengers to share the cost of riding to work. Vanpool is available anywhere in Dallas, Denton, Ellis or Collin counties. Emergency Ride Home service is provided for vanpoolers who have personal or work-related emergencies. Riders are given a ride home via taxi or a rental car, available two times each quarter. The cost of the Emergency Ride Home co-pay is \$10.

Reduced fares are discounted fares for senior citizens age 65 or older (with a valid DART photo ID), non-paratransit certified persons with disabilities (with valid DART photo ID), and Medicare card holders. Certified paratransit-eligible riders may use the bus and rail service free (with valid Paratransit

photo ID). Guide dogs and other service animals are permitted on DART vehicles. DART buses offer wheelchair lifts and other features to accommodate riders with disabilities. Seats near the front door are reserved for the elderly and people with disabilities. According to the Americans with Disabilities Act (ADA) standards, wheelchairs must be secured on buses. There are two wheelchair securement locations per bus, each equipped with devices which hold the wheelchairs safely in place. Operators provide securement assistance as needed. Lap/shoulder belts are available upon request. In addition, DART buses offer “stop announcements” provided by automated equipment or bus operators at major intersections and transfer points.

DART Paratransit Service is a curb-to-curb public transportation service for people with disabilities who are unable to use DART buses or trains. Paratransit is a shared-ride service operated with modern, accessible vehicles, and taxi cabs. Riders who are unable to access vans by using steps can use the wheelchair lifts or ramps. On the large accessible vans, boarding chairs are available upon request. DART also offers free travel training, along with travel ambassadors, to persons with disabilities who are capable of riding accessible bus and rail services. Certified Paratransit riders are welcome to schedule trips to begin and end anywhere in the following cities: Addison; Garland; Rowlett; Carrollton; Glenn Heights; Plano; Cockrell Hill; Highland Park; University Park; Dallas; Irving; Farmers Branch; and Richardson. Service is also provided to and from DFW International Airport.

DART buses have bike racks on the front of the bus. DART has updated its fleet of light rail vehicles (LRV) by inserting a new, low-floor insert between the existing sections of the vehicle adding seating capacity and improving access through level boarding. The SLRVs allow passengers with bicycles to roll directly onto the trains. DART offers bike racks for short-term parking at most rail stations and transit centers. Bike racks are free of charge and are available on a first-come, first-served basis. DART received a federal grant to replace aged and worn bike lockers with a new environmentally friendly state of the art bike lids. The new bike lids meet homeland security requirements, are homeless and vandal resistant, and do not overheat and melt plastic bike components. Use of the new bike lids will be on a first-come, first-served basis.

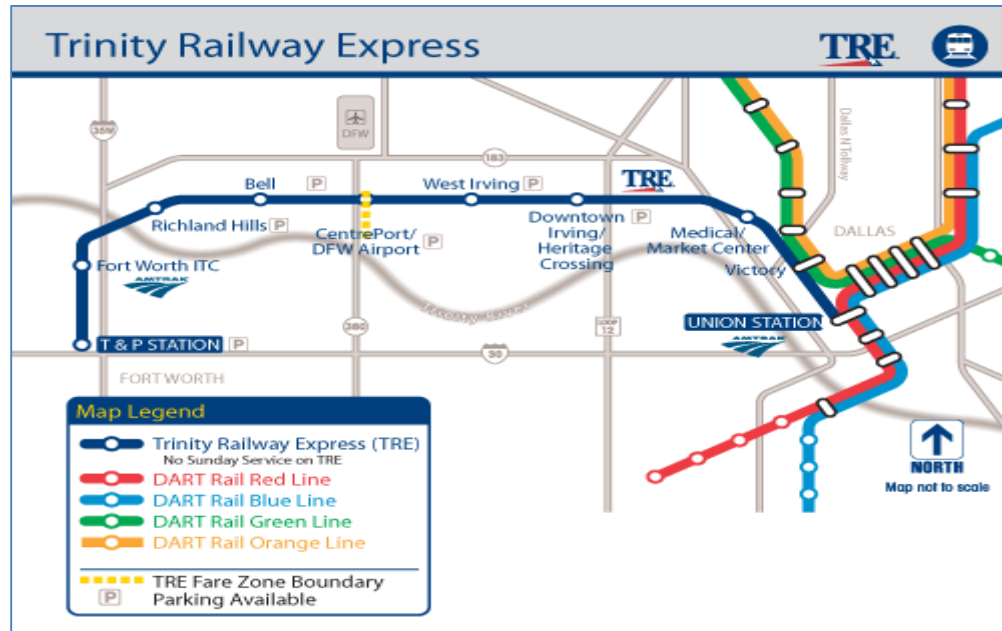
Map 9. Bicycle Routes & Trails - Downtown Dallas Area



Source: Dallas Area Rapid Transit (DART)

The Trinity Railway Express (TRE) commuter train connects the downtown areas of Dallas and Fort Worth, with stops in the Mid-Cities and DFW Airport. Trains operate Monday through Saturday. Travel on the TRE between Union Station and CentrePort/DFW Airport Station or between Fort Worth T&P Station and CentrePort/DFW Airport Station requires a Local (1 Zone) fare. Travel on the TRE that crosses the fare zone boundary of CentrePort/DFW Airport Station requires a Regional fare.

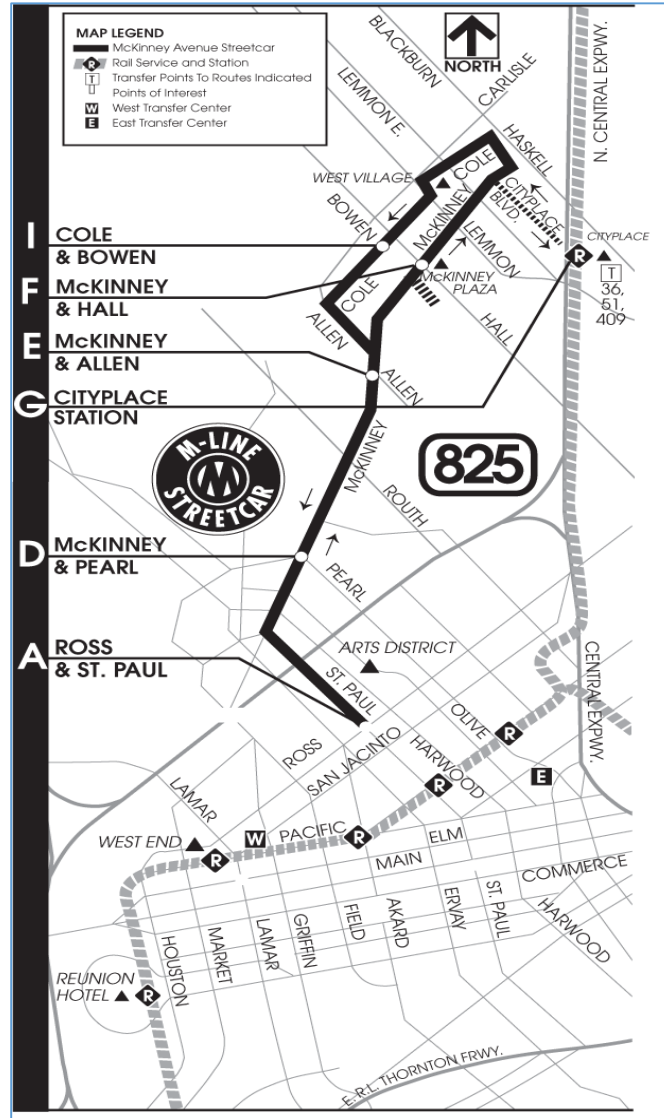
Map 10. Trinity Railway Express Routes



Source: Dallas Area Rapid Transit (DART)

The M-Line is the McKinney Avenue Trolley service. The historic M-Line Trolley offers rides up and down McKinney Avenue, connecting to the west entrance of Cityplace/Uptown Station on the DART Rail system. The M-Line's air-conditioned and heated restored vintage trolleys operates 365 days a year, providing safe, clean, reliable, and convenient public transportation free of charge (except charters) in Dallas' vibrant Uptown Neighborhood. The M-Line is operated by the McKinney Avenue Transit Authority, in partnership with DART. The McKinney Avenue Transit Authority is a 501(c) (3) nonprofit organization. In addition, in 2010, the Federal Transit Administration (FTA) awarded funding for the operation of a streetcar service from near Union Station in Downtown Dallas to Oak Cliff.

Map 11. M-Line Trolley Route



Source: McKinney Avenue Transit Authority

North Central Texas Council of Governments

The North Central Texas Council of Governments (NCTCOG) is a voluntary association of local governments, established to assist local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. NCTCOG's purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions. NCTCOG serves a 16-county region of North Central Texas, centered on the two urban centers of Dallas and Fort Worth. NCTCOG has over 230 member governments including 16 counties, numerous cities, school districts, and special districts. In 2010, NCTCOG was awarded a Community Challenge Grant by the U.S. Department of Housing and Urban Development (HUD) for their Planning for Livable Military Communities (PLMC) grant application. As a HUD Community Challenge grantee, NCTCOG has been designated as a Preferred Sustainability Status (PSS) community through FY2012.

As the Metropolitan Planning Organization for the Dallas-Fort Worth area, the NCTCOG is required to maintain a long-range transportation plan that defines a vision for the region's multimodal transportation system. This plan is known as the Metropolitan Transportation Plan (MTP) and its aim is to identify policies, programs, and projects for development that respond to adopted goals and to guide expenditures for state and federal funds over the next 20 plus years. The MTP is a comprehensive blueprint for transportation systems and services aimed at meeting the mobility needs of the Dallas-Fort Worth Metropolitan Area through the next 25 years. Goals of the 2013 updated MTP are as follows:

- Improve the availability of transportation options for people and goods
- Support travel efficiency measures and system enhancements targeted at congestion reduction and management
- Ensure all communities are provided access to the regional transportation system and planning process
- Preserve and enhance the natural environment, improve air quality and promote active lifestyles
- Encourage livable communities which support sustainability and economic vitality
- Ensure adequate maintenance and enhance the safety and reliability of the existing transportation system
- Pursue long-term sustainable revenue sources to address regional transportation system needs
- Provide for timely project planning and implementation
- Develop cost-effective projects and programs aimed at reducing the costs associated with constructing, operating and maintaining the regional transportation system

According to the MTP, never before has the region experienced such a significant gap between regional mobility needs – which are estimated to be \$395.3 billion through 2035 – and funding for improvements. The MTP estimates that the current cost of transportation congestion in the metropolitan area at approximately \$4.7 Billion per year. The MTP projects that congestion costs will rise to \$10.1 Billion per year in 2035. Additionally, the MTP produced the following figures to further illustrate changing transportation needs in the Dallas-Fort Worth metro area.

Table 13. Projection of Transportation Needs through 2035 - Dallas-Fort Worth Metro Area

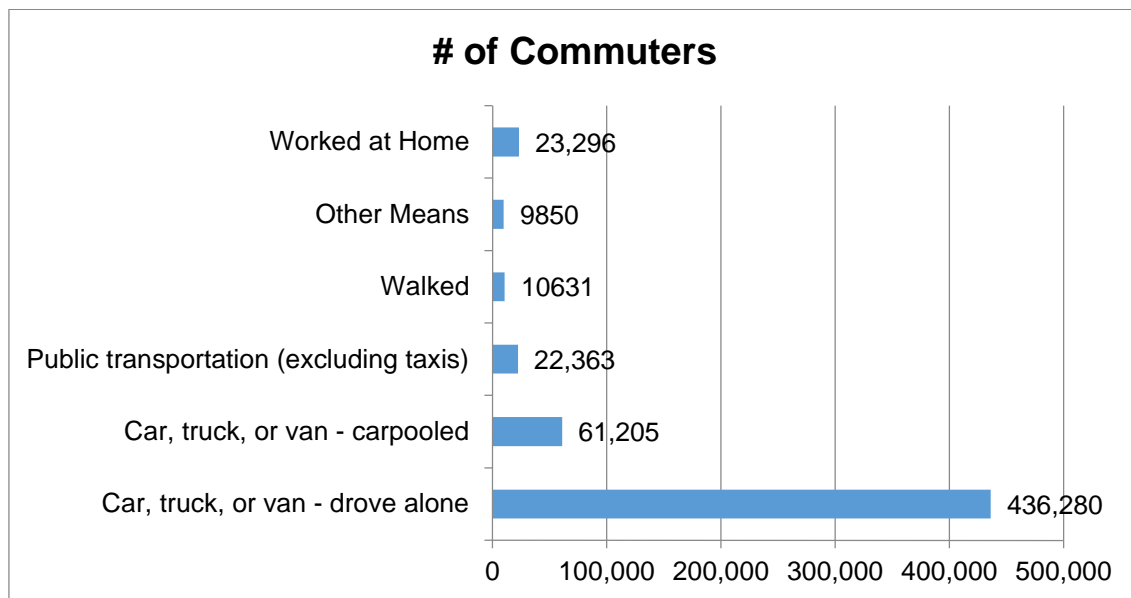
Regional Performance Measures	2013	2035	% Change
Population	6,778,201	9,833,378	45%
Employment	4,292,516	6,177,016	44%
Vehicle Miles of Travel	181,516,746	281,580,581	55%
Hourly Capacity (Miles)	42,593,607	51,288,092	20%
Vehicle Hours Spent in Delay (Daily)	1,165,512	2,489,440	114%
Increase in Travel Time Due to Congestions	32.1%	44.9%	40%
Annual Cost of Congestion (Billions)	\$4.7	\$10.1	114%

Source: North Central Texas Council of Governments

Commuting

According to the 2013, 77.4% of Dallas workers 16 years and over drove to work alone and 10.9% carpooled. Among those who commuted to work, it took them on average 25.2 minutes to get to work.

Figure 10. Modes of Transportation - Dallas, TX



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Table 14. Commute Times - Dallas, TX

Travel Time to Work (one way)	Persons (#)	Rate (%)
Less than 5 minutes	8,006	1.5%
5 to 9 minutes	40,963	7.6%
10 to 14 minutes	70,639	13.1%
15 to 19 minutes	89,933	16.6%
20 to 24 minutes	90,834	16.8%
25 to 29 minutes	34,716	6.4%
30 to 34 minutes	102,035	18.9%
35 to 39 minutes	13,405	2.5%
40 to 44 minutes	17,597	3.3%
45 to 59 minutes	38,454	7.2%
60 to 89 minutes	24,281	4.5%
90 or more minutes	9,466	1.8%
Total:	540,329	100.0%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

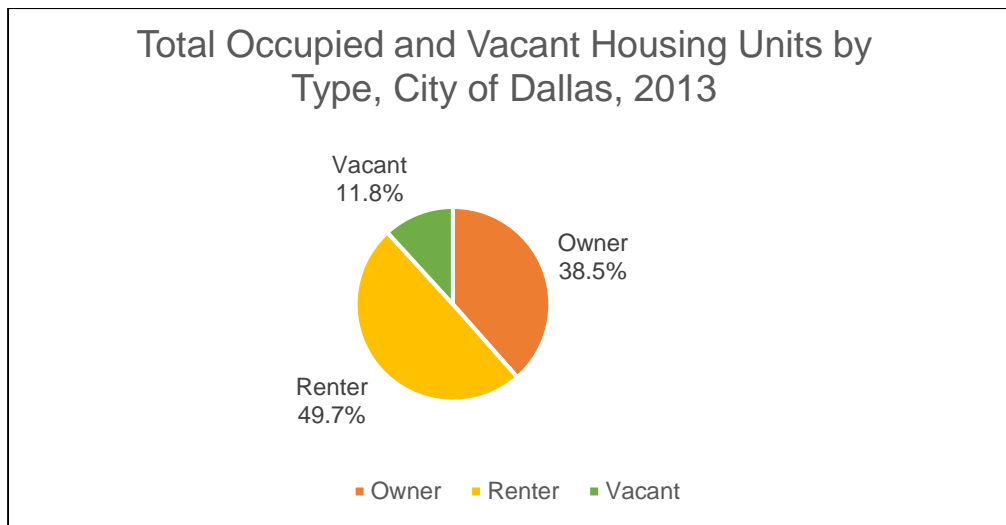
A review of the data in the above table shows that over one-third of the commuters (38.2%) spent 30 minutes or more commuting one way to work. An additional 38.8% spent less than 20 minutes commuting one way to work. The largest group of commuters (18.9%) spent 30 to 34 minutes commuting one way to work.

III. HOUSING PROFILE

Housing by Tenure

According to the U.S. Census, the number of housing units in Dallas has grown by 8.2% from 484,117 in 2000, to 523,645 in 2013. The City's vacancy rate also rose from 6.7% in 2000 to 11.8% in 2013. Including vacant housing units, in 2013, the City of Dallas contained 201,566 owner-occupied units (38.5%), 260,434 renter-occupied units (49.7%), and 61,645 vacant units (11.8%).

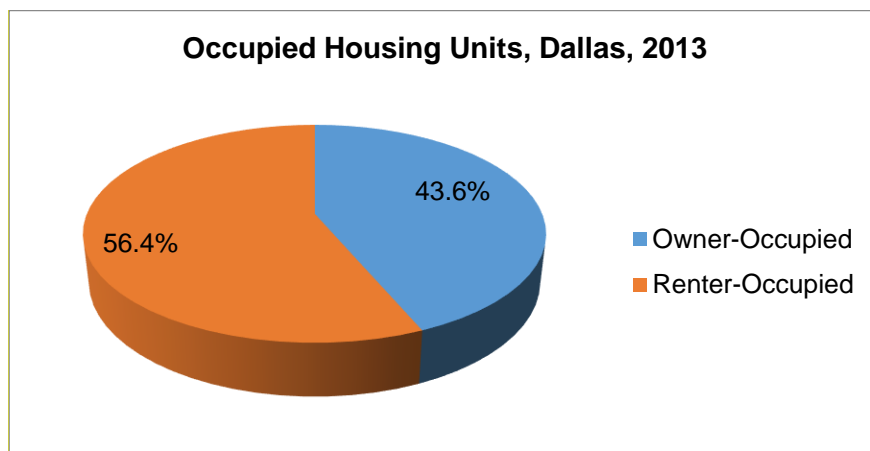
Figure 11. Housing Units by Tenure - Dallas, TX



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Not including vacant units, of the 462,000 occupied housing units in Dallas in 2013, approximately 43.6% were owner-occupied and 56.4% were renter-occupied. This represents a slight increase in the rate of homeownership, up from 43.2% in 2000, and a corresponding decrease in rental tenure, 56.8% in 2000.

Figure 12. Occupied Housing Units by Tenure - Dallas, TX

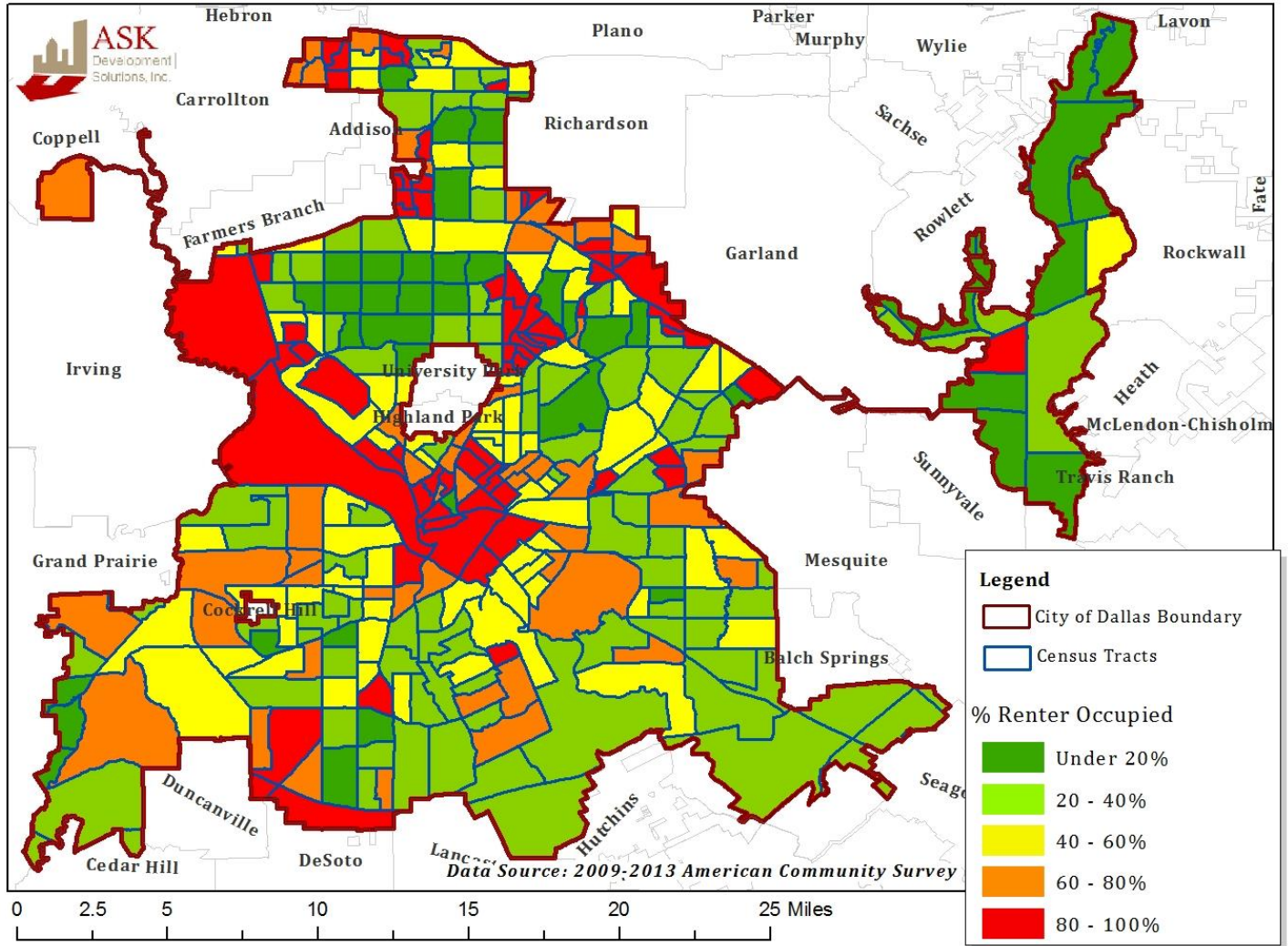


Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

The following map shows renter-occupied and owner-occupied units as a percentage of all occupied units by census tract for 2013.

Map 12. Rental Housing as a Percentage of Total Occupied Units - Dallas, TX

City of Dallas: Percent Renter Occupied Housing (Averages 2009-2013)

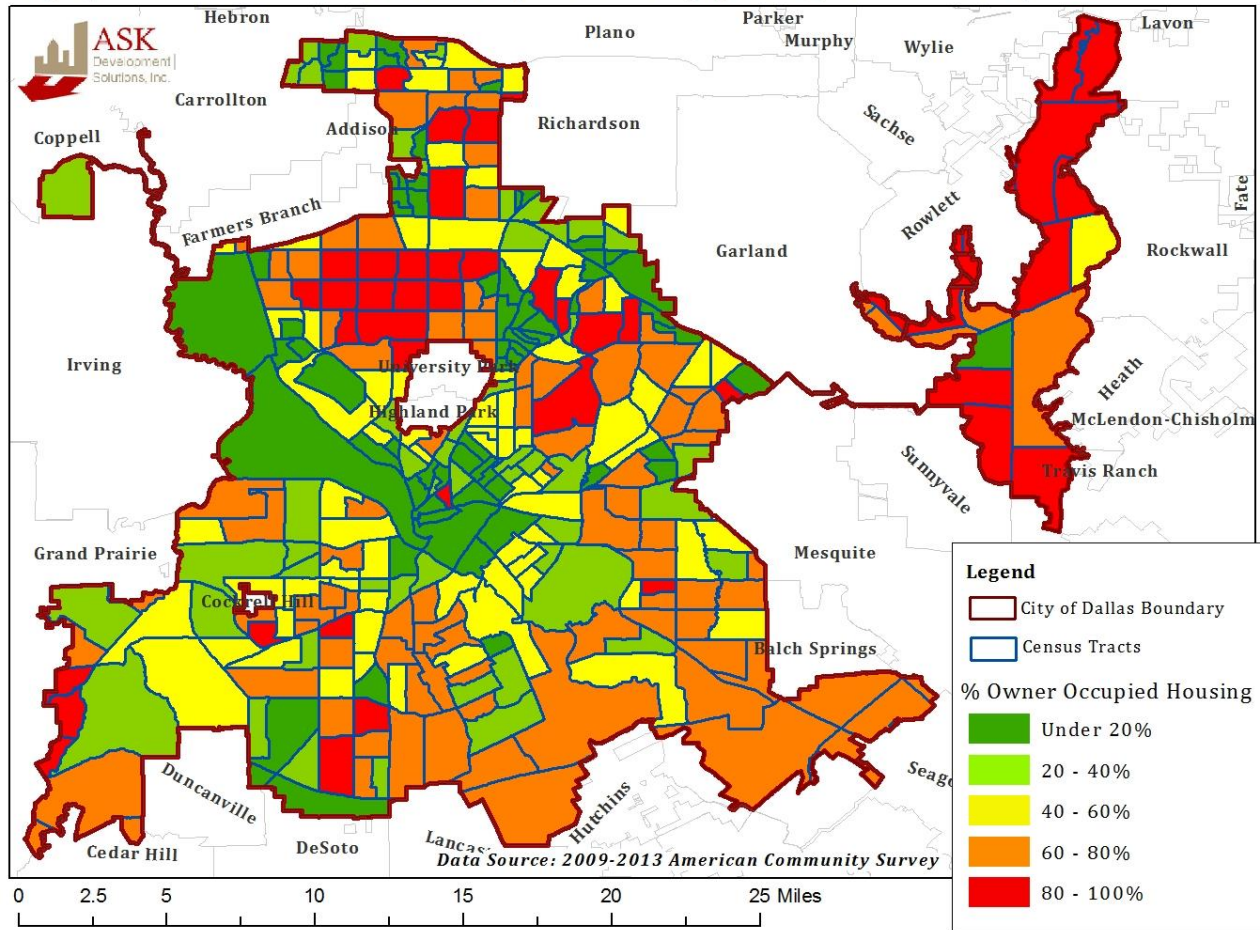


Source: U.S. Census Bureau, 2009-2013 ACS

The census tracts which had the highest percentage (80-100%) of renter households were 611, 6177, 923.11, and 931.04. The census tracts with the next highest renter households were 932, 928.01, 928.02, 931.05, 927.18, 923.12, 927.17, 929, and 924.01. In cross referencing these census tracts with the percentage of African American residents, the data for the tracts with the highest renter occupants had the lowest African American residents at 5-8%. Some tracts with renter occupants of 60-80% also had African Americans at 5-8% and at higher rates of 8-15% in census tracts 931.105, 928.01, and 931.05. The only census tract that had a higher percentage of African American residents at 15-20% was tract number 927.17. For persons of Hispanic ethnicity, the percentage of households in renter occupied housing was highest (90-100%) in the four census tracts with higher renter occupied housing. Only one of the high renter occupancy tracts shows a 50-70% Hispanic households which is still a high percentage.

Map 13. Owner Occupied Housing as a Percentage of Total Occupied Units - Dallas, TX

City of Dallas: Percent Owner Occupied Housing (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Housing Conditions

The 2013 ACS reports 523,645 total housing units in Dallas, and gives a break-out of the types of units in the Dallas housing stock, as well as the year structures were built.

Table 15. Housing Units by Type - Dallas, TX 2013

Total/Type Housing Units	Number of Units	Percentage
1-Unit, Detached	236,324	45.1%
1-Unit, Attached	20,118	3.8%
2 Units	8,570	1.6%
3 or 4 Units	22,372	4.3%
5 to 9 Units	60,443	11.5%
10 to 19 Units	63,960	12.2%
20 or More Units	105,636	20.2%
Mobile Home	6,100	1.2%
Boat, RV, Van, etc.	122	0.0%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Table 16. Year Structure Built - Dallas, TX 2013

Year Structure Built	Number of Units	Percentage
Built 2010 or later	3,495	0.7%
Built 2000 to 2009	64,465	12.3%
Built 1990 to 1999	49,844	9.5%
Built 1980 to 1989	91,173	17.4%
Built 1970 to 1979	101,199	19.3%
Built 1960 to 1969	78,364	15.0%
Built 1950 to 1959	72,980	13.9%
Built 1940 to 1949	32,154	6.1%
Built 1939 or earlier	29,971	5.7%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

The predominant type of housing in Dallas is the single-unit, detached structure (45.1%), followed by structures with 20 or more units (20.2%), structures with 10 to 19 units (12.2%), and structures with 5 to 9 units (11.5%). Comparatively, the 2000 Census predominant housing type was also single-unit, detached structure (44%), followed by structures with 20 or more units (25%), and structures with 5 to 9 units (9%). The housing stock is considered to be of older construction, with the majority (60%) of structures being built prior to 1980.

Housing Affordability

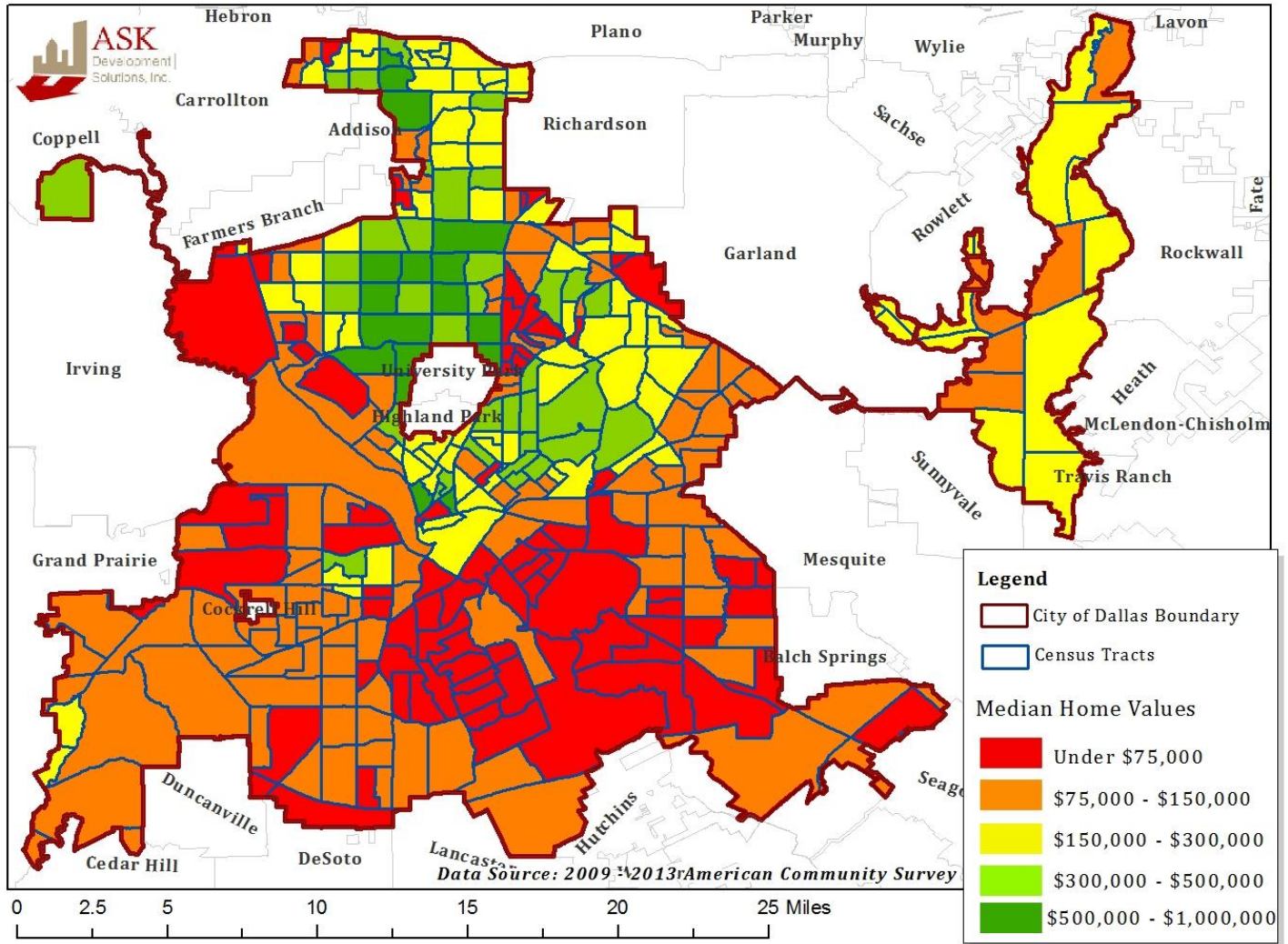
The median value of an owner occupied housing unit in 2013 was \$129,300, an increase of 44% since 2000 (\$89,800). Using the industry standard of three (3) times income, in order to afford a 2013 median priced home in Dallas, a household would need to earn \$43,100 annually. Map 13 shows the median home values throughout the City of Dallas by census tract.

According to the 2013 ACS, median contract rent in Dallas was \$693 monthly. This reflects an increase of \$142 since the 2000 Census (\$551 median rent). Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a 2013 household would need to earn \$27,720 annually to afford the median contract rent.

Table 17, below, shows a comparison between Dallas and other nearby communities including the City of Fort Worth and Dallas County. Of the 10 communities assessed, the Cities of Dallas and Fort Worth shows the lowest rents at \$680 and \$679 per month respectively. Plano and the City of Carrollton have the highest median contract rent at \$917 and \$826 per month respectively. In terms of home value, the City of Mesquite and the City of Garland have the lowest median home value at \$110,600 and \$115,700 respectively. The Cities of Plano and Carrollton also have the highest median home values in the area. Plano's home value is 30% higher than Carrollton's, \$167,700 compared to \$217,800. Plano's home value is almost 70% greater than Dallas' median home value.

Map 14. Median Home Values - Dallas, TX

City of Dallas: Median Home Values (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Table 17. Median Rent and Median Home Value with Affordability Income – Dallas, TX and environs

Geographic Area	Median Contract Rent	Annual Income Required to Afford Median Rent ⁷	Median Home Value	Annual Income Required To Afford Median Home Value ⁸
Dallas (city)	\$680	\$27,720	\$129,300	\$43,100
Arlington	\$687	\$27,480	\$130,000	\$43,333
Carrollton	\$826	\$33,040	\$167,700	\$55,900
Dallas County	\$728	\$29,120	\$128,300	\$42,767

⁷ Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%)

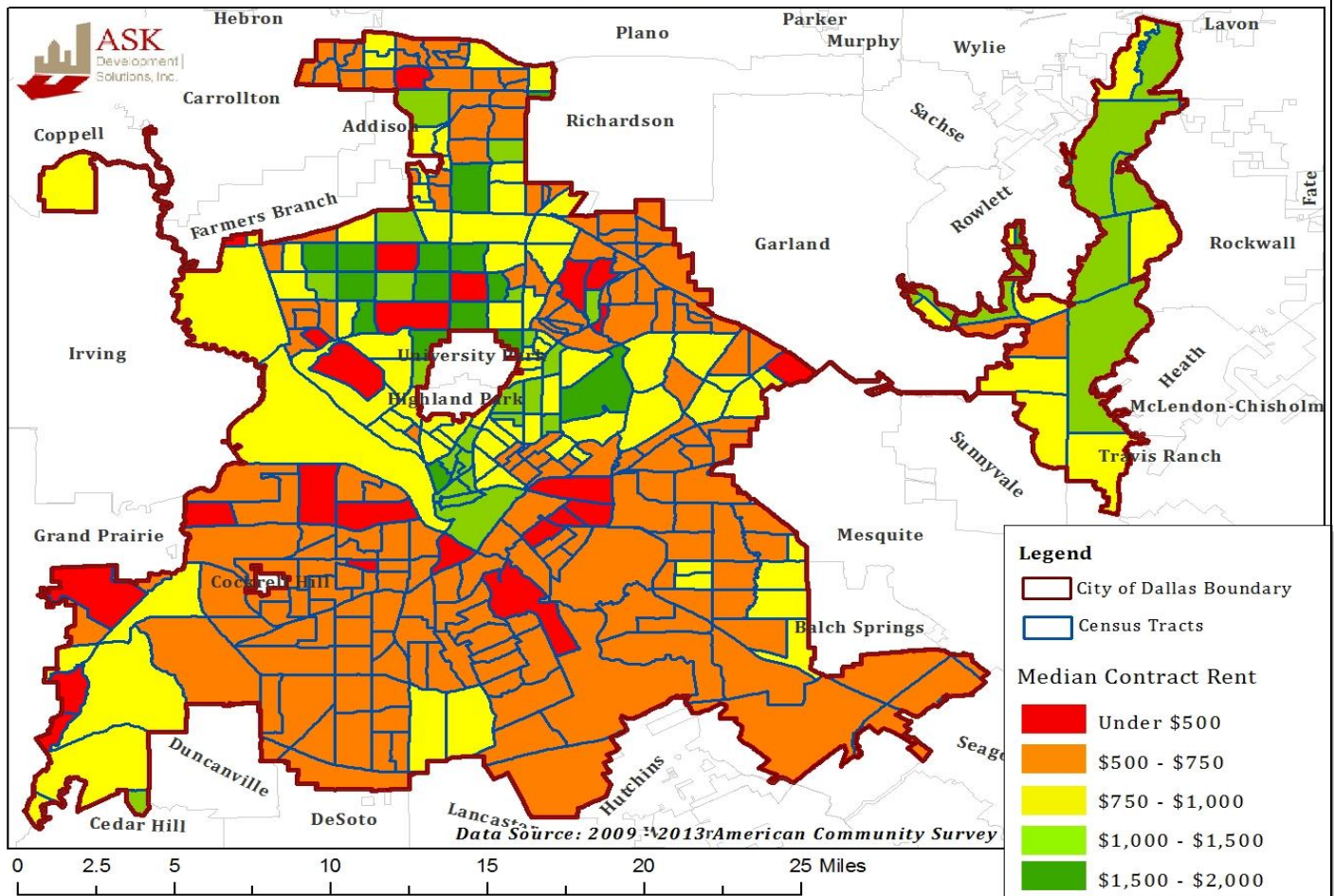
⁸ Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.

Geographic Area	Median Contract Rent	Annual Income Required to Afford Median Rent ⁷	Median Home Value	Annual Income Required To Afford Median Home Value ⁸
Fort Worth	\$679	\$27,160	\$120,700	\$40,233
Garland	\$746	\$29,840	\$115,700	\$38,567
Grand Prairie	\$735	\$29,400	\$124,300	\$41,433
Irving	\$752	\$30,080	\$136,400	\$45,467
Mesquite	\$772	\$30,880	\$110,600	\$36,866
Plano	\$917	\$36,680	\$217,800	\$72,600

Source: U.S Census Bureau, 2009-2013 ACS 5-Year Estimates

Map 15. Median Contract Rent - Dallas, TX

City of Dallas: Median Contract Rent (Averages 2009-2013)



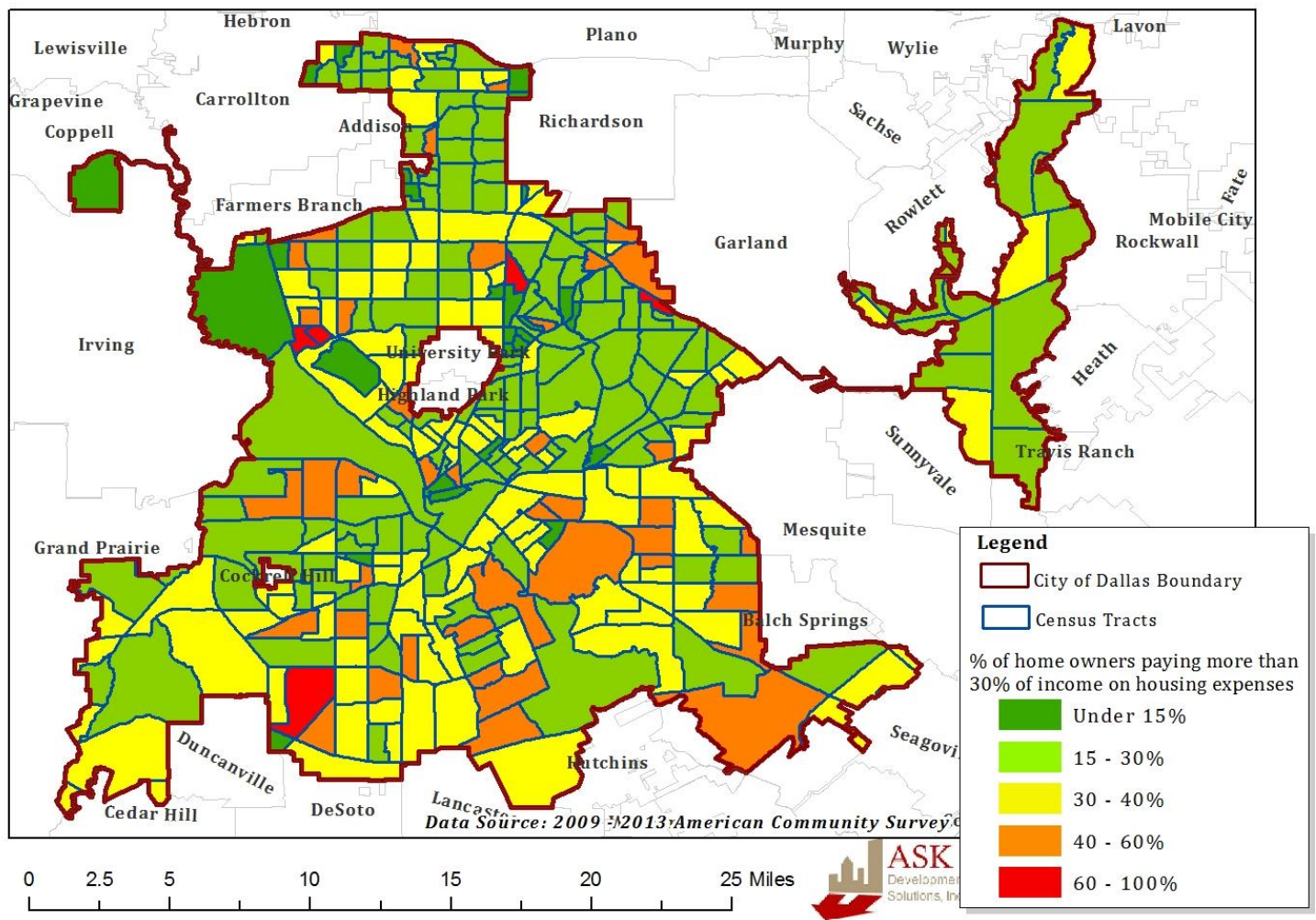
Source: U.S. Census Bureau, 2009-2013 ACS

According to the City's Consolidated Plan, Dallas has relatively low housing costs when compared to the nation however, Dallas residents also earn less than the average American. For this reason,

housing affordability is an issue among both owners and renters. ACS data for 2013 indicates that Dallas has 126,681⁹ owners with mortgages and 38.3% spend 30 percent or more on monthly housing costs. Of these owners, 10,466 or 8.3% pay 30 to 34.9 percent of their household income on housing costs; and 37,944 or 30.0% pay 35 percent or more. Also, there are 72,502 owners without a mortgage; 2,619 or 3.6% pay 30 to 34.9 percent on housing costs; and 10,864 or 15.0% pay 35 percent or more. Table 18 shows the monthly owner costs for housing units with a mortgage and without a mortgage. Dallas homeowners with a mortgage had a median mortgage payment of \$1,496 per month in 2013 while those without a mortgage had monthly housing costs of \$510.

Map 16: Percent Homeowners Spending more than 30% Income on Housing – Dallas, TX

City of Dallas: Percentage of home owners paying more than 30% of income on housing expenses (Averages 2009-2013)



Source: 2009-2013 ACS

Table 18. Selected Monthly Owner Costs - Dallas, TX 2013

Housing Units with a mortgage	127,640	Percentage
Less than \$300	97	0.1%

⁹ Excludes units where the selected monthly owner costs as a percentage of household income cannot be computed.

\$300 to \$499	1,227	1.0%
\$500 to \$699	4,995	3.9%
\$700 to \$999	18,733	14.7%
\$1,000 to \$1,499	39,020	30.6%
\$1,500 to \$1,999	22,517	17.6%
\$2,000 or more	41,050	32.2%
Median (dollars)	\$1,496	N/A
Housing Units without a mortgage	73,926	Percentage
Less than \$100	747	1.1%
\$100 to \$199	3,619	6.0%
\$200 to \$299	8,334	12.1%
\$300 to \$399	12,079	18.0%
\$400 or more	49,147	62.8%
Median (dollars)	\$510	N/A

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

According to the 2013 ACS data, there are 254,727 renter households paying rent and 48.3% pay 30 percent or more of their household income on rental housing costs monthly; of this number 21,380 or 8.7% pay 30 to 34.9 percent of their income on rental housing costs. Another 97,703 or 39.6% pay 35 percent or more on renter housing costs. The median gross rent paid by renter households was \$838 as shown in Table 19.

Table 19. Gross Rent - Dallas, TX

Occupied units paying rent	254,727	Percentage
Less than \$200	3,200	1.3%
\$200 to \$299	4,272	1.7%
\$300 to \$499	11,124	4.4%
\$500 to \$749	79,786	31.4%
\$750 to \$999	76,365	30.0%
\$1,000 to \$1,499	57,976	22.8%
\$1,500 or more	21,914	8.6%
Median (dollars)	\$838	N/A

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

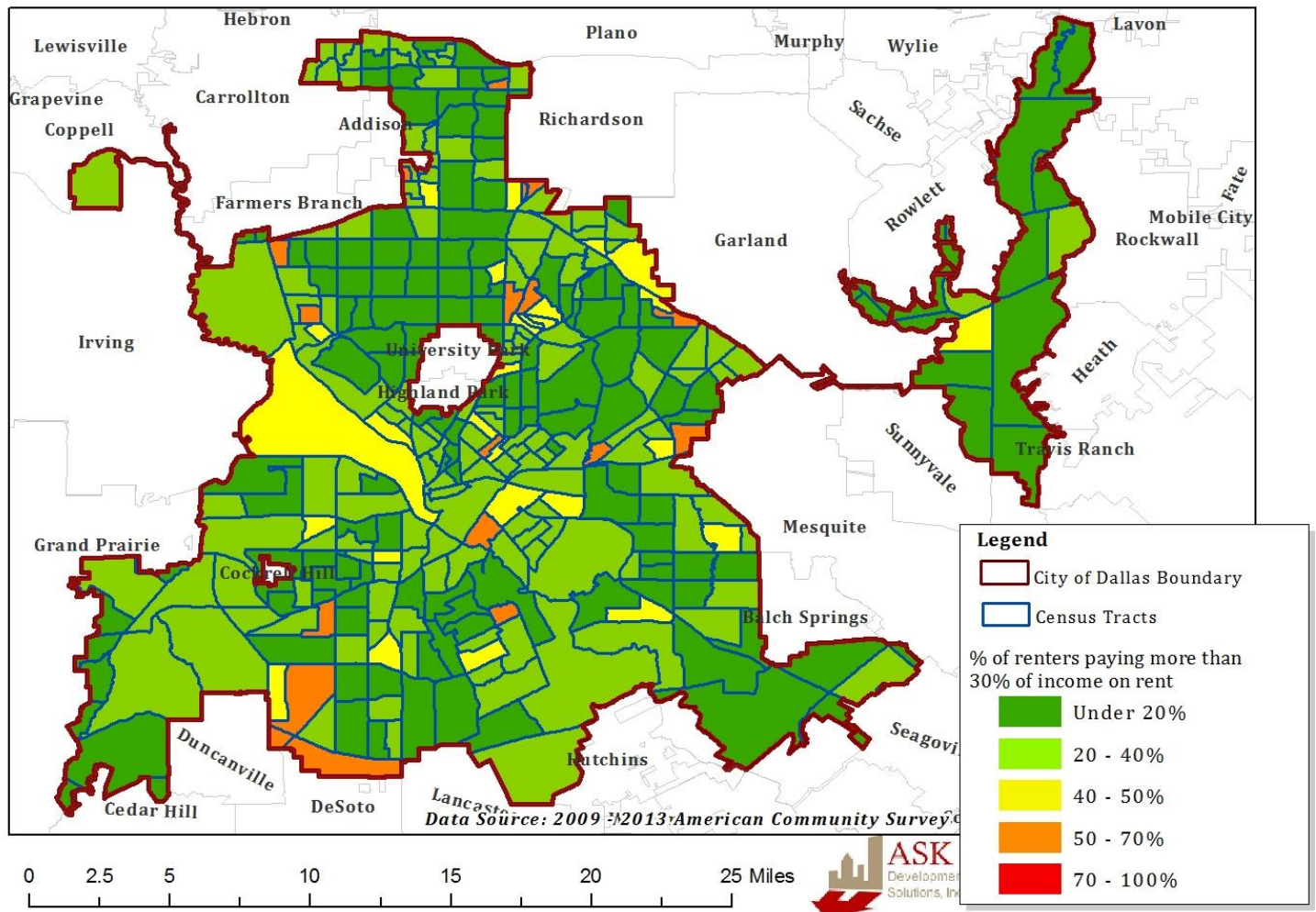
In regards to affordability of rental units, Table 20 provides the range of gross rents and Table 20 provides the FY 2013 Fair Market Rents paid by number of bedrooms. Note that the Dallas Housing Authority uses small area fair market rents as defined by zip codes for its Housing Choice Voucher (HCV) Programs. Appendix #5 provides the FY 2013 Small Area fair market rents for the Dallas metro.

Table 20. Fair Market Rents - Dallas County, TX 2013

Final FY 2013 FMRs By Unit Bedrooms					
	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2013 FMR	\$585	\$701	\$887	\$1,183	\$1,429

Map 17 - Percent Renters paying more than 30% Income on Rent, Dallas, TX

City of Dallas: Percentage of renters paying more than 30% of income on rent (Averages 2009-2013)



Source: U.S. Census, 2009-2013 ACS

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 less 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

Cost-Burden of Owners and Renters

According to HUD, a household with problems consists of:

1. Persons and families living in units with physical defects (lacking a complete kitchen or bath); or
2. Persons and families living in overcrowded conditions (greater than 1.01 persons/room); or
3. Persons and families who are cost burdened (paying more than 30% of income for housing, including utilities).

Although the 2013 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 analysis below is based on this data. The latest available CHAS data is based on 2012 ACS data.

Table 21. Households by Income Category - Dallas, TX

Income Category	Owner	Renter	Number of Households	% of All Occupied Households
Extremely Low Income	19,565	63,295	82,860	18.1%
Low Income	23,550	46,465	70,015	15.3%
Moderate Income	32,725	52,055	84,780	18.6%
TOTAL Low/Mod Income	75,840	161,815	237,655	52.0%
Middle/Upper Income	127,045	92,275	219,320	48.0%
TOTAL Households	202,880	254,090	456,970	100.0%

Table 22. Housing Problems by Income Category - Dallas, TX

Income Category	Number of Households	# With At Least One Housing Problem	% With At Least One Housing Problem
Extremely Low Income	82,860	64,670	78.0%
Low Income	70,015	55,480	79.2%
Moderate Income	84,780	41,835	49.3%
TOTAL Low/Mod Income	237,745	161,985	68.1%
Middle/Upper Income	219,320	33,575	15.3%
TOTAL (All Categories)	456,970	195,560	42.8%

Table 23. Cost Burden for Renters and Owners by Income Category - Dallas, TX

Income Category	All Renters		All Owners	
	Cost Burden >30%	Severe Cost Burden >50%	Cost Burden >30%	Severe Cost Burden >50%
Extremely Low Income	48,700 (77.0%)	40,605 (64.2%)	14,510 (74.2%)	11,015 (56.3%)
Low Income	36,485 (74.6%)	10,755 (23.1%)	14,795 (62.8%)	7,375 (31.3%)
Moderate Income	19,950 (38.3%)	2,355 (4.5%)	14,390 (44.0%)	4,105 (12.5%)
Middle/Upper Income	6,900 (7.5%)	765 (0.8%)	18,085 (14.2%)	3,840 (3.0%)
TOTAL	112,035 (44.0%)	54,480 (21.4%)	61,780 (30.5%)	26,335 (20.7%)

According to the CHAS data, Dallas had 456,970 households in 2012 of which 208,880 (44.4%) were owner-occupied and 254,090 (55.6%) were renter-occupied. Over half (52.0%) of the households were low- and moderate-income households. Approximately 43% of all households experienced at least one of the four housing problems. While 68.1% of LMI households experience at least one housing problem. Both extremely low income and low income households were disproportionately impacted by housing problems. The most common housing problem in Dallas is cost burden. About 89% of all households experiencing a housing problem were cost-burdened. The CHAS data indicates that more rental households experience at least one housing problem in comparison to homeowners. In addition, a greater percentage of rental households are cost-burdened than homeowners. A total of 44% of renter households were cost-burdened of which 21.4% were severely cost-burdened. For owner-occupied units, 30.5% were cost-burdened of which 20.7% were severely cost-burdened.

Table 24. Housing Problems among Renters - Dallas, TX

Income Category	# of Renters	# of Renters With At Least One Housing Problem	% of Renters With At Least One Housing Problem
Extremely Low Income	63,295	49,725	78.5%
Low Income	46,465	39,870	85.8%
Moderate Income	52,055	25,255	48.5%
TOTAL Low/Moderate Income	161,815	114,850	71.0%

Table 25. Housing Problems among Owners - Dallas, TX

Income Category	# of Owners	# of Owners With At Least One Housing Problem	% of Owners With At Least One Housing Problem
Extremely Low Income	19,565	14,945	76.4%
Low Income	23,550	15,610	66.3%
Moderate Income	32,725	16,580	50.7%

TOTAL Low/Moderate Income	75,840	47,135	62.2%
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According to the CHAS data there were 24,090 elderly rental households in Dallas. Of those, 17,820 met the definition of low- and moderate-income. Within the 17,820 low- and moderate-income elderly rental households, 12,420 (69.7%) encountered at least one housing problem, as illustrated in the following table.

Table 26. Elderly Rental Households with Housing Problems - Dallas, TX

Income Category	# of Elderly Rental Households	# of Elderly Rental Households With Housing Problems	% of Elderly Rental Households With Housing Problems
Extremely Low Income	8,990	6,390	71.1%
Low Income	4,855	3,705	76.3%
Moderate Income	3,975	2,325	58.5%
TOTAL Low/Moderate Income	17,820	12,420	69.7%

Based on the cost burden analysis below, the most frequent cause of housing problems for elderly low- and moderate-income rental households is affordability. Of the 17,820 low- and moderate-income elderly rental households, 68.2% paid 30% or more of their income on housing, including 41.7% that paid 50% or more of their household income on housing, as shown below. Extremely low income elderly rental households were disproportionately impacted by severe cost burden.

Table 27. Elderly Rental Households with Cost Burden – Dallas, TX

Income Category	# of Elderly Rental Households With Cost Burden	% of Elderly Rental Households With Cost Burden
Extremely Low Income	6,325	70.4%
Low Income	3,625	74.7%
Moderate Income	2,210	55.6%
TOTAL Low/Moderate Income	12,160	68.2%

Table 28. Elderly Rental Households with Severe Cost Burden - Dallas, TX

Income Category	# of Elderly Rental Households With Severe Cost Burden	% of Elderly Rental Households With Severe Cost Burden
Extremely Low Income	4,835	53.8%
Low Income	1,935	39.9%
Moderate Income	660	16.6%
TOTAL Low/Moderate Income	7,430	41.7%

CHAS data indicates 180,100 small-related (2 to 4 members) households in Dallas. Of the 180,100 small households, 96,030 were renter households, and 84,070 were owner households. Of the small-related renter households, 65,410 (68.1%) were low- and moderate-income households, and 45,520 (69.6%) of the total low- and moderate-income small-related renter households experienced at least one housing problem.

Table 29. Small Related Rental Households with Housing Problems – Dallas, TX

Income Category	# of Small Related Rental Households	# of Small Related Rental Households With Housing Problem	% of Small Related Rental Households With Housing Problem
Extremely Low Income	24,205	19,765	81.7%
Low Income	20,685	17,200	83.2%
Moderate Income	20,520	8,555	41.7%
TOTAL Low/Moderate Income	65,410	45,520	69.6%

CHAS data also indicates that the major housing problem small related rental households experience is affordability and a small percentage of households have a housing problem other than affordability. Of the 65,410 low- and moderate-income households, 69.6% or 45,520 households have at least one housing problem. Of this amount, 21,340 households are dealing with cost burden, and 20,715 experience severe cost burden. Only 5.3% of small related renter households are experiencing a housing problem not related to affordability.

Table 30. Small Related Rental Households with Cost Burden – Dallas, TX

Income Category	# of Small Related Rental Households With Cost Burden	% of Small Related Rental Households With Cost Burden
Extremely Low Income	19,575	80.9%
Low Income	16,050	77.6%
Moderate Income	6,430	31.3%
TOTAL Low/Moderate Income	42,055	64.3%

Table 31. Small Related Rental Households with Severe Cost Burden – Dallas, TX

Income Category	# of Small Related Rental Households With Severe Cost Burden	% of Small Related Rental Households With Severe Cost Burden
Extremely Low Income	16,350	67.5%
Low Income	3,820	18.5%
Moderate Income	545	2.7%
TOTAL Low/Moderate Income	20,715	31.7%

Of the small-related owner households, the CHAS data indicates that 25,405 are low- and moderate income. A total of 15,365 (60.5%) small-related owner households are experiencing a housing problem. In addition, the largest housing problem that small related owner households experience is affordability. Of the 25,405 low- and moderate-income small related owner households, 15,025 (59.1%) experience cost burden, and 7,060 (27.8%) experience severe cost burden.

Table 32. Small Related Owner Households with Housing Problems – Dallas, TX

Income Category	# of Small Related Owner Households	# of Small Related Owner Households With Housing Problem	% of Small Related Owner Households With Housing Problem
Extremely Low Income	4,975	3,715	74.7%
Low Income	8,025	5,405	67.4%
Moderate Income	12,405	6,245	50.3%
TOTAL Low/Moderate Income	25,405	15,365	60.5%

Table 33. Small Related Owner Households with Cost Burden - Dallas, TX

Income Category	# of Small Related Owner Households With Cost Burden	% of Small Related Owner Households With Cost Burden
Extremely Low Income	3,680	74.0%
Low Income	5,325	66.4%
Moderate Income	6,020	48.5%
TOTAL Low/Moderate Income	15,025	59.1%

Table 34. Small Related Owner Households with Severe Cost Burden - Dallas, TX

Income Category	# of Small Related Owner Households With Severe Cost Burden	% of Small Related Owner Households With Severe Cost Burden
Extremely Low Income	3,040	61.1%
Low Income	2,625	32.7%
Moderate Income	1,395	11.2%
TOTAL Low/Moderate Income	7,060	27.8%

Large related households (5 or more members) also have high incidences of housing problems, according to the CHAS data. Of the 47,225 large-related households, 31,355 (66.4%) are low- and moderate-income, and 26,250 (83.7%) of the low- and moderate-income households experience at

least one housing problem. The data shows that 89.0% of all low- and moderate-income large related renter households face at least one housing problem. Cost burden is one of the main factors challenging large related households along with overcrowding. The Consolidated Plan states that larger-sized, lower-income families needing 3 to 4 room, affordable housing units have limited choices thus resulting in overcrowding.

Table 35. Large Related Rental Households with Housing Problems – Dallas, TX

Income Category	# of Large Related Rental Households	# of Large Related Rental Households With Housing Problem	% of Large Related Rental Households With Housing Problem
Extremely Low Income	6,845	6,310	92.2%
Low Income	6,235	5,890	94.5%
Moderate Income	4,845	3,765	77.7%
TOTAL Low/Moderate Income	17,925	15,965	89.0%

Table 36. Large Related Rental Households with Cost Burden – Dallas, TX

Income Category	# of Large Related Rental Households With Cost Burden	% of Large Related Rental Households With Cost Burden
Extremely Low Income	5,820	85.0%
Low Income	3,955	63.4%
Moderate Income	985	20.3%
TOTAL Low/Moderate Income	10,760	60.0%

Table 37. Large Related Rental Households with Severe Cost Burden – Dallas, TX

Income Category	# of Large Related Rental Households With Severe Cost Burden	% of Large Related Rental Households With Severe Cost Burden
Extremely Low Income	4,250	62.1%
Low Income	415	6.7%
Moderate Income	40	0.8%
TOTAL Low/Moderate Income	4,705	26.2%

Of the large-related owner households, the CHAS data indicates that 13,430 (52.1%) are low- and moderate-income. A total of 10,285 (76.6%) low- and moderate-income large-related owner households are experiencing a housing problem.

Table 38. Large Related Owner Households with Housing Problems – Dallas, TX

Income Category	# of Large Related Owner Households	# of Large Related Owner Households With Housing Problem	% of Large Related Owner Households With Housing Problem
Extremely Low Income	2,590	2,280	88.0%
Low Income	4,735	4,180	88.3%
Moderate Income	6,105	3,825	62.7%
TOTAL Low/Moderate Income	13,430	10,285	76.6%

Table 39. Large Related Owner Households with Cost Burden – Dallas, TX

Income Category	# of Large Related Owner Households With Cost Burden	% of Large Related Owner Households With Cost Burden
Extremely Low Income	2,055	79.3%
Low Income	3,510	74.1%
Moderate Income	1,950	31.9%
TOTAL Low/Moderate Income	7,515	56.0%

Table 40. Large Related Owner Households with Severe Cost Burden – Dallas, TX

Income Category	# of Large Related Owner Households With Severe Cost Burden	% of Large Related Owner Households With Severe Cost Burden
Extremely Low Income	1,590	61.4%
Low Income	1,500	31.7%
Moderate Income	230	3.8%
TOTAL Low/Moderate Income	3,320	24.7%

Overall, both renters and owners in elderly households and small-related households experience a similar degree of housing problems as well as cost-burden and severe cost-burden. Low income elderly households, and extremely low income households across all other categories experienced greater incidences of cost burden. Large related households are the group most disproportionately affected by housing problems. Although large related renter households is the group most impacted with cost burden, the level of cost burden and severe cost burden for large related households is proportionate to owners and renters in the other household types examined. This indicates that affordability is not the greatest obstacle for large households in Dallas.

In regards to housing problems within various racial and ethnic groups, according to the CHAS data, the racial and ethnic groups that are disproportionately impacted by housing problems are low- and moderate-income Pacific Islanders. However, this outcome is skewed by the relatively small Pacific Islander population. Amongst very-low income households, Hispanic households experience the most housing problems.

Table 41. Housing Problems within Racial and Ethnic Groups – Dallas, TX

	0-30% AMI	30-50% AMI	50-80% AMI
Jurisdiction as a whole	78.0%	79.2%	49.3%
White	75.2%	80.6%	51.1%
Black/African American	72.9%	73.8%	49.1%
Asian	66.4%	79.5%	53.7%
American Indian, Alaska Native	74.6%	84.5%	57.0%
Pacific Islander	83.3%	100.0%	100.0%
Hispanic	87.3%	82.2%	48.3%

Subsidized Multifamily Affordable Housing Stock

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multifamily housing developments for a variety of income groups and ages, such as the elderly, are necessary. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing. **The City of Dallas and other public agencies funded affordable housing projects throughout the City.** The following are some of the multifamily housing types that meet the needs of low income, elderly and persons with disabilities in the City of Dallas:

- HUD CPD Programs (CDBG, HOME, HOPWA) – The CDBG, HOME, and HOPWA programs are Entitlement Programs which provide annual grants to the City. CDBG funds are used to provide decent housing, suitable living environment, and expands economic opportunities for low- and moderate-income persons. The HOME Program funds a wide range of affordable housing activities and is targeted to low-income households. HOPWA funds projects that benefit low-income persons living with HIV/AIDS and their families.
- Section 108 Loan Program – Section 108 is the loan guarantee component of the CDBG Program. Section 108 loans can be used for any CDBG eligible activity and must meet the CDBG grant requirements. However, the CDBG program only allows the funding of new housing construction under limited circumstances such as part of a community economic development program or as an activity carried out by a community based development organization (CBDO).
- Tax Increment Financing (TIF) – There are numerous TIF districts in the City of Dallas where tax revenue from new development is reinvested in the areas where it was originated. TIF funded plans that address housing requires 20% of the TIF-funded housing to be affordable to low- and moderate-income persons.
- Low income housing tax credits (LIHTC) – The LIHTC program administered by the Texas Department of Housing and Community Affairs (TDHCA) and provides for the development costs of low-income housing by giving a federal tax credit to investors for investing in housing for low-income households typically at 60% of the Area Median Income (AMI) and below. However, due to the rent levels, renters at 30% AMI may not be able to afford the units.
- Section 202 Supportive Housing for the Elderly – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for very low-income elderly persons.
- Section 811 Supportive Housing for Persons with Disabilities – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for persons with disabilities. The

program also provides rental assistance to state housing agencies for new and existing multi-family housing developments.

- Section 8 Loan Management Set-Aside (LMSA) Program – A HUD-funded program that provides financial assistance in the form of rental subsidies to multi-family properties subject to Federal Home Administration (FHA) insured mortgage loans which are in immediate or potential financing difficulty; and thereby to reduce the volume of mortgage loan defaults as well as claims for FHA mortgage insurance benefits from private lenders holding the FHA insured mortgage loans on such projects.¹⁰
- Public Housing – A HUD-funded program that provides financial assistance to local housing agencies (HAs or PHAs) to develop and operate decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. The public housing program in Dallas is administered by the Dallas Housing Authority.
- Section 8 Housing Choice Voucher Program – A HUD-funded program that provides financial assistance for the rental of housing from private landlords for eligible low-income families, the elderly, and persons with disabilities. Tenants are able to find their own housing including single-family homes, townhouses, and apartments. The section 8 voucher program in Dallas is administered by Dallas Housing Authority.

There are 203 publicly funded multifamily projects in Dallas consisting of 29,495 total units of which 25,345 are affordable units. That total includes LIHTC, City-funded, DHA, and HUD projects. Map 17 below is a visual depiction of the distribution of subsidized housing in Dallas including LIHTC units, public housing developments, and other multi-family assisted properties. Table 42 provides a summary of the publicly funded multifamily projects in Dallas by funding source.

Table 42. Subsidized Multifamily Projects by Funding Source – Dallas, TX

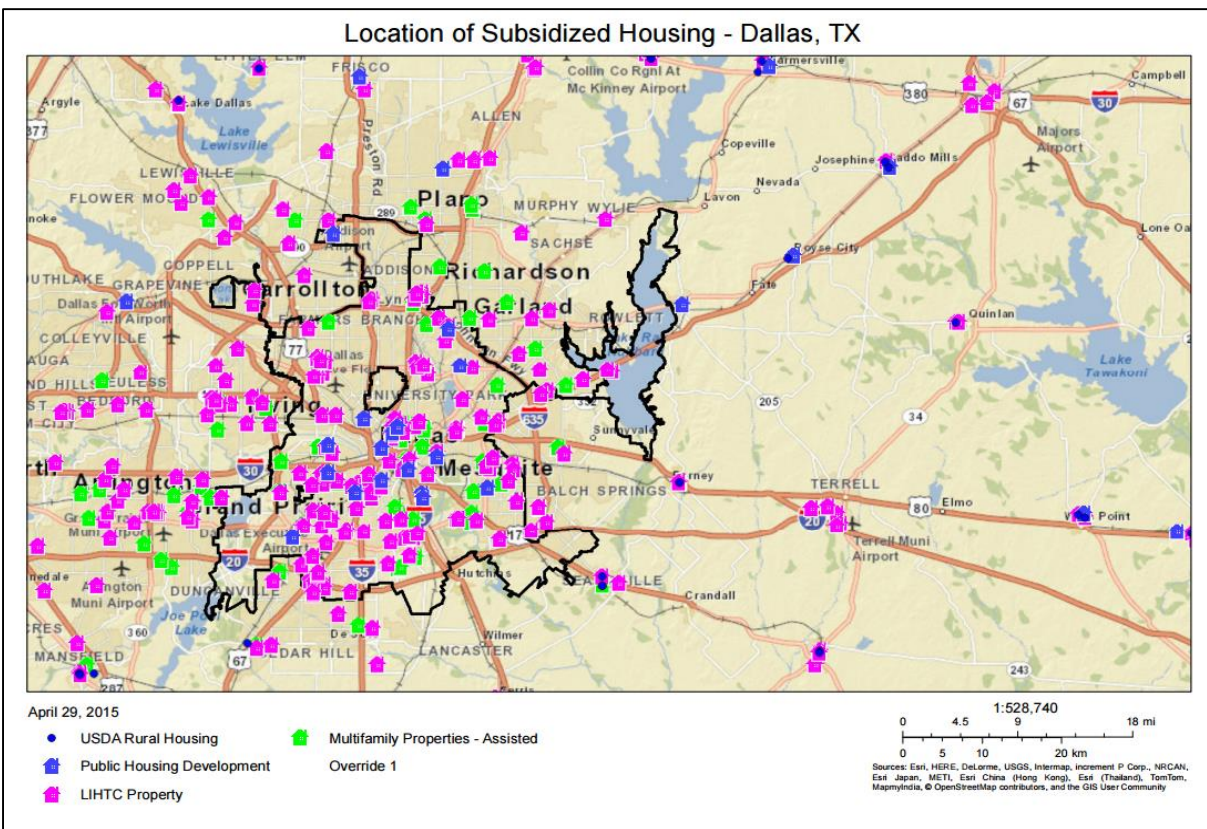
LIHTC	City	DHA	HUD	Projects	Total Units	Affordable Units
X				63	11,526	11,064
X			X	15	2,596	2,481
X		X		11	1,389	1,266
X	X			13	1,798	1,612
X	X		X	2	328	296
	X			32	3,213	1,256
	X		X	3	924	584
			X	34	4,297	3,462
		X	X	4	965	865
		X		26	2,459	2,459
TOTAL				203	29,495	25,345

Source: Dallas City Council Briefing: Preliminary Housing Analysis

A table of projects, included as Appendix #3 provides information on each of the subsidized multifamily projects in Dallas including the project addresses.

¹⁰ U.S. Department of Housing and Urban Development (HUD) website. Section 8 Program Background Information. http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rfp/s8bkinfo
 Accessed March 22, 2015

Map 18. Location of Subsidized Housing - Dallas, TX



Source: HUD CPD Maps

The following section provides information on housing available in the City under the above listed programs.

Low Income Housing Tax Credit Program

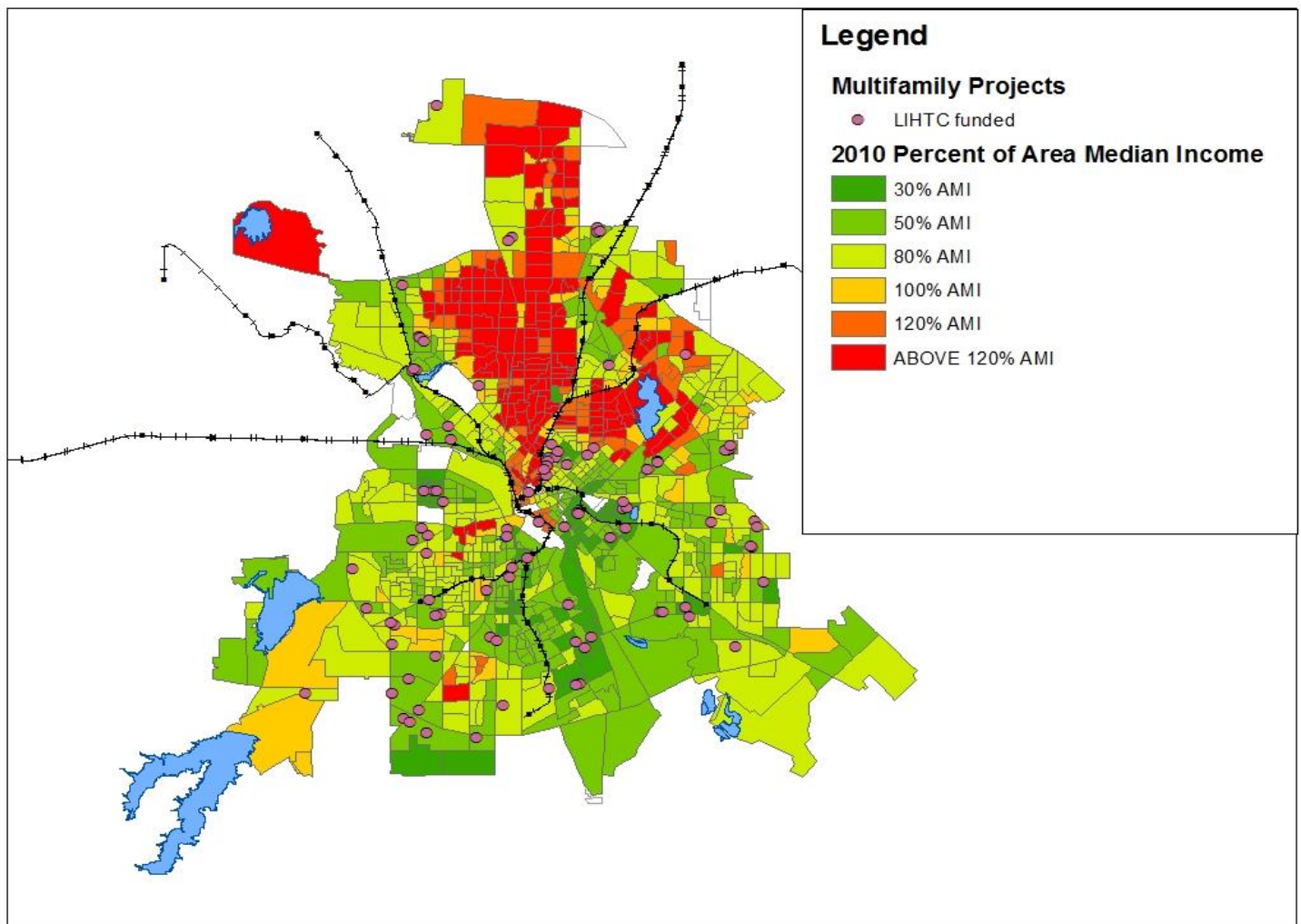
The Texas Department of Housing and Community Affairs (TDHCA) administers the Housing Tax Credit Program and allocates tax credits for rental housing development throughout the State of Texas. Between 1990 and 2014, the TDHCA funded 119 multi-family rental projects in Dallas. The funding resulted in the development of 19,685 housing units including 18,732 LIHTC units.

Location of Affordable Housing by Race/Ethnicity

For purposes of this analysis, a “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Dallas as a whole (43.8% based on 2013 ACS 5-Year estimates). Therefore, tracts with a 48.8% or greater minority tract percentage are considered to be a “minority” tract. Among the 333 identified Dallas tracts, 208 met the criteria and were designated as minority tracts in the analysis. Over 62% of Dallas’ census tracts are considered a “minority” tract.

The LIHTC projects are located in 68 census tracts of which 60 tracts meet the definition of a minority tract. Over 92% (18,144) of the total number of housing units are located in minority tracts and 1,541 (7.8%) of the housing units are located in non-minority areas.

Map 19. LIHTC Funded Projects



Source: Dallas City Council Briefing: Preliminary Housing Analysis

Location of Affordable Housing by Income

Utilizing the median family income percentage per census tract, the majority of affordable housing units are located in low- and moderate income census tracts. A total of 17,978 (91.3%) of the housing units and 17,122 LIHTC units are located in tracts with 0-80% median family income. Over 62% of the housing units are located in low income (31-50%) census tracts. Only 8.7% of the housing units are located in middle and upper income (>80%) tracts. The table below shows the distribution of LIHTC units by income category.

Table 43. Distribution of LIHTC Housing Units by Income Category - Dallas, TX

Income Category	Total Units	LIHTC Units
0-30%	2,488	2,257
31-50%	12,369	11,768
51-80%	3,121	3,097
Subtotal LMI	17,978	17,122
>80%	1,707	1,610
TOTAL	19,685	18,732

Of the 68 census tracts included in the analysis, the top 10 tracts with the greatest number of units account for 35.6% (7,008) of the total units and 34.8% (6,528) of the LIHTC units. Only one census tract (CT 1.00) out of these 10 tracts is a non-minority tract and is a middle income tract. Table 45 identifies the 10 census tracts with the greatest number of LIHTC units and the income and racial/ethnic characteristics of the tracts.

Table 44. LIHTC Units by Census Tracts - Dallas, TX

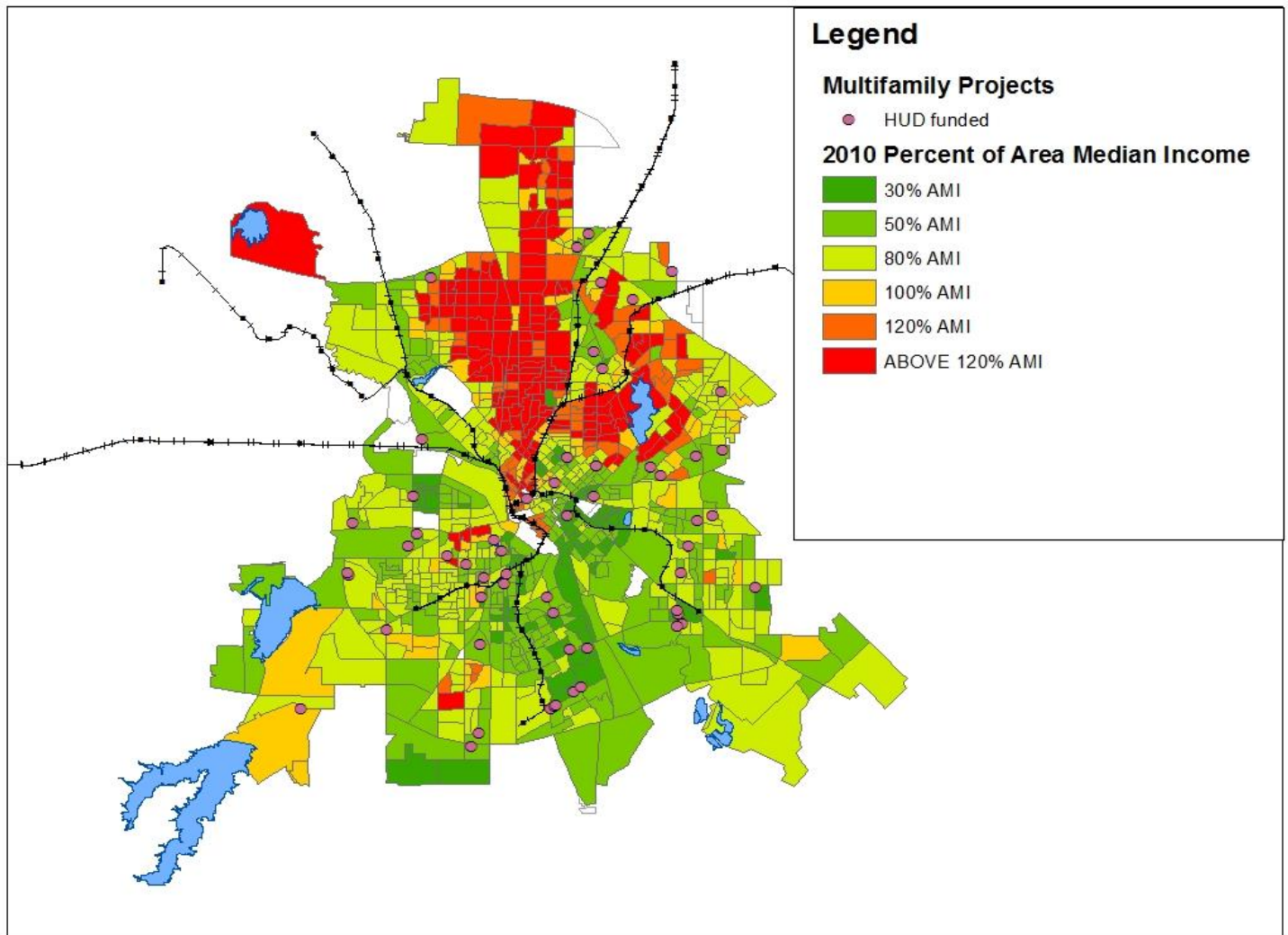
Census Tract	Total Units	LIHTC Units	Income Category	Minority Area
166.05	1,204	1,202	Low	Yes
93.04	898	806	Very Low	Yes
123.02	876	830	Low	Yes
16.00	746	555	Low	Yes
122.08	689	646	Low	Yes
98.04	575	553	Low	Yes
205.00	512	512	Low	Yes
115.00	511	500	Low	Yes
1.00	507	450	Middle	No
107.01	490	474	Low	Yes

HUD Multifamily Projects

There are a total of 58 HUD-funded projects in the City of Dallas containing 7,688 affordable units. These projects include private development projects that are directly funded by HUD and target households at or below 50% AMI. Map 19 shows the location of HUD-funded multifamily projects in Dallas compared to income. Similar to the distribution of LIHTC units, HUD-funded units are also primarily located in census tracts with predominately low, low, and moderate income households.

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Map 20. HUD Funded Projects – Dallas, TX



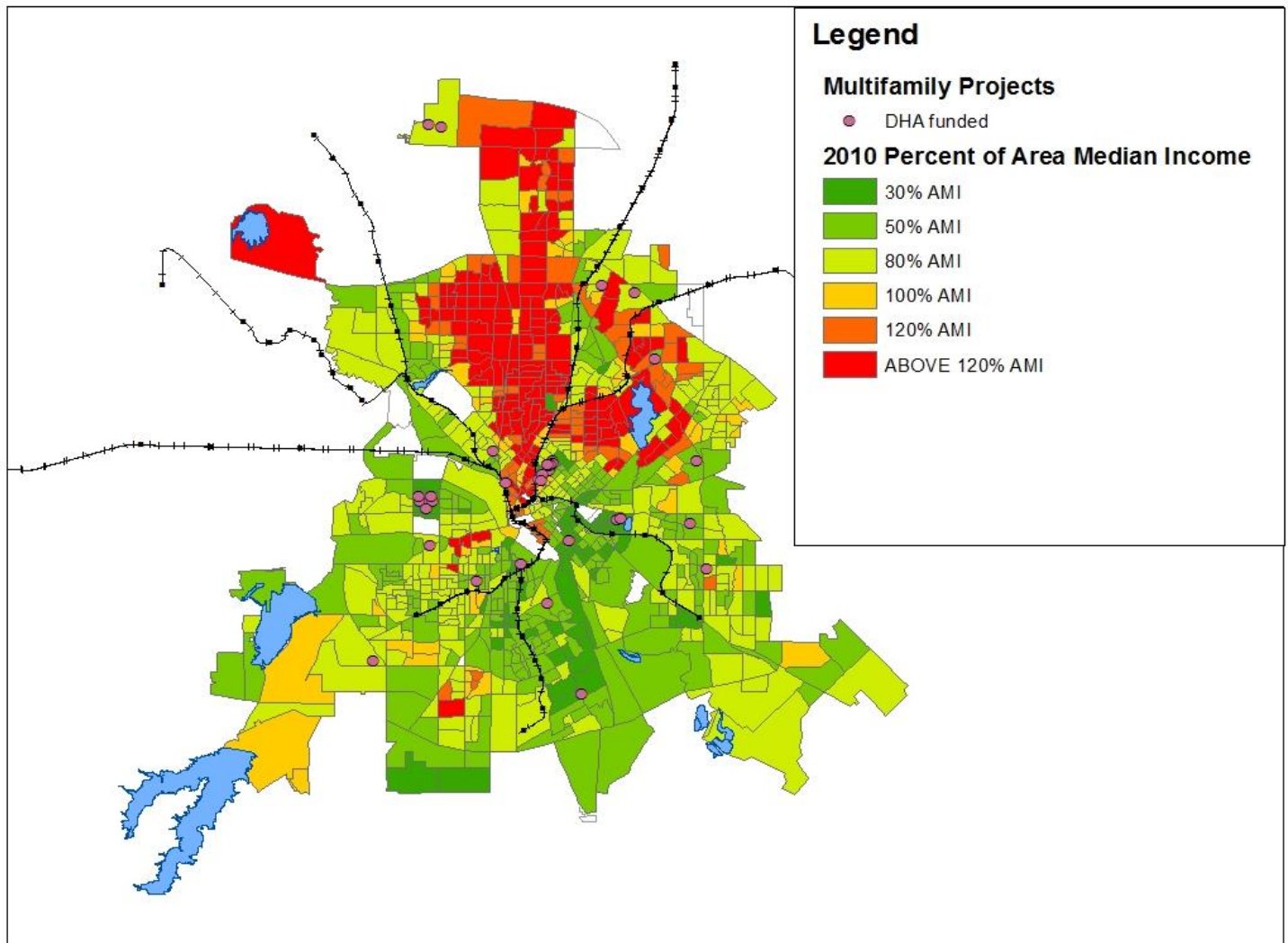
Source: Dallas City Council Briefing: Preliminary Housing Analysis

Public Housing Units

The Dallas Housing Authority has developed 41 public housing projects with 4,590 affordable units. As shown in Map 20, only two of the DHA properties are located in middle income (100% AMI) census tracts and the remainder are located in low- and moderate-income areas.

The distribution of Section 8 units is discussed in the Public Housing section of the AI.

Map 21. DHA Funded Projects

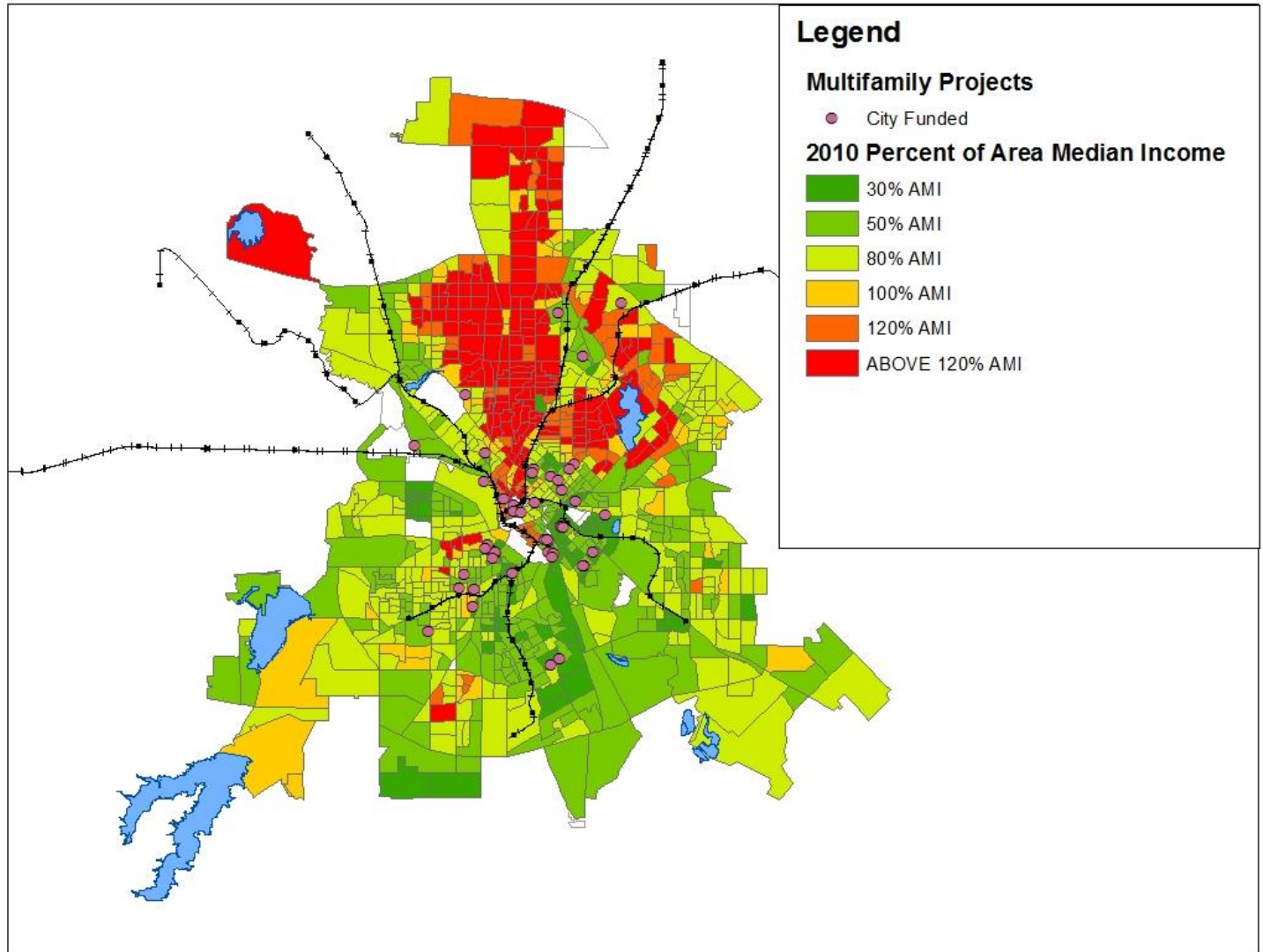


Source: Dallas City Council Briefing: Preliminary Housing Analysis

City-funded Multifamily Projects

The City of Dallas, utilizing CDBG, HOME, HOPWA, Section 108, and TIF funding, developed a total of 50 projects since 1990 with a total of 3,748 affordable units. Map 21 shows the majority of these projects are centrally located in Dallas with three projects in northwest region of the City. A significant share (38%) of the City-funded projects are located in TIF or Neighborhood Investment Program (NIP) areas and were part of an area-wide revitalization strategy.

Map 22. City Funded Multifamily Projects



Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for disabled persons you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a disabled person as “any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment. The City of Dallas adopted this federal definition of disability in its City Code.

The most recent data comprehensive data on disability status among Dallas’ population was the U.S. Census 2013 ACS. According to the 2013 ACS, 9.5% (114,496 persons) of Dallas’ civilian non-institutionalized population reported a disability. The data included the following breakdown of the disabled population by age group. The highest percentage of disabilities occurred in the 65 and over population group (38.3%) and the 18 to 64 category has the largest number of disabled persons.

Table 45. Disability Status of the Civilian Non-Institutionalized Population - Dallas, TX

Population Status	Number	Percentage
Total Population	1,208,672	100%
With a Disability	114,496	9.5%
Population Under 5 years	102,392	
With a Disability	576	0.6%
Population 5 to 17 years	214,371	
With a Disability	9,026	4.2%
Population 18 to 64 years	783,350	
With a Disability	63,307	8.1%
Population 65 years and over	108,559	
With a Disability	41,587	38.3%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

The 2013 ACS also provides information regarding type of disabilities within the Dallas population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the city, representing 31.4% of all disabilities in Dallas. The least common disability reported among Dallas residents was vision difficulty. The largest population group with disabilities in Dallas County and the State of Texas is also the elderly where 37.7% and 40.2% of senior citizens report some type of disability.

Table 46. Disability Characteristics of Residents- Dallas, TX

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	1,208,672	114,496	9.5%
Population under 5 years	102,392	576	0.6%
With a hearing difficulty		480	0.5%
With a vision difficulty		300	0.3%
Population 5 to 17 years	214,371	9,026	4.2%
With a hearing difficulty		1,574	0.7%
With a vision difficulty		1,661	0.8%
With a cognitive difficulty		6,376	3.0%
With an ambulatory difficulty		1,230	0.6%
With a self-care difficulty		1,442	0.7%
Population 18 to 64 years	783,350	63,307	8.1%
With a hearing difficulty		10,798	1.4%
With a vision difficulty		13,450	1.7%
With a cognitive difficulty		26,824	3.4%
With an ambulatory difficulty		33,627	4.3%

Population/ Characteristic	Total	# With a Disability	% With a Disability
With a self-care difficulty		12,448	1.6%
With an independent living difficulty		23,133	3.0%
Population 65 years and over	108,559	41,587	38.5%
With a hearing difficulty		14,183	13.1%
With a vision difficulty		9,020	8.3%
With a cognitive difficulty		11,984	11.1%
With an ambulatory difficulty		28,783	26.5%
With a self-care difficulty		13,046	12.0%
With an independent living difficulty		21,292	19.6%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Many of the disabled individuals in Dallas have more than one reported disability therefore, there is duplication between disability characteristics. Among persons with disabilities, 58,262 (50.9%) report having two or more disabilities. Almost 62% of elderly, disabled persons report having two or more disabilities.

Table 47. Age and Number of Disabilities - Dallas, TX

Population	Number
Total Population	1,208,672
Population under 18 years	316,763
With one type of disability	6,871
With two or more types of disability	2,731
Population 18 to 64 years	783,350
With one type of disability	33,352
With two or more types of disability	29,955
Population 65 years and over	108,559
With one type of disability	16,011
With two or more types of disability	25,576

Source: U. S. Census Bureau, 2009-2013 ACS 5-Year Estimates

The census data on disability focuses on physical, mental, and emotional conditions, however, the disabled population includes persons with HIV/AIDS and related illnesses as well as those dealing with chronic alcoholism. Dallas' 2013-2017 Consolidated Plan includes statistics from a 2008 Substance Abuse and Mental Health Services Administration (SAMHSA) study indicating that there were 160,864 persons living in Dallas suffering from a mental illness of which 36,000 or 22.4% had a serious mental illness. The same study also revealed that 80,000 Dallas residents had a dependence or abused alcohol or illicit drugs. The 2011 HIV Surveillance Report published by the Texas Department of State Health Services (TDSHS) stated that there were 16,481 persons living with HIV/AIDS in the Dallas EMSA of which 84% resided in Dallas County.

To further analyze the housing needs of disabled persons in Dallas, the CHAS data was examined to determine the extent of housing problems particularly for low- and moderate-income households with a disabled member.

The 2012 CHAS data provides the most recent detailed data of housing problems of disabled residents based on their household income. There were 166,125 households with a disabled member of which 112,350 (67.6%) were of low- and moderate-income. According to the CHAS data 74,115 low- and moderate-income disabled member households had housing problems. A greater percentage of disabled member renter households experienced housing problems when compared to disabled member owner households. According to the City's Consolidated Plan, non-homeless special needs populations, including persons with disabilities and the elderly, are priced out of the rental market without some form of housing subsidy.

Table 48. Disabled Member Households with Housing Problems

Income Category	# of Disabled Member Households with Housing Problem	% of Disabled Member Households with Housing Problem
Extremely Low Income	37,855	76.6%
Low Income	22,695	68.1%
Moderate Income	13,565	45.8%
TOTAL Low/Moderate Income	74,115	66.0%

Within disabled member renter households, 77.0% with household incomes less than 30% AMI had housing problems; 79.7% with household incomes greater than 30% but less than 50% AMI had housing problems; and 44.4% of households with incomes greater than 50% but less than 80% AMI had housing problems.

Table 49. Disabled Member Renter Households with Housing Problems

Income Category	# of Disabled Member Renter Households with Housing Problem	% of Disabled Member Renter Households with Housing Problem
Extremely Low Income	26,225	77.0%
Low Income	12,850	79.7%
Moderate Income	5,395	44.4%
TOTAL Low/Moderate Income	44,470	71.3%

Within disabled member owner households, 75.8% with household incomes less than 30%AMI had housing problems; 57.2% with household incomes greater than 30% but less than 50% AMI had housing problems; and 46.8% of households with incomes greater than 50% but less than 80% AMI had housing problems. Extremely Low-Income disabled member owner households are disproportionately affected by housing problems.

Table 50. Disabled Member Owner Households with Housing Problems

Income Category	# of Disabled Member Owner Households with Housing Problem	% of Disabled Member Owner Households with Housing Problem
Extremely Low Income	11,630	75.8%
Low Income	9,845	57.2%
Moderate Income	8,170	46.8%
TOTAL Low/Moderate Income	29,645	59.3%

While the CHAS data does not provide details on the type of housing problems faced by disabled member households, typically having a disability impacts earning potential. Therefore, residents with disabilities often face affordability issues. According to the 2013 ACS, in Dallas, 20,149 persons with a disability are a part of the labor force and 5,144 disabled persons are unemployed. The median income of disabled persons is approximately \$8,106 less than persons without a disability. According to the FY 2013-2017 Consolidated Plan, disabled persons have some of the lowest income and households with disabled members have worst case housing needs. A 2005 study, The Housing Needs of Texans with Disabilities, reported that in Texas, 700,000 households with mobility/self-care limitations are low income of which approximately 20% were extremely low-income. Additionally, 20% of persons with disabilities live in poverty. According to the 2013 ACS, 29.6% of Dallas residents with any disability live below the poverty level.

Due to the large number of disabled persons in the City, there is a great need for a combination of housing and services. During the preparation of the FY 2013-2017 Consolidated Plan, residents ranked services to the disabled as the second highest priority. The City's Consolidated Plan indicates that persons with physical and/or developmental disabilities are in need of group homes, nursing homes, adult day care centers, and assisted living facilities depending on their condition and the level of care needed. Persons with mental health disabilities and those with alcohol or drug addictions need supportive housing. In the 2011 Comprehensive HIV Needs Assessment prepared by the Ryan White Planning Council for the Dallas Area, persons with HIV/AIDS were found to be in need of assistance with dental care, medical care, medications, and transportation as well as housing needs including long-term rental assistance vouchers, emergency financial assistance with rent/mortgage and utilities and facility based housing.

The City has undertaken several actions in recent years to address the need for housing for the disabled. A review of the City of Dallas' FY 2013-2014 Action Plan revealed that services and housing for persons with disabilities are provided from the following primary sources:

- Texas Department of Aging and Disability Services
- Texas Department of Assistive and Rehabilitative Services
- Texas Department of Housing and Community Affairs
- Local Homeless Continuum of Care
- U.S. Department of Health and Human Services
- Substance Abuse and Mental Health Services Administration
- Texas Department of State Health Services

Other programs which offer special services for persons with disabilities include:

- Lighthouse for the Blind (American Federation for the Blind)

- Callier Center for Communication Disorders and Deaf Action Center
- Disabled rights and assistance (REACH of Dallas)
- ARC of Dallas and the Association of Independent Living
- Texas Department of Assistive and Rehabilitative Services (DARS)
- Easter Seals of Greater Dallas
- DART para-transit services
- Citizens Development Center
- Goodwill Industries of Dallas
- The Veteran’s Administration

One of the major partners of the City is the Dallas Housing Authority (DHA). A review of the DHA waiting list demonstrates the need to increase housing stock for the disabled. The FY 2013-2017 Consolidated Plan included statistics from the DHA showing that over 4,000 persons on the waiting lists for the Housing Authority indicated they were disabled. Demographic data available for October 2013 shows that the percentage of disabled housing in public housing far exceeds the citywide disability rate. There were 1,267 families (31%) headed by a non-elderly disabled person in properties owned by the DHA and another 4,330 families (24%) participating in the Housing Choice Voucher Program. The nature of the disability was not available.

During 2012, the DHA contracted for the preparation of a Physical Needs Assessment at its properties which included the site, building exteriors, interior common areas, as well as UFAS/ADA requirements and Section 504 requirements. The DHA invested \$2,014,332 at its properties to meet accessibility requirements expending funds on site improvements such as sidewalk repairs, ramps, and playground areas. It is the DHA’s policy that if a tenant is in need of a handicap unit beyond what DHA has available that DHA will retrofit a unit to accommodate the person with the disability. Even with this commitment to improving accessibility, according to the Consolidated Plan, a public housing survey indicated a need for unit updates and more units for persons with physical and cognitive disabilities. The table below, provides a profile of housing authority properties showing the number of accessible units in each property. Approximately 7% of the housing authority units are classified as handicap units.

Table 51. List of Public Housing Properties and Accessible Units – Dallas, TX

Property	Type of Housing	Number of Units	Handicap Units*
Audelia Manor	Elderly/Disabled	123	15
Barbara Jordan Square	Family	100	4
Brackins Village	Family	102	5
Brooks Manor	Elderly/Disabled	227	10
Carroll Townhomes	Family	71	9
Cedar Glenn	Family	250	12
Cedar Springs	Family	402	9
Cliff Manor	Elderly/Disabled	180	14
Conner Drive	Family	11	1
Estell Village	Family	291	15
Foster Green Manor	Elderly/Disabled	252	25

Property	Type of Housing	Number of Units	Handicap Units*
Frankford Townhomes	Family	76	7
Frazier Fellowship	Family	60	6
Hidden Ridge Apts	Not available	Not available	17
Kelly Blvd	Family	19	1
Kingbridge Crossing	Family	196	12
Lakeland Manor	Elderly/Disabled	172	10
Lakeview Townhomes	Family	152	8
Lakewest 50	Family	50	3
Larimore Lane	Family	21	1
Little Mexico	Family	102	8
Military	Family	25	1
Mill City Frazier	Family	87	10
Monarch Townhomes	Family	65	7
Park Manor	Elderly/Disabled	196	14
Renaissance Oaks	Elderly	Not available	9
Roseland Estates	Family	103	19
Roseland Gardens	Elderly/Disabled	101	7
Roseland Scattered Sites	Family	64	9
Roseland Townhomes	Family	114	16
The Hamptons at Lakewest	Family	225	19
Villa Creek Apts	Family	152	3
Wahoo Frazier	Family	95	9

* Handicap Units include Section 504 units and Audio/Visual Units

Section 504

The City of Dallas's FY 2013-2017 Consolidated Plan includes a needs assessment for public housing units operated by the DHA. The DHA conducted a Physical Needs Assessment in 2012 for the purpose of evaluating the physical aspects of public housing properties. Based on the Assessment, the DHA expended over \$2 million to meet accessibility requirements in 2012. The improvements included sidewalk repairs, ramps, pavement, and playground areas.

According to the Consolidated Plan, in addition to the DHA, the following services and housing options are also currently available in the City for disabled persons:

- Eleven (11) adult day care centers for people who do not require institutional care but who cannot be left alone during the daytime;
- Congregate living arrangements as well as other support services;
- One Section 811-funded 18-unit project for disabled persons, known as Iris Place; and
- Shelter Plus Care projects for homeless persons with disabilities.

Dallas' disabled population also have access to resources through the Metro Dallas Housing Alliance (MDHA). According to Dallas' 2013-2017 Consolidated Plan, MDHA is the lead nonprofit agency designated by HUD to coordinate and plan local homeless services. MDHA is comprised of 74 agencies including the City of Dallas that represent shelters, hospitals, government agencies, local municipalities, nonprofits, faith-based organizations, housing and treatment centers, businesses, and community members. MDHA has been involved in the development of more than 2,000 units of permanent supportive housing for homeless children and families and single adults with disabling conditions and more than 1,800 units of transitional supportive housing in the Dallas area.

The Dallas Ten-Year Plan to End Chronic Homelessness was adopted by the Dallas City Council in 2004. One of the goals included in the plan was the development of 700 units of permanent housing for the disabled by 2012. The following table adopted from the MDHA website shows the providers and number of units of permanent supportive housing in Dallas.

Table 52. List of Permanent Supportive Housing Units - Dallas, TX

Provider	Units	Units Under Development
ABC Behavioral Health	49	0
AIDS Services of Dallas	64	0
Central Dallas Ministries	150	27
City of Dallas	75	0
City of Dallas Shelter and Care	160	0
Dallas County	35	0
Dallas Housing Authority (DHA) - Project-Based Vouchers	0	Approx. 200
Dallas Housing Authority(DHA)- Cliff Manor	0	100
Housing Crisis Center	80	0
LifeNet Behavioral Healthcare	191	0
Metro Dallas Homeless Alliance	44	0
Metrocare Services <i>Note: 25 of these units/ beds are Safe Haven beds, and are no longer considered PSH by HUD, though they were when the document was compiled.</i>	123	50
Prince of Wales	64	0
Taylor Farms	0	16
VA Supportive Housing	210	100
Total	1,245	493

Source: MDHA Website

According to the FY 2013-2014 Action Plan, HOPWA funds are used to provide housing assistance and housing-related support, which is not typically funded through the Ryan White CARE Act. The State of Texas also provides funding for HIV housing and services under the State of Texas HIV Services Grant.

As discussed in the Recent Housing Accomplishments section of this analysis, the City of Dallas also funds residential home repair utilizing federal CDBG funds. The rehabilitation programs that specifically serve the elderly and/or disabled include the: People Helping People Volunteer Home Repair Program

and the Reconstruction Program. These programs provide grants and deferred payment loans to elderly and/or disabled homeowners for minor exterior repairs services as well as the installation of handicap ramps and installation of doors and handrails for disabled applicants. The Reconstruction Program provides assistance when the house is in determined to be beyond repair. The City demolishes and builds a new home on the same homeowner site.

Despite the efforts that has been made by the City and its partners in regards to the provision of accessible housing, based on size and characteristics of Dallas' disabled population, the available housing facilities in the City, and the unmet need for housing and services, the need for affordable, accessible housing remains an issue. The need is even greater for disabled renter households. The extent of the need is however difficult to quantify because of insufficient data on the number of accessible units in the City, particularly in the private market.

Housing Stock Available to Elderly Persons

According to the 2010 U.S. Census, there are 105,943 elderly persons (over 65 years of age) living in Dallas comprising 8.8% of the population. Of the 105,943 elderly persons, 48,563 persons (45.8%) are age of 75 and over and are considered to be extra elderly or frail elderly. The elderly population rate is smaller in Dallas when compared to the state where the elderly population represents 10.3% of the total population. In terms of growth between 2000 and 2010, persons in the age group 55-64 years have experienced the greatest increase in both Dallas and the state of Texas. The population over 55 years of age makes up a smaller percentage of the overall population however, this segment of the population has been growing significantly faster than the younger age groups. According to Dallas' FY 2013-2017 Consolidated Plan, the city is the third largest metro region in the United States with the greatest number of elderly persons.

Table 53. Population Distribution by Age Group - Dallas, TX and State of Texas 2000 and 2010

Dallas	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	876,238	73.7%	832,726	69.5%	-5.0%
45-54	132,491	11.1%	150,317	12.5%	13.5%
55-64	77,550	6.5%	108,830	9.1%	40.3%
65-74	53,554	4.5%	57,380	4.8%	7.1%
Over 75	48,747	4.1%	48,563	4.1%	-0.4%
Total	1,188,580	100.0%	1,197,816	100.0%	0.8%
Texas	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	14,569,961	69.9%	16,510,648	65.7%	13.3%
45-54	2,611,137	12.5%	3,435,336	13.7%	31.6%
55-64	1,598,190	7.7%	2,597,691	10.3%	62.5%
65-74	1,142,608	5.5%	1,472,256	5.9%	28.9%
Over 75	929,924	4.5%	1,129,630	4.5%	21.5%
Total	20,851,820	100.0%	25,145,561	100.0%	20.6%

Source: 2000 and 2010 U.S. Census

Elderly and Extra Elderly

The 2012 CHAS data indicates that there were 94,755 households that have mobility or self-care limitations. This figure is broken down into 44,220 renter households and 50,535 owner households. Of the 44,220 renters with mobility and self-care limitations, 35,605 (80.5%) are low- and moderate-income households. The renter households with the highest rate of housing problems are elderly 1 & 2 member households. Elderly is defined as a household composed of one or more persons at least one of whom is 62 years of age or more. Extra elderly is defined as a 1 or 2-member households where either person is 75 years of age or older. According to the data, housing problems disproportionately impact low income extra elderly 1 & 2 member households, extremely low income and low income elderly 1 & 2 member households, and extremely low income and low income other households.

Table 54. Housing Problems for Renters with Mobility & Self Care Limitations 2010

Household by Type, Income, & Housing Problem	Extra Elderly 1 & 2 Member Households	Elderly 1 & 2 Member Households	Other Households	Total Renters
Extremely Low Income	2,085	5,105	42,530	49,720
% With Housing Problems	64.7%	76.8%	79.6%	78.6%
Low Income	1,310	3,460	35,100	39,870
% With Housing Problems	69.3%	81.0%	87.1%	85.8%
Moderate Income	995	1,870	22,390	25,255
% With Housing Problems	66.3%	54.5%	47.5%	48.5%
Middle/Upper Income	1,080	830	10,340	12,250
% With Housing Problems	38.7%	17.0%	12.2%	13.3%
Total Households	5,470	11,265	110,360	127,095
% With Housing Problems	58.2%	58.6%	48.9%	50.0%

Further analysis of the CHAS data shows that of the 50,535 owner households with mobility and self-care limitations, 29,335 (58.0%) are considered low- and moderate-income households. In general owner households have significantly less housing problems than renter households. Among elderly owner households, both low income and extremely low income elderly 1 & 2 member households and extra elderly 1 & 2 member households are disproportionately impacted by housing programs. Among other households, all income categories are disproportionately impacted by housing problems with the exception of middle and upper income owner households.

Table 55. Housing Problems for Owners with Mobility & Self Care Limitations – Dallas, TX

Household by Type, Income, & Housing Problem	Extra Elderly 1 & 2 Member Households	Elderly 1 & 2 Member Households	Other Households	Total Owners
Extremely Low Income	2,990	4,455	7,505	14,950
% With Housing Problems	74.2%	79.6%	71.5%	74.3%
Low Income	2,450	3,140	10,020	15,610
% With Housing Problems	46.2%	58.3%	77.9%	66.3%
Moderate Income	1,415	3,045	12,120	16,580
% With Housing Problems	28.8%	40.8%	59.6%	50.7%
Middle/Upper Income	1,020	4,080	16,230	21,330
% With Housing Problems	8.9%	15.5%	18.2%	16.8%
Total Households	7,875	14,720	45,875	68,470
% With Housing Problems	30.7%	32.9%	34.5%	33.7%

According to the 2013-2017 Consolidated Plan, the senior population in Dallas County is expected to double in the next twenty years. Seniors depend on social security and retirement income and face rising housing costs. The large number of seniors residing in the City of Dallas and the anticipated growth increases the need for low-maintenance housing, low-income housing, increased case management, home health care agencies, and services to help older adults remain in their homes. The Consolidated Plan includes specific housing needs that consist of the provision of three or more bedroom units, or additions to existing units for larger families with elderly parents and grandparents, and/or larger land parcels, and supportive housing for the growing numbers of elderly as the demand for onsite care for seniors is growing. To address the housing needs of Dallas' elderly residents, city staff participates in a senior housing coalition with representatives from a private developer, Friends of Senior Affairs, Dallas Area Agency on Aging, Hampton Baptist Church, Senior Net, Senior Source, Visiting Nurse Association, Plain-O-Helpers, Senior Adults Services, and a realtor.

The HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities provides a listing of HUD insured and HUD subsidized multifamily properties that serve elderly persons and/or persons with disabilities. The latest available inventory is from 2010 and includes 15 properties with 1,251 units designated for elderly persons and 87 units designated for persons with disabilities. Table 57 provides details on each of the assisted properties.

Table 56. Multi-family Inventory of Units for the Elderly and Disabled - Dallas, TX 2010

Property Name	Section of the Act	Occupancy Eligibility	Total Units	Units Designated for the Elderly	Units Designated for the Disabled
Aya Senior Village	202	Elderly	30	29	-
Cliff View Village	202	Elderly	28	28	-

Property Name	Section of the Act	Occupancy Eligibility	Total Units	Units Designated for the Elderly	Units Designated for the Disabled
Cliff View Village II	202	Elderly	28	27	-
Cliff View Village III	202	Elderly	28	27	-
Casa De Amigos II	202	Elderly/Disabled	73	65	8
Forest Dale Inc.	202	Elderly	206	205	-
Fowler Christian Apts.	202	Elderly/Disabled	144	118	26
Greater Bethlehem Plaza	202	Elderly/Disabled	30	30	30
Lakeland Manor		Elderly/Disabled	172	-	10
Mabel Meshack White Manor	202	Elderly	65	63	4
Midpark Towers	223(a)(7)/231	Elderly/Disabled	200	141	9
Pegasus Apts.	221(d)(4)	Elderly	156	156	-
Prairie Creek Village Apts.	202	Elderly/Disabled	120	107	-
Pythian Manor Apts.	202	Elderly	76	75	-
Tyler Street Manor	236(j)(i)/202	Elderly/Disabled	180	180	-

Source: 2010 HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities

Public Housing

Public Housing is a program funded by the U.S. Department of Housing and Urban Development (HUD) for low-income residents. Annual gross income must be within limits as established by HUD, and eligible families pay a monthly rent equal to the greatest of 30% of their monthly adjusted income or 10% of unadjusted monthly income. Applicants may qualify as a family and/or as an eligible single person.

The mission of the Housing Authority of the City of Dallas (DHA) is to provide quality, affordable housing to low-income families and individuals through the effective and efficient administration of housing assistance programs; and by creating and cultivating opportunities for program participants to achieve self-sufficiency and economic independence. The DHA was created in 1938 by the Dallas City Council after being authorized by the Legislature of Texas under the Housing Authorities Law of 1937. The goals of the agency include:

- Increasing the availability of decent, safe, and affordable housing
- Improving community quality of life and economic viability

- Promoting self-sufficient and asset development of families and individuals
- Ensuring equal opportunity in housing for all Americans; and
- Promoting resident employment and business opportunities

The DHA provides housing opportunities to nearly 60,000 people. According to the agency's 2014 PHA Plan, there are approximately 25,702 individuals on the public housing waiting list and 23,334 on the housing choice voucher program waiting list. The DHA website indicated that estimated wait time for both programs is approximately 3-5 years with no new applications being taken.

Since its creation, the DHA has experienced several challenging periods in its history. As a result of problems highlighted in an audit of the agency, the DHA was completely reorganized in 1979. Another major milestone in its history is the 1985 case that has come to be known as the Walker Settlement. A lawsuit brought against the City of Dallas, HUD, and the DHA by seven African American women alleged that public housing units were built in the minority areas within the City and that tenant selection procedures encourages racial segregation. DHA entered into a Consent Decree.

Currently, DHA offers clients a wide range of housing choices and support services designed to move clients towards self-sufficiency. The DHA operates both conventional housing assistance programs and the Housing Choice Voucher (HCV) Program.

Section 8 rules determine eligible units by household size and the age and sex of children. Appendix #5 provides the FY 2013 FMRs by zip code for the Dallas, TX HUD Metro FMR Area. HUD defines Small Areas using ZIP Codes within the metropolitan area. Using ZIP codes as the basis for FMRs provides tenants with greater ability to move into "Opportunity Neighborhoods" with jobs, public transportation, and good schools. They also provide for multiple payment standards within a metropolitan area, and they are likely to reduce need for extensive market area rent reasonableness studies. Lastly, HUD hopes that setting FMRs for each ZIP code will reduce overpayment in lower-rent areas. Dallas renter households were paying rents of between \$490 and \$2,000 per month.

The Conventional Public Housing Program provides rental assistance to low-income and moderate-income families and individuals. DHA owns and manages all rental units offered under this program. According to the agency's 2014 PHA Annual Plan, there were 3,639 units owned by the DHA. Under the Conventional Housing Program, DHA offers Mixed Population Housing where individuals over the age of 62 and disabled adults reside together and are able to participate in a variety of group activities that allow them to socialize. Other programs include the Family Self-Sufficiency Program, designed to assist families in becoming economically independent and self-sufficient, and resident services which include home study centers, and Resident Employment & Training (RET).

During October 2013, 4,035 families were housed in DHA properties. The average annual income for each family was \$9,776. The racial composition for those assisted was 88% Black/African American, 10% White, 1% Asian, and 1% Pacific Islander. 358 of the families or 9% were of Hispanic origin. 49% of the families assisted had children under the age of 17 and 95% of these households were single-headed households.

Figure 13. DHA Conventional Housing Program Accomplishments 2013 - Dallas, TX

Demographic Report For All Properties				printed on 10/29/2013																																
Family Annual Income Less or = \$5000: 1,060 26% \$5001-10000: 1,640 41% \$10001-15000: 625 15% \$15001-20000: 335 8% \$20001-25000: 168 4% \$25001-30000: 97 2% \$30001-35000: 48 1% \$35001-40000: 30 1% Over \$40000: 32 1%		Age of Family Head <=17: 0 0% 18-30: 792 20% 31-40: 834 21% 41-50: 702 17% 51-60: 844 21% 61-70: 494 12% 71-80: 258 6% 81-90: 82 2% >90: 8 0%		Race of Family Head White : 409 10% Black/African American : 3,538 88% American Indian : 7 0% Asian : 25 1% Pacific Islander : 39 1% Mixed : 0 0% NotDefined : 17 0%		Ethnicity of Family Head <table border="1"> <thead> <tr> <th>Hispanic</th> <th>Non-Hispanic</th> <th>Decline</th> </tr> </thead> <tbody> <tr> <td>358</td> <td>3,565</td> <td>112</td> </tr> <tr> <td>9%</td> <td>88%</td> <td>3%</td> </tr> </tbody> </table>		Hispanic	Non-Hispanic	Decline	358	3,565	112	9%	88%	3%																				
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Families Headed by Non-Elderly Person with Disability Total : 1,267 Percentage : 31%																																				

Source: Dallas Housing Authority

The Housing Choice Voucher Program (formerly known as Section 8) is a federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

The DHA works with more than 500 landlord properties under the voucher program with 18,135 vouchers according to the 2014 PHA Annual Plan. The housing authority properties and private properties that participate in the voucher program are located throughout the City of Dallas and DHA's area of operation: the Counties of Collin, Dallas, Denton, Ellis, Kaufman, Rockwall, and Tarrant.

During October 2013, the HCV Program assisted 17,866 families. The average annual income for each family was \$12,922. The racial composition of those assisted was 86% Black/African American, 10% White, 3% Asian, and 1% Pacific Islander. 6% of the families were of Hispanic origin. 49% of the families assisted had children under the age of 17 and 96% of these households were single-headed households.

Figure 14. DHA Housing Choice Voucher Program Accomplishments October 2013 - Dallas, TX

Section 8 Demographic Report For All Programs				printed on 10/29/2013																																
Family Annual Income Less or = \$5000 : 3,378 19% \$5001-10000 : 5,631 32% \$10001-15000 : 3,235 18% \$15001-20000 : 2,249 13% \$20001-25000 : 1,285 7% \$25001-30000 : 913 5% \$30001-35000 : 566 3% \$35001-40000 : 288 2% Over \$40000 : 321 2%		Age of Family Head <=17: 0 0% 18-30: 2,086 12% 31-40: 4,909 27% 41-50: 3,915 22% 51-60: 3,367 19% 61-70: 2,105 12% 71-80: 1,090 6% 81-90: 368 2% >90: 18 0%		Race of Family Head White : 1,723 10% Black/African American : 15,335 86% American Indian : 39 0% Asian : 613 3% Pacific Islander : 156 1% Mixed : 0 0% NotDefined : 0 0%		Ethnicity of Family Head <table border="1"> <thead> <tr> <th>Hispanic</th> <th>Non-Hispanic</th> <th>Decline</th> </tr> </thead> <tbody> <tr> <td>1,067</td> <td>16,578</td> <td>221</td> </tr> <tr> <td>6%</td> <td>93%</td> <td>1%</td> </tr> </tbody> </table>		Hispanic	Non-Hispanic	Decline	1,067	16,578	221	6%	93%	1%																				
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Source: Dallas Housing Authority

Housing Choice Voucher Homeownership Program

In addition to rental assistance, the housing choice voucher program also supports homeownership for first-time homebuyers through the DHA Housing Choice Voucher Homeownership Program. The program allows first-time homebuyers to use voucher assistance toward the purchase of a home. Potential homebuyers are required to complete a first-time homebuyer training course and have to meet other qualifications. The program is structured to allow homebuyers to locate their own homes and to secure financing. DHA can assist with securing financing through relationships developed with lenders. The family is also responsible for hiring an independent professional inspector to inspect the property. DHA will conduct an initial Housing Quality Standard (HQS) inspection to determine if the property is decent, safe and sanitary. Under the program, families are responsible for a minimum of 1 percent of the homes sale price as the down payment.

Current voucher program participants or those eligible to participate in the HCV program qualify for the program if they are:

- Able to secure a mortgage loan based on income, credit and debt;
- First-time homebuyers (no member of the household has had ownership in a principal residence in the past three years)
- Families with one adult family member who has an income equal to or greater than the federal minimum wage multiplied by 2000 hours and who has been employed on a full-time basis and continuously for at least one year
- Disabled families whose annual income is equal to the minimum monthly Federal Supplemental Security Income (SSI) X 12 (welfare assistance no included for eligibility) and
- Those who have not previously defaulted on a mortgage while participating in the program and who can satisfy other initial eligibility requirements.

As it relates to the fair housing, one of the goals of the DHA is to ensure equal housing opportunity and to affirmatively further fair housing. To achieve this goal, the agency will undertake:

- Affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability;
- Affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability;
- Affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required;
- Reserve up to 20% of the Section 8 Housing Choice Vouchers for Project- Based assistance which will provide housing for families with special needs; and
- Comply with the Violence against Women and Justice Department Reauthorization Action of 2005 (VAWA).

According to the 2014 PHA Plan, it is the policy of the DHA to conduct affirmative marketing of the programs to ensure that the waiting list includes a mix of applicants in term of race, ethnicity, age, and disability.

To meet the housing needs of families of races and ethnicities with disproportionate housing needs, the DHA plans to: increase awareness of PHA resources by affirmatively marketing to races or ethnicities shown to have disproportionate housing needs; conduct activities to affirmatively further fair housing such as informing Section 8 tenants of the location of units outside areas of poverty or minority concentration as well as marketing the program to landlords outside of areas of poverty or minority concentration.

It is also the policy of the DHA to respond to all complaints received from applicants and tenants who believe they may have been discriminated against. The agency maintains records of all complaints, investigations, and final decisions. Applicants are also advised of their right to file a complaint with the HUD Fair Housing and Equal Opportunity Office and the process to do so.

Homeownership by Race and Ethnicity

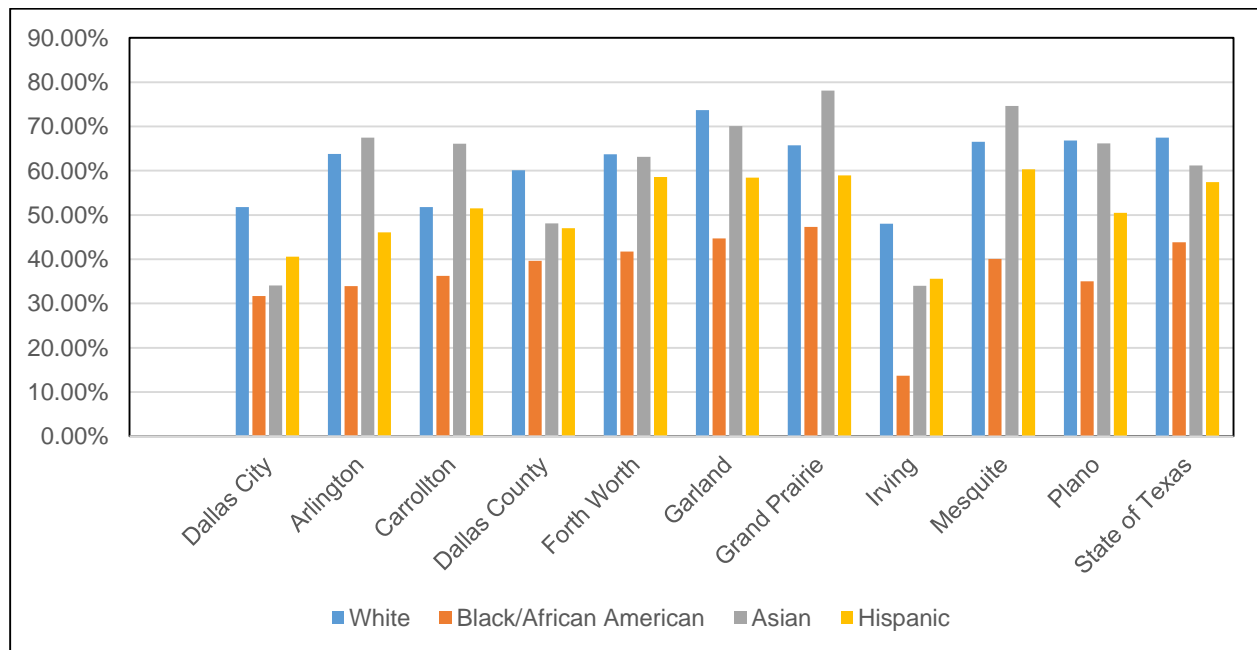
As in most areas of the country, rates of homeownership vary by race/ethnicity in the City of Dallas and its neighboring communities. The overall rate of homeownership in Dallas, for all races, was 43.6% according to the 2013 ACS. In Dallas, Whites have the highest rate of homeownership (51.8%) of all race and ethnic groups, followed by Hispanics (40.6%), Asians (34.1%), and then Blacks (31.7%). The Dallas homeownership rate is lower than those of Dallas County, the State of Texas and all the neighboring communities examined with the exception of the City of Irving. The following tables depict homeownership rates by race in Dallas, Dallas County, and the neighboring cities within the Dallas area.

Table 57. Homeownership Rates by Race/Ethnicity - Dallas, TX

County or City	Overall Homeownership Rate	Ownership Rate - White	Ownership Rate – Black/African American	Ownership Rate - Asian	Ownership Rate – Hispanic
Dallas City	43.6%	51.8%	31.7%	34.1%	40.6%
Arlington	57.4%	63.8%	33.9%	67.5%	46.1%
Carrollton	62.8%	51.8%	36.2%	66.1%	51.5%
Dallas County	52.5%	60.1%	39.6%	48.1%	47.0%
Fort Worth	58.5%	63.7%	41.7%	63.1%	58.6%
Garland	63.7%	73.7%	44.7%	70.1%	58.4%
Grand Prairie	61.8%	65.7%	47.3%	78.1%	58.9%
Irving	38.8%	48.0%	13.7%	34.0%	35.6%
Mesquite	60.3%	66.5%	40.1%	74.6%	60.3%
Plano	64.0%	66.8%	35.0%	66.2%	50.5%
State of Texas	63.5%	67.5%	43.8%	61.2%	57.4%

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

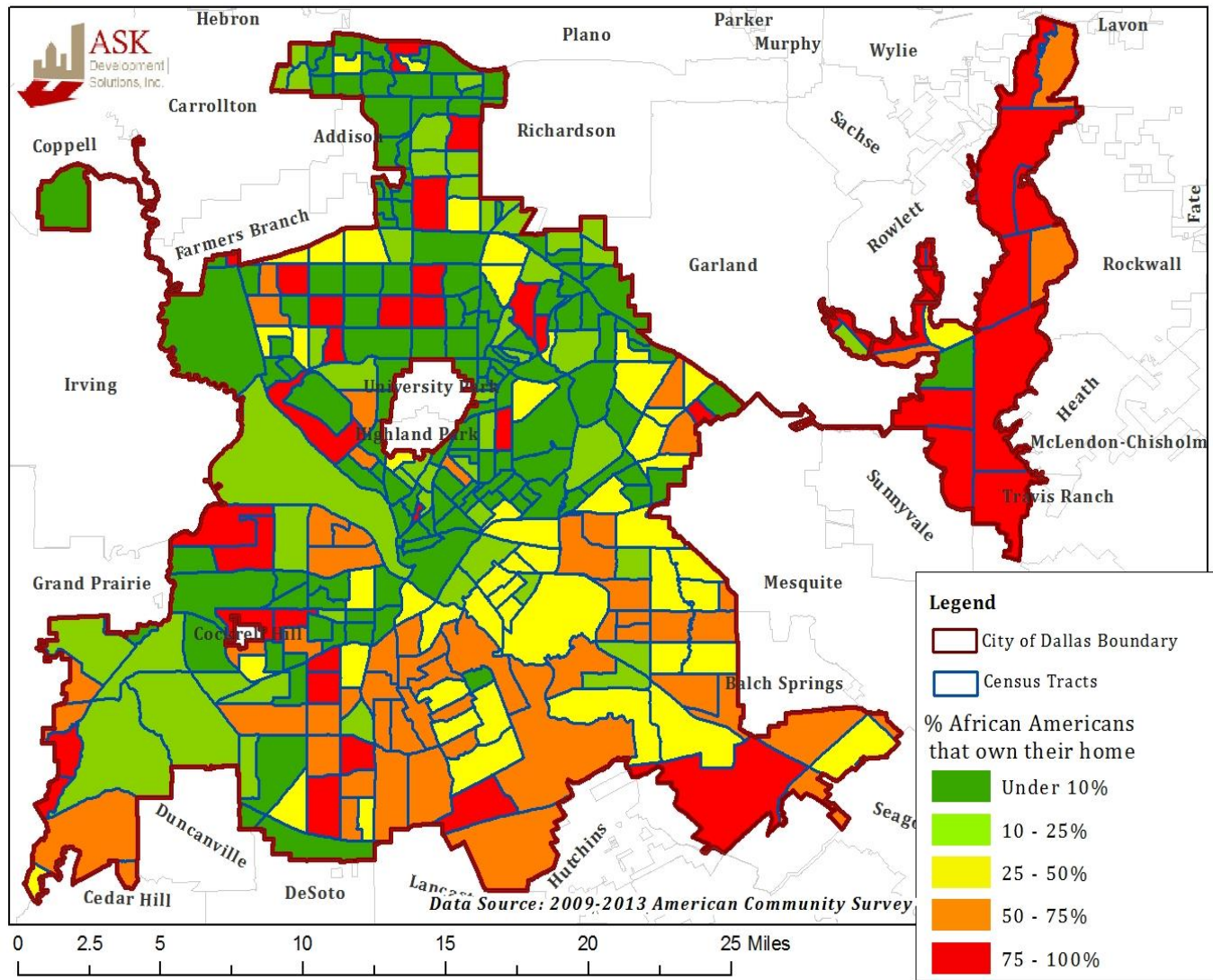
Figure 15. Homeownership by Race/Ethnicity



Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates

Map 23. African American Households Homeownership – Dallas, TX

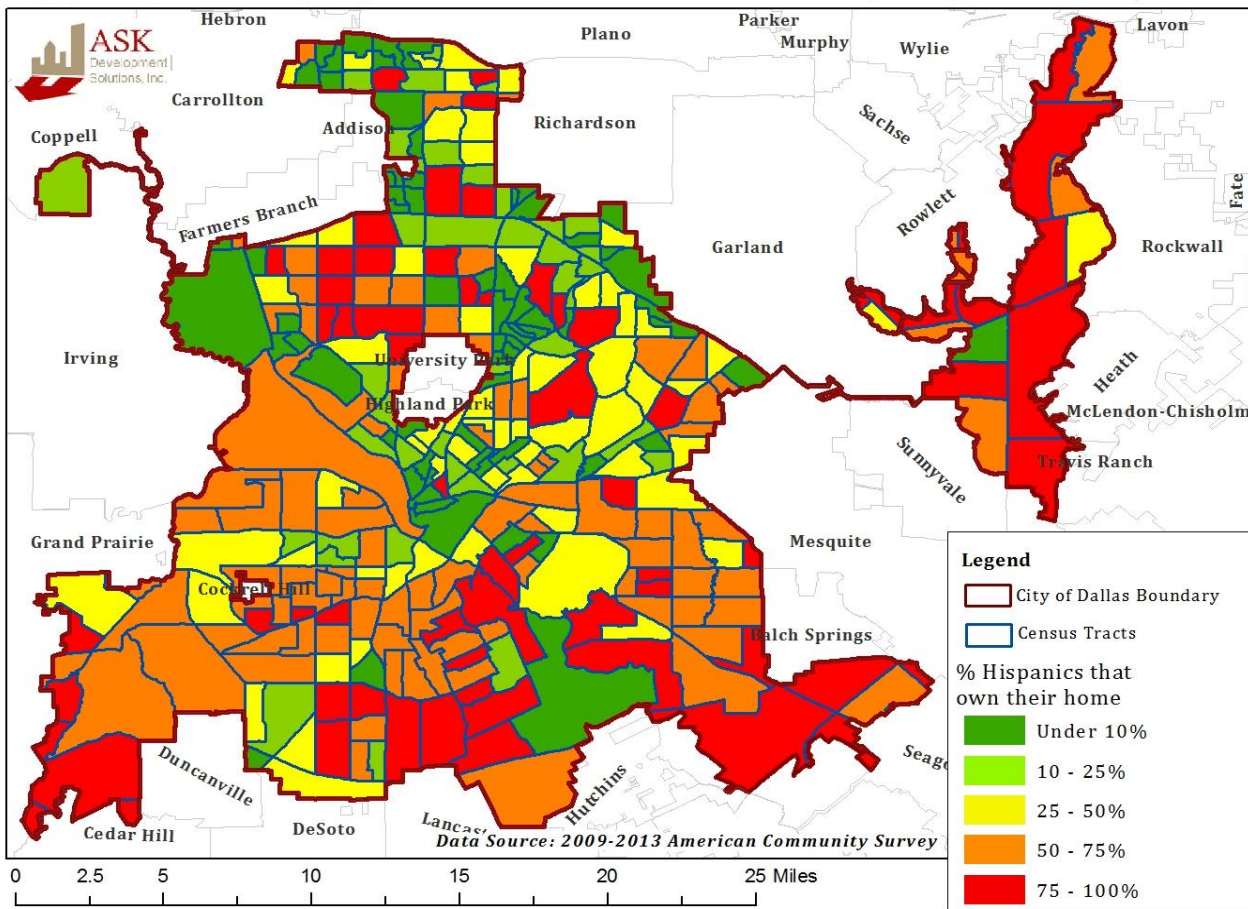
City of Dallas: Percent of African American Households that Own their Home (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Map 24. Hispanic Households Homeownership - Dallas, TX

City of Dallas: Percent of Hispanic Households that Own their Home (Averages 2009-2013)



Source: U.S. Census Bureau, 2009-2013 ACS

Dallas recognizes that increasing homeownership rates is crucial to the successful growth of the city as higher rates of homeownership typically means more stable neighborhoods. It is a goal of the City to increase homeownership in less affluent areas and create a balance between owner-occupied units and rental housing in all neighborhoods. One of the factors that has an impact on planning for homeownership is population growth. According to forwardDallas!, Dallas' Comprehensive Plan, the city is experiencing rapid growth, population projections anticipate that Hispanics, African Americans, and other ethnic minorities will make up the largest share of the population growth by 2030. Based on the anticipated growth, the Plan calls for increasing the percentage of homeowners by targeting efforts to minority groups. Part of the challenge with increasing minority homeownership is identifying the barriers that affect these households.

The strategies proposed by the City to increase homeownership include:

- Encouraging new development to include homes on smaller lots, townhomes, and condominiums;
- Expanding existing housing development and homeownership programs to support a variety of owner-occupied housing; and
- Encouraging owner-occupied redevelopment and infill housing and conversion of existing rental units to owner-occupied housing by partnering with non-profit developers, including CHDOs, and through programs such as the Neighborhood Investment Program, Urban Land Bank

Development Program, Land Transfer Program, and the Residential Development Acquisition Loan Program.

Some of the specific actions to increase homeownership as reported in the City’s FY 2011-2012 Consolidated Annual Performance Evaluation Report (CAPER) include the assistance of 196 households through the Mortgage Assistance Program (MAP). Of the households assisted, 112 were Hispanic, 73 were African American, 11 were White, and 1 household was categorized as “Other.” The table below provides details on the income characteristics of the beneficiaries:

Figure 16 – Race and Ethnic Characteristics of MAP Households

Race/Ethnicity	0-30% AMI	30-50% AMI	50-80% AMI
Hispanic	7	26	79
African American	1	20	52
White	0	1	10
Other	0	0	0
Total	8	46	142

Source: City of Dallas FY 11-12 CAPER (Derived from Beneficiary Chart)

The U.S. Department of Housing and Urban Development considers that a disproportionate need exists when members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole. According to the CHAS data included in this AI, the only racial group that has a disproportionate housing need are low and moderate income Pacific Islanders. However, these figures are skewed due to the relatively small Pacific Islander population in Dallas. Extremely low income Hispanic households experience greater housing needs than any other racial or ethnic group in that income category.

Recent City Housing Accomplishments and Use of Resources

The City of Dallas is an entitlement community which receives federal funds from the U.S. Department of Housing and Urban Development (HUD) annually. The City receives funds under its Consolidated Plan for the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) Programs. As part of the Consolidated Planning process, the City is required to prepare an annual report of its accomplishments known as the Comprehensive Annual Performance Evaluation Report (CAPER). The CAPER generally includes an assessment of the City’s progress towards meeting the goals and objectives established in its 5-year Consolidated Plan and subsequent Annual Action Plans. The CAPERs for the 2009-2011 program years as well as the 2013 Annual Action Plan and the 2013-2017 Consolidated Plan were reviewed to determine recent housing accomplishments and actions taken to promote fair housing.

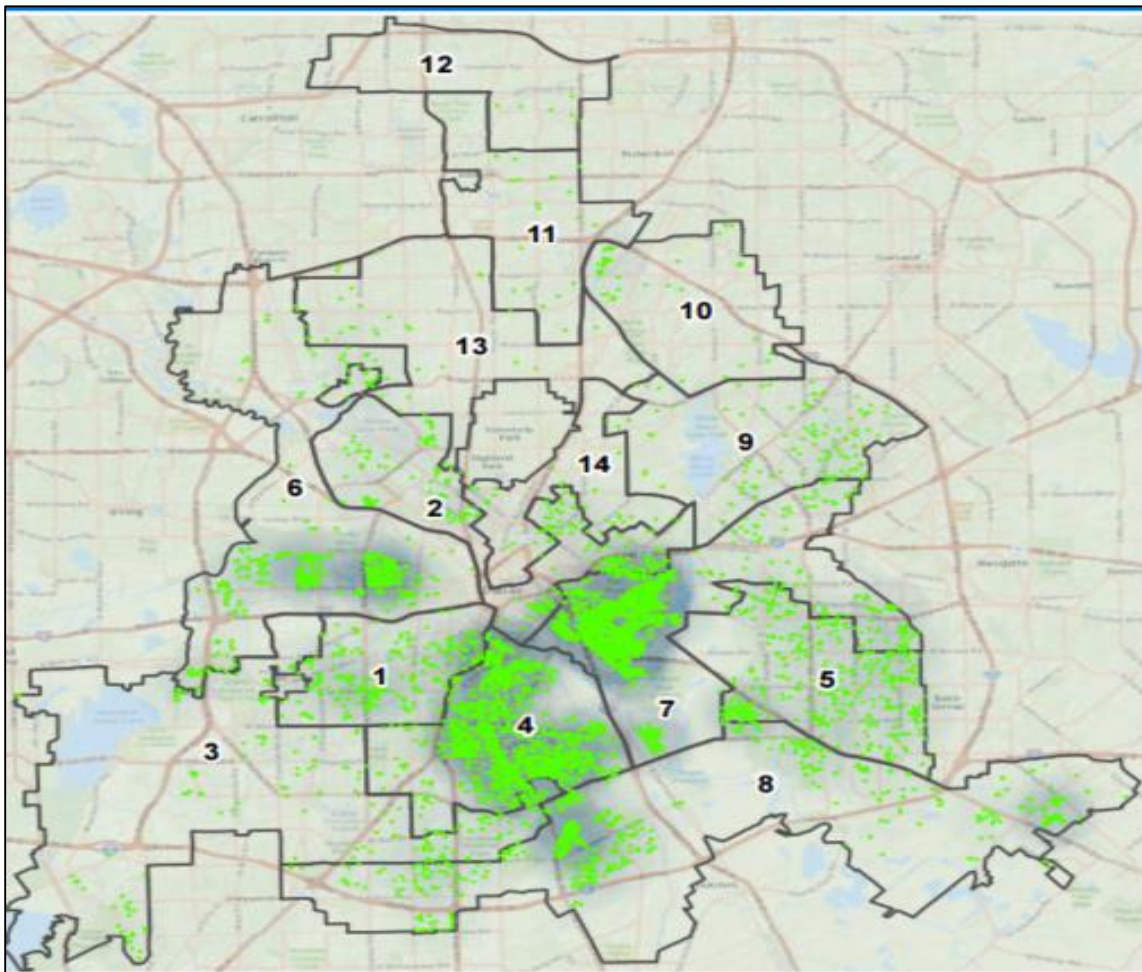
The City of Dallas’ housing priorities are to increase the supply of affordable housing, expand homeownership opportunities, revitalize neighborhoods, and create mixed-income communities. The CAPERs indicate that the City has consistently provided funding to non-profit and for-profit developers, subrecipients, and other community-based organizations to operate programs and carry out projects aimed at providing decent housing conditions for low- and moderate income residents. According to the 2013-2017 Consolidated Plan, there is not sufficient affordable housing in Dallas for lower income families. The City recognizes the need for specific types of housing based on population data and has

utilized General Obligation Funds in combination with economic development and transit oriented initiatives to provide affordable housing.

The City also implements several housing programs including the Neighborhood Investment Program (NIP), Community Prosecution Program, and the SAFE Program. Each of these programs support code enforcement activities in CDBG-eligible census tracts to correct code violations, reduce criminal activity, and create safer and healthy neighborhoods. The need for these programs was reinforced by a recent study commissioned by the Dallas Area Habitat for Humanity and prepared by the University of North Texas. The study, *From Blight to Light: Assessing Blight in the City of Dallas (2013)*, revealed that over half of the census tracts in Dallas are considered moderate to high-blighted areas. These programs are the City's response to property owners neglecting their responsibilities. In addition to these neighborhood enhancement programs, the City provides financial assistance to eligible households to purchase homes, construct replacement homes, or repair existing residential properties.

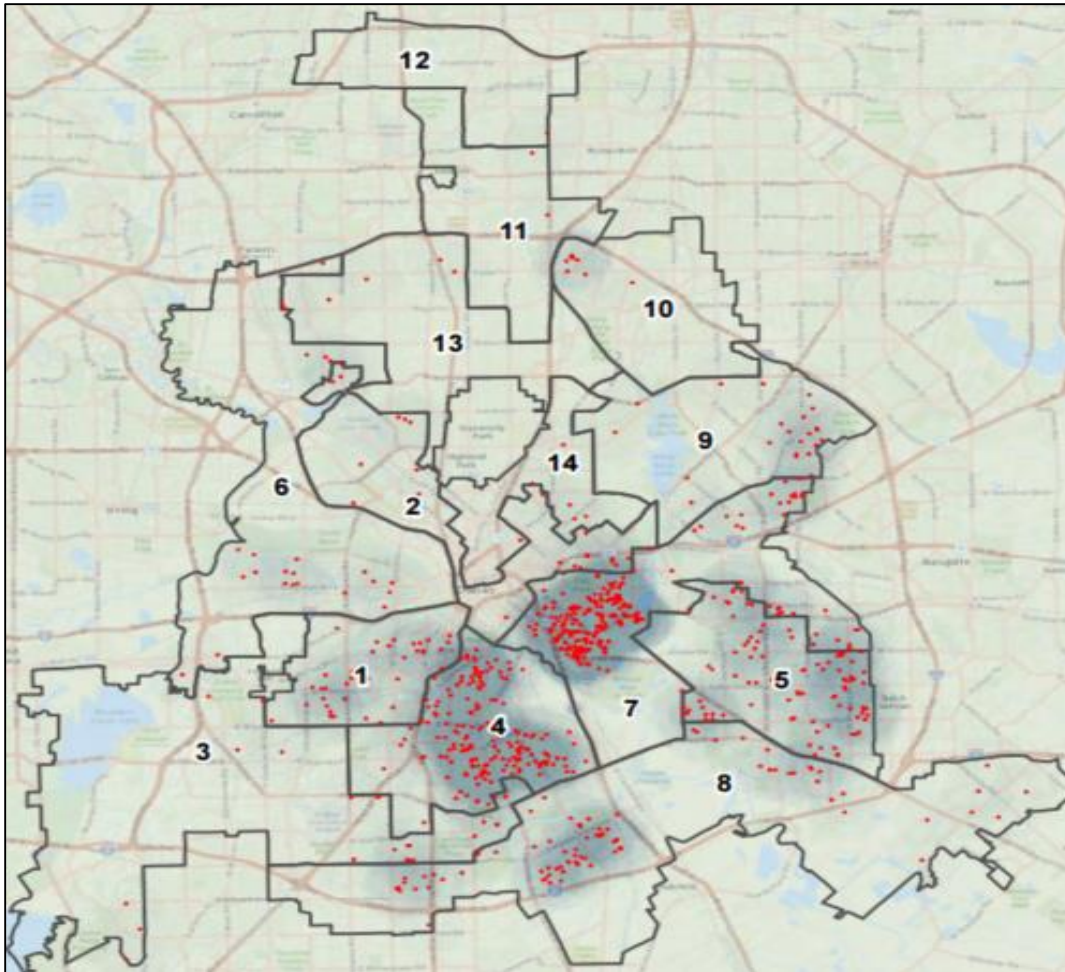
Based on data from the 2015 Dallas Map Book, in 2012, there were 6,301 parcels in the City of Dallas with code liens for weeding, mowing, and cleaning of properties. The liens totaled \$3.1 million and only 12.6% of the liens were paid. There were also 770 parcels with secure closure liens totaling \$308,606. Over 88% of these liens (\$272,742) were unpaid. Maps 26 and 27 show the parcels with code liens by type.

Map 25. 2012 Weed/Mow/Clean Liens – Dallas, TX



Source: 2015 Dallas Map Book (Lien Principal Report for Year 2012, City of Dallas)

Map 26. 2012 Secure Closure Liens – Dallas, TX



Source: 2015 Dallas Map Book (Lien Principal Report for Year 2012, City of Dallas)

The CAPERs reports that during the three-year period assessed, over 5,000 low- and moderate income residents were approved for assistance through various housing programs administered by the City. In all, over \$36.4 million was expended on the Mortgage Assistance Program, Reconstruction/SHARE Program, NIP Major Home Repair, People Helping People Volunteer Home Repair, Bond Fund Program, CHDO Program, and Minor System Repair Program.

The Home Repair Assistance Programs benefited 1,505 low- and moderate income households between 2009 and 2011. While there are several repair programs, each is tailored to the needs of the community and assistance depends of qualifying based on income, location of residence, extent of repair needed, and other factors such as age and disability status for the programs that target the elderly and disabled homeowners.

The Annual Action Plan includes a description of each of the home repair programs, the funding allocated, and the targeted goals for the year. The Reconstruction Program, People Helping People Volunteer Home Repair Program, and Major Systems Repair Program assist the majority of the beneficiaries and are summarized below.

- The Reconstruction Program provides deferred payment loans made to low-income homeowners for reconstruction of existing homes. Homeowners must be 62 years of age or older or disabled and their household income be at or below 80% MFI. Financial assistance is

provided as a no interest deferred payment loans secured by a promissory note and deed of trust.

- The People Helping People Volunteer Home Repair Program also assists the elderly and disabled persons by providing grants for minor exterior repairs performed by volunteers and through contract services. To qualify, the household income must be at 50% or below of MFI, citywide or if homeowners reside in a Neighborhood Investment Program area, the household income must be 80% or below of MFI.
- The Major Systems Repair Program provides low income homeowners with a maximum loan amount of \$17,500 to replace four major systems: heating/air conditioning; plumbing/gas; roof, and electrical. The loans are structures as deferred payment loans, forgiven at a rate of 1/60th of the loan provided the borrower occupies the property continuously for the five-year loan term.

The figures in the following table 59 extracted from the City of Dallas’s CAPERS represent the number of households assisted with Home Repair Assistance.

Table 58. City of Dallas Home Repair Assistance Accomplishments Projects Completed 2009-2011

	No. of Homeowners Assisted (2009)	No. of Homeowners Assisted (2010)	No. of Homeowners Assisted (2011)
CDBG FUNDED			
Mortgage Assistance Program	204	67	50
Major System Repair	106	102	106
Reconstruction/SHARE	31	31	7
SDFP/Major System Repair	4	5	-
NIP Major Home Repair	34	13	-
People Helping People	179	235	293
HOME FUNDED			
Reconstruction/SHARE	-	9	29
TOTAL	558	462	485

In addition to the home repair assistance programs and homebuyer programs, the City also undertakes new construction of affordable housing units by funding developers including Community Housing Development Organizations (CHDOs). Funding has been used for acquisition of lots, operation costs, predevelopment costs, and development costs. In FY10-11, ten CHDOs received development loans totaling \$3,710,835 in CHDO HOME project funds for the construction of affordable housing units. As a result of this funding, 46 affordable homes were constructed and sold. In FY 2011-12, six CHDOs and three non-profit developers received development loans totaling \$4,045,867 in CHDO, HOME and CDBG project funds for the construction of 52 affordable housing units.

To further encourage the development of affordable housing units in Dallas, the City also provides loans under the Section 108 Program. The Section 108 Program is a loan guarantee program, which enables CDBG grantees to borrow up to five times their annual entitlement grant. The program is derived from CDBG legislation and is subject to CDBG requirements. Under the Section 108 Program, borrowers

including entitlement communities can re-loan Section 108 proceeds to 3rd party borrowers to fund eligible projects. In recent years, the City has provided Section 108 loans to be used as gap financing to developers. To participate in the program, developers are required to set-aside a specific number of units as affordable to rent to eligible low income residents. Recent projects include the Continental Building, the Lone Star Gas Lofts, and Lancaster Urban Village. The loans made for these developments were \$7,600,000, \$11,750,000, and \$8,492,000, respectively. Combined, the projects consist of 519 units of which 204 (39%) are designated as affordable units.

City of Dallas Housing Programs

In order to address fair housing choice through providing a variety of affordable and accessible housing opportunities, the City of Dallas offers the following housing programs which are administered mainly by the Housing and Community Services Department:

Comprehensive Homeless Outreach Program

Purpose: to serve individuals who are homeless and or ex-offenders through a continuum of care method that includes emergency shelter, case work services, intake and assessment, transitional housing, supportive services, and job readiness placement with the goal of gaining or regaining economic self-sufficiency

Homeless Services oversees and manages all Homeless programs, processes rental and utility payments, case manages clients, and provides bi-weekly home visits to housing residents.

The Homeless Supportive Housing Assistance Program requires participation in supportive services as the participants obtain and remain in stable housing. The supportive services help participants increase skills and/or income, with the goal of becoming self-sufficient.

The supportive services provided to program participants include assessing the needs of the individuals and/or families, and facilitating access to ancillary services such as health care, behavioral health care, housing placement, job training and placement, substance abuse treatment, transportation, hygiene, and food.

Emergency Shelter Grant (ESG) Rapid Re-Housing Program and HOME Tenant-based Rental Assistance (TBRA)

The program provides services to high-risk adult ex-offenders who have minor children and families. The program will provide case management and referrals that will assist the individuals with re-entry into the community. Staff provides direct services to clients to assist them with employment, housing, education, life skills, mentoring, substance abuse treatment and community services.

Project Reconnect/Offender Re-entry

The program provides non-violent ex-offenders on parole with case management and services or referrals that will assist them with re-entry into the community. Staff provides direct services to clients to assist them with employment, housing, education, life skills, mentoring, substance abuse treatment and community services. Also provides referrals to partner agencies for supportive services.

HIV/AIDS Housing and Services

HIV/AIDS Housing Services provides housing assistance and support services for persons living with HIV/AIDS and their families in the Dallas eligible metropolitan statistical area.

City Child Care Services

The Childcare Program, through partnerships with non-profit agencies, provides childcare for low to moderately low income working parents and teenage parents who are attending school and do not qualify for any other form of public assistance. Intake/assessments are completed to determine eligibility both on the phone and in-person. Program participants are required to pay a portion towards subsidy amount based on a sliding fee scale.

Senior Services Program

The Senior Services Program provides services on behalf of the 155,000+ adults aged 60 years or older in Dallas and assists the elderly through education, outreach, and information and referral services. The program provides staff support to the City Council appointed Senior Affairs Commission and its various committees. A senior ombudsman provides assistance for complex non-traditional requests and conducts non-emergency home visits. A senior employment contract provides effective job search training and techniques for older adults. Bilingual staff is available.

Supplemental Nutrition Program for Women, Infants and Children (WIC)

WIC is a fully grant-funded Texas Department of State Health Services (DSHS) preventative program that provides low-income pregnant women, new mothers, infants and children up to age 5 with nutritious foods that are high in protein, iron, calcium, vitamin B6 and folic acid. WIC also provides nutrition education, breastfeeding support and improved access to health care and social services in order to prevent nutrition-related problems in pregnancy, infancy and early childhood.

Lactation services and breastfeeding support are available through two specialty facilities, the Dallas Lactation Care Center and Community Baby Café

Housing Preservation

Home Repair Programs (For low-to-moderate income homeowners)

Major Systems Repair Program - Provides up to \$17,500 deferred loan for replacement of major systems from among: electrical, plumbing, HVAC and roof, performed by certified contractors.

Home Reconstruction Program - Provides up to \$103,000 zero-interest, deferred payment loan for demolition and on-site reconstruction of structures beyond economic feasibility for repair.

Emergency Repair Program - Provides grants up to \$7,500 to respond to living situations which calls for immediate action to protect the health or safety of the occupants. Recommended repairs are sewer lines, gas lines, water lines/and or water damage, water heaters, roof, electrical systems, air conditioning and heaters (seasonal), windows, ADA renovations, ramps, toilets, grab bars, and other vital accessibility needs.

People Helping People Program (PHP) (For elderly and/or disabled homeowners)

PHP provides minor exterior repair and paint services to single family homes through volunteer and contract service to lower income, elderly and disabled homeowners. A home can receive up to a \$5,000 grant in materials and supplies for minor *exterior* repairs provided by volunteer organizations. The volunteers provide home repair assistance.

Specialty services provided by professional contractors include the following services:

- Replace broken window panes
- Service existing Working heating units

- Extermination for Roaches only
- Installation of 110 Air Condition Window Units for Homeowners without any air in their homes

Community Services Programs

The Community Centers at Martin Luther King, Jr. and the West Dallas Multipurpose Community Centers implement cultural, educational, health, and social services to Dallas residents. The Centers also provide housing for community agencies and City of Dallas departments that address issues having the greatest impact on the community. Property Management, Administrative and Social Services Programs ensure that residents of Dallas have access to programs and services that address health, employment, educational, cultural, and social needs. The City of Dallas uses the “One Stop Shop” concept at the community centers to deliver over 32 different programs and services to qualified residents of Dallas.

The Social Services Programs provide assistance to individuals who have experienced a temporary crisis, and make referrals to program partners who also assist with meeting client basic needs. Additional services include the coordination of Thanksgiving food distribution and a Christmas toy drive.

Senior/Medical Transportation Services - West Dallas Multipurpose Community Center

Senior/Medical Transportation Services - Provides non -emergency transportation to medical and health related destinations for senior citizens and / or disabled persons. These services are available to ambulatory adults starting at age 60 years, and low- income persons with disabilities of any age, residing in City Council designated zip codes. Passes may be available to assist DART certified citizens who, due to mobility are unable to use standard transportation.

Housing Development

Community Based Development Organizations (CBDO) Program – Provides eligible community based development nonprofits with interim construction financing for building new homes in Neighborhood Investment Program areas.

Community Housing Development Organization (CHDO) Program - Provides community-based housing development organizations with loans/grants for operating assistance and development funding, including but not limited to pre-development costs, development costs, construction subsidies, relocation costs, demolition costs, acquisition costs, related acquisition costs, rehabilitation, home replacement, rental rehabilitation, lease purchase, homebuyer subsidies and operating assistance.

General Obligation Bond Program 2012 - Promoting economic development in the Southern area of the city and promoting economic development in other areas of the city in connection with transit oriented development, through planning, designing, constructing, improving, extending and expanding public street, utility and other infrastructure facilities, including the acquisition of land and improved properties, demolition, retail, commercial, industrial, residential and mixed use development loans and grants.

Neighborhood Stabilization Program (NSP) - The program allows the City of Dallas to purchase foreclosed property, land banking, redevelopment, rehabilitation and down payment assistance.

Housing Services Program - Provides operating assistance to CHDOs for housing related activities such as housing counseling, eligibility intake processing and real-estate activities.

Housing Development Loan Program - Provides private and non-profit organizations with loans/grants for the development of affordable senior housing.

Urban Land Bank Demonstration Program

Dallas Housing Acquisition and Development Corporation - Acquires vacant tax-delinquent lots through tax-foreclosure lawsuits for re-sale at below market pricing to nonprofit and for-profit developers of single-family homes for sale to low-to-moderate income homebuyers.

Land Transfer Program - Provides nonprofit developers tax-foreclosed property, surplus property under the control of the City of Dallas, and release of non-tax City liens on private properties that will be acquired for affordable housing development. Release of non-tax City liens is also available to for-profit entities.

Section 108 Development Loan Program

Section 108 Development Loan Program provides development loans for large scale affordable multi-family projects, for mixed use residential and commercial projects, for transit-oriented development projects and for commercial development projects which provide housing for low/moderate renters and create jobs for low/moderate income workers.

Mortgage Assistance Program

The Mortgage Assistance Program (MAP) assists homebuyers with a total household income of less than 80 percent of the Dallas Area Median Family Income to purchase a home within the city limits of Dallas by providing down payment and closing cost assistance up to \$20,000 for homebuyers purchasing a new Community Housing Development Organization (CHDO) constructed home, by providing homebuyers purchasing a newly constructed home on a lot procured from the Dallas Housing Acquisition and Development Corporation (DHADC or Land Bank) and \$10,000 for homebuyers purchasing a newly constructed home on a lot procured from the DHADC or Land Bank and up to \$8,500 for homebuyers purchasing an existing home and a maximum of \$1,500 to pay for Minimum Housing Standards (MHS) required repairs.

Police Special Pay Down-Payment Assistance Program

Provides qualified police officers compensation of \$6,000 to be used towards their down payment and non-recurring closing costs, and is available for the purchase of any property within the City Limits of Dallas.

Neighborhood Investment Program

The Neighborhood Investment Program (NIP) acts as a vehicle for focusing Housing/Community Services Department, public improvements, code enforcement, and other City resources, within specific geographic areas of the city.

Neighborhood Enhancement Program (NEP) - In February 2008, the City Council approved the NEP as a companion to the NIP. The NEP provides funding for streetscape improvements, landscaping and neighborhood gateway initiatives, pedestrian amenities, and related architectural/engineering work. Projects are selected to maximize neighborhood impact under the NIP and are coordinated by the Housing/Community Services Department.

Fair Housing Actions

Fair Housing is a shared concern, regionally and locally, in the City and the County. The City of Dallas completed its last Analysis of Impediments (AI) to Fair Housing Choice in 2007. The analysis identifies barriers to fair housing choice, to prevent and address discriminatory housing practices based on race, color, national origin, sex, religion, disability and familial status. Over the past five years, the City has initiated activities to address the impediments identified as outlined in more detail in this section. The City of Dallas has used the strategies below to address fair housing issues.

City of Dallas Fair Housing Office

The City of Dallas established a Fair Housing/Human Rights Office (FHO) with the mission “to promote and preserve housing choice without regard to race, color, religion, sex, national origin, handicap, familial status or sexual orientation; and to promote and preserve equal employment and public accommodations without regard to sexual orientation.”¹¹ In 2005, the City of Dallas was granted final certification as a substantially equivalent fair housing agency. This means that HUD has determined that the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. After a certification determination, HUD refers complaints of housing discrimination that it receives to the City for investigation. Further information is included in the Fair Housing Complaint Data section of this AI.

Fair Housing Accomplishments

To address fair housing, the Fair Housing Office provides the following services:

- Discrimination complaint Intake
- Investigates and enforces discrimination complaints
- Conciliation and mediation
- Fair housing training
- Approve and monitor Affirmative Fair Housing Marketing Plans
- Government-assisted Affordable Housing List
- Housing and Disability Resource Guide

The CAPERs demonstrate that the City of Dallas has participated in several activities to address its pledge to “affirmatively further fair housing.” According to the CAPERs, in addition to enforcement activities, the City through the FHO affirmatively furthered fair housing by:

- Engaging in education of its citizens, employees, and housing providers on fair housing rights and responsibilities;
- Promoting fair housing by marketing on local radio stations, television, and in newspaper advertisements;
- Distributing affordable housing referral packets;
- Maintaining and updating a list of government-assisted affordable multifamily units for distribution to citizens;

¹¹ Dallas Fair Housing/Human Rights Office website, <http://dallascityhall.com/departments/fairhousing/pages/default.aspx>
Accessed April 21, 2015

- Monitoring affirmative fair housing marketing plans for City-assisted multifamily family housing developments; and
- Observing Fair Housing Awareness Month and conducting seminars and other meetings that increases awareness and knowledge of fair housing.

Between FYs 2010-2013, the City expended a total of \$1,758,154 on fair housing activities and has committed \$627,714 to fair housing enforcement activities for FY 14-15. A summary of the fair housing accomplishments from the City's CAPERs are provided in the table below. Between FYs 2010 – 2013, the City received, processed and made available referrals for 6,115 citizen requests for services; filed and investigated 438 housing discriminations complaints; provided 249 fair housing presentations and promotional events for citizens, housing providers, and city employees; and monitored an average of 41 Affirmative Fair Housing Marketing Plans. The City requires developers to submit an Affirmative Fair Housing Marketing Plan for any multi-family rental project that is funded with CDBG, Section 108, or HOME funding. Plans are reviewed for racial demographics of the census tracts where the project is located, target market, marketing strategy and activity plan, proposed marketing sources, and community contacts.

Table 59 City of Dallas Fair Housing Accomplishments against Goals 2010-2013

Outcome	Accomplishment Type	Program Year	Proposed	Actual
Housing assistance inquiries processes and referred annually	People	2010	1,200	1,462
		2011	1,200	1,411
		2012	1,200	1,378
		2013	1,200	1,864
Investigate discrimination complaints of violations of the Fair Housing Ordinance	Complaints	2010	70	104
		2011	70	119
		2012	70	133
		2013	70	82
Provide fair housing education and outreach	Events	2010	70	42
		2011	70	56
		2012	70	72
		2013	70	79
Approve and monitor Affirmative Fair Housing Marketing Plans for city assisted housing programs and projects	Housing Complexes	2010	38	40
		2011	38	45
		2012	38	36
		2013	38	43

The following pages provide additional detail on the fair housing activities carried out by the City of Dallas between October 2006 and September 2014 for each fiscal year.

October 2006 – September 2007

- The Fair Housing Office spent \$47,686.00 on advertising
- The Office conducted 42 outreach activities

October 2007 – September 2008

- The Fair Housing Office spent \$48,284.20 on advertising
- The Office conducted 67 outreach activities.
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing office provided (8) fair housing trainings to DHA staff and resident councils.
- The Fair Housing Office provided 599 housing referral packets, which included resources for disabled persons.

October 2008 – September 2009

- The Fair Housing Office spent \$48,284.20 in advertising - this consisted of 204 radio advertisements, of which 117 were conducted in Spanish and 56 newspaper advertisements, of which 30 were printed in Spanish newspapers.
- The Office conducted 95 outreach activities.
- The Office implemented a Fair Housing website which references 15 links for organizations that assist disabled persons.
- The Fair Housing Office provided 1,029 housing referral packets, which included resources for disabled persons.
- The Fair Housing Office partnered with Vecinos Unidos and KLNO radio station to provide fair housing educational information to the Hispanic community.
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing Office provided (4) fair housing trainings to DHA staff and resident councils.

October 2009 – September 2010

- The Fair Housing Office spent \$42,279.20 in advertising – this consisted of 264 radio advertisements, of which 124 were conducted in Spanish and 43 newspaper advertisements, of which 15 were printed in Spanish newspapers.
- The Office conducted 121 outreach activities.
- The Office coordinated fair housing education and outreach with Consumer Credit Counseling Services home loan counseling program with 52 participants.
- During Fair Housing month, the Office partnered with Consumer Credit Counseling Services, Wells Fargo and America Home Key dba Gold Financial Mortgage and NACA to provide fair housing and mortgage lending education, along with eligibility requirements.
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Office provided fair housing education to 64 residents in Lancaster Housing Authority
- The Fair Housing Office provided (6) fair housing trainings for DHA staff and resident councils.
- The Fair Housing Office provided 751 housing referral packets, which included resources for disabled persons.

October 2010 – September 2011

- The Fair Housing Office spent \$19,392.50 in advertising – this consisted of 55 radio advertisements, of which 30 were conducted in Spanish and 40 newspaper advertisements, of which 16 were printed in Spanish newspapers. In addition, the Office purchased 25 spots (advertisements) on a Spanish television station.

- The Office conducted 53 outreach activities.
- During Fair Housing month, the Office partnered with NACA and the City Credit Union to educate the public on fair housing and the mortgage lending process.
- The Fair Housing Office partnered with the Women Council of Dallas Association of Real Estate Brokers and Bank of America to provide fair housing and educational information to address barriers to low-income and the minority population.
- The Fair Housing Office partnered with LULAC to provide fair housing and human relations information to the GLBT community.
- The Fair Housing Office partnered with the Southeast Dallas Hispanic Chamber of Commerce and provided educational information to the Hispanic community during Hispanic Festival
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing Office provided (5) fair housing training to DHA staff and resident councils.
- The Fair Housing Office provided 587 housing referral packets, which included resources for disabled persons

October 2011 – September 2012

- The Fair Housing Office spent \$20,433.72 in advertising – this consisted of 138 radio advertisements, of which 106 were conducted in Spanish and 60 newspaper advertisements, of which 16 were printed in Spanish newspapers. In addition, the Office purchased 35 spots (Advertisements) on a Spanish television station.
- The Office conducted 49 outreach activities.
- During Fair Housing month, the Office partnered with City Credit Union and Metro-Tex Association of Realtors to educate the public on the mortgage lending process.
- The Fair Housing provided (1) fair housing training to DHA staff and resident council.
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing Office partnered with the Women Council of Dallas Association of Real Estate Brokers and Metro-Tex Association of Realtors to provide fair housing information and encourage lender education on the mortgage lending requirements.
- The Fair Housing Office provided 500 housing referral packets, which included resources for disabled persons.

October 2012 – September 2013

- The Fair Housing office spent \$13,971.00 in advertising – this consisted of 115 Spanish radio advertisements and 45 newspaper advertisements, of which 16 were printed in Spanish newspapers.
- The Office conducted 68 outreach activities.
- During Fair Housing month, the Office partnered with the City Credit Union to provide fair housing information and lender education on the mortgage lending process and eligibility requirements.
- The Fair Housing Office provided fair housing training to 20 Dallas County Housing staff members.
- The Fair Housing Office provided 425 housing referral packets, which included resources for disabled persons

October 2013 – September 2014

- The Fair Housing office spent \$17,886.15 in advertising – this consisted of 197 radio advertisements, of which 150 were conducted in Spanish and 65 newspaper advertisements, of which 14 were printed in Spanish newspapers. In addition, the Office purchased 35 spots (Advertisements) on a Spanish television station and 50,000 email advertisements
- The Office conducted 77 outreach activities.
- Held Analysis of Impediments meetings and distributed Analysis of Impediments Surveys to Citizens, Civil Rights, Advocacy & Faith Based Organizations, Real Estate Community & Mortgage Institutions, CHODOs, Chambers of Commerce & Developers and Continuum of Care & Disability Organizations to receive input.
- The Fair Housing Office provided 436 housing referral packets, which included resources for disabled persons
- Received \$40,000 Partnership Grant from HUD to increase public access to more information about their rights under Fair Housing law and promote the goal of Affirmatively Furthering Fair Housing by providing training and outreach. Hired 1 bilingual intern that assisted Fair Housing Staff with distributing Fair Housing and Housing literature to 113 organizations (civil rights organizations, Hispanic and faith based groups) within the city of Dallas. Conducted special outreach with the Senior Source, MDHA (Metro Dallas Homeless Alliance) and Veterans Coalition of North Central Texas to provide training and literature to the homeless and disability communities. Posted a monthly message to promote Fair Housing on the City of Dallas Facebook page. Purchased 1,500 Sexual Orientation and 1,500 Fair Housing brochures. Purchase a variety of promotional items totaling 7,000 items. These materials were utilized to improve outreach to Hispanic, LGBT, Disabled and other underrepresented population.

Regional Fair Housing Initiatives

In consideration of the fact that fair housing is often a regional issue, the City of Dallas has initiated and/or participated in regional activities as outlined below.

- The City of Dallas has collaborated with neighboring cities such as Garland to carry out fair housing activities.
- During Fair Housing month in 2014, the City hosted a Fair Housing Symposium on Affirmatively Furthering Fair Housing with representatives from the City of Dallas, neighboring communities, HUD officials, lending community development community and real estate community.
- At the time of issuance of this report, the City hosted a fair housing symposium titled “Sustainable Communities: Strategies for Innovation and Regional Cooperation” on April 27, 2015. Neighboring communities will participate.
- FHO staff continually researched best practices from other communities such as Garland, Austin, etc.
- FHO staff started attending regional meetings with housing authorities, which addressed fair housing issues regionally.

City Regulatory Review

This Section focuses on the review of the local public sector policies to determine if such policies affect housing choice by limiting or excluding dwellings or housing facilities for persons with disabilities or other protected class members from certain residential areas. HUD believes that there are instances

where policies have the effect of violating the provisions of the Fair Housing Act (FHA) since they may indirectly discriminate against persons with disabilities and racial and ethnic minorities.

In order to make this determination, the Consultant examined the forward Dallas! Comprehensive Plan as well as Municipal Zoning and Building Codes. In addition to the review of these adopted policies, the Consultant provided a questionnaire to the City to assist in the preparation of the Analysis of Impediments to Fair Housing Choice Study. The purpose of the questionnaire was to review public policies and practices concerning the Zoning Code and Comprehensive Plan as it relates to fair housing choices, particularly housing for individuals with disabilities. The following information is garnered from the examination undertaken and the questionnaire.

One of the best places to begin the education, awareness, and sensitivity process is to include language and concepts related to fair housing in the planning process. It will be noted where the City of Dallas could use preventative and proactive strategies in this regard.

NIMBYism in the City of Dallas

Resistance to new or different housing is often referred to as “Not in my backyard” or NIMBYism. NIMBYism is based on the fear that the proposed housing is to be occupied by individuals in some way different from those already residing in the area. Stereotypes often get combined with fears such as loss in property values, attraction of crime, and substandard housing and results in neighborhood resistance. Responses from focus groups and the survey questions identified NIMBYism as an issue.

NIMBYism is most effectively addressed through education and awareness that results in corrected perceptions and elimination of stereotypes.

Accessibility

Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multi-family housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act cover a wide range of residential housing including, but not limited to, apartments, condominiums, single room occupancy units, public housing, extended stay and residential hotels, nursing homes, dorms, shelters, and other units funded through federal block grant funds. Redevelopment of an existing property to add four or more units or public and common areas is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not typically subject to the provisions, those that are funded with federal block grant funds may be subject to the provisions.

In addition to provisions in the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed, built, altered, or leased with federal funds

- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

Constitutional Equal Protection Considerations

Under the current state of the law, a local government cannot adopt ordinances or other regulations based on race, ethnicity, or national origin, even if for their benefit, unless the ordinance or regulation are justified by a compelling governmental interest and are narrowly tailored to further that interest. Comprehensive planning must be adopted with regard to this “strict scrutiny” limitation.

Review of the ForwardDallas! Comprehensive Plan

The purpose of reviewing the City’s ForwardDallas! Comprehensive Plan is to identify to what extent the Comprehensive Plan helps the City to implement its commitment to equal housing opportunity and to what extent the portions of the plan may serve as impediments to fair housing choice for persons protected by the FHA. As such, the review covers six subject areas selected because of their correlation with fair housing choice. As such, the review covers six subject areas selected because of their correlation with fair housing choice. These areas are:

1. Inclusion of Protected Group Demographic Description
2. Plans for Affordable Housing/Diverse Community
3. Reference to CDBG or Other Federal Housing Programs
4. Affirmatively Furthering Fair Housing
5. Compliance with Applicable Laws and Regulations
6. Other Items

The forwardDallas! Comprehensive Plan was adopted by Ordinance No. 26371 and passed by the Dallas City Commission in June 2006. The Plan was noticeably prepared with a broad range of input from the community and is thorough in its development and organization. ForwardDallas! builds from other plans such as the 1994 Dallas Plan, the 1987 City of Dallas Growth Policy Plan, the adopted Trinity River Corridor Comprehensive Land Use Plan, the Strategic Engagement Economic Development Plan and the many small Area Plans such as the Inside the Loop Plan, Arts District Plan and the Fair Park Comprehensive Development Plan.

In general, a comprehensive plan is defined as a long-term guide for the development of a community outlining existing conditions and providing goals, policies, and actions to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Comprehensive plans are typically developed with input from stakeholders in the community and function as a living document used in the decision making process by current and future community leaders. The comprehensive plan provides guidance for the City’s future in regards to the type and intensity of development, land uses, and open space.

ForwardDallas! is comprised of four major components each serving a specific purpose: a Vision; Policy Plan; Implementation Plan; and Monitoring Plan.

The Vision for the City is a broad perspective of the future of the City based on the desires of its residents. The Vision includes six core values that are the foundation for the plans objectives and recommendations. The six priorities were determined from results of a community survey and are as follows:

1. Education
2. Public Safety
3. Healthy Environment
4. Job Growth
5. Convenient Choices
6. Quality of Life

As it pertains to fair housing, quality of life includes the availability of diverse housing choices due to Dallas' diverse population.

Using the core values, common themes emerged at public meetings held to garner input on the plan. These themes also form the basis for guiding principles in the policy plan. Some of the key themes that relate to housing and that may impact fair housing choice are protecting and preserving existing neighborhoods, building on the success of historic preservation in the community, matching housing with jobs, improving opportunities for homeownership, and providing housing choices for people at various income levels.

The policy plan covers seven areas and is the outline to bring the City's vision to reality. The seven areas are land use, economic development, housing, transportation, urban design, the environment and neighborhoods. Each element of the plan includes goals, policies and implementation measures to achieve the vision. The policy plan includes five guiding principles that tie back to the core values identified in the vision. These are

1. Economic Development;
2. Housing and Community;
3. Social Equity;
4. Environmental Sustainability; and
5. Transportation and Infrastructure.

The Housing and Community Principle focuses on providing new housing choices to citizens of all income levels, and the Social Equity Principle fosters equal access to quality housing, jobs, education and healthcare.

The Implementation Plan provides a timeline for accomplishing the policy plan implementation measures or actions. The fourth component of forwardDallas!, the Monitoring Program, establishes a tracking mechanism to monitor progress as well as changes in the City. This section of the plan also provides the basis for annual reports, adjustments and updates to the forwardDallas! Policy Plan.

Inclusion of Protected Group Demographic Description

As a proactive and preventative approach, inclusion of information about race, national origin, familial status, or disability status of persons in a comprehensive plan is one way to help remind the community that it is composed of a significant number of persons who are most likely to need the protection of the FHA in their attempts to find or occupy housing in the community. Inclusion in the demographic profile can help ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues. It is for these reasons that a review of demographic information is undertaken and it is recommended that such data be included in the Comprehensive Plan.

The Appendix to ForwardDallas! includes a Background Analysis that contains a Current Conditions Analysis. Within this analysis, census trends based on population, race and ethnicity, national origin, age, and income are examined. The Background Analysis also includes a Housing Assessment where the census trends and other demographic information are applied to housing needs. It is important to point out that the goals and policies in the Housing Element of the Comprehensive Plan emerged from the findings of the Housing Assessment. While the ForwardDallas! does include demographic data for the majority of the protected classes, it does not contain data on the number of persons with disabilities.

A review of other adopted plans on the City's website revealed that not all the City's planning documents include a demographic profile. The 2002 Renaissance Plan for Dallas Parks and Recreation, prepared by Carter-Burgess did contain a demographic analysis including information on projected racial makeup of the population. A more detailed demographic analysis was also included in the appendix to the document; however, it was not available on the website. Review of other plans like the Downtown Park Master Plan, adopted in 2004, and also prepared by Carter-Burgess, the 2005 Emerald Bracelet Report, and the 2005 Trinity River Corridor Comprehensive Land Use Plan, prepared by HNTB Corporation, Good Fulton & Farrell, Economics Research Associates, and J-Quad Associates, revealed that the documents do not include information on race, ethnicity, national origin, or disability status.

1. Plans for Affordable Housing/Diverse Community

As stated above, the FHA does not require that communities plan for constructing or assisting in the construction of "affordable" housing nor require that communities be, or advertise themselves as "diverse communities". However, HUD has recognized the inclusion of "affordable" housing and promotion of a community as a "diverse community" are steps that communities can take to "affirmatively further fair housing". Racial minorities, some recent immigrants, single mothers with children, and persons with disabilities, all protected by the FHA, are over represented in the low- and moderate-income categories, and are among the persons most likely to need "affordable" housing. Taking steps to address the housing needs of lower income persons and to establish respect for a "diverse" community are therefore viewed by HUD as "affirmatively furthering fair housing actions".

Although affordable housing is not equivalent to fair housing, increasing the availability of housing would benefit minority families and persons with disabilities.

Although Dallas' population may be described as diverse, there has been historic racial segregation in the City. Over the years, housing for lower income and minority residents has been concentrated in certain areas of the City, including the southern region.

The Housing Element of forwardDallas! includes housing related goals, policies, and actions based on housing supply, demand, and affordability. One of the goals of the City is to expand affordable housing alternatives by instituting the following policies:

- Gearing homeownership programs to meet projected affordable housing needs especially for demographic groups that are underrepresented in homeownership;
- Encouraging the distribution of affordable housing throughout the City and the region; and
- Obtaining support from community-based organizations to develop affordable housing.

Other goals or policies in ForwardDallas! includes attracting more middle and higher income households to Southern Dallas; utilizing economic development efforts to direct investment toward the southern Sector while also supporting key existing business districts; and ensuring that people from all parts of Dallas have equal access to quality neighborhoods with good public schools, parks, and other public amenities.

The City also recognizes that as population increases the demand for housing will also increase. Based on the projections, the City anticipates that over a 30-year period, a mix of households will be added to the Dallas population including single-person households, households at the high and lower ends of the income spectrum, and households headed by foreign-born adults. Additionally, Hispanics are projected to have the largest share of the population growth along with Blacks and other minority groups. As such, the City plans to target homeownership opportunities to these groups. The elderly population is also expected to experience significant growth thus prompting the need for independent and assisted living facilities. Based on the diversity of the population, the City plans to provide a variety of housing options throughout the City ensuring that quality housing is accessible to all people.

Neighborhood Plus Plan

The City of Dallas adopted a new housing plan and strategy, Neighborhood Plus Plan, in October 2015. The Neighborhood Plus Plan includes six main objectives and action steps that will address potential fair housing issues in the City of Dallas such as the concentration of affordable housing, lack of affordable housing, revising and improving the housing policy, inadequate or inaccessible public transportation, and increase homeownership opportunities for minorities and low income households. The housing plan has six objectives which are set to be accomplished by 2035. The objectives and some of the action steps are provided below:

1. Collective Compact – The Neighborhood Plus Plan will create a framework for organizing, communicating, coordinating, and partnering with the private and nonprofit sectors as well as neighborhood organizations for planning, resource allocation, and service provision.
2. Alleviate Poverty – The Neighborhood Plus Plan includes data that shows that the City of Dallas has 20.1% of its families living below the poverty line. Poverty disproportionately affects minorities and in Dallas, African-Americans and persons of Hispanic ethnicity represent the largest proportion of families living in poverty. The City has set a goal to reduce the Dallas poverty rate to 15% by 2020 to bring it in line with other communities in the region. Living in poverty clearing impacts families or individuals housing choice and forces households to live in substandard housing conditions and often in neighborhoods with high crime levels, poor performing schools, and lack of infrastructure and basic services. The Neighborhood Plus Plan will develop programs that provide workforce training to increase employment opportunities and

earnings, prioritize early childhood education which has been proven to improve the educational outcome of students, and provide transportation, childcare, and health programs which are basic needs that low income persons often have to forego in order to maintain their housing situation.

3. Fight Blight – The goal of the Neighborhood Plus Plan is to reduce concentrated blight in the City of Dallas by 25% by 2020. Therefore, the City’s plan to address blight will affect fair housing choice in numerous ways including increasing property values that can create mixed communities, reducing crime, and assisting elderly, disabled, and low- and moderate income homeowners with home improvement costs.
4. Attract & Retain the Middle Class – The programs under this objective include improving school quality, creating home improvement incentive programs, eliminating barriers to neighborhood revitalization, supporting infill housing and redevelopment, and making neighborhoods more desirable. This objective addresses concentration of affordable housing in Dallas and seeks to create a balance throughout the City. By improving services and amenities in neighborhoods that are predominantly lower income and/or minority concentrated, middle income households are more likely to move to these areas especially if there are incentives provided by the City.
5. Expand Homeownership – The City’s goal is to improve the homeownership rate to 50% by 2035. According to the 2013 ACS, 44% of Dallas households are homeowners. The City plans to expand homeownership by increasing infill housing, encourage a wider range of housing types to meet preferences, develop private sector partnerships to develop affordable housing options, expand mortgage assistance programs to attract homebuyers, and increase the number of eligible loan applicants by hosting homebuyer classes and events.
6. Enhance rental housing options – The City aims to reduce substandard rental housing by at least 50% by 2035. Under this objective, the City will strengthen and expand the rental registration and inspection programs and improve design standards for multi-family development. The City plans to increase the supply of affordable rental units by requiring that at least 20% of units are affordable in projects that are publicly funded. There is also a focus on TOD that encourages housing in proximity to employment centers, health care, and schools and generally benefits lower income persons and protected class groups that utilize public transportation such as persons with disabilities, elderly persons, families with children, and minorities.

The Neighborhood Plus Plan focuses on addressing the housing needs of homeowners and renters in the City of Dallas and the region and considers other areas that have an impact on a households housing options such as education, health, mobility, business, and safety.

Drafting of the housing plan began in January 2015 preceded by several actions the City carried out beginning in early 2014 when it held a Fair Housing Symposium, several community engagement activities and community workshops, and presented the framework for the plan to the Dallas City Council.

The purpose of the plan according to a Neighborhood Plus presentation made to the Dallas City Council in February 2015 is to:

- Set a new direction for housing development in Dallas;

- Strengthen neighborhood revitalization policy and develop a planning and decision framework to guide community investment decisions;
- Acknowledge the interdependence of public, private, and non-profit partnerships; and
- Establish a collaborative relationship that leverages planning and investment choices to strengthen Dallas' regional leadership.

The six main objectives of the plan are furthered by 23 policies and over 77 action items. Some of the policies and actions that will promote fair housing in Dallas include actions that will:

- Increase the earning potential of Dallas residents giving them access to more housing options;
- Encourage the development of affordable housing and increase the homeownership rate;
- Encourage the development of diverse housing types;
- Improve the linkage between employment, housing, and transportation through transit-oriented development; and
- Develop a regional approach to addressing fair housing.

The City of Dallas is in the process of developing a multi-departmental implementation strategy for Neighborhood Plus. A copy of the latest briefing on Neighborhood Plus is attached as Appendix #8 and incorporated by reference.

2. Reference to CDBG or Other Federal Housing Program

The Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) are federal housing programs that provide funding to entitlement communities such as Dallas. The funds are allocated on an annual basis from the U.S. Department of Housing and Urban Development (HUD) with the goal of principally benefitting low- and moderate income persons. The CDBG Program by design has a broad range of eligible uses including funding public improvement projects in eligible areas, providing financial support to social service agencies, rehabilitating residential homes, property acquisition, and clearance activities. HOME on the other hand designed exclusively to create affordable housing for low-income households. The funds can be used for a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance.

This review is done to determine if the Comprehensive Plan and related documents include a reference to the existence and value of the CDBG and/or other Federal housing programs, as the City is a recipient of those funds. Federal housing programs continue to be a valuable funding source to fill gaps that must be addressed in order to provide all residents in a community access to decent housing options CDBG and other Federal housing program funds such as NSP have become reliable and important parts of the community development programs for communities throughout the nation, including the City of Dallas. Expected uses for CDBG funds can be incorporated into the planning process and can become reliable components of a Comprehensive Plan. Inclusion of references to CDBG and other Federal housing programs in comprehensive plans also serves as a way to inform local citizens of the valuable existing relationships and those that can be developed, between Local, State and Federal governments.

ForwardDallas! did not include any specific reference to the CDBG or HOME programs however, the City did indicate that in order to carry out its Non-Traditional Homeownership Programs, geared towards transforming renters into homeowners, it would coordinate existing City, State, federal, and private sector homeownership programs.

3. Affirmatively Further Fair Housing

As mentioned previously, each community that accepts federal block grant funds certifies that it will “affirmatively further fair housing” and will report to HUD the actions it has taken to implement the certification. Although the plans that were reviewed did not include a specific reference to “affirmatively further fair housing” review of the Code of Ordinances revealed that Chapter 20A, Fair Housing, also referred to as the Dallas Fair Housing Ordinance (Ord. Nos. 13456; 14809; 20652; 20780) states that it is the policy of the City to promote the opportunity for each person to obtain housing without regard for race, color, sex, religion, handicap, familial status, or national origin. The Ordinance also describes the process to file a complaint and the penalties for violation. Additionally, Chapter 46 of the Code titled Unlawful Discriminatory Practices Relating to Sexual Orientation (Ordinance No. 24927) indicates that It is the policy of the City of Dallas to bring about through fair, orderly, and lawful procedures the opportunity for every person to obtain employment, access to all places of public accommodation, and housing, without regard to sexual orientation. This Chapter includes unlawful housing practices which it identifies as discrimination in the sale or rental of housing, housing financing, or providing brokerage services because of sexual orientation.

Compliance with Applicable Laws and Regulations

HUD has started the process of formulating specific regulations to be followed in the preparation of the AI. The new rule proposes to incorporate fair housing planning into the Consolidated Plan and the Public Housing Authority (PHA) Annual Plan processes. When finalized, the new rule will incorporate fair housing priorities into housing, community development, land-use, and other policy making documents. The proposed changes came about as a result of a Report by the US Government Accountability Office where it was determined that HUD needs to enhance its requirements and oversight of jurisdictions’ fair housing plans. HUD’s Office of Fair Housing and Equal Opportunity (FHEO) oversees all fair housing matters including a jurisdiction’s compliance with the Affirmatively Further Fair Housing (AFFH) certification, included in the Consolidated Plan and Action Plan. Should HUD determine that the AFFH is inaccurate, HUD has the authority to disapprove a Consolidated Plan, which may result in withholding CDBG and other formula grant funds until the AFFH matter is resolved. The FHEO administers, in addition to the Fair Housing Act, other fair housing and civil rights programs such as Title VI of the Civil Rights Act of 1964; Age Discrimination Act of 1975; Title II ADA; Section 3 of the HCD Act of 1968; and Section 504 of the Rehabilitation Act of 1973, as amended.

Section 3

The Section 3 Program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low or very low income residents in connection with projects and activities in their neighborhoods.

Other Items: Community Participation in Planning Process

As mentioned above, there was significant public participation in the development of forwardDallas! The City organized a 75-member Advisory Committee comprised of business leaders, neighborhood representatives, public agency leaders, and concerned citizens. In addition, the City used various methods to gather input on the Plan. Specifically, the following activities were conducted:

- A scientific and representative public opinion survey (a telephone survey evenly distributed across all council districts, in-depth interviews with community leaders and person-on the-street interviews) with almost 800 respondents.

- An eight-page insert published in the Dallas Morning News.
- Nine community workshops and two citywide workshops.
- Ten open houses to solicit feedback from the workshops and to present interim results.
- Ten Advisory Committee meetings.
- More than 100 meetings with stakeholder groups, including neighborhood associations and business groups.
- Two public meetings on the draft version of forwardDallas!
- Ten small-group work sessions on the draft attended by some Advisory Committee members, elected officials and the public.

In developing Dallas' new housing policy, the Neighborhood Plus Plan, the City has implemented a process to encourage input and involvement from residents of the City. The City has held several events including community workshops throughout the City in English and Spanish to identify and prioritize issues and identify opportunities to improve neighborhoods. The City has also hosted a neighborhood block party, National Night Out, and attended community festivals to inform residents about the new direction the City is taking to improve all the neighborhoods in Dallas.

The Downtown Dallas 360, adopted in 2011, included its planning process which occurred over a period of 18 months. The process was led by a Steering Committee, Technical Committee, and Project Management Team. The Steering and Technical committees comprised representatives from City departments and organizations, stakeholder groups and corporations such as Dallas Area Rapid Transit (DART), Dallas Convention and Visitors Bureau, Dallas Convention Center, private developers, Downtown Residents Council, and Downtown Dallas Inc. (DDI). Additionally, community input was garnered through two community forums and multiple sessions with area stakeholders, Dallas City Council members and key staff.

The Trinity River Corridor Comprehensive Land Use Plan also had an extensive public process. Each phase of the planning process included opportunities for input utilizing five methods: individual comments, stakeholder meetings, community workshops, meetings with interested organizations, and briefing and input from official groups including the Dallas City Council, City Council Trinity River Committee, City Plan Commission, and Park and Recreation Board.

Based on the review of these planning documents, it is clear that it is the City's practice to seek citizen input and encourage public participation in its planning process. The City is encouraged to continue with citizen participation activities and include persons from all racial, ethnic and religious groups as well as persons with disabilities.

Zoning Code

Zoning Ordinances are enforceable in courts of law by the local community and therefore warrant even closer attention to help 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 review covered key areas that have an impact on fair housing choice including zoning, building regulations, accessibility standards, and other policies and practices. The following subject areas were selected to be reviewed:

- Minimum Lot Size for Single Family Residential

- Definition of “Family”
- Group Living Facilities
- Multifamily Maximum Structure Height and Densities
- Other Comments

Minimum Lot Size for Single Family Residential

The City’s zoning regulations relating to residential development reveals that there are 20 residential districts in the City comprised of single family, duplex, townhouse, multifamily, and manufactured home districts. The variety in the zoning districts indicates a broad range of land use and density categories to promote housing variety. Of the 20 residential districts, seven are single family districts with minimum lot sizes ranging from 5,000 square feet to one acre lots. Section 51A-4.410 – Schedule of Yard, Lot and Space Regulations provides the minimum lot dimensions for all zoning districts. The table below is adapted from the chart for residential districts:

Residential Zoning District	Minimum Front yard (in feet)
R-ac Single family district 1 acre	40
R-1/2ac Single family district ½ acre	40
R-16 Single family district 16,000 sq. ft.	35
R-13 Single family district 13,000 sq. ft.	30
R-10 Single family district 10,000 sq. ft.	30
R-7.5 Single family district 7,500 sq. ft.	25
R-5 Single family district 5,000 sq. ft.	20

Single family residential uses are also a primary residential use in the townhouse districts and the clustered housing district. These districts accommodate smaller lot sizes of at least 2,000 square foot. Additionally, the City of Dallas adopted Section 51A-4.900, Affordable Housing, of the Development Code. The purpose of the Affordable Housing section is to:

- (a) Encourage the provision of dwelling units affordable to families of low income throughout the city;
- (b) Ensure that these dwelling units are safe, sanitary, decent, and otherwise substantially equivalent to public housing in the city;
- (c) Ensure that these dwelling units are available in a variety of sizes to the same extent as throughout the city; and
- (d) Otherwise promote the general welfare of the city and its residents.

The Affordable Housing section of the development code applies to lots in a Standard Affordable Housing (SAH) district. The SAH district is comprised of multifamily and mixed-use districts as follows: MF-1(SAH), MF-2(SAH), MU-1(SAH), MU-2(SAH), and MU-3(SAH). The Affordable Housing section is applicable when an application is made for a building permit that would increase the dwelling unit density permitted in that district above the number permitted by right. The City Council may also impose an SAH requirement in a planned development district that allows 15 or more multifamily dwelling units in the district. Single family units are not permitted by right in the MU-2(SAH), and MU-3(SAH) districts.

Definition of “Family”

It is important to consider how families are defined in a zoning ordinance because the Fair Housing Act requires that groups of unrelated persons be treated equally as traditional families and be held to the same regulatory requirements. The City indicated in the questionnaire on public policies and practices

that the definition of family in the Development Code does not prevent unrelated individuals from sharing the same home. The City's Development Code defines a family as individuals living together as a single housekeeping unit in which not more than four individuals are unrelated to the head of the household by blood, marriage, or adoption.

The current definition of family limits the number of unrelated persons in a home to a maximum of four individuals. The Dallas Development Code allows a larger number of unrelated persons to reside in handicapped group dwelling units, therefore the cap on unrelated persons does not negatively impact persons with disabilities.

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 that are classified as residential uses and that serve persons who are elderly and persons with disabilities. These are group residential facilities, handicapped group dwelling unit, and retirement housing.

a) Group Residential Facility

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

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

Group residential facilities have density restrictions which 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.

b) Handicapped Group Dwelling Unit

A handicapped group dwelling unit is defined 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 units 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. There are hundreds of group homes located throughout the City.

c) Retirement Housing

Retirement housing is defined as a residential facility principally designed for persons 55 years of age or older and 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.

Adult day care facilities are also defined in the code 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. Additionally, the use is by right as a limited use in MF-3(A), MF-4(A), and office districts. Adult day care facilities require a special use permit in residential districts.

The Texas Department of Aging and Disability Services (DADS) administers long-term services and support for seniors and people with intellectual and physical disabilities. DADS also licenses and regulates providers of these services. DADS regulates adult day care facilities, assisted living facilities, nursing facilities and skilled nursing facilities, home and community support service agencies including home health agencies, and hospices, publicly and privately operated intermediate care facilities for individuals with an intellectual disability or related conditions, publicly and privately operated Home and Community-based Services waiver providers, and publicly and privately owned Texas Home Living waiver providers.

Multifamily Maximum Structure Height and Densities

According to the chart of zoning rules on the City's website, in multifamily districts where the primary use is residential, districts MF-1(A) and MF-2(A), the maximum building height is 36 feet. Districts MF-3(A) and MF-4(A) which in addition to residential uses support limited retail and personal services uses go up to 90 feet and 240 feet, respectively. Special standards such as residential proximity slope are also imposed assuring that single family neighborhoods are protected. Multifamily housing, defined as three or more dwelling units per lot are permitted by right in the clustered housing, multifamily, central area and mixed-use districts. The inclusion of multifamily and high density housing encourages the development of affordable housing.

Other Comments

Building Codes and Accessibility: Local jurisdictions such as the City of Dallas adopt building or construction codes to regulate building safety and other standards for residential and commercial buildings. These codes are enforced through a permitting and inspection system which authorizes a specific governmental unit, typically a building department, to set fees and carry out actions. The City's Building Inspection Department is responsible for building code compliance.

The building codes used by a City are not required to include or enforce federal accessibility requirements. The responsibility of ensuring that federal accessibility requirements are included in residential projects are left to the developers, designers, and operators of such buildings. State and local accessibility requirements must be enforced by the local governmental unit such as the City of Dallas.

The FHA and the American with Disabilities Act (ADA) has design and accessibility standards but does not have a permitting and plan review process for enforcement. However, the issuance of a certificate of completion and building permits by the City's building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

Ordinance No. 29161 amended Chapter 53 Dallas City Code to adopt the 2012 edition of the International Building Code with certain changes. The building code regulates the construction, enlargement, alteration, repair, demolition, use, and maintenance of construction work in the City. Section 1101.2 of the Building Code states that building and facilities shall be designed and constructed to be accessible with the Dallas Building Code and the International Code. Section 1107.2.1.1 addresses multifamily dwellings and requires compliance with accessibility requirements pertaining to accessible entrances, accessible routes and accessible common and public use areas in multifamily dwellings containing four or more units that were built after March 13, 1991. During plan review, building staff reviews plans to ensure compliance with accessibility standards.

The City has adopted the following requirements for new buildings:

In buildings that are ready for first occupancy after March 13, 1991, and have an elevator and four or more units:

- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All units must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats and other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars and

- Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and was ready for first occupancy after March 13, 1991, these standards apply to ground floor units.

The issuance of a certificate of completion and building permits by the City's building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

Property Tax Policies: Policies regarding property tax increases and tax relief impacts housing affordability. The Texas Property Tax Code allows for property tax exemptions for seniors and persons with disabilities, two groups of people that are generally low income. Each homesteaded household is exempted for \$3,000 for county purposes and \$15,000 of the appraised value from the school district. In addition to these exemptions, disabled persons and seniors also qualify for an exemption of \$10,000 of the appraised value of his or her homesteaded residence. Disabled veterans who are 100% disabled and their surviving spouses are tax exempt.

In addition to property tax exemption for qualified residents, the Texas Property Code also provides tax exemptions to CHDOS, Community Land Trusts, and other developers of affordable housing that is for rent or sale to low- and moderate income households. Any property that an organization owns for the purpose of building or repairing housing for sale or rental to a low- and moderate income household without profit may be tax exempt.

Each form of tax relief is subject to certain specific criteria and must be applied for. These forms of tax relief reduce or eliminate tax liability for owners and reduce housing costs for renters making housing units more affordable.

Off-Street and Handicap Parking: According to the questionnaire completed by the City, the requirements for all uses with respect to handicap parking is that handicapped parking must be provided and maintained in compliance with all Federal and State laws and regulations. In regards to required off-street parking, group residential facilities must have 0.25 spaces per bed, plus one space per 200 square feet of office area or a minimum of four spaces is required. Single family uses and handicapped group dwelling units are required to have one space in R-7.5(A), R-5(A), and TH districts and two spaces in all other districts. Multifamily districts require one space for each 500 square feet of dwelling unit floor area within the building site, except that in central area districts, only one space for each 2,000 square feet of dwelling unit floor area within the building site is required and handicapped parking must be provided if more than ten off-street parking spaces are required for this use. If a special use permit is required for any use, the off-street parking requirement may be established in the ordinance granting the special use permit.

Planned Development District: Chapter 51P of the Development Code provides regulations for planned development districts (PDDs). A PDD is a customized zoning district intended for larger scale, mixed use development which would not be possible within any of the standard zoning districts. Development standards such as height, setbacks, and allowed uses are contained within the ordinance written specifically for the PDD.

Accessory Structures: The single family use regulations of the Development Code states that only one dwelling unit may be located on a lot, and that the board of adjustment may grant a special exception to authorize an additional dwelling unit in any district when, in the opinion of the board, the additional dwelling units will not: (i) be used as a rental accommodation; or (ii) adversely affect

neighboring properties. The board requires the applicant to deed restrict the property to prevent use of the additional dwelling unit as rental accommodations.

Boards and Commissions: The City of Dallas has several boards and commissions that relate to fair housing issues. Other corporate entities related to the City may have governing boards. Usually, each board requires members to meet specific qualifications and are generally appointed by members of the City Council. The City Secretary oversees the process of receiving nominations for all Boards and Commissions and coordinating with other departments which work directly with each board. Maintaining active boards and commissions allows residents of Dallas to have input on the programs and the actions of the City. Some of the City's board include but are not limited to¹²:

City Plan Commission

City Plan Commission (CPC) is responsible for making recommendations to the City Council regarding planning and zoning matters, and for administering Chapter 212 of the Texas Local Government Code regarding the platting and recording of subdivisions and additions. The COC appointed two advisory bodies: the Zoning Ordinance Committee (ZOC) and the Urban Design Committee (UDC). The ZOC is responsible for reviewing potential amendment to the City's Development Code and the UDC is responsible for reviewing long range planning and area plans prior to the City Plan Commission consideration.

Zoning Board of Adjustment

The Board of Adjustment (BDA) is a fifteen-member citizen board appointed by the City Council to hear and take action on variations to the Development Code regulations, on appeal from decisions of the Building Official made in the enforcement of the Development Code and on termination of non-conforming uses.

Landmark Commission & Task Force

The Landmark Commission is responsible for making decisions regarding Certificate of Appropriateness applications within all City of Dallas historic districts and individually designates structures.

Southern Dallas Development Corporation Board

Assists in the development and financing of small businesses, create jobs and stimulate the economic growth of Southern Dallas and the Enterprise Zone by promoting investment. The Southern Dallas Development Corporation is a separate corporate entity and is not a City department.

Community Development Commission

Fosters citizen participation and provides advice and recommendations to the City Manager and City Council on the use of CDBG and other HUD grant funds.

Housing Finance Corporation Board

Responsible for issuing tax-exempt mortgage revenue bonds and oversee operation of single family mortgage programs. The Housing Finance Corporation is a separate corporate entity and not a City department.

Building Inspection Advisory, Examining and Appeals Board

¹² <http://citysecretary.dallascityhall.com/boards.html>

Assists the building official in the administration and interpretation of the building, electrical, plumbing and mechanical codes adopted by the City of Dallas.

Dallas Area Rapid Transit Board

Implements the DART Service Plan to provide mobility, improve quality of life, and stimulate economic development. DART is a separate corporate entity and not a City department.

Dallas Housing Authority (DHA) Board of Commissioners

Responsible for local policy-making, administration and planning of programs which provide, or assist others in providing an adequate supply of quality housing which meets the needs and financial abilities of low-income citizens. DHA is a separate corporate entity and not a City department.

Senior Affairs Commission

Promotes independence, dignity and purpose through education, volunteerism, advocacy, and services.

Tax Increment Financing Districts (TIF) Boards

The TIF Boards for their respective TIF districts review and provide recommendations to the City Council concerning TIF funding.

Visitability and Universal Design:

The City of Dallas has incorporated FHA accessibility requirements in its Building Code and adheres to Section 504 of the Rehabilitation Act in regards to accessibility in its housing programs. Section 1107.2.11 of the City's Building Code, Multifamily Dwellings, requires that all covered multifamily dwellings contain adaptable design features including:

- an accessible route into and through the dwelling unit;
- light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
- reinforcements in bathroom walls to allow later installation of grab bars and around the toilet, tub, shower and shower seat, if provided, and;
- Usable kitchens and bathroom that an individual in a wheelchair can maneuver about the space.

HUD's CPD Notice 05-09: *Accessibility Notice – Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and their applicability to Housing Programs funded by HOME and CDBG*, recommends the use of the visitability concepts in addition to the requirements of Section 504 and the FHA. Visitability is defined by AARP in the *Increasing Home Access: Designing for Visitability*¹³ brief as a house built to include a zero-step entrance, wide doorways with 32" of clear passage space, and a half bathroom on the main floor. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features.

¹³ http://assets.aarp.org/rgcenter/il/inb163_access.pdf

IV. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist.

CRA Compliance

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The Community Reinvestment Act (CRA) requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. CRA examinations are conducted by the Federal Financial Institutions Examinations Council (FFIEC) of federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS).

The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- * Outstanding
- * Satisfactory
- * Needs to Improve
- * Substantial Noncompliance

From 2000 to present, 79 CRA Performance Ratings have been given to banks based within the city limits of Dallas, Texas. (It should be noted that a bank may have been rated more than once during this time period.) Three (3) bank examinations received a rating of "Outstanding", 75 received a rating of "Satisfactory", and 1 received a rating of "Needs to Improve." All examinations and ratings are illustrated below, in alphabetical order, by bank/institution name.

Table 60 - FFIEC CRA Performance Ratings, Dallas, Texas

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
07/07/2003	AMERICAN BANK, NATIONAL ASSOCIATION	DALLAS	TX	Satisfactory	\$26,724
01/09/2008	AMERICAN BANK, NATIONAL ASSOCIATION	DALLAS	TX	Satisfactory	\$24,219
04/08/2002	BANK OF TEXAS, N.A.	DALLAS	TX	Satisfactory	\$1,937,136
05/29/2006	BANK OF TEXAS, N.A.	DALLAS	TX	Satisfactory	\$3,478,175

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
10/01/2001	BANK OF THE SOUTHWEST OF DALLAS	DALLAS	TX	Satisfactory	\$122,650
03/31/2000	BANK ONE, TEXAS, N.A.	DALLAS	TX	Satisfactory	\$31,051,593
01/01/2000	BEAL BANK, S.S.B.	DALLAS	TX	Satisfactory	\$1,379,097
10/10/2000	BLUEBONNET SAVINGS BANK FSB	DALLAS	TX	Satisfactory	\$2,470,442
03/01/2000	COMERICA BANK - TEXAS	DALLAS	TX	Satisfactory	\$3,715,855
09/09/2008	COMERICA BK	DALLAS	TX	Outstanding	\$65,961,348
08/16/2010	COMERICA BK	DALLAS	TX	Outstanding	\$59,143,523
04/08/2002	COMERICA BK-TX	DALLAS	TX	Satisfactory	\$4,111,590
06/01/2010	COMMUNITY TRUST BANK OF TEXAS	DALLAS	TX	Satisfactory	\$183,342
01/01/2006	DALLAS CITY BANK	DALLAS	TX	Satisfactory	\$63,043
06/23/2000	DALLAS NATIONAL BANK	DALLAS	TX	Satisfactory	\$43,357
12/31/2004	DALLAS NATIONAL BANK	DALLAS	TX	Satisfactory	\$43,357
06/01/2006	EQUITY BANK,SSB	DALLAS	TX	Satisfactory	\$114,633
04/17/2000	FIRST MERCANTILE BANK, N.A.	DALLAS	TX	Satisfactory	\$126,878
10/01/2009	FIRST PRIVATE BANK OF TEXAS	DALLAS	TX	Satisfactory	\$119,932
08/01/2012	FIRST PRIVATE BANK OF TEXAS	DALLAS	TX	Satisfactory	\$282,977
09/18/2000	GATEWAY NATIONAL BANK	DALLAS	TX	Satisfactory	\$128,497
11/28/2005	GATEWAY NATIONAL BANK	DALLAS	TX	Satisfactory	\$264,233
07/01/2004	GRAND BANK	DALLAS	TX	Satisfactory	\$132,015
08/03/2009	GRAND BANK	DALLAS	TX	Satisfactory	\$379,535
10/01/2012	GRAND BANK	DALLAS	TX	Satisfactory	\$514,557
06/02/2003	INWOOD NATIONAL BANK	DALLAS	TX	Satisfactory	\$696,787
04/13/2009	INWOOD NATIONAL BANK	DALLAS	TX	Satisfactory	\$1,299,791
03/01/2006	JEFFERSON BANK	DALLAS	TX	Satisfactory	\$203,085
10/01/2003	LIVE OAK STATE BANK	DALLAS	TX	Satisfactory	\$53,681
11/05/2008	LIVE OAK STATE BANK	DALLAS	TX	Satisfactory	\$118,583
10/01/2013	LIVE OAK STATE BANK	DALLAS	TX	Satisfactory	\$124,472
08/01/2002	LONE STAR BANK	DALLAS	TX	Satisfactory	\$178,712
02/28/2003	MERCANTILE BANK & TRUST, FSB	DALLAS	TX	Satisfactory	\$179,030
09/01/2005	MILLENNIUM STATE BANK OF TEXAS	DALLAS	TX	Satisfactory	\$59,114

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
12/01/2009	NEXBANK, SSB	DALLAS	TX	Satisfactory	\$560,361
06/01/2013	NEXBANK, SSB	DALLAS	TX	Satisfactory	\$784,781
05/01/2000	NORTH DALLAS BANK & TRUST CO.	DALLAS	TX	Satisfactory	\$616,484
09/01/2002	NORTH DALLAS BANK & TRUST CO.	DALLAS	TX	Satisfactory	\$765,497
06/01/2005	NORTH DALLAS BANK & TRUST CO.	DALLAS	TX	Satisfactory	\$896,884
07/05/2008	NORTH DALLAS BANK & TRUST CO.	DALLAS	TX	Satisfactory	\$935,029
01/01/2012	NORTH DALLAS BANK & TRUST CO.	DALLAS	TX	Satisfactory	\$1,128,894
09/09/2002	NORTHERN TRUST BANK OF TEXAS NA	DALLAS	TX	Outstanding	\$846,008
10/01/2010	ONE WORLD BANK	DALLAS	TX	Satisfactory	\$118,745
02/12/2007	ONE WORLD BK	DALLAS	TX	Satisfactory	\$54,745
10/01/2002	PARK CITIES BANK	DALLAS	TX	Satisfactory	\$57,533
11/01/2007	PARK CITIES BANK	DALLAS	TX	Satisfactory	\$677,466
03/01/2011	PARK CITIES BANK	DALLAS	TX	Satisfactory	\$920,298
01/01/2004	PAVILLION BANK	DALLAS	TX	Satisfactory	\$58,646
05/01/2009	PEGASUS BANK	DALLAS	TX	Satisfactory	\$94,159
06/01/2012	PEGASUS BANK	DALLAS	TX	Satisfactory	\$239,913
04/20/2004	PRESTON NATIONAL BANK	DALLAS	TX	Satisfactory	\$34,946
05/18/2009	PRESTON NATIONAL BANK	DALLAS	TX	Satisfactory	\$62,574
05/01/2011	PRESTON STATE BANK	DALLAS	TX	Satisfactory	\$156,607
01/08/2007	PROFESSIONAL BANK, N.A.	DALLAS	TX	Satisfactory	\$78,532
03/01/2003	SIGNATURE BANK	DALLAS	TX	Satisfactory	\$46,867
04/05/2008	SIGNATURE BANK	DALLAS	TX	Satisfactory	\$88,598
12/29/2000	SOUTHWEST SECURITIES, FSB	DALLAS	TX	Satisfactory	\$345,986
05/27/2003	SOUTHWEST SECURITIES, FSB	DALLAS	TX	Satisfactory	\$668,333
12/29/2006	SOUTHWEST SECURITIES, FSB	DALLAS	TX	Satisfactory	\$916,983
06/30/2010	SOUTHWEST SECURITIES, FSB	DALLAS	TX	Satisfactory	\$1,701,148
09/01/2009	SOVEREIGN BANK	DALLAS	TX	Satisfactory	\$774,191
12/01/2012	SOVEREIGN BANK	DALLAS	TX	Satisfactory	\$914,313
11/01/2011	STATE BANK OF TEXAS	DALLAS	TX	Satisfactory	\$604,578
03/04/2008	T BANK, NATIONAL ASSOCIATION	DALLAS	TX	Satisfactory	\$157,852

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
07/12/2004	TEXAS CAPITAL BANK, N.A.	DALLAS	TX	Satisfactory	\$18,883
07/09/2007	TEXAS CAPITAL BANK, N.A.	DALLAS	TX	Satisfactory	\$4,283,993
04/27/2011	TEXAS CAPITAL BANK, NATIONAL ASSOCIATION	DALLAS	TX	Satisfactory	\$9,140,432
09/29/2003	TEXAS COMMUNITY BANK AND TRUST, N.A.	DALLAS	TX	Satisfactory	\$144,553
11/01/2010	TEXAS SECURITY BANK	DALLAS	TX	Satisfactory	\$125,924
08/01/2013	TEXAS SECURITY BANK	DALLAS	TX	Satisfactory	\$202,824
03/01/2004	THE OAKS BANK & TRUST COMPANY	DALLAS	TX	Satisfactory	\$90,985
05/01/2005	TOLLESON PRIVATE BANK	DALLAS	TX	Satisfactory	\$112,423
11/01/2010	TOLLESON PRIVATE BANK	DALLAS	TX	Needs to Improve	\$366,865
12/01/2012	TOLLESON PRIVATE BANK	DALLAS	TX	Satisfactory	\$365,176
11/29/2010	TOWN NORTH BANK, NATIONAL ASSOCIATION	DALLAS	TX	Satisfactory	\$682,559
10/01/2011	TRIUMPH SAVINGS BANK, SSB	DALLAS	TX	Satisfactory	\$256,905
12/10/2001	UNITED TX BK	DALLAS	TX	Satisfactory	\$92,541
02/13/2006	UNITED TX BK	DALLAS	TX	Satisfactory	\$78,047
02/22/2010	UNITED TX BK	DALLAS	TX	Satisfactory	\$120,657

Source: FDIC, <http://www.ffiec.gov/craratings>

In addition, the FFIEC publishes annual Census Reports that use a limited number of demographic, income, population, and housing data from the FFIEC's Census files prepared for HMDA and CRA data. The FFIEC updates the Census Windows Application annually to reflect changes to MSA/MD boundaries announced by the Office of Management and Budget (OMB), include income estimates developed by the FFIEC, and include CRA distressed/underserved tracts as announced by the federal bank regulatory agencies. These reports were gathered from the FFIEC for the Census Tracts within the City of Dallas and are contained in Appendix #6 of this document.

Fair Housing Complaint Data

The City of Dallas Fair Housing Office receives discrimination complaints, investigates complaints, and provides conciliation as an option to resolve their complaint including the execution of conciliation agreements. The section of the Analysis of Impediments to Fair Housing Choice will include a review of the nature and extent of fair housing complaints filed with the City in recent years. The review of complaint data identifies trends in fair housing discrimination and can guide the direction that fair housing education and outreach actions need to take.

Filing a Complaint

To file a complaint with the City of Dallas Fair Housing Office, residents of Dallas may complete a fair housing complaint form, which is available on the City's website, or call or visit the Fair Housing Office at the following location:

Dallas Fair Housing Office
 1500 Marilla St., Room 1BN
 Dallas, TX 75201
 (214) 670-FAIR (3247)
 Fax (214) 670-0665
 TTY (214) 670-6936

All complaints are investigated to determine whether there is reasonable cause to determine if there was a violation of the City's Fair Housing Ordinance. Complaints are dual filed with HUD's Office of Fair Housing and Equal Opportunity. If reasonable cause is established, the Dallas Fair Housing Office may continue to attempt to facilitate an agreement between the complainant and the respondent, if appropriate. The finding of cause is established by the City Attorney's office, which then passes the case to the Fair Housing Office. The Fair Housing Administrator or Assistant Director of Fair Housing may issue a charge and a lawsuit will be filed in the State District Court. However, during this period, conciliation attempts may be considered, if appropriate. The conciliation agreement, if reached, lays out provisions to protect the filer of the complaint and the public interest. If an agreement is executed, the Fair Housing Office will take no further action unless the agreement is violated. The final investigation report is submitted to the City's Attorney Office for determination.

Housing Discrimination Complaints

The data used for this analysis was provided by the Dallas Fair Housing Office for the period October 2007 through March 2015 and covers the number of housing discrimination complaints filed along with the basis of the complaints. Data on how cases were resolved including closed with no cause found, conciliation, outside settlement, transfer to HUD, etc. for the period October 2011 to March 2015 was also analyzed.

Housing discrimination complaints were filed on the basis of race, color, religion, sex, disability, familial status, national origin, and retaliation. In some cases, complaints were filed on more than one basis. For the period October 2007 to September 2014, as noted in the table below, a total of 619 cases were closed by the Fair Housing Office. A majority, more than half, of all closed cases were based on race (27.9%) and disability/handicap (27.9%) followed by national origin (11%). Of all closed cases, 21.6% were those with more than one basis.

Table 61- Fair Housing Closed Cases (All) October 2007- September 2014, Dallas, TX

FAIR HOUSING CLOSED STATUS REPORT	
Number of Closed Cases	
Basis	# of closed cases
<i>Disability (Handicap)</i>	173
<i>Race</i>	173
<i>Familial Status</i>	7
<i>National Origin</i>	69
<i>Multiple Bases</i>	134
<i>*Other</i>	63
Total	619

*Includes familial status cases not reported separately

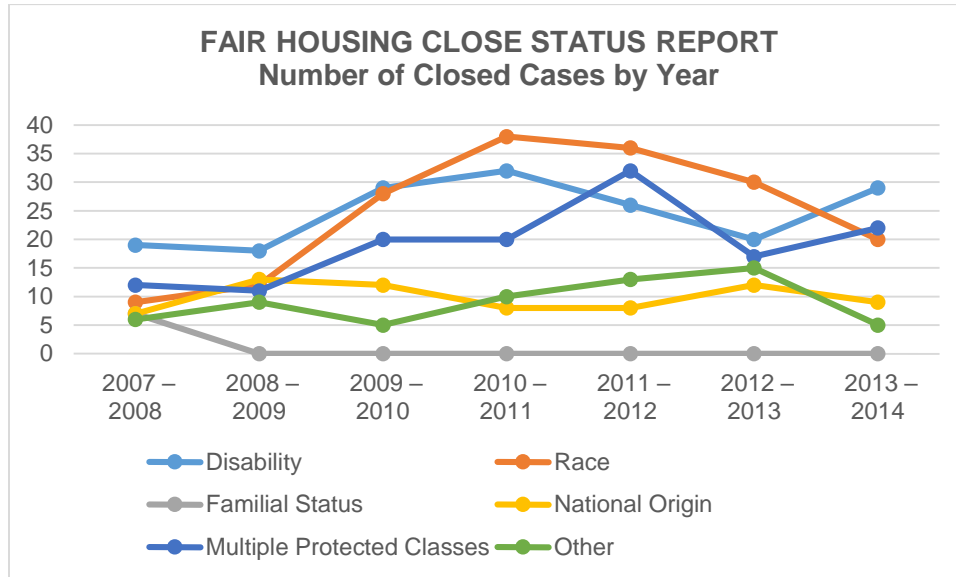
In reviewing the trends for closed cases, it was noted that for all fair housing cases closed, almost double the number of case were closed in FY 2011-12 than in FY 2007-08 and FY 2008-09. After FY 2011-12, all closed cases declined by 28.3% for FY 2012-2013 and less (9.6%) from FY 2012-2013 to FY 2013-2014. Race and disability were consistently the top two bases for closed housing discrimination cases with both alternating for the top basis over the review period. However, both bases have been declining since FY 2010-11 except for an increase in the last year of the review period. For cases based on race there was a 300% increase from FY 2007-08 to FY 2011-2012 and a decline of 44% from FY 2011-12 to FY 2013-14. For cases based on disability, the shifts were not as pronounced at 36.8% increase from FY 2007-08 to FY 2011-2012 along with a decline and then an increase 11.5% to FY 2013-14.

For cases involving more than one bases, cases increased by 167% from FY 2007-08 to FY 2011-2012 to a decline of 46.8% for FY 2012-13 and an increase of 45% from FY 2012-13 to FY2013-14. Of the closed cases that were labeled as other, these included the bases of sex, religion, and color, and showed a gradual increase up until FY 2012-13, after which there was a significant decline of 66.6% in FY 2013-14. It should be noted that cases involving familial status were shown as seven (7) in FY 2007-08 due to the high number that year. In other years, cases involving familial status are reported under “Other” because they were less than seven cases. Also, familial status cased were also included along with another basis in cases with multiple cases. See figure 17 below for a graphical representation of the trends for fair housing closed cases.

Table 62 – Annual Fair Housing Cases Closed by Basis for 2007-2014, Dallas, TX

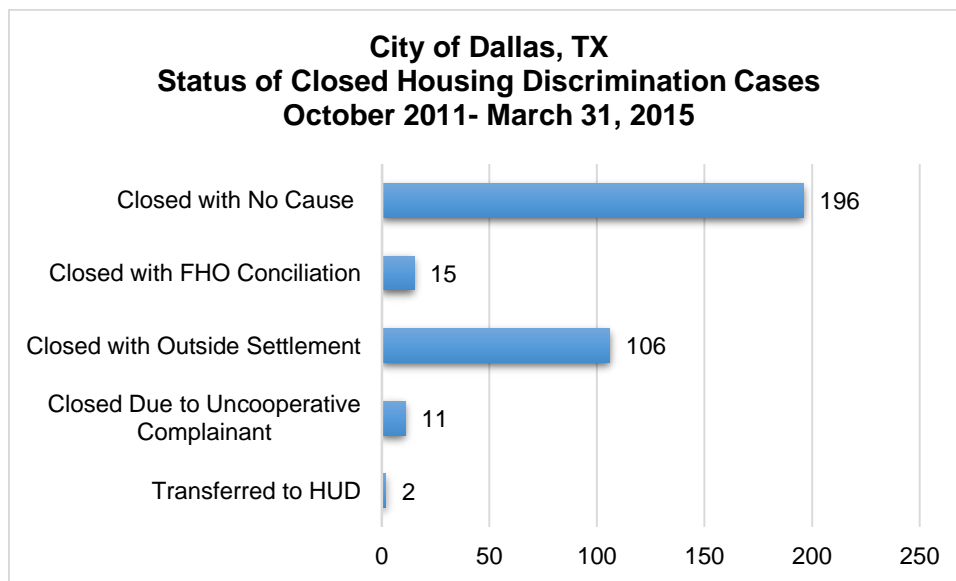
FAIR HOUSING CLOSED STATUS REPORT							
Number of Closed Cases by Year							
Basis	2007 – 2008	2008 – 2009	2009 – 2010	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014
Disability	19	18	29	32	26	20	29
Race	9	12	28	38	36	30	20
Familial Status	7	0	0	0	0	0	0
National Origin	7	13	12	8	8	12	9
Multiple Bases	12	11	20	20	32	17	22
Other	6	9	5	10	13	15	5
Total	60	63	94	108	115	94	85

Figure 17- Annual Fair Housing Complaints by Basis for 2007-2014, Dallas, TX



In reviewing closed cases, it is also important to assess how cases were resolved. Typically, cases are closed with a determination of “no cause,” conciliation through the Dallas FHO, an external settlement, a transfer to HUD or because of an uncooperative complainant. During the period of October 2011 through March 31, 2015, 330 housing discrimination cases were closed by the Dallas Fair Housing Office. Of the 330 cases, 196 (59.4%) were closed with no cause and 106 (32.1%) were closed with outside settlement. Another 15 (4.5%) complaints were settled through conciliation. Of the remaining cases 11 (3.3%) were closed due to an uncooperative complainant and 2 (.6%) were transferred to HUD. See Figure 18 below.

Figure 18 – Disposition of Housing Discrimination Closed Cases 2011-2015, Dallas, TX



Fair Housing Cause Case Report

It should be noted here that housing discrimination complaints are based upon allegations of discriminatory treatment or practice and are investigated to determine if there is a violation of the law that would result in a “cause” finding. As such, the level of fair housing complaints filed cannot by itself be used to determine the level of fair housing issues in the City. As noted in the above disposition analysis, when cases are filed, they are closed for a variety of reasons and some may not reach the stage where cause is determined. In some cases, the complainants may voluntarily withdraw their complaints, seek to resolve complaints in other ways, or fail to respond to the FHO. The following table shows fair housing cases for the period from FY 2000-01 through FY 2014-15 that were determined to have cause and proceeded to further action including litigation. Nineteen (19) cases were identified.

Of the 19 identified cases, the following observations were made:

- Nine (9) respondents were operators of multi-family apartment complexes, four (4) were individual landlords, two (2) were Realtors, two (2) were public housing, and the remainder were a developer, and a homeowner’s association.
- A review of the cases shows that the majority of housing discrimination cases determined to have cause were based on disability (eight cases or 42%), with six cases being disability only and two cases combined with another basis. There were six cases (32%) based on familial status with five cases being the only basis and one case combined with another basis. Six cases (32%) were also based on race with two of the cases combined with another basis.
- The largest numbers of cases were in 2003 (four cases), 2008 (three cases), and 2000 (three cases)

Table 63- Annual Fair Housing Cause Cases FY 2000-2014, Dallas TX

DATE	CASE #	BASIS	RESPONDENT
01/25/2000	97.048	Familial Status	Multifamily Apartment Complex
02/04/2000	99.080	Race	Multifamily Apartment Complex
02/04/2000	99.092	Race	Multifamily Apartment Complex
02/16/2001	00.069	Familial Status	Individual Landlord
01/17/2003	02.026	National Origin and Familial Status	Multifamily Apartment Complex
06/20/2003	02.041	Disability	Multifamily Apartment Complex
06/26/2003	03.007	Race and Color	Multifamily Apartment Complex
06/27/2003	02.047	Race	Multifamily Apartment Complex
03/17/2005	05.008	Race	Multifamily Apartment Complex
06/11/2007	07.027	Disability	Developer
01/24/2008	07.060	Familial Status	Individual Landlord
07/23/2008	07.056	Disability	Home Owner’s Association
12/08/2008	08.027	Disability	Condominiums
05/07/2010	09.060	Disability and Race	Realtor
06/04/2012	11.023	Disability and Religion	Individual Landlord
07/13/2012	11.042	Familial Status	Individual Landlord
05/2014	13.063	Disability	Public Housing*
07/2014	14.031	Disability	Public Housing*
01/14/2015	13.017	Familial Status	Realtor

*Transferred to HUD

Hate Crimes

Any traditional crime, such as murder, arson, or vandalism, can be classified as a hate crime if it is motivated by a bias against a race, religion, disability, ethnic origin, sexual orientation, gender, and gender identity. The gender and gender identity bias types were added in 2013 in response to the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009. Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments to Fair Housing.

Hate crimes are reported to the Federal Bureau of Investigation (FBI) by jurisdictions. The AI reviewed the latest data for 2009 through 2013 for the City of Dallas. The City did not submit data on hate crime incidents in 2012. Incidents are reported by number of incidents per bias motivation. Over the five-year period examined, there were 57 hate crimes reported in the City of Dallas. Sexual orientation was noted in 47% of the reported crimes. The table below provides the hate crime incidents by year.

Table 64 – Number of Hate Crime Incidents per Bias

Number of Incidents per bias motivation								
Year	Race	Religion	Sexual Orientation	Ethnicity	Disability	Gender	Gender Identity	Total
2013	3	2	9	4	0	0	0	18
2012	-	-	-	-	-	-	-	-
2011	3	2	10	1	0	-	-	16
2010	2	3	5	2	0	-	-	12
2009	3	2	3	3	0	-	-	11
Total	11	9	27	10	0	0	0	57

Legal Cases

As part of the fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues in the City of Dallas. The purpose of the case analysis is to understand fair housing issues and challenges and to identify possible impediments or barriers to fair housing choice in the region. Information was gathered from court documents and rulings, newspaper articles, and press announcements. The review provides a summary of the case highlights as it relates to fair housing.

Disparate Impact under the Fair Housing Act

Subpart G 100.500 (a) of the February 15, 2013 fair housing regulations define discriminatory effect as follows: A practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.

HUD explains that the February 15, 2013 Fair Housing Act's Discriminatory Standard Rule formalizes the longstanding interpretation of the Fair Housing Act to include discriminatory effects liability and establishes a uniform standard of liability for facially neutral practices that have a discriminatory effect. It adds that under this rule liability is determined by a "burden-shifting" approach. The charging party or plaintiff in an adjudication first must bear the burden of proving its prima facie case of either disparate impact or perpetuation of segregation, after which the burden shifts to the defendant or respondent to prove that the challenged practice is necessary to achieve one or more of the defendant's or

respondent's substantial, legitimate, nondiscriminatory interests. If the defendant or respondent satisfies its burden, the charging party or plaintiff may still establish liability by demonstrating that this substantial legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Subpart B Section 100.70 (d) adds subsection (5) as other prohibited conduct under discriminatory housing practices – enacting or implementing land-use rules, ordinances, policies, or procedures that restrict or deny housing opportunities or otherwise make unavailable or deny dwelling to persons because of race, color, religion, sex handicap, familiar status, or national origin.

There is a current case in the U.S. Supreme Court, Texas Department of Housing and Community Affairs V. Inclusive Communities Project (discussed below) challenging whether disparate impact claims are cognizable under the FHA.

The TDCHA v. ICP case is the third time this matter is going before the Supreme Court with two earlier cases being Mt. Holly Gardens Citizens in Action, Inc. vs. Township of Mount Holly, 658 F.3d 375 (3d Cir. 2011), cert. granted, 133 S. Ct. 2824, 186 L. Ed. 2d 883 (2013) and Magner v. Gallagher, 619 F.3d 823 (8th Cir. 2010), cert. granted, 132 S. Ct. 1306 (2012). Both the Mount Holly and Magner v. Gallagher cases were settled after the completion of briefing but before the Supreme Court could hear oral argument and answer the question presented.

The TDCHA v. ICP case has been an ongoing case since 2008. ICP filed suit against the TDHCA claiming that the state housing agency intentionally discriminated based on race and that the TDHCA's administration of Low Income Housing Tax Credit (LIHTC) Program had a disparate racial impact thus violating the Fair Housing Act (FHA). Specifically, ICP alleged that TDHCA disproportionately approved LIHTC allocations in predominantly minority neighborhoods and disproportionately denied LIHTC projects in predominantly non-white neighborhoods.

On March 20, 2012, the district court found that TDHCA, while not intentionally discriminating against minorities, had funding processes and guidelines that had a disparate impact by having the effect of providing LIHTC to projects that were primarily located in high minority areas.

The court ordered that TDHCA submit a remedial plan to remedy the FHA violation and to prevent future violations. The Court adopted the remedial plan on August 7, 2012 along with a requirement for annual reporting to ensure that the new application scoring guidelines outlined in the remedial plan would have the effect of not causing any further violations of the FHA and remove any effects from the past discrimination.

TDHCA appealed to the U.S. Fifth Circuit Court of Appeals. During the appeal, HUD issued new regulations that established standards for proving disparate-impact claims under the FHA – "Implementation of the Fair Housing Act's Discriminatory Effects Standards." The Fifth Circuit reversed the district court's decision and remanded the case to evaluate disparate impact under the new regulations. TDHCA requested that the U.S. Supreme Court review the decision. The issues presented are:

- 1) Are disparate-impact claims cognizable under the FHA? and,
- 2) If disparate-impact claims are cognizable under the FHA, what are the standards and burdens of proof that should apply? ¹⁴

¹⁴ Petition of Writ of Certiorari filed by TDCHA (May 13, 2014)

The case was heard by the Supreme Court on January 21, 2015 and a decision is pending.

Other Cases

HUD v. Bank of America Corporation (HUD Inquiry No.: 349560; HUD File No.: 04-13-0016-8)

The National Fair Housing Alliance (NFHA) and several of its member organizations filed a HUD administrative complaint against Bank of America Corporation (BOA) in September 2012.

The complaint alleges that BOA has violated the FHA by maintaining and marketing Real Estate Owned (REO) properties in predominantly minority communities (African-American, Latino, and other non-white communities) in disrepair while maintaining REOs in white communities in better condition. The complaint has since been amended with the latest amendment being filed in September 2014.

The NFHA alleged it has been investigating BOA's handling of REOs since 2009 and over the course of the investigation, the agency has investigated 868 REOs in 41 cities across the nation. The results of the investigation varied by city but overall, the investigation revealed that racial disparities in how BOA maintains and markets REOs.

One of the cities investigated is Dallas. NFHA claims 65 BOA REO properties (31 in predominantly African-American communities, 17 in predominantly Latino communities, and 6 in predominantly non-white communities) were investigated and revealed:

- *Disparities in the number of maintenance and marketing deficiencies or problems:*
 - *REO properties in White communities were 1.6 times as likely as REO properties in communities of color to have fewer than 5 maintenance or marketing deficiencies.*
 - *REO properties in communities of color were 2.4 times as likely as REOs in White communities to have 10 or more maintenance or marketing deficiencies.*
- *Racial disparities include more occurrences of substantial amounts of trash, accumulated mail, overgrown grass or leaves, overgrown or dead shrubbery, broken mailboxes, broken doors and locks, damaged steps or handrails, damaged windows, damaged sliding, missing shutters, water damage, small amounts of mold, utilities that were exposed or tampered with. In addition, 13% of REO properties in communities of color were marketed as distressed, while none of REO properties in White communities had the same problem.*

NFHA states it will continue to amend the complaint as investigations continue in order to include additional cities until a resolution is reached. BOA has denied any wrongdoing.

HUD v. Wells Fargo Bank N.A., et al (HUD Inquiry No.: 338973; HUD File No.: 09-12-0708-8)

NFHA filed a similar complaint as noted above, against Wells Fargo in April 2012. This complaint alleged an investigation of 19 metropolitan areas including Dallas and claimed Wells Fargo to have "harmed existing homeowners in predominantly minority communities, individuals who successfully purchases Wells Fargo's REO properties, prospective purchasers who are interested in purchasing REO properties, NFHA and its Operating Members, and others."

NFHA and Wells Fargo entered into a Conciliation Agreement that became effective in June 2013. According to the Conciliation Agreement, Wells Fargo denied differential treatment but agreed to the settlement to avoid further litigation. Wells Fargo agreed to modify its REO maintenance and marketing

standards, utilize NFHA as a consultant to assist in the monitoring of maintenance and marketing of REO properties, sponsor conferences for industry and non-profit participants to provide education on fair housing issues, REO, short sales, and other areas, and provide \$250,000 to NFHA and its partners to hold seminars on foreclosures and REOs in certain communities.

Wells Fargo also had to provide \$27 million to NFHA and its partners to provide programs and services to promote homeownership, rehabilitation, and development in predominantly minority communities in the 19 metropolitan areas identified in the complaint. The fair housing organization in Dallas that is party to the Agreement is the North Texas Fair Housing Center (NTFHC).

Complaints filed against developers for housing discrimination based on disability

Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multi-family housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act cover a wide range of residential housing including, but not limited to, apartments, condominiums, single room occupancy units, public housing, extended stay and residential hotels, nursing homes, dorms, shelters, and other units funded through federal block grant funds. Redevelopment of an existing property to add four or more units or public and common areas is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not typically subject to the provisions, those that are funded with federal block grant funds may be subject to the provisions.

In addition to provisions in the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed,
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

The following cases are examples of alleged housing discrimination on the basis of disability in the City of Dallas.

NFHA and North Texas Fair Housing Center v. UDR, Inc. (Case No.: 3.2012cv03641)

Filed in September 2012, the case brought against UDR, Inc. a real estate investment trust, by the NFHA and NTFHC, involved three multi-family developments owned by UDR in the Dallas area – the Savoye, the Belmont, and the Riachi. The lawsuit alleged that UDR and its affiliates discriminated against persons with disabilities by designing and constructing multi-family dwellings and common areas without the FHA required accessibility features. The case was settled in June 2013, and UDR

agreed to renovate the three developments and pay \$87,000. UDR also agreed to build all new apartments that meet the accessible design and construction requirements. UDR was also required to provide education on fair housing rights to its tenants and training to its staff.

NFHA and North Texas Fair Housing Center v. BBL Builders L.P.

The NFHA and NTFHC filed a federal complaint against BBL Builders L.P. and the owners of nine Texas apartment complexes for discriminating against persons with disabilities. The lawsuit filed in October 2013, alleged that the apartments designed/constructed by BBL Builders L.P. did not meet the accessibility requirements of the FHA, specifically because “there was insufficient space to navigate bathrooms and kitchens in a wheelchair and narrow and steep routes through the property, among other violations.”

1600 Pacific Building LP v. City of Dallas (Case No.: 06-10-0449-4,-6,-8,-9)

In 2007, 1600 Pacific Building LP (Claimant) received an award of \$16 million (TIF funding) to develop a vacant office building in downtown Dallas into housing. One of the condition for the City’s funds was that 20% of the housing units be affordable. Claimant was unable to start construction and the agreement lapsed. Thereafter, Claimant approached the City with new development ideas for the building and seeking considerable more financial assistance from the City and others. Claimant presented various proposal including the addition of additional stories onto the vacant building and creating small apartments. Claimant proposed that a majority of the housing units be affordable. In June 2009, Claimant presented its proposal to the TIF Board and the City Council Housing Committee. Both declined to support Claimant’s request for funding. Among the many reason for not supporting the project with public monies, the included the following:

1. The project was in bankruptcy and the project’s lender was seeking to foreclose on the property because of nonpayment for at least a year. The project had failed to pay property taxes for two years totaling \$263,000 and was being sued by the county to foreclose its tax lien. The project had failed to pay its insurance premiums and was being sued by a utility provider for \$66,000 for nonpayment. The landlord on a ground lease with a related entity for the adjacent garage, a key component of the project, was suing to terminate the lease in part because of nonpayment. The developers had failed to keep the building in compliance with code requirements and had no plan to address any of these issues.
2. Claimant sought more than \$70 million in TIF support (which are City funds not federal funds), which would have committed 85% of the then available TIF funds from the TIF district where the project was located and which was four to five times more than any other housing project seeking TIF support.
3. To maximize its return, Claimant proposed adding five stories onto the vacant building and then squeezing a large number of tiny apartments into the building, some as small as 375 square feet. No other City-supported renovation project had ever such small units or so many small units or found it necessary to take this approach. Despite request, Claimant did not produce evidence that the addition was structurally feasible.
4. Claimant sought to use public financing (federal, state, and local) in excess of \$112 million, without contributing any of their own capital or equity, to build a structure with a projected completed value of ranging from \$37 million to \$48 million.

5. Before the DC-TIF Board, Claimant asserted they would secure other public financing (i.e. LIHTCs, grants), but had taken no action or spent any money to secure it and the project did not qualify for significant portions of the other proposed public funding even if the developers had attempted to seek it.
6. The developers had never completed any project anywhere.

Approximately eight (8) months after the City declined to provide funding, claimant submitted an administrative complaint to HUD. Claimant alleged that the funding was denied because it included affordable housing. Claimant also made vague and broad allegations against the City's housing policies and the City's support of other projects with affordable housing. The City responded and provided information and documents to HUD. The City was not contacted by HUD for approximately three years.

, On November 22, 2013, HUD issued a Letter of Findings of Non-Compliance with fair housing and civil rights laws based on the allegations of Claimant. The City promptly filed a request for review with supporting evidence that demonstrated the falseness of Claimant's allegations and the incorrectness of factual statement and findings in the Letter of Non-Compliance. The City and HUD began discussions concerning the Letter and Claimant's allegations.

In November 5, 2014, the City entered into a Voluntary Compliance Agreement (VCA) with HUD. HUD agreed that all issues and findings in the Letter of Non-Compliance were superseded by the VCA. HUD acknowledged that some of its findings in the Letter were incorrect. There were no findings or relief for Claimant. The primary terms of the VCA were that the City would

- 1) Continue to develop its Housing Plus Plan.
- 2) Present City Council with an ordinance that prohibits discrimination based on source of income.
- 3) Work with area governments in attempt to develop a 10-year regional housing, and
- 4) Convene a symposium to discuss regional planning activities for fair housing.

Claimant dismissed its remaining claims in its administrative HUD complaint on or before the VCA was signed.

U.S. ex rel. Lockey, et. al v, City of Dallas, et al.

The individuals involved in the 1600 Pacific Building HUD complaint also filed a False Claims Act case in federal district court against the City and DHA. They repeated and relied on the allegations in HUD administrative proceeding to claim that the City had falsely certified that it was affirmatively furthering fair housing and falsely certified it was complying with other required federal civil rights obligations. The federal district court granted the City's and DHA's motions to dismiss. The plaintiffs appealed. The Fifth Circuit affirmed the district court's decision. After mandate issued, the plaintiff attempted to amend their pleadings but the district court denied their request.

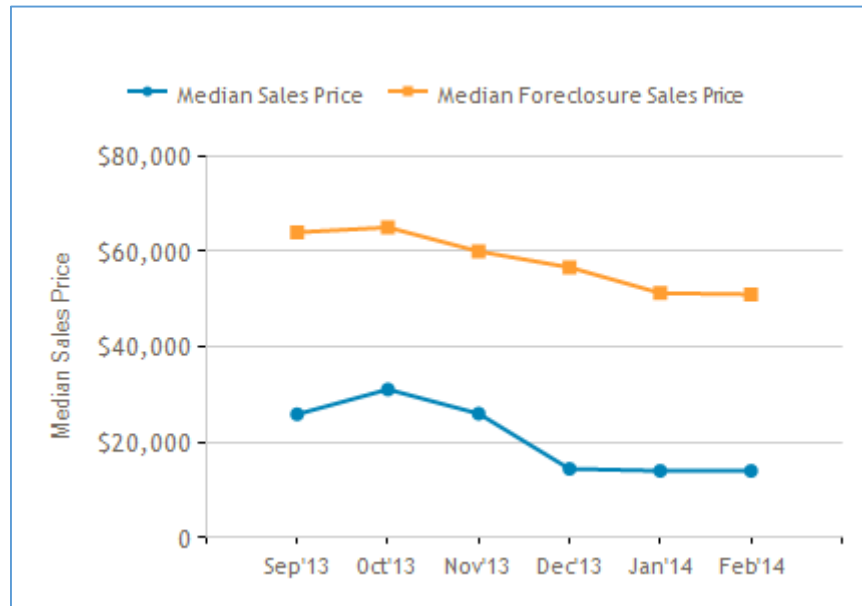
Foreclosure Data

For analysis of foreclosure impacts in Dallas, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-

foreclosure, at auction, and bank-owned (REO) properties. The information from RealtyTrac represents current data or data recorded within a snapshot of time (one calendar month), as of March 2014.

RealtyTrac states that overall home sales for February 2014 were up 14% compared with the previous month, and up 16% compared with a year ago. According to RealtyTrac, the median sales price of a non-distressed home in Dallas in March 2014 was \$140,000. The median sales price of a foreclosure home was \$51,000, or 264% higher than non-distressed home sales price in Dallas. The figure below gives a further illustration of the changes in median sales prices of homes.

Figure 19 - Median Sales Price of Homes and Foreclosure Homes, Dallas, Texas



Source: RealtyTrac, 2014

The following table compares home sales and median sales price for Dallas and other cities in the Dallas metro area.

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Table 65 – Comparative Home Sales for Dallas and Neighboring Cities 2013-2014

City	March 2014 Total Sales (change from prior year)	Median Sales Price (change from prior year)
DALLAS	1,244 Up 1.4%	\$14,000 Down 15.7%
Arlington	369 Up 7.9%	\$121,373 No change
Carrollton	94 Down 26.6%	Not available
Cedar Hill	49 Down 22.2%	Not available
Desoto	61 Up 7.0%	Not available
Fort Worth	1,082 Up 8.9%	\$23,396 Down 16.6%
Garland	197 Down 14.3%	\$38,726 Down 35.9%
Grand Prairie	169 Up 8.3%	\$47,500 No change
Irving	135 Down 13.5%	\$7,389 Down 91.3%
Lancaster	48 Up 6.7%	\$35,798 No change
Lewisville	75 Down 18.5%	Not available
Mesquite	184 Down 8.0%	\$45,000 Up 9.8%
Plano	250 Down 2.0%	Not available
Richardson	106 Down 3.6%	Not available
Rowlett	91 Up 23.0%	Not available

Source: RealtyTrac, 2014

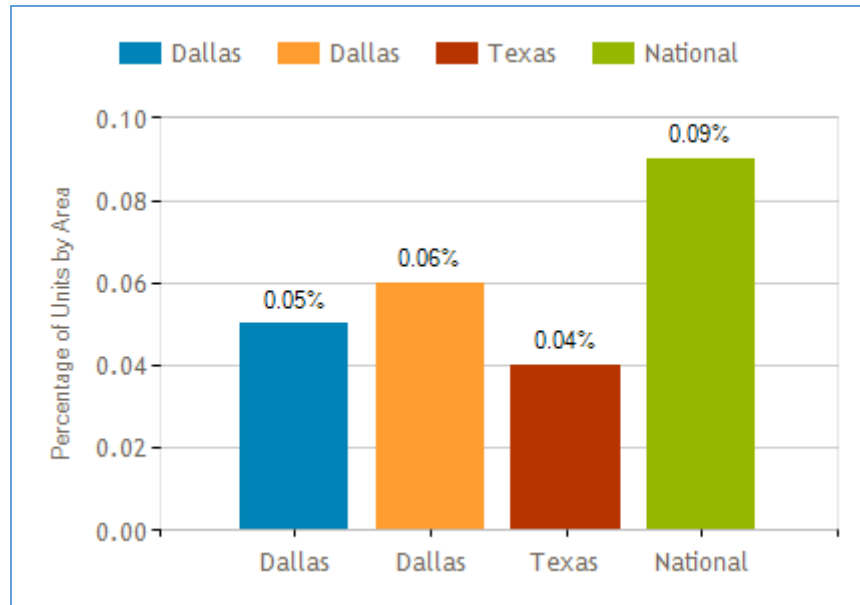
According to RealtyTrac, one out of every 1,988 homes in Dallas was under foreclosure in March 2014. RealtyTrac further analyzes foreclosures according to zip code within the city of Dallas. In March 2014, the zip codes with the highest number of foreclosures were as follows: one in every 52 homes in zip code 75247; one in every 470 homes in 75241; one in every 532 homes in 75249; one in every 720 homes in 75216; and one in every 838 homes in 75217.

In Dallas County, RealtyTrac shows that 1 out of every 1,701 homes was under foreclosure in the March 2014. Cities within Dallas County (not including the City of Dallas) having the highest number of foreclosures in March 2014 are as follows: one in every 583 homes in Cedar Hill; one in every 593

homes in Desoto; one in every 841 homes in Duncanville; one in every 859 homes in Lancaster; and one in every 952 homes in Rowlett.

RealtyTrac provides a geographical comparison of foreclosures within the city, county, state, and on the national level. The City of Dallas rate of foreclosure (0.05%) is lower than that of Dallas County (0.06%) and the national rate (0.09%), but higher than Texas (0.04%).

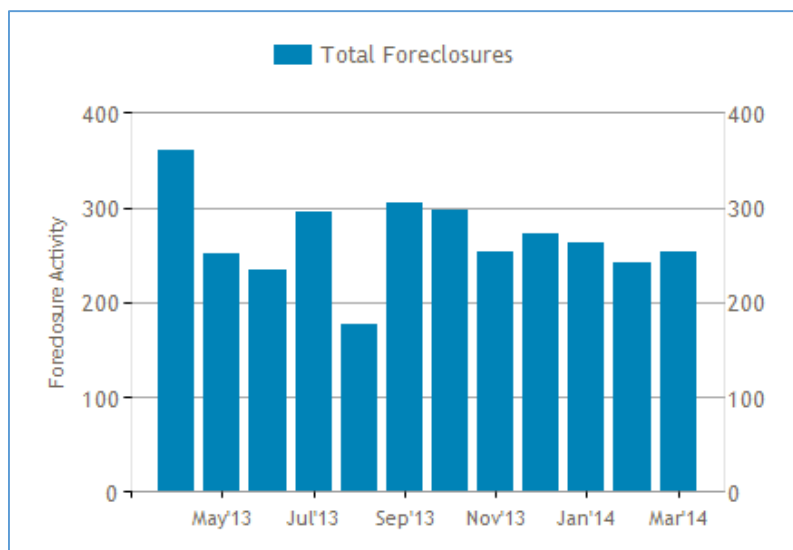
Figure 20- Foreclosure Rate Comparison for Dallas (city), Dallas County, Texas, and National



Source: RealtyTrac, 2014

RealtyTrac shows that the number of foreclosures within Dallas has varied over the last year. The following figure shows foreclosures in 2013 and 2014 within Dallas, with the peak occurring in April 2013 and the lowest point occurring in August 2013.

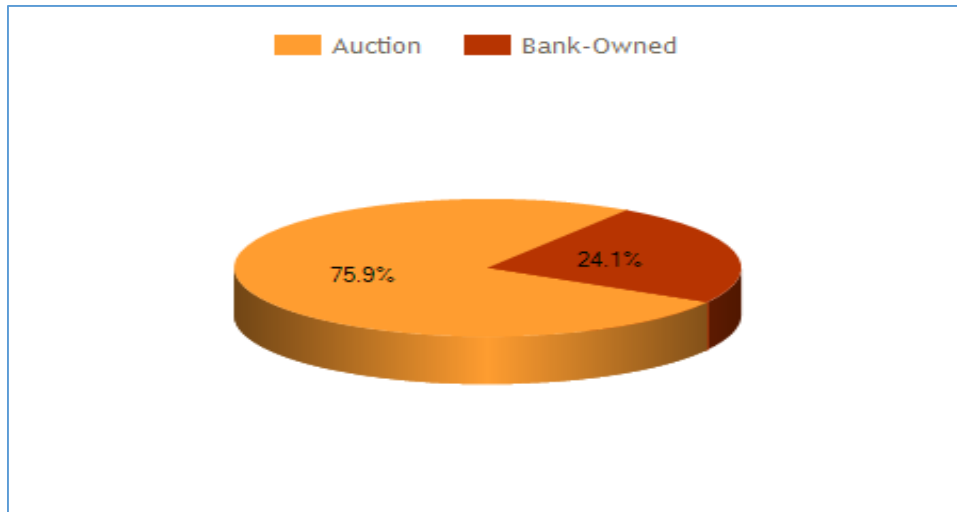
Figure 21 - Total Foreclosure Activity, Dallas, Texas



Source: RealtyTrac, 2014

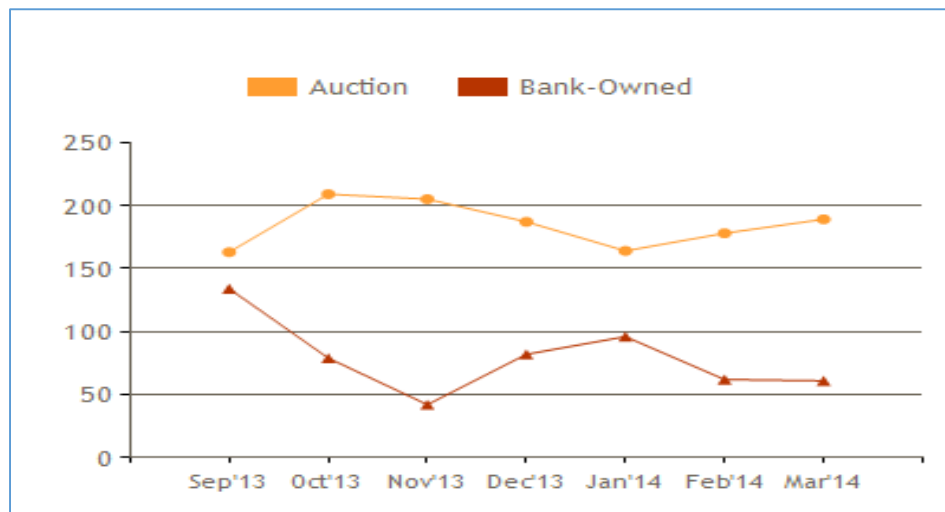
According to RealtyTrac, there are currently 1,622 properties in Dallas, TX that are in some stage of foreclosure (default, auction or bank owned) while the number of homes listed for sale on RealtyTrac is 1,111. In March 2014, the number of properties that received a foreclosure filing in Dallas, TX was 5% higher than the previous month but 1% lower than the same time last year. RealtyTrac shows that all current foreclosure properties are either bank owned or at auction status, and the number of each has changed over time, as shown below.

Figure 22- March 2014 Distribution of Foreclosure Type, Dallas, Texas



Source: RealtyTrac, 2014

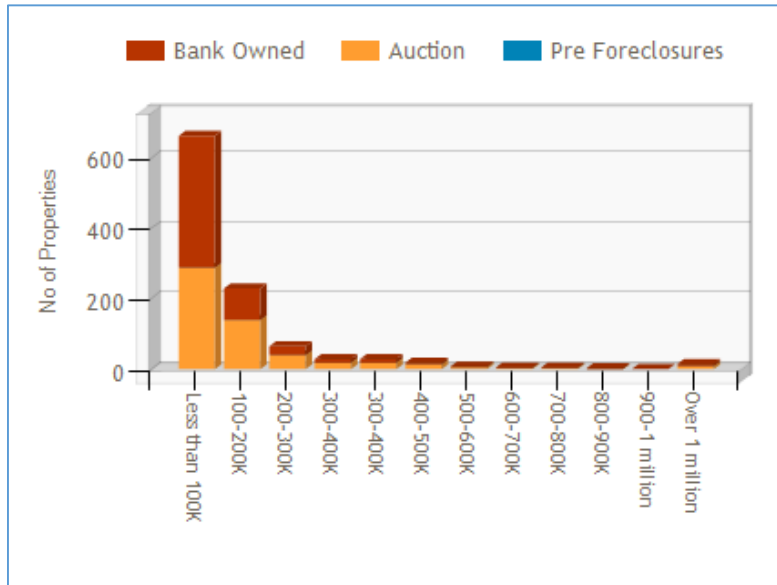
Figure 23- Number of Foreclosures by Type, Dallas, Texas



Source: RealtyTrac, 2014

RealtyTrac reports that of the 1,622 Dallas properties in some stage of foreclosure, the highest availability rate occurs in the less than \$100,000 price range (661 properties). The following is a depiction of properties available per estimated market for the City of Dallas.

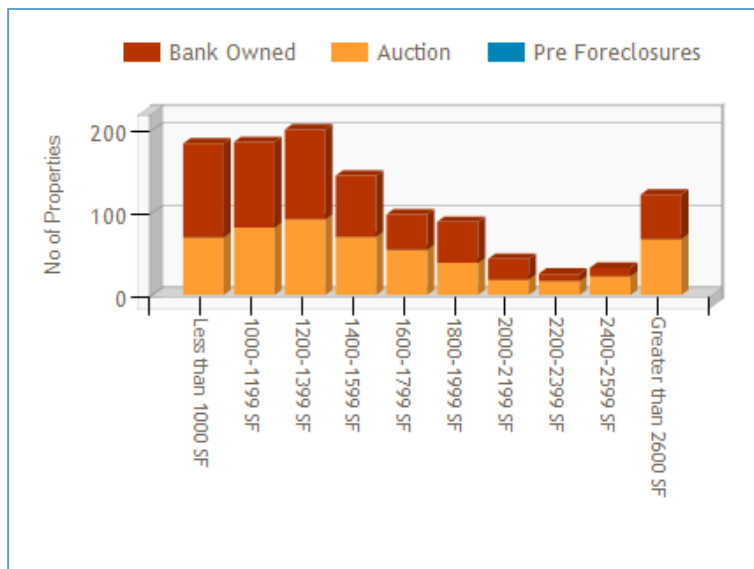
Figure 24- Number of Foreclosure Properties Available Per Market Value, March 2014, Dallas, Texas



Source: RealtyTrac, 2014

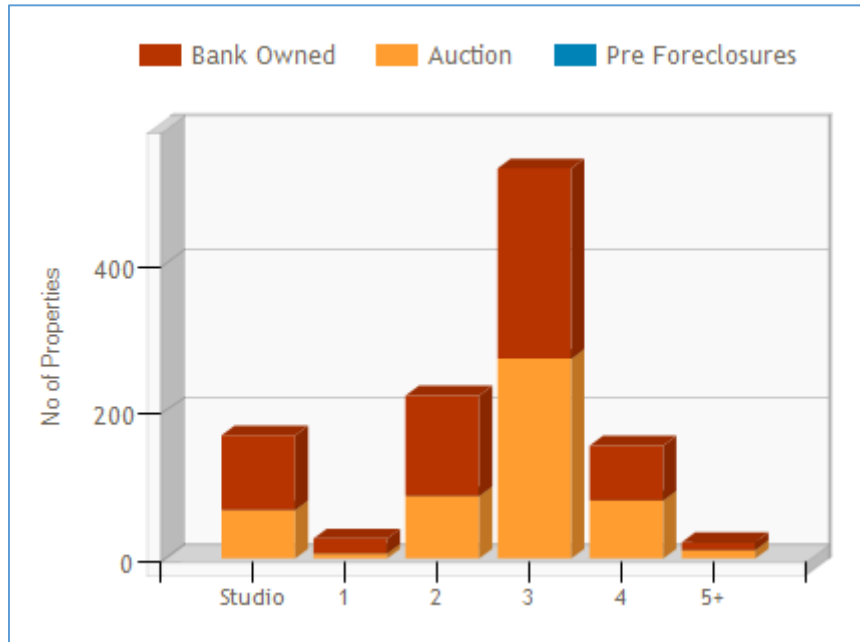
Of the foreclosure properties available in the Dallas market, RealtyTrac reports on the number of properties available per square footage, number of bedrooms, and year built. The following figures show that the highest availability of properties occurs with those that are 1,200 – 1,399 square feet (201 properties), 3 bedrooms (529 properties), and built between 1950 and 1959 (256 properties).

Figure 25- Number of Properties per Square Footage, March 2014, Dallas, Texas



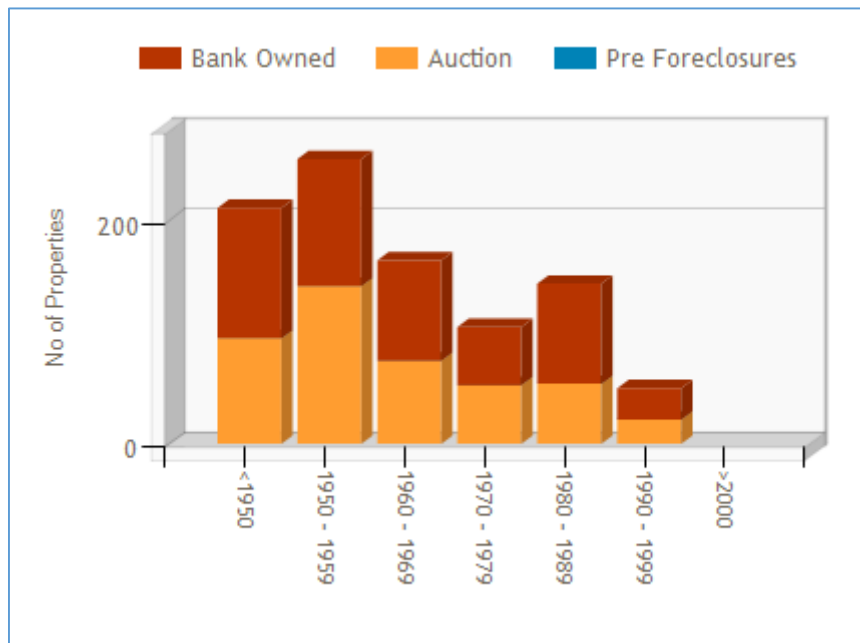
Source: RealtyTrac, 2014

Figure 26- Number of Properties per Bedroom, March 2014, Dallas, Texas



Source: RealtyTrac, 2014

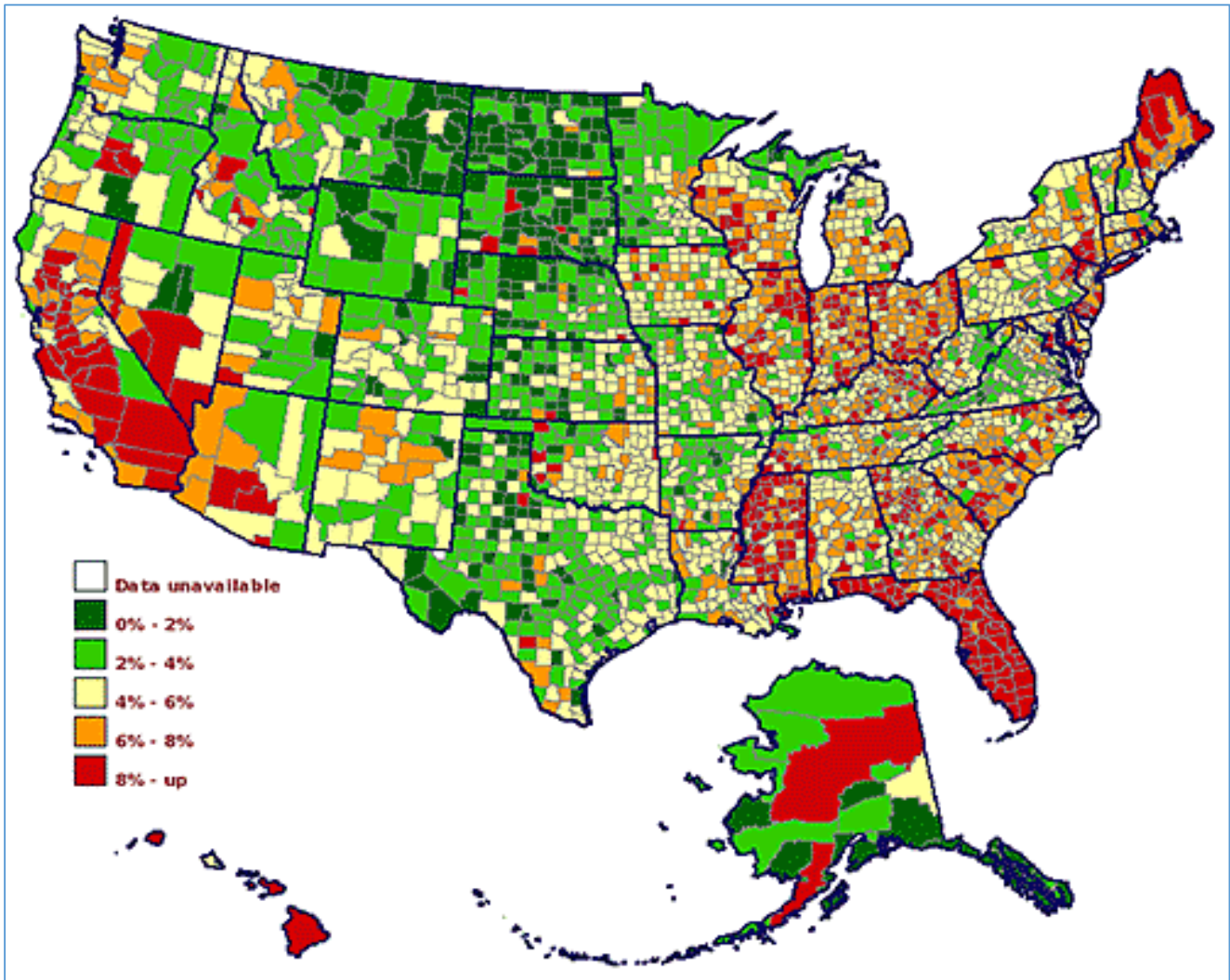
Figure 27- Number of Properties per Year Built, March 2014, Dallas, Texas



Source: RealtyTrac, 2014

According to the Federal Reserve Bank of Dallas, Texas did not experience a drastic home appreciation or expansion of exotic mortgages in the lead-up to the recent recession; therefore, the region did not get into a mortgage crisis as severe as in some other parts of the nation (see map below). However, the region has not been immune to the consequences of the financial system turmoil and the economic slowdown.

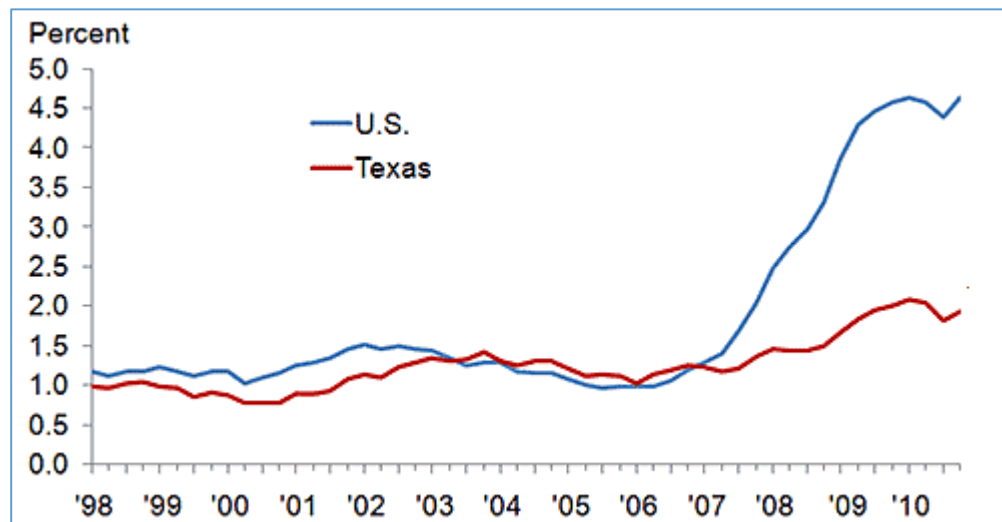
Map 27. Seriously Delinquent Mortgage in the United States – December 2010



Source: Federal Reserve Bank of Dallas, Community Development Office

The Federal Reserve Bank of Dallas states that although Texas' foreclosure rate as a percentage of total mortgages serviced has stayed lower than the national level since 2007, it increased throughout the recession (see figure below). The foreclosure inventory exceeded 2% for Texas and 4.6% for the nation in first quarter 2010 and then dropped afterward, partially attributed to the demand surge with the homebuyer tax credit. The foreclosure inventory bounced back in fourth quarter 2010. The increase may be related to a seasonal drop in sales but suggests that foreclosure activities may not have peaked. The inventory has resumed growing since third quarter 2010.

Figure 28- Foreclosure Inventory, Texas vs. the United States



Source: Federal Reserve Bank of Dallas, Community Development Office

The Federal Reserve Bank of Dallas states that mortgage loan performance varies across Texas. The following table shows the volume of mortgages and delinquency rate for the 30 Texas counties with the largest numbers of prime loans being serviced in the Lender Processing Service database. These counties are similar in that subprime accounts for only a small percentage of total loans serviced, and the foreclosure rate for subprime is much higher than for prime loans. In the four large counties in North Texas—Dallas, Tarrant, Collin and Denton—over 24,400 prime and 6,100 subprime mortgages are seriously delinquent.

Table 66- Mortgage Delinquencies in 30 Texas Counties (December 2010)

County	Prime loans			Subprime loans		
	Number serviced	Total past due (percent)	Seriously delinquent (percent)	Number serviced	Total past due (percent)	Seriously delinquent (percent)
Harris	385,637	8.92	3.85	21,507	41.21	27.34
Dallas	232,185	10.19	4.5	10,345	42.21	28.82
Tarrant	205,748	8.96	3.94	6,577	41.37	28.3
Bexar	174,901	9.26	3.62	6,218	40.4	24.96
Travis	124,482	5.33	2.3	2,495	35.63	22.57
Collin	114,093	5.9	2.65	2,354	41.08	29.14
Denton	100,050	6.53	2.83	2,268	40.92	27.07
Fort Bend	75,193	7.48	3.34	3,428	42.68	28.82
Williamson	70,820	6.55	2.68	1,403	40.27	26.66
El Paso	55,617	9.09	3.15	2,771	37.57	22.09
Montgomery	55,175	6.48	2.66	1,677	38.64	23.91

Prime loans				Subprime loans			
Bell	38,376	7.08	2.95	647	36.01	23.8	
Galveston	37,470	7.21	2.99	1,476	39.97	25.68	
Hidalgo	33,078	11.4	4.25	2,840	40.49	24.33	
Brazoria	32,194	7.94	3.51	1,268	45.58	29.18	
Nueces	27,560	9.07	3.39	1,146	40.23	23.65	
Lubbock	25,559	7.39	2.43	515	33.4	16.89	
Cameron	21,604	11.32	3.81	1,486	38.56	23.22	
Hays	20,798	7.37	2.94	487	41.68	26.28	
Ellis	17,365	11.45	4.95	737	41.93	26.73	
McLennan	17,310	7.4	2.69	491	38.9	20.57	
Comal	16,684	6.16	2.5	350	39.71	22.57	
Johnson	16,523	10.23	4.3	542	38.01	23.62	
Brazos	15,946	4.21	1.2	271	33.95	17.71	
Smith	15,209	7.05	2.68	435	45.75	28.97	
Guadalupe	14,843	6.27	2.31	266	39.47	22.93	
Webb	14,004	15.24	4.96	954	45.81	28.3	
Jefferson	13,336	10.21	3.76	620	40	24.84	
Rockwall	12,867	8.03	3.56	299	41.14	27.09	
Kaufman	12,685	11.79	5.17	474	44.73	30.59	

Source: Federal Reserve Bank of Dallas, Lender Processing Services Applied Analytics

Although the level of seriously delinquent mortgages in Texas is slightly improved from one year ago, according to the Federal Reserve Bank of Dallas, such mortgages are still at very high levels in the metro areas. The Federal Reserve Bank of Dallas states that over 30,000 households are at least 90 days' delinquent on their mortgage in the four-county Dallas–Fort Worth metro area as of December 2010. This is a rate of one out of every 22 mortgages reported. To address this issue, local coalitions and the Texas Foreclosure Prevention Task Force (TFPTF) continue to connect at-risk homeowners with free, nonprofit housing counseling approved by the Department of Housing and Urban Development (HUD). The TFPTF also works to support those counselors with funding, specialized training, marketing and outreach services.

Through its role as fiscal sponsor for the TFPTF, the Texas State Affordable Housing Corporation (TSAHC) administers federal National Foreclosure Mitigation Counseling (NFMC) funding on behalf of the state of Texas. To date, the TSAHC has leveraged just under \$1 million in NFMC dollars, with over \$1 million in funding provided by NeighborWorks America, the state of Texas through the Texas Department of Housing and Community Affairs, Fannie Mae, and numerous financial institutions and foundations. TSAHC has used these funds to reimburse a network of HUD-approved counseling agencies for providing over 4,800 free counseling sessions to consumers and to offset the costs of numerous training and outreach events.

Local coalitions like the Greater Houston Foreclosure Prevention Task Force, Dallas–Fort Worth Home Ownership Preservation Enterprise (DFW HOPE), and the “Don't Borrow Trouble” campaign in El Paso continue to host events to raise awareness of alternatives to foreclosure.

HMDA Data Analysis

Introduction

This section contains an analysis of Home Mortgage Disclosure Act (HMDA) data for the City of Dallas, Texas. HMDA was enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public loan data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities; public officials are distributing public-sector investments so as to attract private investment to areas where it is needed; and possible discriminatory lending patterns can be identified.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk. Data can be retrieved or ordered at their website <http://www.ffiec.gov/hmda/hmdaproducts.htm>. The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose.

HMDA data consist of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contain information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for one to four family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), refinancing, and home improvement loans.

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract that comprises the City of Dallas. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the citywide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race. For purposes of this analysis, a “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Dallas as a whole (43.8% based on 2013 ACS 5-Year estimates). Therefore, tracts with a 48.8% or greater minority population would be considered a “minority” tract.

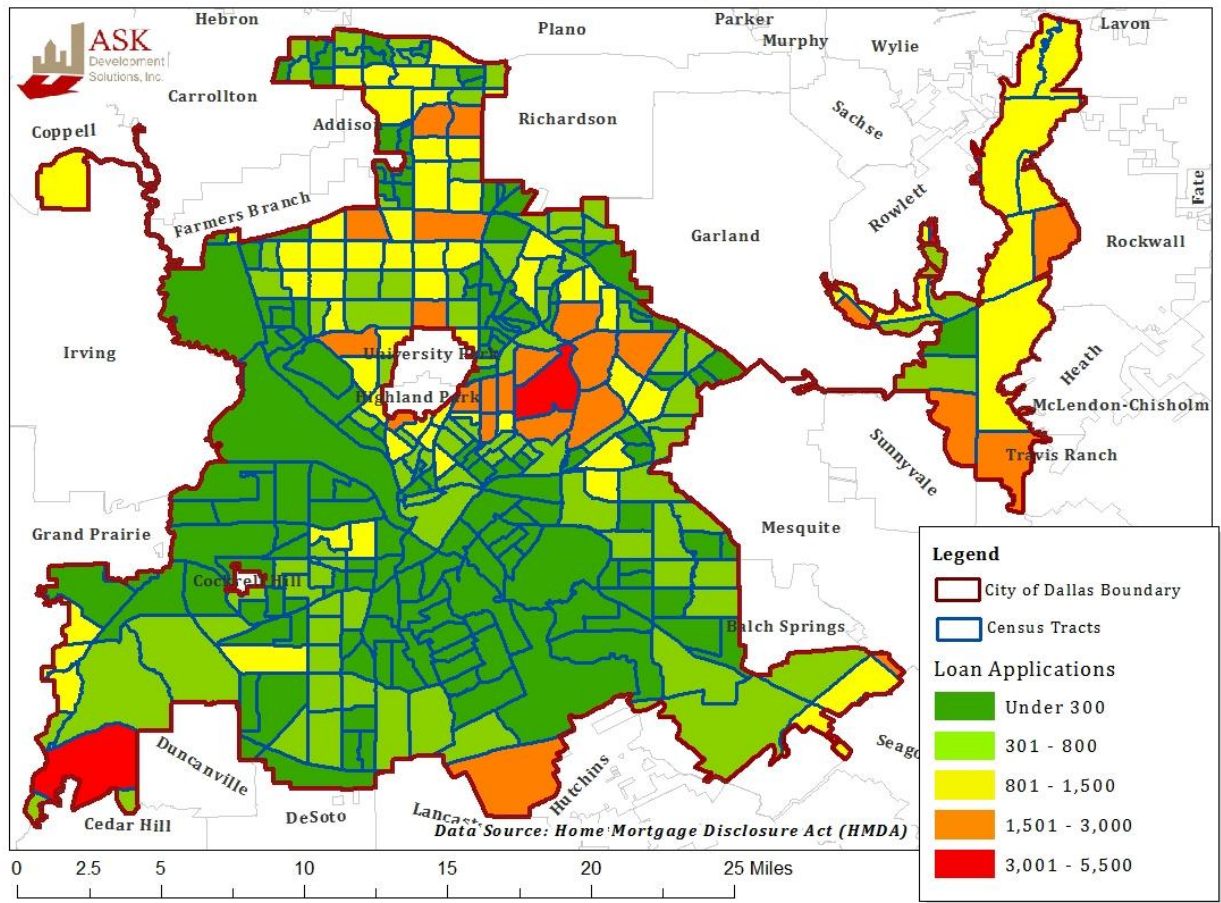
In order to accurately portray HMDA data for the City, only those tracts that were either entirely within the City or whose area fell predominantly within City boundaries were utilized. Certain tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be

noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data is available for the three-year period, the most recent years, 2010-2013, were utilized in this analysis (extracted from HMDA Flat Files, 2010-2013).

Among the tracts analyzed, there were 192,290 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 29,416 (15.3%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Map 28. Total Number of Loan Applications 2010-2013, Dallas, TX

City of Dallas: Total Number of Loan Applications (2010-2013)

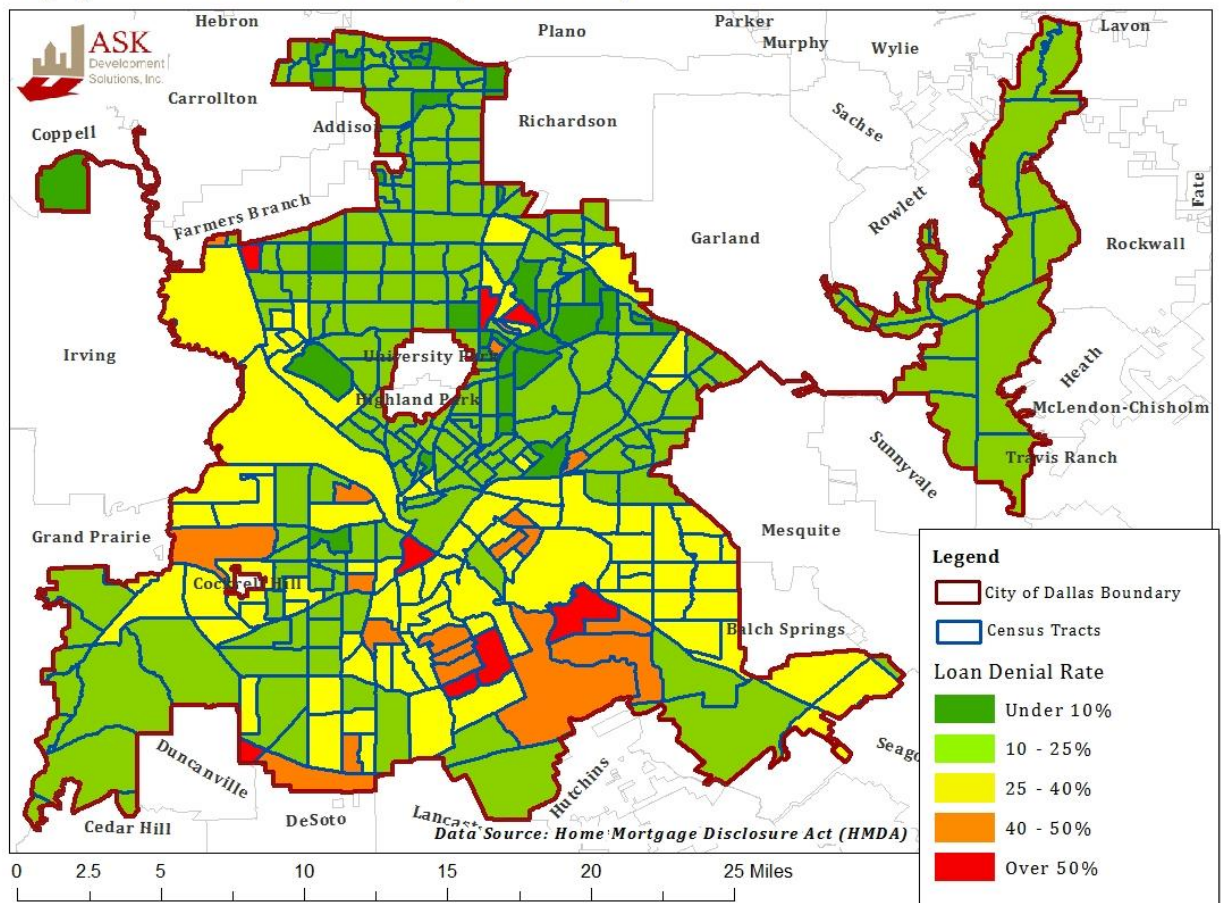


Overall Loan Application Comparison Data Analysis by Census Tract

The HMDA analysis focuses on 333 census tracts that are entirely within the corporate limits of Dallas, Texas. In 2010-2013, 192,290 total applications were submitted with 45,353 (23.6%) of them coming from minority applicants. Of the minority applications, 11,162 (24.6%) of those applications were denied. This is 9.3% higher than the 15.3% overall denial rate for all applications. In addition, of the 333 tracts, 286 (85.9%) of them had a higher minority applicant denial rate than that of their respective tract. Appendix #6 shows a breakdown of the total denial rate of all 333 tracts as well as the minority denial rate by census tract.

Map 29. Ratio of all Types of Loan Denials to Applications: 2010-2013 – Dallas, TX

City of Dallas: Loan Denial Rate (2010-2013)



Source: Home Mortgage Disclosure Act (2010-2013)

Loan Application Comparison Data Analysis by Minority Census Tract

The minority tracts were examined more closely and Appendix #6 shows the loan application denial rates for all the minority census tracts in the City of Dallas.

Of the 286 tracts with higher minority denial rates, 193 (67.5%) of them are “minority” tracts. As mentioned previously tracts with a 48.8% or greater minority population are considered a “minority” tract. Among the 333 identified Dallas tracts, 208 met the criteria and were designated as minority tracts in the analysis. Therefore, the data shows that 92.8%, or 193 out of the 208 total minority tracts had higher minority applicant denial rates than that of the overall denial rates. Not factoring in any other variables this would appear to indicate some discrimination in lending based on property location in areas of minority concentration. More analysis will need to be done in order to determine a definitive connection between these higher denial rates and areas with higher minority populations.

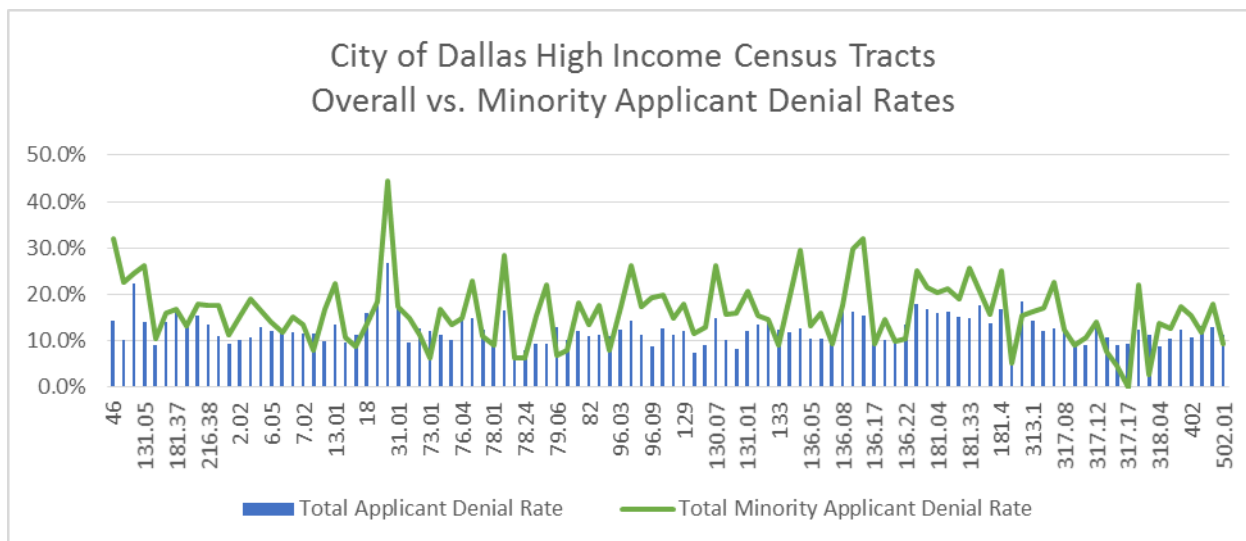
Analysis of Tracts by Income Characteristics

High Income Tracts

Appendix #6 breaks down the median income category for 329 Dallas tracts (data was not available for four census tracts). The table notes that 106 census tracts within the City of Dallas exhibit median incomes that are higher than that of the MSA (those with a median income of >100%). Of these 106 higher income tracts only 10 (9.4%) were minority tracts. Conversely, of the census tracts that met HUD's definition of low-income (less than 80% AMI) Dallas had a total of 186 tracts of which 177 (95.2%) tracts were minority tracts.

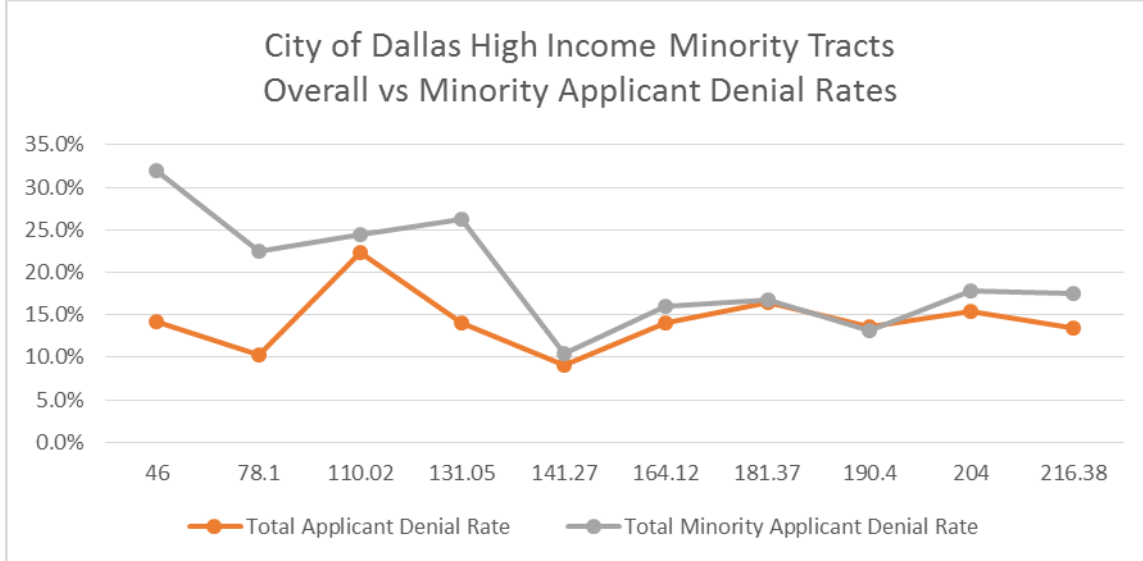
In addition, to breaking down the median income category data. The HMDA data also looked at any connection between denial rates and median income. The data noted a trend (pictured below). For example, of the 106 census tract with income levels higher than the MSA (those with a median income of >100%), 78 (73.6%) of the tracts have a higher minority applicant denial rate than that of the overall denial rate.

Figure 29. High Income Census Tracts Overall vs Minority Applicant Denial Rates – Dallas, TX



The data also notes that this higher minority denial trend is still reflected when you look exclusively at high income level minority tracts only. For example, of the 10 "minority" census tract with income levels higher than the MSA, nine (9) out of the 10 tracts have a higher minority applicant denial rate than that of the overall denial rate. This would seem to indicate that higher income applicants may still face hurdles in qualifying for loans and that these hurdles have the capacity to disproportionately affect even high income minority households.

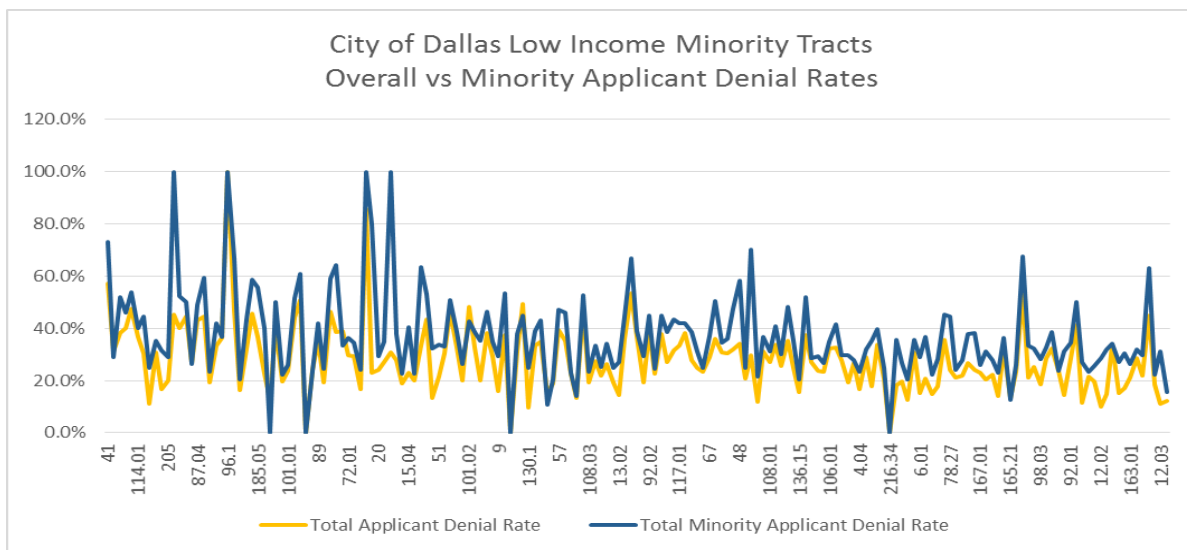
Figure 30. High Income Minority Tracts Overall vs Minority Applicant Denial Rates – Dallas, TX



Low Income Tracts

When examining lower income households the same higher denial trend found in the high income tracts emerges. For example, of the 186 tracts with median incomes that fell below 80% of their MSA, 178 (95.7%) of the tracts had a higher minority applicant denial rate than that of the overall denial rate for their tract. As mentioned previously 177 (95.2%) of the low income tracts in Dallas fell into the minority tract category.

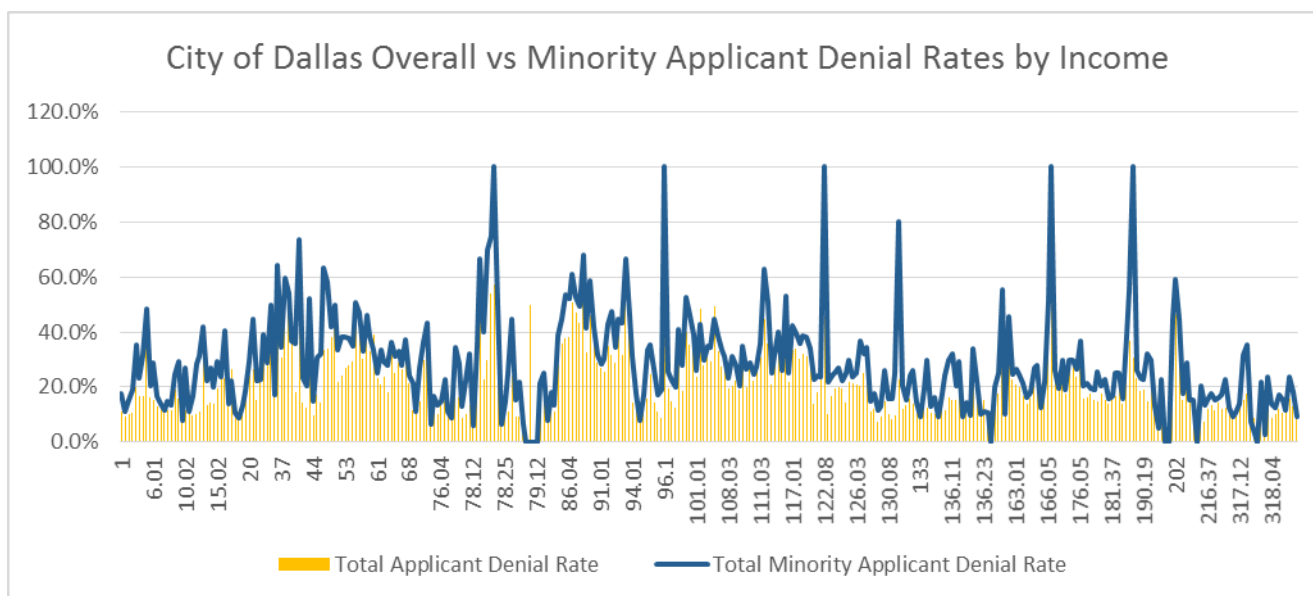
Figure 31. Low Income Minority Tracts Overall vs Minority Applicant Denial Rates – Dallas, TX



All Tracts by Income

Finally, Figure 31 below shows a comparison of all 333 Dallas tracts and the trend of higher denial rate can be seen across the board when using median income as the main comparison. The data shows that as an overall standard it appears minority application denial rates are higher with the biggest differences in denial rate occurring in tracts with lower median incomes.

Figure 32. Overall vs Minority Applicant Denial Rates by Income – Dallas, TX



These income characteristics do not necessarily suggest discriminatory practices based on low income level but could mean that lower income households may be facing other challenges such as creditworthiness, low paying jobs, and higher debt and are unable to qualify for a loan. The concern about these challenges increase with the fact that Dallas’ low income tracts have a high minority population.

Denial Rates and Minority Loan Applications

As mentioned before the majority of tracts with higher minority application denial rates than overall rates were minority tracts. Furthermore, the majority of the minority tracts also make up those tracts with the highest minority application denial rate/overall rate disparities. For example, Tract 185.06 has an overall application denial rate of 30.8%, while the minority application rate is 100%. This tract and the other tracts with the greatest difference between minority application denial rate and overall denial rate (Tracts 130.11, and 122.08) are skewed due to a small number of total applications. However, Tract 78.2 which has 37 overall applications and 10 minority applications has an overall application denial rate of 29.7% and a minority application denial rate of 70%. Similarly, Tract 47, also a minority tract, has a minority application denial rate of 63.3% while the overall denial rate is the 33.3%, exhibiting the same trend.

Typically, there is a correlation between high denial rates and low median income and Dallas conforms to this pattern. Of the 188 tracts with highest overall denial rates (a denial rate of over 16%) 158 (84%) are low- and moderate income tracts. The breakdown of the tracts is as follows: 7 (3.7%) of them had a median income of Very Low, 71 (37.8%) had a median income of Low, 80 (42.6%) had a median income of Moderate, 21 (11.2%) had a median income of Middle, and the remaining 9 (4.8%) tracts were High income tracts. Appendix #6 shows the census tracts with highest overall denial rates.

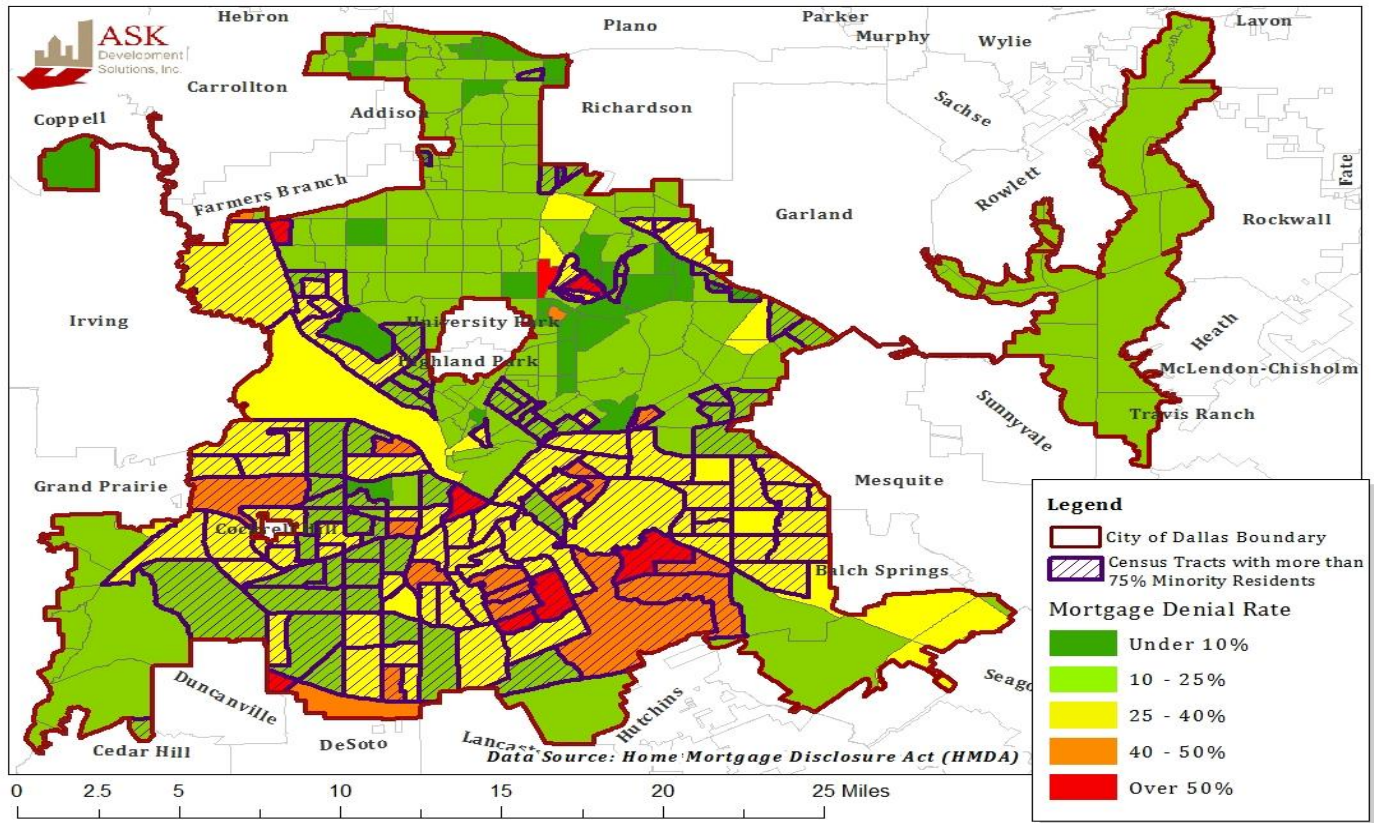
This is also true when you look exclusively at the minority application rates. Of the 165 tracts with the highest minority application denial rates (a denial rate of over 25%), 145 (87.9%) are low- and moderate income tracts. The breakdown of the tracts is as follows 7 (4.2%) were tracts with a median income of Very Low, 61 (37.0%) were Low income tracts, 77 (46.7%) were Moderate income tracts, 15 (9.1%)

were Middle income tracts, and 5 (3.0%) were High income tracts. Appendix #6 shows the census tracts with highest minority applicant denial rates.

Overall, the data indicates that the elevated denial rate among tracts appears to be based on the income and racial/ethnic characteristics of the tract. The HMDA data also suggests that there may be discriminatory lending based on race/ethnicity of property location within the City of Dallas as well as income characteristics. A definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level specific to the City of Dallas. Map 18 gives a visual presentation of the data analyzed in this section.

Map 30. Loan Denial Rates by Percent Minority Residents: 2010-2013 – Dallas, TX

City of Dallas: Mortgage Denial Rate by Areas of High Minority Concentration (2010-2013)



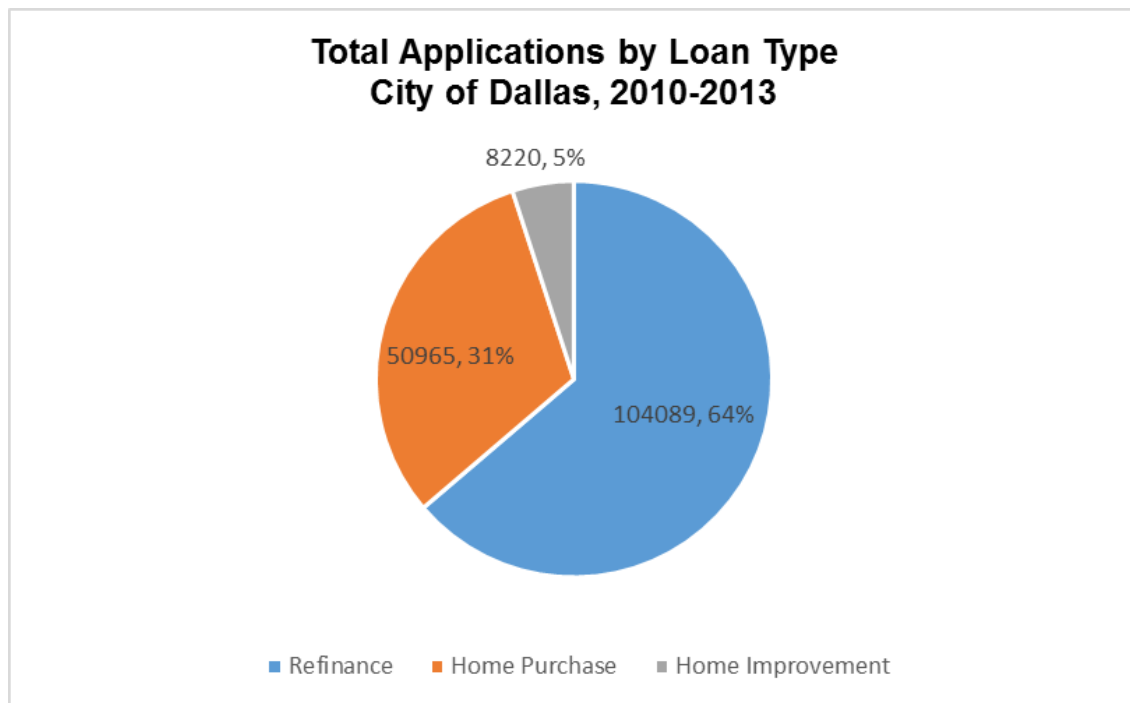
Source: Home Mortgage Disclosure Act (2010-2013)

Loan Application Denials Breakdowns by Loan Type

Appendix #6 shows total conventional loan denials by loan purpose. There are three classifications for loan type: conventional, FHA, and VA loans. Conventional loans are loans that are not guaranteed or insured by the federal government under the Veterans Administration (VA), the Federal Housing Administration (FHA), or the Rural Housing Service (RHS) of the U.S. Department of Agriculture. FHA and VA loans are backed by the government, meaning that the FHA or the Department of Veteran’s Affairs promises to pay lenders if a borrower defaults on the loan. Borrowers must meet certain requirements to be eligible for each loan type.

The majority of loan applications in the City of Dallas were for refinancing - 104,089 (63.8%), followed by home purchase loans - 50,965 (31.2%) and home improvement loans - 8,220 (5.0%). The loan denial rate for refinancing loans was 17.4% and the denial rate for home purchase loans was 9.4%. Home improvement loans had a denial rate of 51.0% but this is skewed by the relatively small number of home improvement loan applications. The figure below gives an overview of the loan types sought in Dallas between 2010 and 2013.

Figure 33 – Total Applications by Loan Type 2010-2013, Dallas, TX



Loan Originations and Comparison Analysis

This section examines originations (the number of applications that result in loans being made) and denial rates broken down by race/ethnicity. The first table breaks these characteristics down by the three conventional loan types. Of the 153,242 loan applications submitted between 2010 and 2013, 118,086 or 77.0% were conventional loans. The majority of loan applications in the City of Dallas were for refinancing (54.4%), followed by home purchase loans (41.2%) and home improvement loans (4.2%). The loan denial rate for refinancing loans was 17.1% and the denial rate for home purchase loans was 8.6%. Home improvement loans had a denial rate of 50.0% but this is skewed by the small number of home improvement loan applications.

Table 67- Loan Denials by Loan Source and Race/Ethnicity (2010-2013), Dallas

Home Mortgage Disclosure Act (HMDA) Analysis					
Comparison of Originations Within Categories					
Dallas, TX 2010-2013					
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Loan Source					
Conventional	118,086	58,437	49.5%	18,919	16.0%
FHA	29,859	10,846	36.3%	3,508	11.7%
VA	4,737	2,251	47.5%	517	10.9%
FSA	560	225	40.2%	43	7.7%
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Race & Ethnicity*					
White (Not Hispanic)	84,166	47,067	55.9%	10,656	12.7%
White (Identified as Hispanic)	15,898	7,027	44.2%	3,786	23.8%
White (Including Non-Hispanic and Hispanic)	100,064	54,094	54.1%	14,442	14.4%
Hispanic or Latino (Including All Races)	17,855	7,761	43.5%	4,507	25.2%
Black or African-American (Alone)	9,883	4,032	40.8%	2,710	27.4%
American Indian or Alaska Native (Alone)	494	238	48.2%	104	21.1%
Asian	6,145	3,345	0.1%	905	14.7%
Native Hawaiian and Pacific Islander (Alone)	235	124	52.8%	33	14.0%
Not Provided/Not Applicable	15,291	6,456	42.2%	3,376	22.1%
	Number of Applications	Number of Originations	Percent of Originations	Number of Denials	Denial Rate
Loan Purpose					
Home Purchase	63,383	30,247	47.7%	5,476	8.6%
Home Improvement	6,486	2,240	34.5%	3,246	50.0%

Home Mortgage Disclosure Act (HMDA) Analysis					
Comparison of Originations Within Categories					
Dallas, TX 2010-2013					
Refinance	83,373	39,272	47.1%	14,265	17.1%
	153,242	71,759		22,987	

*Please note due to the intersection of race and ethnicity, some applications are double counted depending on how the respondent answered their race versus their ethnicity.

Table 67 also compares the denial and originations rates of whites and minorities. The data shows that the majority of loan applications across all loan types in Dallas were made by White households with 84,166 applications. For all conventional loan types, applicants identifying as White and Not Hispanic made up 56.1% of the number of applications. The denial rate of these applications was 12.7%. Comparatively, non-white applications were 33.7% of the application size and had a denial rate of 23.8%.

When broken down by conventional loan type it is noted in Table 68 below, that for home purchase loans, non-white applications made up only 36.1% of the total applications and had a 13.6% denial rate while Whites made up 53.8% of the total applications but only had a 7.3% denial rate. For home improvement loans, minority applications made up only 44.5% of the total applications and had a 70.3% denial rate while Whites made up 43.8% of the total applications and had a 31.4% denial rate. Home improvement loan data is again skewed by the small number of applications. Finally, for refinance loans, minority applications made up only 30.9% of the total applications and had a 27.0% denial rate while Whites made up 56.6% of the total applications but only had a 15.4% denial rate.

Table 68- Loan Denial Rates by Loan Type and Race/Ethnicity 2010-2013

Analysis of Home Mortgage Disclosure Act Data						
HMDA Activity for Dallas, TX						
2010-2013						
Home Purchase Loans						
Race/Ethnicity	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Not Hispanic)	34,118	53.8%	2,492	7.3%	19,352	56.7%
White (Identified as Hispanic)	7,439	11.7%	972	13.1%	3,589	48.2%
White (Including Non-Hispanic and Hispanic)	41,557	65.6%	3,464	8.3%	22,941	55.2%
Hispanic or Latino (Including All Races)	8010	12.6%	1,142	14.3%	3,796	47.4%
Black or African-American (Alone)	3,616	5.7%	566	15.7%	1,548	42.8%
American Indian or Alaska Native (Alone)	201	0.3%	22	10.9%	97	48.3%
Asian	2,778	4.4%	310	11.2%	1,560	56.2%
Native Hawaiian and Pacific Islander (Alone)	97	0.2%	7	7.2%	50	51.5%
Not Provided/Not Applicable	5,069	8.0%	734	14.5%	2,340	46.2%

Analysis of Home Mortgage Disclosure Act Data						
HMDA Activity for Dallas, TX						
2010-2013						
Home Improvement Loans						
	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Not Hispanic)	2,844	43.8%	892	31.4%	1,443	50.7%
White (Identified as Hispanic)	949	14.6%	658	69.3%	212	22.3%
White (Including Non-Hispanic and Hispanic)	3793	58.5%	1550	40.9%	1655	43.6%
Hispanic or Latino (Including All Races)	1225	18.9%	865	70.6%	264	21.6%
Black or African-American (Alone)	833	12.8%	611	73.3%	171	20.5%
American Indian or Alaska Native (Alone)	35	0.5%	30	85.7%	5	14.3%
Asian	90	1.4%	41	45.6%	30	33.3%
Native Hawaiian and Pacific Islander (Alone)	7	0.1%	2	28.6%	3	42.9%
Not Provided/Not Applicable	1076	16.6%	690	64.1%	186	17.3%
Refinance Loans						
	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Not Hispanic)	47,204	56.6%	7,272	15.4%	26,272	55.7%
White (Identified as Hispanic)	7,510	9.0%	2,156	28.7%	3,226	43.0%
White (Including Non-Hispanic and Hispanic)	54,714	65.6%	9,428	17.2%	29,498	53.9%
Hispanic or Latino (Including All Races)	8,620	10.3%	2500	29.0%	3701	42.9%
Black or African-American (Alone)	5,434	6.5%	1,533	28.2%	2,313	42.6%
American Indian or Alaska Native (Alone)	258	0.3%	52	20.2%	136	52.7%
Asian	3,277	3.9%	554	16.9%	1,845	56.3%
Native Hawaiian and Pacific Islander (Alone)	131	0.2%	24	18.3%	69	52.7%
Not Provided/Not Applicable	9,146	11.0%	1952	21.3%	3,840	42.0%
All Loans Purpose						
All Loans Purpose	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Not Hispanic)	84,166	54.9%	10,656	12.7%	47,067	55.9%

Analysis of Home Mortgage Disclosure Act Data						
HMDA Activity for Dallas, TX						
2010-2013						
All Loans Purpose	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Identified as Hispanic)	15,898	10.4%	3,786	23.8%	7,027	44.2%
White (Including Non-Hispanic and Hispanic)	100,064	65.3%	14,442	14.4%	54,094	54.1%
Hispanic or Latino (Including All Races)	17,855	11.7%	4,507	25.2%	7,761	43.5%
Black or African-American (Alone)	9,883	6.4%	2,710	27.4%	4,032	40.8%
American Indian or Alaska Native (Alone)	494	0.3%	104	21.1%	238	48.2%
Asian	6,145	4.0%	905	14.7%	3,435	55.9%
Native Hawaiian and Pacific Islander (Alone)	235	0.2%	33	14.0%	122	51.9%
Not Provided/Not Applicable	15,291	10.0%	3,376	22.1%	6,366	41.6%

* Please note due to the intersection of race and ethnicity, some applications are double counted depending on how the respondent answered their race versus their ethnicity.

As noted with all total loans, White applicants represented the largest number of loan applicants, 54.9%, with 84,166 applications. Origination rate for Whites was 55.9%. Hispanics (who did not identify as white) were the next largest applicant group with 17,855 applications submitted and an origination rate of 43.5%. African-American applications came in third with 9,883 applications and an origination rate of 40.8%.

This review of the HMDA data suggests that there may be discriminatory lending based on race/ethnicity. In addition, any possible discriminatory practices appear to affect African Americans and persons of Hispanic ethnicity most of all. As mentioned in the overall loan section to make a definitive conclusion would require a greater degree of analysis taking into consideration other variables and characteristics that may be affecting the results.

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V. PUBLIC OUTREACH

Public Participation in the AI

As part of the Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i) and in accordance with its Citizen Participation Plan, the City of Dallas conducted a very inclusive community participation process that incorporated input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. The process served not only to meet the compliance requirements but provided the City with the public's perceptions and experiences related to housing discrimination and fair housing choice. In addition, public notices providing for reasonable accommodation and alternative formats for information were offered to persons with Limited English Proficiency and persons with disabilities, including the hearing-impaired. In line with its education and outreach goals from the 2007 AI, the City's FHO sought to expand its outreach to underrepresented populations groups. A draft copy of the AI was also made available on the City's website and at the Fair Housing Office for public comments from May 7 through June 15, 2015. Written comments were submitted by Habitat for Humanity, ICP, and Texas Appleseed. City staff reviewed the comments and conducted follow up with the agencies. In response to public comment, the census data tables, maps, and analysis were updated using the most current ACS and CHAS data. Other public comments on the AI will be used to assist the City in fair housing planning and are included in the City's fair housing file.

Print and Broadcast Media

The City's Communications Department promoted the AI and the surveys on the City's government cable television station. The AI information on the survey was published in the following newspapers of general circulation: the Greensheet on 9/18/2013, the Dallas Examiner on 9/19/2013, and El Heraldo, a Spanish Language paper on 9/20/2013. See attached copies of newspaper ads in Appendix #7.

The following section will outline the community participation elements and results.

Fair Housing Surveys

The City used four types of fair housing surveys which were administered through Survey Monkey, an internet platform for conducting surveys. The fair housing surveys were targeted to residents, housing service providers/advocates, Realtors, and lending institutions. A Spanish version of the resident survey was also created. Website links to the four fair housing surveys were posted on the City's main website and the Fair Housing Office's website and distributed via emails, social media, and flyers. To cater to persons without internet access or computer familiarity, paper surveys were distributed to social service agencies, community centers, City Hall, and at meetings and presentations. In addition, the surveys were at public outreach events and distributed to citizens coming to City Hall to get birth certificates and pay water bills. The paper surveys were then entered in Survey Monkey. The resident survey consisted of 29 questions which included both open ended and multiple choice questions. The surveys were open from September 4, 2013 and closed in March 2015. The surveys were used to gather information about the respondents' experiences and perceptions of housing discrimination and their opinions on the fair housing laws, practices, and services in the City.

Resident Surveys

The resident survey was completed by a total of 330 Dallas area residents. Thirty-three (33) of the 330 surveys were submitted in the Spanish language version and translated for inclusion in survey results.

It should be noted that some survey respondents choose to skip or not answer some questions within the survey. Therefore, the results described below are based on the number of responses actually given to each survey question and will not always include 330 responses.

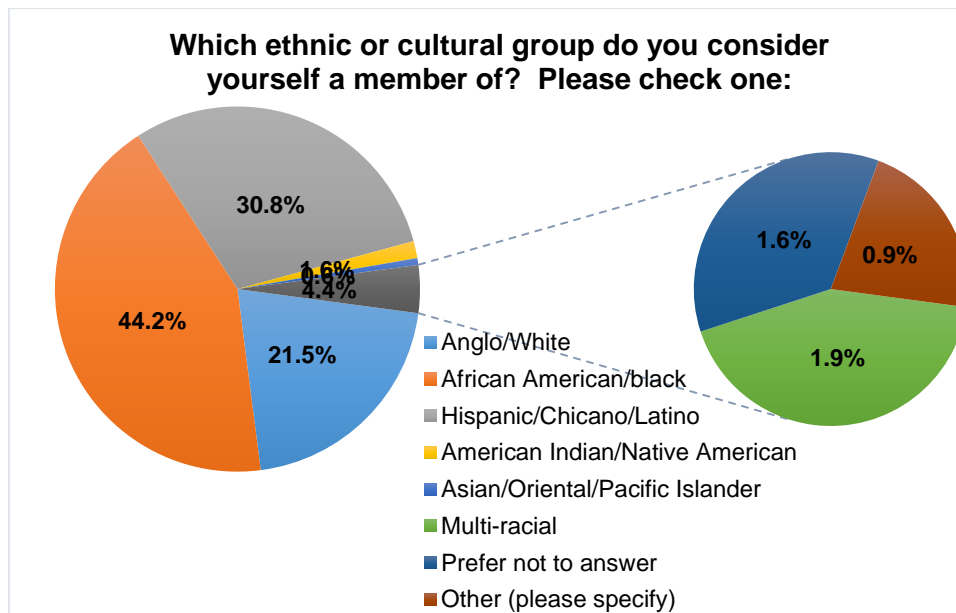
Demographics

Of the residents surveyed, the majority, 279 persons (85.3%), noted that they lived within the limits of the City of Dallas. With such a large majority, respondent answers were a confident representative sample of Dallas community members. The remaining 14.7% (48 persons) of the sample said they lived outside of the city limits but did not indicate which location. Finally, only 3 respondents skipped the question entirely.

Race and Ethnicity

In addition, having a diverse respondent sample was key to obtaining the necessary information needed to complete our analysis. Of the respondents surveyed 69 persons (21.5%) are Anglo/White; 142 (44.2%) are African American or Black; 99 (30.8%) are Hispanic/Latino ethnicity; 5 (1.6%) are American Indian/Native American; 2 (0.6%) are Asian; 6 (1.9%) are Multi-racial; 5 (1.6%) preferred to not answer; and 1 (.9%) marked the selection “Other.”

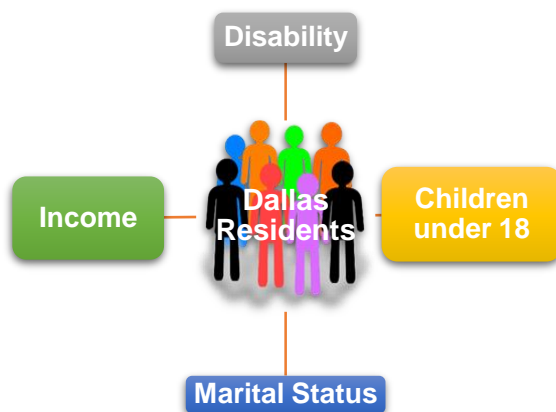
Figure 34-Resident Survey Responses – Racial/Ethnic Membership



The respondent sample was then compared to census data for the city of Dallas. According to the 2010 Census, the racial makeup of the community was 50.7% Anglo/White; 25.0% Black or African American; 0.7% American Indian/Native American; 2.9% Asian; and 2.6% of two or more races. Over 42% (42.4%) of the Dallas population identified themselves as being of Hispanic/Latino ethnic origin. Therefore, the survey respondents identifying themselves as Anglo/White and as being of Hispanic/Latino ethnicity are the most underrepresented group, and the survey respondents identifying themselves as African American or Black are the most overrepresented group

Other Demographics

Figure 35- Other Demographics of Survey Respondents



In addition to racial and ethnicity identifiers it was important for the respondent sample to have a representative sample of other demographic characteristics.

Marital Status

Of the residents surveyed, 106 persons (34.4%) are married; 127 (41.2%) are single head of household; 37 (12.0%) are divorced; 15 (4.9%) are domestic partners; 15 (4.9%) are widowed; and 8 (2.6%) preferred not to answer.

Disability Status

Of the residents surveyed, over one-fourth stated that they or someone in their household had a disability or handicap (26.3%, 84 persons). Seventy-three percent (73.7%, 225 persons) respondents answered that none had a disability or handicap.

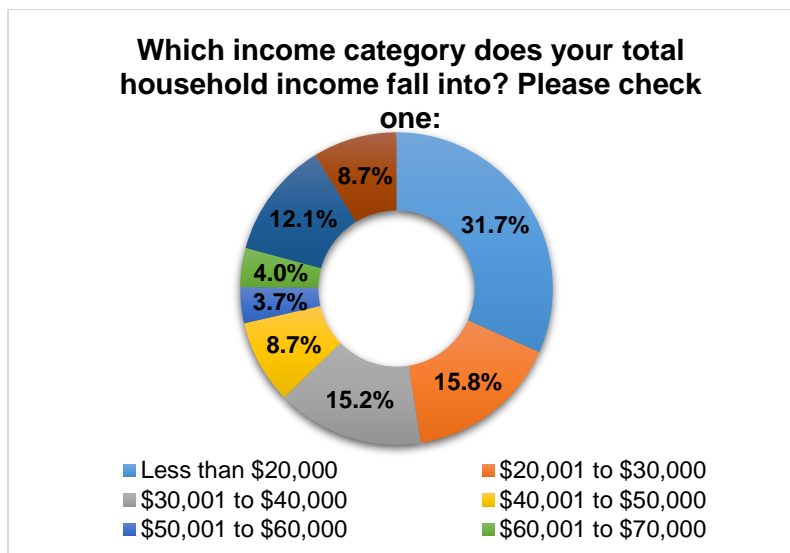
Familial Status

The citizen survey asked respondents to state whether their household included children less than 18 years of age. The respondent sample was almost even across the two response options. One hundred and fifty-one persons (48.2 %) answered that they did have children under 18 years of age, and 162 (51.8 %) answered that they did not.

Income

As we are looking at impediments to fair housing it was important that the respondent sample contained an adequate representation of persons who would be affected by fair housing choice. The total sample broke down as follows:

Figure 36 – Resident Survey Respondents – Income Categories



The majority of residents, 31.7% (102 persons), surveyed reported having a total household income of less than \$20,000. Followed by 15.8% and 15.2% reporting have income of \$20,001 to \$30,000 and \$30,001 to \$40,000 respectively. Finally, only 12.1% of participants reported having a total household income of \$70,001 or more.

Housing Discrimination

Survey respondents were also asked to identify ways in which housing discrimination can occur, based on list of general categories. The following responses were recorded.

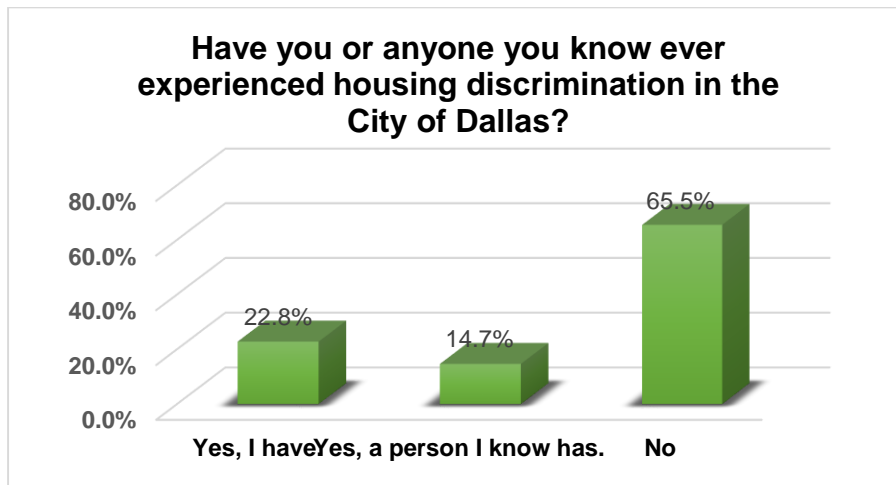
Table 69- Survey Responses re Housing Discrimination

Areas in Which Housing Discrimination Can Occur	# of Respondents	% of Responses
Race	210	73.7%
Color	177	62.1%
Disability/Handicap	152	53.3%
Religion	153	53.7%
Sex	163	57.2%
Age	135	47.4%
Sexual Orientation	135	47.4%
Familial Status (w/one or more children under 18 years of age)	148	51.9%
Level of Income	140	49.1%
National Origin	123	43.2%
Poor English Language Skills	106	37.2%
Source of Income (Public Assistance)	138	48.4%
Citizenship Status	118	41.4%
Other	34	11.9%

For the individuals who selected “Other,” they reported that areas in which housing discrimination could also occur included: Credit History, Criminal Records, Sex Offender Status, Pets, Sexual Orientation, and Mental Health.

In addition to noting that Race and Color are the two highest areas, participants felt that discrimination could occur, it is also important to note that a significant portion, 37.2%, also cited poor language skills. This coupled with the information that over 40% of persons surveyed felt that there was inadequate fair housing information available in other language translations makes this as a possible impediment.

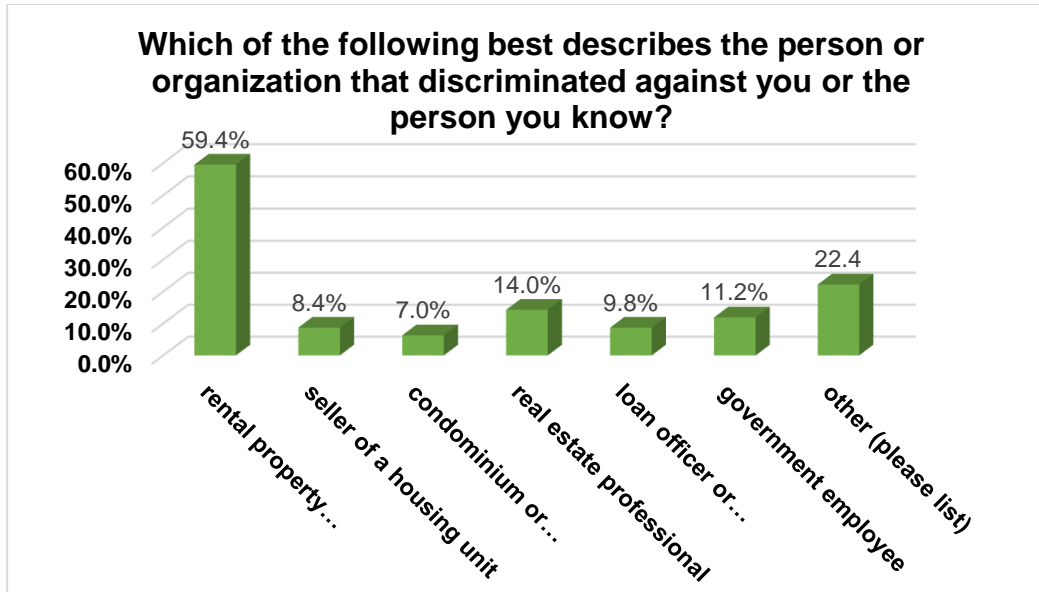
Figure 37 - Survey Responses re Housing Discrimination



Of the survey respondents, 70 persons (22.8 %) felt that they had experienced housing discrimination; 45 persons (14.7 %) knew of someone who had; and 201 persons (65.5 %) had not experienced housing discrimination (did not have first- or second-hand knowledge). While more people had not experienced discrimination there was still a significant portion of the survey participants (37.5 %) that had first- or second-hand knowledge of housing discrimination. Further analysis of responses will show where/how the discrimination occurred, which is important in pinpointing what/where impediments may exist in Dallas.

Respondents who had experienced or had knowledge of discrimination were then probed further about their experience. Their results are detailed in the charts and descriptions below.

Figure 38 - Survey Responses re Source of Housing Discrimination

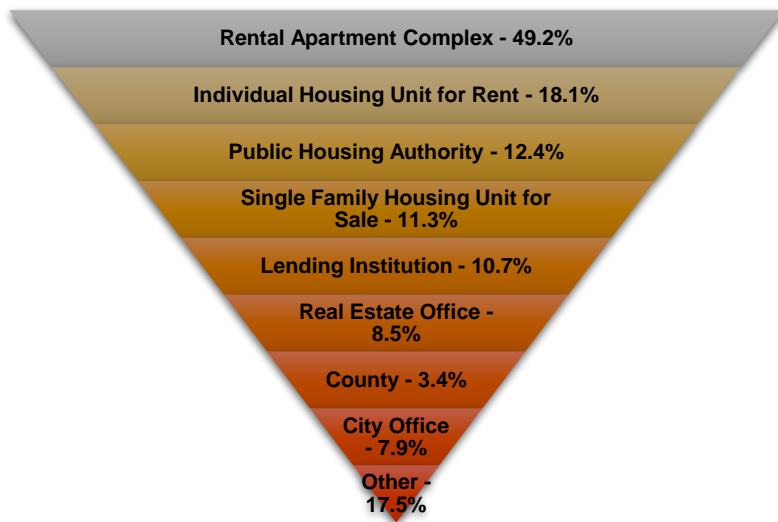


Of the 115 respondents who had first or second hand knowledge of discrimination, 143 responses were recorded indicating the person/organization(s) they feel are responsible for housing discrimination. Respondents were able to select more than one response. Of these responses, the most selected person/organization, with 85 (59.4%), who indicated discrimination by a rental property manager/owner; followed by 20 (14.0%) who indicated their discrimination came at the hands of a real estate professional.

The remaining options broke down as followed: 12 (8.4%) by the seller of a housing unit; 10 (7.0 %) by a condominium or homeowner's association; 14 (9.8 %) by a loan officer or mortgage broker; 16 (11.2 %) by a government employee; and 32 (22.4 %) by some other person/organization not listed. The responses given in the other category included: Neighbors of section 8 housing, Churches, and Stores.

Respondents were also asked to describe the location where the discrimination occurred. There were 177 responses that listed the location where housing discrimination occurred, and respondents were able to indicate more than one location. The largest number of respondents, 87 persons (49.2%), indicated that discrimination occurred at a rental apartment complex; 32 (18.1%) at an individual housing unit for rent; 20 (11.3%) at a single family housing unit for sale; 22 (12.4%) at the public housing authority; 15 (8.5%) at a real estate office; 19 (10.7%) at a lending institution; 14 (7.9%) at a city office; 6 (3.4%) at a county; and 31 (17.5%) indicated Other. The responses given in the other category included: State, Section 8, McDonalds, and at a Shopping Mall.

Figure 39- Survey Responses re Housing Discrimination



Survey respondents that experienced housing discrimination were asked to state what they believed was the basis of their discrimination. The following responses were given.

Table 70 - Survey Responses re Basis of Housing Discrimination

Basis of Housing Discrimination	# of Respondents	% of Responses
Race	57	36.8%
Color	27	17.4%
Religion	4	2.6%
Sex	3	1.9%
Disability/Handicap	14	9.0%
Family Status	18	11.6%
National Origin	7	4.5%
Age	18	11.6%
Sexual Orientation	12	7.7%
Poor English language skills	10	6.5%
Citizenship Status	10	6.5%
Level of Income	44	28.4%
Source of Income (public assistance)	23	14.8%
Other	46	29.7%

Of the 174 responses to this question, Race was most frequently noted as the basis of housing discrimination (included in 63 of responses); followed by Level of Income (28.7%); and Color (16.7%). Survey respondents stated that discrimination occurred for reasons based on the protected classes and other areas of perceived discrimination, such as level and source of income. While some of the other reasons that persons identified for housing discrimination are not federal protected classes, the high amount of responses is concerning as they have the potential for disparate impact on members of the protected classes and/or may be included in local or state definition of protected classes.

Familiarity with Housing Programs and Fair Housing Law

Figure 40 - Survey Responses re Fair Housing Information Sources



As mentioned above, based on the survey results, Dallas residents are **not** well-informed about fair housing rights and responsibilities. Only 28.4% (87 persons) surveyed are familiar with fair housing or social services provided by the City of Dallas. In addition, half of respondents (50.3%, 144 persons) have not seen/heard information regarding fair housing programs, laws, or enforcement within the City of Dallas. In addition, of the 311 respondents that answered the question regarding knowledge of Fair Housing laws, only 23 (7.4%) considered themselves to be Very Knowledgeable; 132 (42.4%) as Somewhat Knowledgeable; and 156 (50.2%) as Not Knowledgeable.

When asked if current fair housing laws and enforcement mechanisms are effective, 17.8% felt they are Very Effective, 43.8% felt that they are Somewhat Effective, and 38.4% felt that they are Not Effective. When given the opportunity to state why/why not current fair housing laws and enforcement mechanisms are effective, some of the following reasons were given (some were repeated in various forms):

Very and Somewhat Effective Reasons:

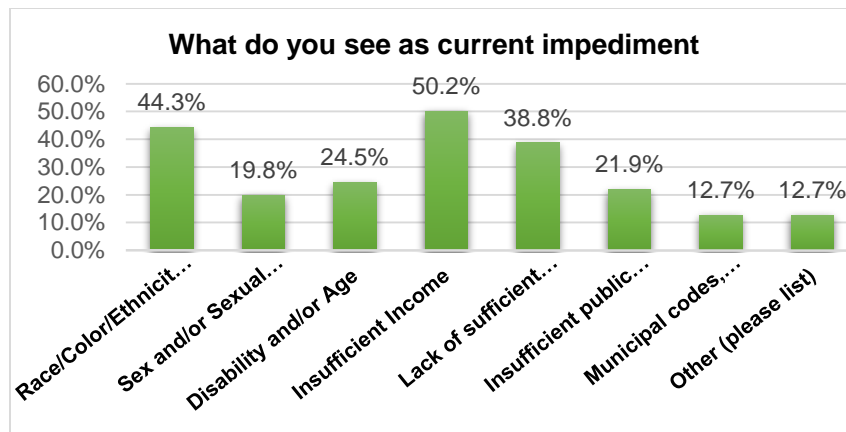
- I have not heard/read/seen any complaints regarding the issue in recent years.
- Things are getting better - as we learn to ignore the political aspects of it all.
- Less discrimination in states where there is more minority integration.
- Developers should be required to set aside affordable units.
- Confidence that the City has a fair housing office and will respond to housing discrimination allegations.
- Until the city starts prosecuting for discrimination towards the LGBT in housing this will never be "very effective".
- Laws and regulations are there; how the time required to get issues addressed is typically longer than the time required to obtain housing.
- Energetic staff in the Fair Housing Office.
- People are more knowledgeable and know how to respond to discrimination.

Not Effective Reasons:

- Not enough public information available and funding
- Dallas is still very segregated according to economic and social class.
- The City lacks programs to rehabilitate older housing units to keep them affordable and available
- Not effective because dissatisfaction with help from the Dallas Fair Housing Office, and it took a long time to find housing
- No inspection of the properties w/o initiating a code compliance complaint. Tenant unaware of any further investigation of the property by the city.
- Discrimination still happens, people don't fear the repercussions.
- A lot of people do not know about fair housing. More information needed.
- Affordable housing continues to be concentrated in certain geographic areas
- Would-be developers of affordable housing cannot get the construction permits or financing they need
- Anti-discrimination for the LGBT community
- Hispanics in court over unfair housing (farmers branch)
- Long waiting lists for public housing (over two years).
- Because people don't know where to complain to or are afraid to complain and the burden of proof lies with the person complaining, there's a lot of apt managers charging fees just for applying (non-refundable) and the illegal immigrant has preference in the places I applied because they have no credit.

Housing Choice and Housing Supply

Figure 41- Survey Responses re Current Impediments



When asked about the current impediments to fair housing choice in Dallas, the most common impediment to fair housing cited was Insufficient Income (105 person or 44.3%). Income is followed closely by the 44.3% (105 persons) that felt Race/Color/Ethnicity/ National Origin was a current impediment; and by the 38.8% (92 persons) who felt it was Lack of Sufficient Quality Affordable Housing. The remaining impediments broken down as followed: Disability and/or Age (58 or 24.5%); Insufficient Public Transportation (52 or 21.9%); Sex and/or Sexual Orientation (47 or 19.8 %); and 12.7% citing Municipal codes, ordinances, or regulations. Finally, 30 persons (12.7% of participants) selected "Other" and noted the following (some were repeated): insufficient credit, legal status,

neighborhoods that refuse to allow low-income housing, homeless status, criminal history, affordable housing for all including homeless and HIV population, limited bike and pedestrian access, religion – faith, and planning/zoning laws not being strict enough.

Of the residents surveyed, 54.6% (166 persons) felt that housing choices **are** geographically limited to certain areas or neighborhoods in the City of Dallas, although 138 respondents (45.4%) did not feel there was a limitation. The residents that felt that geographical limitations existed named the following reasons (many of these responses were repeated in various forms):

- Housing areas are segregated based on income and fears that low income housing will affect property values.
- Popular or traditional homes are located in more expensive neighborhoods.
- The "Grow South" Initiative seems to be primarily beneficial to "people of color."
- Seriously? Look at the map. Low income = high crime, crappy neighborhoods, etc.
- Most housing within affordable range either poor quality or those of a higher standard are full. Newer construction replacing affordable housing is expensive. Transit oriented housing unaffordable to those dependent on mass transit.
- Racism, poverty and public transportation (lack of)

When asked about affordable housing choices, the majority (68.9% or 208 persons) felt that affordable housing options are concentrated in certain areas or neighborhoods. Only 94 respondents (31.1%) felt that affordable housing options are spread throughout the City of Dallas. Respondents were given the opportunity to describe the areas of concentrated affordable housing options, and the following answers were given (many responses were repeated): South Dallas, West Dallas, parts of East Dallas, South of I-30; neighborhoods along Buckner Boulevard south of Ferguson; neighborhoods west of Love Field, Oak Cliff, Fair Park, South Dallas, Pleasant Grove and other high crime or areas of poverty, poor areas; black areas; and high crime areas.

It was also noted that affordable housing cannot easily be found inside loop 12, or inside 635, unless seeking South Dallas, which lacks walkability and basic community supports: groceries, postal, medical, etc. When asked if they perceive certain geographic areas or neighborhoods within Dallas to be undesirable, the majority (64.9%) of respondents answered affirmatively (194 respondents). In addition, the undesirable areas were identified by those surveyed to include (many of these responses were repeated in various forms): South Dallas, West Dallas, East Dallas, Pleasant Grove, Oak Cliff, Fair Park, South of I-30, St Francis/Loop 12, Forest/Audelia, NW Hwy/Marsh Lane West, West of the Trinity River, Bishop area, and Singleton.

It is perceived through the media and by new residents to the DFW metropolitan that Southern Dallas is undesirable, as well as anywhere that's not located in the Far North Dallas Area.

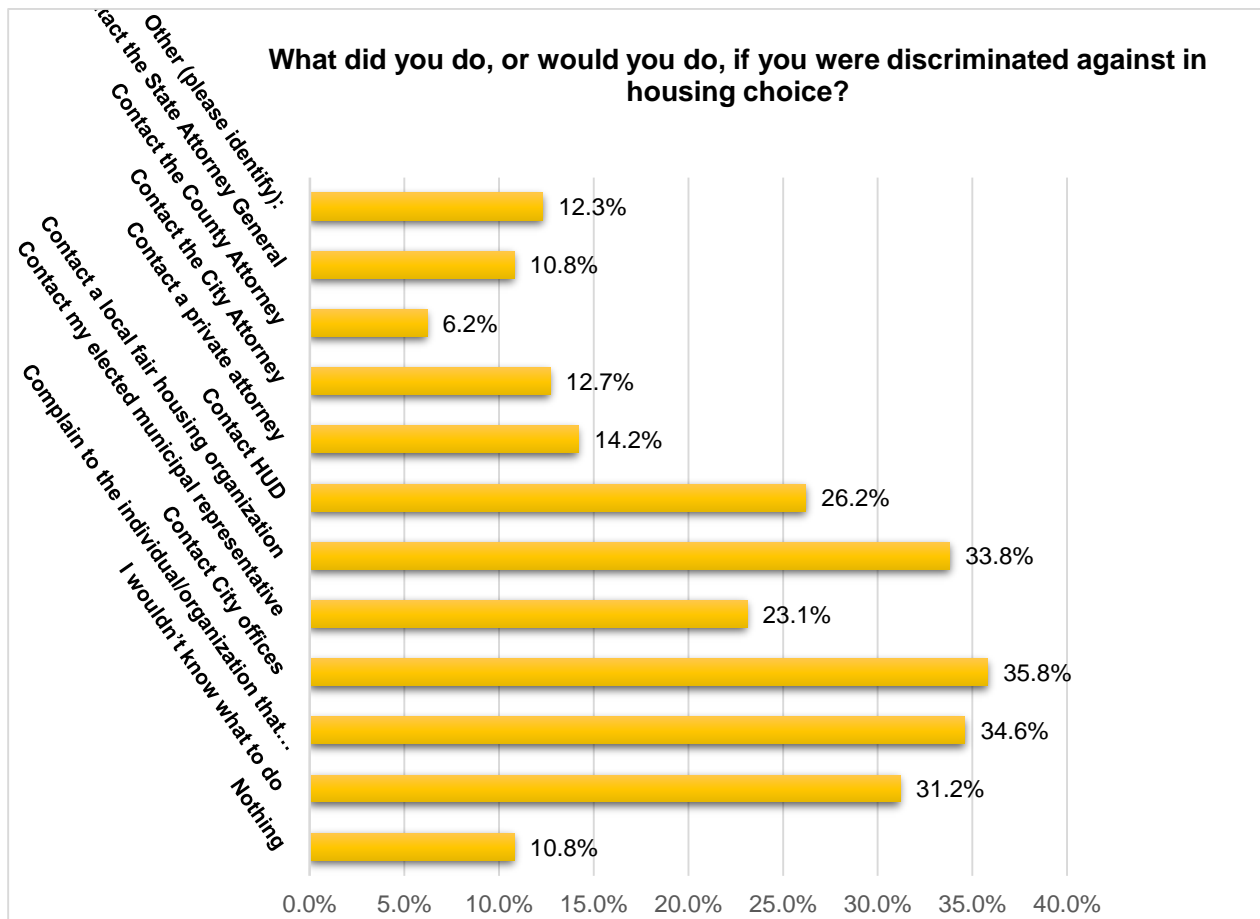
The survey asked if there was an adequate supply of affordable housing available to residents with disabilities, senior citizen residents, and residents with children. The following answers were collected (many were repeated in various forms):

- Affordable housing is located in areas of high crime.
- Inadequate housing for parents with three or more children and long waiting lists.
- Inadequate housing for residents with disabilities and senior housing is expensive.
- Inadequate accessible housing and housing for persons with chemical sensitivity
- No allowance for disabilities such as chemical sensitivities
- Affordable apartments have been torn down for upscale apartments see zip 75206.

- No. Our city is not providing adequate housing for the disenfranchised and the poor. The Rich basically own this city. The homeless and the poor could be helped more with more options for affordable housing.
- Challenges with commuting from South Dallas to work without a car.
- No, City policy is to tear down older housing and replace with more expensive housing rather than rehabilitation.

Fair Housing Education and Enforcement

Figure 42- Survey Responses re Responses to Housing Discrimination



Of residents surveyed, the largest group (103 persons, or 33.8% of all responses) answered that they would contact City offices if discriminated against in housing choice, and the next largest group (99 persons, or 34.6%) answered that they would either make a complaint to the individual/organization that discriminated. In addition, tied for the second largest group was the almost one-third of respondents (99 persons, or 34.6 %) who wouldn't know what to do, and only 11.1% (34 persons) would do nothing. Survey respondents were also able to write-in answers in the "Other" category and 11.5% (35 persons) of them did so, their answers were included:

- Publicize via news and social media.
- Call the Dallas Observer- the other options are useless.
- Blog the address with actual experiences in hopes they don't receive any business.
- How to process a complaint needs publicly?
- Unawareness of complaint process for single unit rental properties

- Speak with community leaders.
- Tenant Associates Housing Authority

Residents offered responses in the table below for the most effective ways to disseminate information about fair housing rights and/or responsibilities.

Table 71- Survey Responses re Effective Ways to Communicate Fair Housing Information

Most Effective Ways to Inform Residents About Fair Housing Rights and Responsibilities	# of Respondents	% of Responses
Public Meeting(S)	165	54.5%
Fair Housing Literature/Information In Public Libraries And Municipal Center	135	44.6%
Television Advertisements/Announcements	203	67.0%
Radio Advertisements/Announcements	152	50.2%
Bilingual Advertisements/Announcements	142	46.9%
Information On The City's Website	138	45.5%
Other: <ul style="list-style-type: none"> • At parent teacher conferences Dallas schools • Fair housing testing. • Proactive and public punishment of offending landlords, etc. • Information to landlords, developers, and realtors. • Picket the places that display unfair housing or contact me. • Provide info through non-profits and churches. Many people with FH issues may not have access to media • Public awareness campaign. • Separate website for housing. City website is a mystery. • Door to Door • Public meetings at libraries and public events • Facebook, Twitter, etc. 	44	14.5%

Surveyed residents were asked for suggestions to change fair housing laws and practices. Suggestions included (and many were repeated in various forms):

- Have people that speak Spanish.
- Remove the long waiting period it takes to get assistance for your particular problem!!!! Reduce the red tape and find people who really care!!!!
- Enforcement
- Don't limit people to just the city of Dallas, also include Dallas County.
- FIRE the people at City Hall who let downtown developers skip low-income housing, then FIX IT!
- Provide more information to community residents and agencies.
- Stop giving/renewing permits to apartment owners to build if they do not display fair housing & credit is a form of discrimination as well

- Encourage affordable renovations and tax incentives in blighted areas to builders and remodelers and incorporate affordable units in market rate for sale and rental units. Seek support of an anchor grocery/store to encourage more small businesses with affordable commercial leases and transit oriented development.
- Be visible at various locations throughout the city, meet and greet with residents.
- Make the people who discriminate live in public housing.
- More opportunities for single residents with no children or dependents to purchase affordable housing/homes.
- Hire and use volunteers
- Consider the use of manufactured housing
- All City/County/Fed need to work together

The survey concluded by asking for specific actions that the City of Dallas could take to address impediments and improve fair housing choice for all residents. The following answers were given, with many repeated in various forms including the previous question:

- More affordable housing units for seniors
- Enforce the law equally for all. Do not make distinctions.
- Enforce safer neighborhoods.
- A Dallas public office that deals with only homeless issues.
- Listen and investigate the complaints.
- Hire a majority of Anglos to work in that agency since Anglos represent the majority instead of only Blacks. Blacks are far more prejudiced and biased.
- The City should be working closely with the DPD and non-profits
- Welcome citizen participation at City Hall. City Council Members, the Mayor, the City Managers, and City Attorneys should take field trips once a month to learn about a neighborhood from its residents - not for a photo op.
- Stop placing mostly Caucasian police officers in African American neighborhoods because the officers are not being diverse and understanding. That causes African Americans to flock to areas of high crime areas because they feel that other Caucasians will not accept them because of the actions displayed by your officers.
- Improve economic opportunities for the Southern and Eastern sectors of Dallas.
- Recognize properties/managers who show improvements or who don't receive complaints. Give them a "seal" of some sort that indicates they've received training and pledge not to discriminate.
- Invest in regular paid advertising, leverage paid with donated advertising. Combine efforts with other agencies (federal, Dallas Housing Authority, other cities).
- Consider organizing a regional task force for agencies to share information, best practices, training, etc.
- Take this fair housing survey to large gatherings of residents such as the Texas State fair to get a more representative sample.

Additional Surveys

Additional online surveys and questionnaires were created for Housing Service Providers, Realtors, and Lending Institutions in the Dallas area via <http://www.surveymonkey.com>. These surveys were open in September 2013 and available to area service providers, realtors, and lenders. At the time of publication, a total of 21 industry representatives had completed surveys.

Realtor Surveys

The Consultant and City of Dallas staff emailed and invited Dallas real estate professionals to attend an informational AI meeting/feedback session, as well as fill out the fair housing survey. A total of 8 real estate professionals completed a survey. A summary of these surveys is as follows.

Half (50.0%) of the real estate professionals surveyed felt they were Very Knowledgeable about Fair Housing Law, and the other 50.0% felt Somewhat Knowledgeable. No respondents answered as Not Knowledgeable.

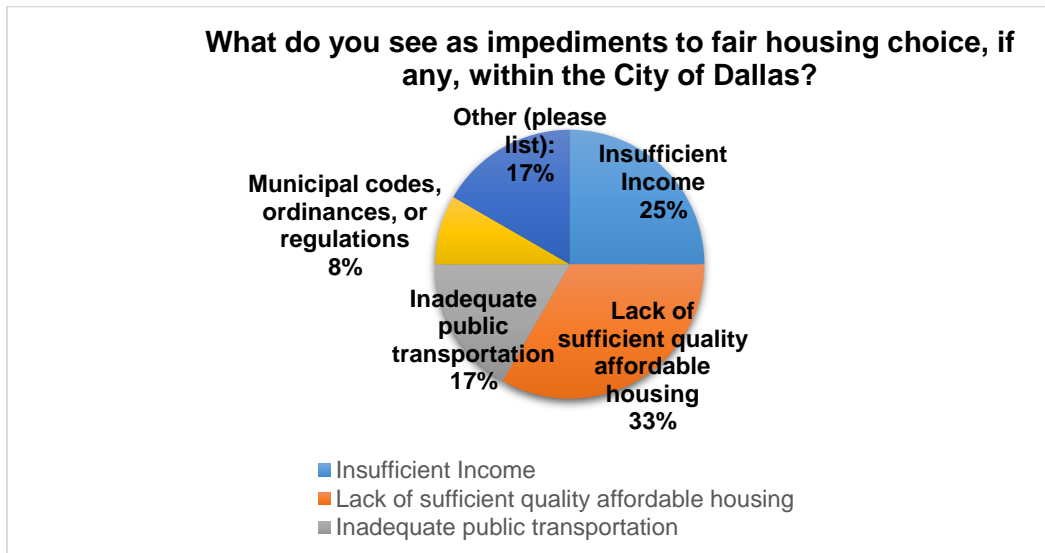
Realtors were asked a variety of questions regarding the practices and procedures of their businesses. The following answers were given. It should be noted that not all respondents chose to answer all questions.

Table 72- Survey Responses re Fair Housing Background Questions

Background Questions for Realtors	Yes # and %	No # and %
Does your company have written policies addressing Fair Housing Laws?	8 100%	0
Do your marketing materials and/or display advertisements include images of people of diverse racial/ethnic backgrounds?	6 75.4%	2 25.0%
Do you publish in local minority and multi-lingual publications?	4 62.5%	3 37.5%
Does your company undertake any special/affirmative marketing efforts to target minorities or low-income clients?	8 100%	0
Do you intentionally employ bilingual individuals on your management and sales staff in order to serve clients with poor English language skills?	7 87.5%	1 12.5%
Have you carved out a specialty/niche market in the City of Dallas?	2 25.0%	6 75.0%
Do you accept listings or show homes outside of your specialty/niche market?	5 83.3%	1 16.7%
Do you accept listings regardless of home value?	4 66.7%	2 33.3%
Do you accept listings in low-income or minority neighborhoods of the City of Dallas?	4 66.7%	2 33.3%
Do you serve clients participating in public homebuyer subsidy programs?	4 66.7%	2 33.3%
Does your real estate business, in policy or in practice, deny services to potential clients on any of the following bases?	0	0
Do you perceive certain groups or individuals to be less desirable as clients of your real estate business?	1 12.5%	7 87.5%
Have any groups or individuals filed complaints against your real estate company, or initiated legal action on the basis of fair housing discrimination, with any Federal, State, or local regulators?	2 25.0%	6 75.0%
Do you feel existing fair housing laws are enforced in a fair and impartial manner?	5 71.4%	2 28.6%

When asked to identify the impediments to fair housing choice in Dallas, the largest group of respondents (4 respondents, 57.1%) felt that Lack of Sufficient Quality Affordable Housing followed by Insufficient Income (3 respondents, 42.9%) Additional responses are as illustrated below.

Figure 43 - Survey Responses re Impediments to Fair Housing Choice



Respondents were able to list additional impediments within the “Other” category. The following impediments were listed:

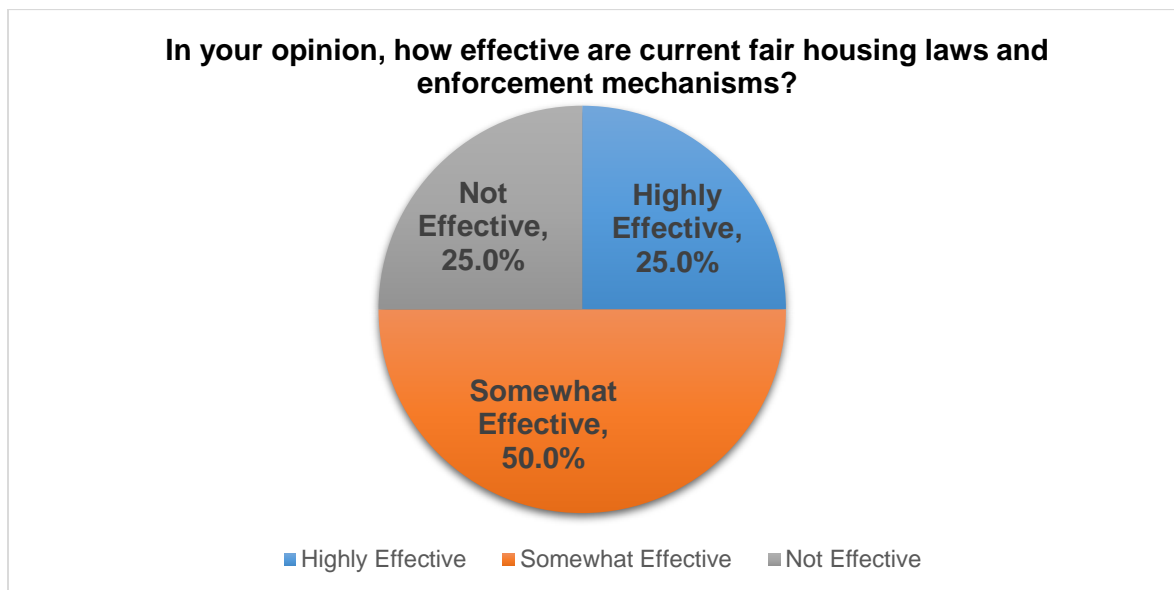
- Lack of adherence to laws by property owners/managers.
- Too many areas need to have unrecoverable homes removed and let someone like the city or Habitat for Humanity help build them back up. Hamilton Park is an example.

Realtors were asked if they used fair housing materials and had fair housing training as part of their real estate businesses. The following answers were given.

- Eight respondents (100%) had business materials promoting fair housing.
- Eight respondents (100%) had received fair housing training.
- Six respondents (85.7%) had received training by way of continuing education. Three respondents (42.9%) had received certification training.

Realtors were asked to determine how effective current fair laws and enforcement mechanisms were in Dallas. The majority (50.0%) found the laws/enforcement to be Somewhat Effective, 25.0% of the respondents felt that laws/enforcement was Highly Effective, and 20.0% found them to be Not Effective.

Figure 44- Realtors Survey Responses re Fair Housing Laws and Enforcement



Respondents provided the following responses on why the current fair housing laws are/are not effective:

- Potential tenants are not aware of their rights, so they usually don't file complaints.
- Stronger penalties than fines and wrist slaps for non-compliant individuals

Surveyed real estate professionals made the following suggestions for improving fair housing laws and practices:

- Utilization of testers by the City to gather data and catch violators of the law.
- Enforce the current laws and fix problems such as approved appraisers who introduce racial and economic bias in appraisals done in certain neighborhoods

Survey respondents suggested the following actions that the City of Dallas could take to address impediments and improve fair housing choice for all residents:

- Require online and in person training for owners/managers.
- PPD response needs improvement in Southeast Dallas.
- Restore areas where housing conditions have declined or are declining.

Lender Surveys

Dallas mortgage lenders were invited to attend an informational AI meeting/feedback session, as well as fill out a fair housing survey. No lenders completed a survey.

Housing Provider Surveys

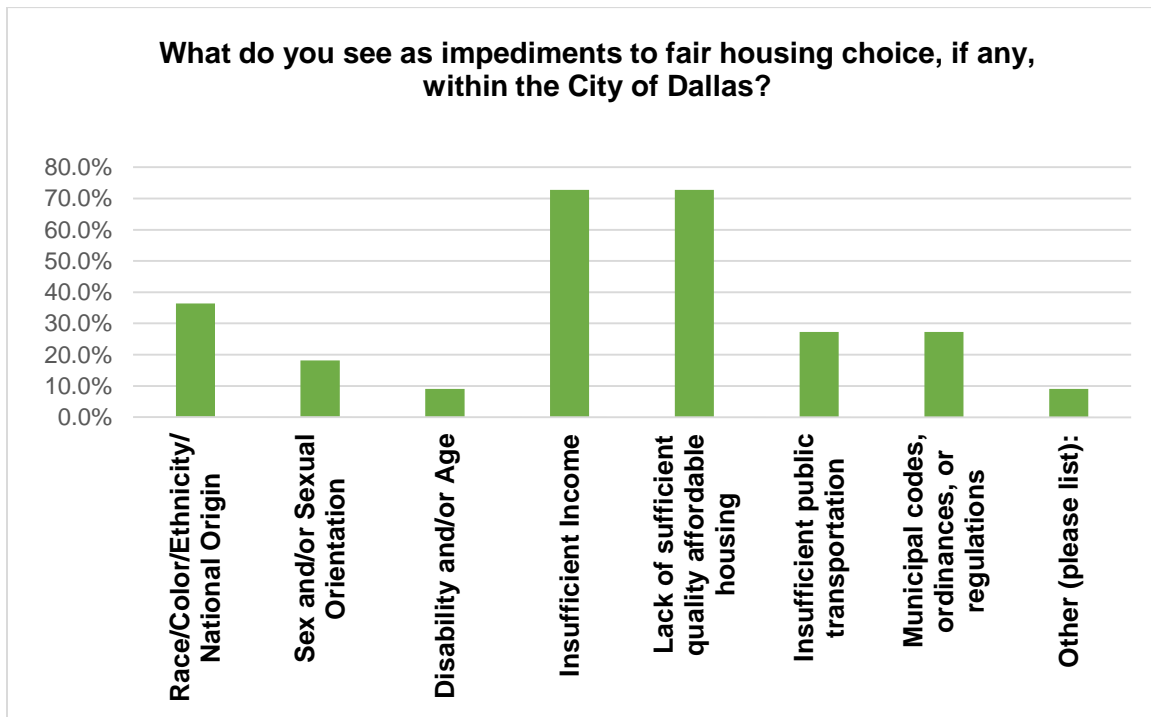
Dallas housing providers were invited to attend an informational AI meeting/feedback session, as well as fill out a fair housing survey. A total of 13 housing providers completed a survey.

Housing providers were asked about their knowledge of Fair Housing laws, including Texas Fair Housing Law. The majority (76.9%) stated that they were Somewhat Knowledgeable, 15.4% of the respondents felt that they were Very Knowledgeable, and 7.7% felt that they were Not Knowledgeable.

Two (15.4%) of the housing providers stated that they assist with fair housing complaints. The respondents were asked to state where the fair housing complaint originated. One reported incident occurred with a rental property manager/owner and 1 reported incident occurred with a seller of a housing unit. Respondents were asked to state the average number of fair housing complaints each year, based on type/location. Two respondents stated that they assist with an average of 3 fair housing complaints at rental apartment complexes per year. No other types/locations of fair housing complaints were given. Respondents stated that their clients were subject to housing discrimination due to their source of income (public assistance), and that this type of discrimination occurred approximately 5 times a year.

When asked to identify impediments to fair housing choice in Dallas, the majority of housing service providers (72.7%) stated that Insufficient Income and Lack of Sufficient Quality Affordable Housing were impediments. Over one-third (36.4%) of respondents stated that Race/Color/Ethnicity/National Origin was an impediment to fair housing choice.

Figure 45 – Housing Providers Survey Responses re Impediments

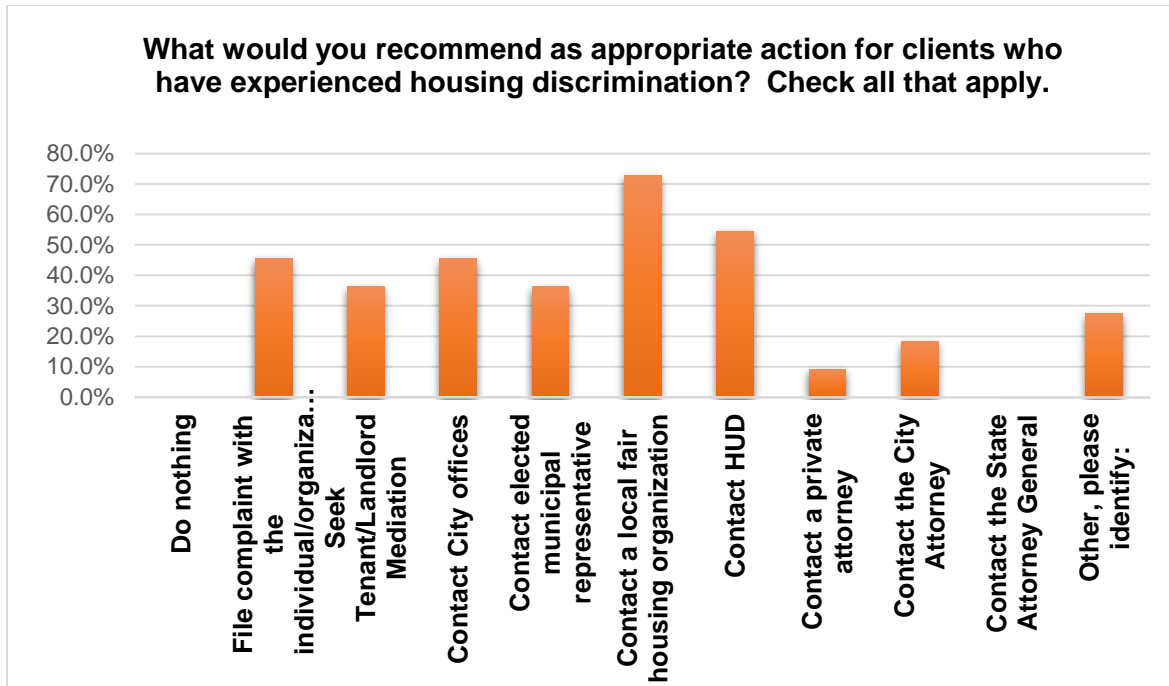


Eight respondents (72.7%) felt that housing choices were geographically limited to certain areas or neighborhoods in the City of Dallas to be undesirable, but three (3) respondents (27.3%) did not. When asked to describe the limited areas, the answers were as follows: less affluent areas, areas with a lack of sufficient quality affordable housing, and the southern sector.

Housing providers were asked if residents of Dallas perceived certain areas or neighborhoods to be undesirable. All of the respondents (100%) felt that this was true. When asked to give examples of the undesirable areas, the following answers were given (many answers were repeated): South Dallas, West Dallas, Oak Cliff, Pleasant Grove, Fair Park, and high crime areas.

Housing providers were asked to identify appropriate actions for clients who have experienced housing discrimination. The largest number of respondents (8, 72.7%) stated that they would recommend the client contact a local fair housing organization and 6 respondents (54.5 %) would recommend contacting HUD.

Figure 46 – Housing Providers Survey Responses re Response to Housing Discrimination



Regarding changes to fair housing laws and practices, suggestions included sexual orientation and other LGBT protections, more public presentations and marketing, better investigative methods with real consequences and solutions, and ensuring city and State laws do not stymie federal protections.

Regarding what the City of Dallas could do to address impediments and expand fair housing choice, suggestions included advertising in the local press, marketing to schools, parent groups, and communities, making available more decent affordable homes, and employing more persons to investigate discrimination claims. It was also recommended that the City should develop a housing policy and that community banks are encouraged to provide loans in underserved communities.

Public Meetings, Presentations and Focus Groups

Meetings were held in September and December 2013 to solicit input on housing discrimination and impediments to fair housing in the City. Discussion topics included availability of affordable and accessibility housing, concentration of public and assisted housing in areas with high minority and ethnic populations, neighborhood resistance to affordable or accessible housing including group homes, perceived impediments to fair housing, housing discrimination, unequal distribution of affordable housing, and fair housing awareness and knowledge. Realtors, lenders and housing providers were asked questions related to certification and on-going fair housing education and diversity in realtor and lending institutions in Dallas.

Focus Groups - Eight (8) focus group meetings were held. Meetings and focus groups were advertised by City staff through emails and newspaper ads. The focus groups included realtors, lenders, HOME 166

community housing development organizations (CHDOs), neighborhood associations, chamber of commerce, agencies serving the homeless, persons with disabilities, Civil Rights, advocacy, and faith based organizations, members of the Asian-American community, members of the LGBT (lesbian, gay, bi-sexual, transgender) community, and the Hispanic and Native American community. The tables below show lists of group participants, meeting dates and locations. Additional AI presentations were made by the staff of the City’s Fair Housing Office at various venues during the study period. The format of the meeting consisted of a presentation on the AI and the AI process and open ended questions were used to engage discussion regarding fair housing issues and impediments in the City.

Real estate professionals and housing providers were asked questions regarding the following:

- Fair housing requirements including orientation for new staff, training, certifications and continuing education and delivery method.
- How to diversify housing opportunities across all areas of the City.
- Experiences related to NIMBYism related to affordable housing, public housing, and housing for persons with disabilities and the elderly such as group homes.
- The availability of affordable housing and public transportation that allows families to find housing close to employment centers.

Table 73- Focus Group Meetings – City of Dallas

Focus Group	Meeting Dates & Times	Location
Realtors, property managers, & lenders	9/25/2013 10:00 am	Dallas City Library
Community housing development organizations & chamber of commerce	9/25/2013 2:00 pm	Dallas City Library
Housing providers for the homeless, persons with disabilities and the Dallas Metro Continuum of Care	9/26/2013 10:00 am	City Hall
Civil Rights, Advocacy and Faith Based Organizations	9/26/2013 2:00 pm	City Hall
Neighborhood Associations	12/03/2013 6:00 pm	City Hall
Asian American Community	12/04/2013 2:00 pm	City Hall
Human Rights & LGBT	12/05/2013 10:00 am	City Hall
Hispanic and Native American Community	12/05/2013 2:00 pm	City Hall

Findings and Observations

1. Gender Identity and Sexual Orientation

- Regarding the LGBT community, main fair housing issues concern the transgender especially for persons who have expressed a different gender and not had a change procedure.
- Transgender is an umbrella term for persons whose gender identity, gender expression or behavior does not conform to that typically associated with the sex to which they were assigned at birth. Gender identity refers to a person's internal sense of being male, female or something else; gender expression refers to the way a person communicates gender identity to others through behavior, clothing, voice or body characteristics.
- Fair housing concerns were noted as it related to homeless shelters or congregate living where most facilities have common sleeping and showering areas. Persons who have a different gender expression than the sex assigned at birth pose a risk for both themselves and the persons they associate with in these settings. Legal gender such as a driver's license or legal name changes is used in shelters.
- Some shelters have started adjusting living arrangements for its transgender population but this has not caught on.
- Persons who are gay, lesbian or bi-sexual are less likely to experience housing discrimination due to their generally higher income status. LGBT population seen as a more educated, higher income, more media savvy, white, disposable incomes.
- More minorities and lower income persons represented in the transgender demographic. Transgender community has less of a network. Behind the curve in organizing and networking.
- However, the LGBT community does experience housing discrimination but there is not enough formal data on rental discrimination among the demographic. Referrals have been made to the FHO for filing complaints but there has been very limited success in getting persons to seek help
- One of the main reasons for not seeking FH services or reporting discrimination is fear of disclosure of one's sexual orientation
- Not enough education and awareness about the legality of exclusion of transgender individuals and sexual orientation
- Education needed on both sides: Dallas Gay and Lesbian Alliance has done training for police and plan to start with the fire dept. Use of newspaper, community presence, and booth space at events suggested
- Suggest need for official presentation material (pamphlets) for shelters to make complaints for the LGBT community (who to contact, etc.). Prospective clients may not be aware of steps in the process for filing a complaint
- The City FHO has sexual orientation pamphlet but does not include gender identity/expression
- Group homes have challenges with sexual orientation or gender expression as it relates to the type of living arrangements (male or female). Some group homes may be exempt from some provisions
- Understanding of the LGBT ordinance is unclear among practitioners

- LGBT task force seen as more politically connected with access to City staff. Transgender representation was late in coming. Need for language changes in forms and policies.
- Several changes have been proposed to the Sexual Orientation ordinance to update the language mainly regarding public accommodations.

2. Hispanic and Native American Communities

- Need for financial education and housing counseling, presence of predatory loan products, high levels of foreclosures among a demographic with low homeownership levels.
- Many undocumented and low income. Results in fear of losing housing and being “branded” as troublemakers in seeking new housing if renters report code violations. Acceptance of poor living conditions. Limited affordable housing choices.
- Lack of knowledge in terms of how to make complaints
- Lack of confidence that the City may be able to help them due to negative experience with Code Enforcement and police in the form of evictions

3. Real Estate, Community Housing Development Organizations (CHDOs)

- Living in the southern section of the City is not desirable.
- Location of housing including LIHTCs, apartments, 100% deed restrictive projects mainly in the south end. Sentiment that the cost of land being more affordable in the southern was an excuse to continue segregation. Affordable housing can't be transplanted to the north of the City.
- Problem more complex to fix
- Housing goals are unclear? Suggestion to use housing policy to do mixed use and mixed income projects in other areas based on financial viability of projects.
- Need for a change of the City's housing policy and some state laws. Texas is one of two states in the country in which it is unlawful to use inclusionary zoning as an affordable housing strategy
- Suggestion that groups should actively lobby the State Housing Finance Agency and review and comment on the Qualified Allocation Plan annually for the use of low income housing tax credits
- City's development code geared towards communities where things are working well. Same policy affects other areas. Need for objective indicators and incentives.
- Comments suggest that affordable housing in north Dallas is restricted by land use and development code.
- Sixty percent of deed restricted units in the City are in southern Dallas.
- Area around UNT –Dallas – instead of putting in zoning that matches the area. Investigate property value going up. Inadvertent stifling any type of future development. Intentionally stifling zoning to prepare costs from going up and City may have to subsidize. Council member for the area agrees with the policy.
- Need for strategies to get investors to invest and deal with unproductive properties
- Funding opportunities should be in line with priorities established
- The City has no clear housing policy that is approved by the City Council. Housing goals are mainly developed based on the use of federal funds through the City's Consolidated Plan
- Allocation of funds for the development of affordable housing is done on a first come first served basis with an open application cycle. No RFP system, no scoring,

- Possible use of Community Investment Areas (CRAs) and tax increment financing (TIF)
- Strong culture of NIMBYism in the City. When trying to develop housing for homeless, developers desire land to be used to develop area for homeless. Resistance from business community
- Hard time trying to redevelop projects for low income and homeless
- Limited permanent supportive housing. No assisted living –concerns about congestion for parking, family members visiting, projects bringing down property values
- Bridge – Homeless shelter. Found an undeveloped area in the central business district. Farmers market now complaining about homeless. In the area.
- City receiving complaints regarding homeless services
- City is trying to regulate boarding houses. Standard inspection. Saturation in the south
- Mental health and disability. Boarding home operators are payee for govt. assistance. Once or twice per year. Boarding house inspection team has been established.
- So little flow – limited permanent supportive housing
- Not quite as pervasive with geriatric for seniors. No assisted living – congestion for parking, family members, bringing down property values
- City receiving complaints about homeless services
- South –boarding homes. Zoning. City trying to regulate. Standard inspection. Saturation in the south
- Mental health and disability. Boarding home operators are payee for govt. assistance. Once or twice per year. Boarding house inspection team established.

4. Asian Americans

- There is also an Asian American Chamber of Commerce.
- There is a perception that Asians are more educated, earn more, and don't experience housing discrimination. There are Asians that have fair housing challenges including the ability to secure decent and affordable housing.
- Many Asians who are affected by fair housing issues are immigrants and refugees.
- Language and lack of information on where to go and will they get help results in fair housing barriers.
- Asians have several different languages making it difficult to find interpreters. It might be useful to provide training on fair housing issues to agencies and persons who serve the population.
- Refugee service tends to be located in certain neighborhoods and along with cultural affinity sometimes results in population concentrations.
- Another challenge for Asian families is seen with elderly persons when a spouse dies, they have life challenges including housing.
- The Dallas FHO has very few Asian cases.
- Islamic groups have their own support systems. Monthly meetings at Buddhist temples. A good point of contact is with the Islamic Refugee Center

- Refugee resettlement agencies work in specific neighborhoods. Can create limited housing options such as Victory Meadows as a main area. The development was viewed as having limited services and limited transportation access.
- There is also often technology access/digital disparity in some Asian population sub groups.

Impediments

Some of the impediments that were identified in the focus groups included:

- Families with children where the significant other (boyfriend or husband) has criminal background have difficult in securing housing
- Limited housing for children with special needs
- Transportation access between affordable housing and employment centers
- Little or no credit history
- Limited English Proficiency (LEP) limits access to fair housing choice and limits action when housing discrimination does occur because it goes unreported. Some ethnic groups with LEP challenges have several different languages making it harder to find interpretation services.

Recommendations

The following recommendations to address fair housing choice were offered in the focus groups:

- Allocation of City's federal allocation to additional areas
- Continued education to some of the Asian and other organizations
- More education and outreach on discrimination areas such as mental illness and service animals (must be ordered by health care provider, landlord can't require service deposit, create a financial burden or add hold harmless clauses to the lease)
- More support for emerging communities
- More information about the City's housing programs and rental assistance program updated information
- Partner more with the Asian American and Social Service units.
- Once or twice a year FHO providing FH training with City staff working on fair housing issues or receiving federal funds
- Follow up with ethnic religious groups – Islam Refugee of Dallas
- Suggestion for the FHO to target the Hispanic population through the Regional Operations of Catholic Charities. FH training to be arranged.

Public Meetings - Three public meetings were also held with the general public, the Housing Subcommittee, and the Community Development Commission. Presentations on the AI and the AI process were made at these meetings. The meetings of the Housing Subcommittee and the Community Development Commission are open to the public and comments on the AI were received. The format of the focus group consisted of a presentation on the AI and the AI process and question and answers. There was some discussion on the previous 2007 AI and current status of the activities recommended to address impediments found. After which, open ended questions were used to engage

discussion regarding fair housing issues, concerns and impediments in the City. Notes of the discussions and observations taken at the meetings are summarized below.

Table 74- Public Meetings – City of Dallas

Public Meetings/Public Hearings	Meeting Dates & Times	Location
City of Dallas Housing Subcommittee	9/25/2013 6:00 pm	City Hall
Public Input Meeting	9/25/2013 2:00 pm	City Hall
Community Development Commission Briefing	12/05/2013 6:00 pm	City Hall

Summary of Comments

- Concerns were expressed regarding single family affordable housing being purchased, demolished, and replaced with condominiums – (zero lot lines/fourplexes-three story). Rezoning allowed. The replacement was not affordable even though economic incentives being provided for revitalizations areas such as Tax Increment Financing (TIFs). Costs are higher and rents and sales higher to encourage the investments. TIFs encourage demolition and clearance.
- The City’s FHO increased its outreach efforts by hiring an Outreach Coordinator, establishing a web page and conduct 80 workshops annually
- The City’s FHO was encouraged to increase its outreach to populations with Limited English Proficiency and those underrepresented in its client base such Asian American and African communities. Suggestions for outreach include contacting Buddhist temples, Korean Evangelical Churches, Dallas Black Chamber, the Urban League, Progressive Voters League, Veterans, and West Dallas Ministers Alliance for those demographic groups.
- Experiences were shared regarding “steering” incoming minority families are sometimes not shown some neighborhoods.

Recommendations

- The City should conduct an economic analysis of its policies on affordable housing.
- Brief council members on fair housing issues and encourage community or town hall meetings on fair housing.

Key Person Interviews

In conjunction with the surveys, ASK conducted key person interviews in-person, by teleconference, and via email correspondence with members of the City of Dallas Staff and nonprofit and advocacy groups.

Table 75- Key Person Interviews (City Staff and External Parties) – City of Dallas

Focus Group	Meeting Dates & Times	Location
Agencies		
Dallas Housing Authority	9/24/2013 10:30 am	City Hall
ICP & North Texas Fair Housing Center	9/24/2013 4:15 pm	Dallas
HUD Fort Worth Regional Office	9/27/2013 10:00 am	HUD Fort Worth
Civil Rights, Advocacy and Faith Based Organizations	9/26/2013 2:00 pm	City Hall
City Departments		
Fair Housing Office	9/24/2013 9:00 am	City Hall
Planning & Zoning and Assistant City Manager	9/24/2013 9:00 am	City Hall
Office of Financial Services & Housing	9/24/2013 2:30 pm	City Hall
Economic Development	9/5/2013 9:00 am	City Hall
Transportation Department	9/26/2013 10:00 am	City Hall
Public Information Office	12/4/2013	City Hall

Notes of the discussions and observations taken at the meetings are summarized below.

Summary of Comments

- Southern Dallas has been left out of revitalization efforts in the City and requires more commitment from public and private stakeholders.
- There is a challenge attracting younger families to the South Dallas area because of concerns about the school system.
- Non-profit developers need additional support from the Planning Department to maneuver the development approval process.
- NIMBYism is prevalent in the more affluent areas of Dallas.
- Lack of affordable housing.
- Need variety in housing choices such as larger units and a lease purchase option.
- The City's non-profit housing providers need more support from the City in terms of partnership, financial support, and assistance with meeting program requirements.

- Challenging for development projects in low income communities to score high enough to get LIHTC funding.
- A good point of contact for the fair housing issues is the Crisis Intervention Center that is operated out of the City's Police Department and serves all residents. The Center provides social work and case management services and addresses mental health issues, homelessness and assistance to senior residents among other groups. All racial and ethnic groups are served.
- The City's FHO has increased outreach to many racial and ethnic groups including Asians, Muslims, Hispanics, etc. that may not typically use their services.
- Mixed use and transit oriented development can be used to connect housing to employment center. Galleria valley View an example. Being rezoned for higher density. However, this does address affordability of units since there are no provisions for low income set-aside units in those developments.
- Inclusionary zoning still on the books from Walkers Judgement – However, it is voluntary since the State of Texas does not allow for required inclusionary zoning.
- Standard Affordable Housing (SAH) designation is also available - automatically added to multi-family developments – however not used because projects did not meet the threshold. Payment in lieu also a part of the ordinance.
- Regarding a suggestion about replatting away from historical neighborhood patterns, it was noted that replatting for single family housing is a more challenging process. Smaller lots in the south end may facilitate easier replats.
- Zoning variances for replats could be challenged by 20% of the residents and is subject to approval recommendation by the City's Planning Commission. A veto of a Planning Commission disapproval would require a large majority of Council members.
- Discussions with the City's Public Information Office explored the increased use of electronic media and social media to disseminate fair housing information.
- Despite the significant outreach and education efforts of the City's FHO, of the 330 persons who responded to the fair housing resident survey housing resident survey still shows that a large number of residents consider themselves not knowledgeable about fair housing laws (48.1%) and 43.7% consider themselves somewhat knowledgeable. Only 8.2% consider themselves very knowledgeable.
- The City has two websites: Dallas City Hall and the Dallas City Newsroom. The City also has and email list serve with a web based E-alert that residents can sign up to receive. The City also operates the Dallas City News Network – Govt. channel, Clear Channel Digital Billboard for Public Service Announcements (PSAs), and outdoor kiosks that could be used for fair housing outreach.
- Currently the City spends approximately \$20,000 per year on fair housing advertising and promotion. There are also opportunities to use HD studio produced videos and/or download fair housing videos from HUD's YouTube channel.
- The need for outreach to racial and ethnic minorities as well as general audiences was discussed.

VII. FAIR HOUSING IMPEDIMENTS AND RECOMMENDED ACTIONS

Introduction

The City of Dallas has identified impediments to fair housing choice and recommendations for specific actions that the City will take to reduce or remove those impediments. This section will review any current impediments identified through this 2015 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City. The recommendations will consist of both reactive and proactive actions to address the impediments and ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. This section will also review the impediments and action plan identified in the City's prior 2007 AI and the status of fair housing activities and whether the impediments then still need addressing.

One of the main implications of the July 2013 Proposed Fair Housing Rule is more of a focus on "affirmatively furthering fair housing" activities in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or "affirmative" approach that reflects the goals and objectives of the proposed Fair Housing Rule up to its becoming a final rule.

In order to develop a viable implementation plan, the City views the recommended actions as a framework for addressing the impediments and a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

Update to 2007 Previous Impediments and Recommended Actions

The City of Dallas's 2007 AI identified seven (7) impediments to fair housing choice and provided recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review the impediments and action plan identified in the City's 2007 AI and the status of those impediments. The City also identified funding invested in the action plan activities and a determination was made as to whether the 2007 impediment still needed further or ongoing action.

The City of Dallas Fair Housing Office (FHO) provided a list of activities carried out and funding invested in fair housing activities during the period of the 2007 AI. See section #III for a list of fair housing accomplishments by the City. The list of completed activities was compared to the list of the key impediments identified in the city at that time and the proposed activities/actions that the city proposed to address the impediments. Based on a review of the activities, there are some cases in which it is unclear whether adequate action has been taken and the impediment still needs to be addressed. Information on the city's activities/proposed actions, current status and activity funding to address key impediments to fair housing choice are provided below.

It is also noted that in the 2007 AI, while no department was named as the coordinator of the fair housing action plan, the City's Fair Housing Office is the central point for all related fair housing activities and carried out the plan. For the 2015 AI, it is recommended that the Fair Housing Office and the Assistant Director of that office will serve as the AI Implementation Coordinator and will coordinate with

other City Departments and serve as liaison in working with local and regional external partners. Roles and responsibilities for other City Departments and external partners are outlined in the Fair Housing Planning Matrix which is included as Appendix #2. The current AI also outlines a process for tracking and ensuring that the fair housing activities are carried out.

Previous Impediment #1: Difficult access to information on housing and related services for persons with disabilities.

Planned Action/Goal #1: Maintain and distribute an updated resource guide in the Fair Housing Office on housing for persons with disabilities and update information annually

Timeline: Annually, beginning FY 2007-2008

Current status: The City's FHO distributed 1,029 resource guides on housing for persons with disabilities in FY 2008—2009. Subsequently, the FHO includes information on resources for persons with disabilities in all of its housing referral packets annually. The FHO also established a fair housing website in FY 2008-2009 that included links to organizations that served persons with disabilities.

Updated Action(s): This impediment has been addressed with the actions of the City's FHO and efforts should be maintained in the future.

Previous Impediment #2: Need education and outreach by the financial institutions on the mortgage lending process to the minority and low income communities.

Planned Action/Goal(s):

- a. **Planned Action/Goal #2 (a):** Coordinate fair housing education and outreach with CCCS home loan counseling programs
- b. **Planned Action/Goal #2 (b):** Encourage lender education on the mortgage lending process and eligibility requirements.

Timeline: From Oct. 2007 to Sept. 2013

Current status: In four of the five years, usually during fair housing month, the Dallas FHO partnered with several lenders, realtors, and housing counseling agencies regarding fair housing, home loan counseling, and mortgage lending education. These organizations included Consumer Credit Counseling Services, Wells Fargo and America Home Key dba Gold Financial Mortgage, Neighborhood Assistance Corporation of America (NACA), City Credit Union, Women Council of Dallas Association of Real Estate Brokers, Metro-Tex Association of Realtors, and Bank of America. The City also hosted a Fair Housing Symposium that included the mortgage lending community.

Updated Action(s): This impediment has been addressed with the actions of the City's FHO. However, it is recommended that these activities should be held annually in the future.

Previous Impediment #3: Need fair housing opportunities in affordable housing programs

Planned Action/Goal(s):

- a. **Planned Action/Goal #3(a):** Maintain and distribute government-assisted housing resource guide to citizens.
- b. **Planned Action/Goal #3(b):** Continue to coordinate fair housing outreach with the City's Housing Department.
- c. **Planned Action/Goal #3(c):** Seek opportunities to provide annual fair housing training for management of government-assisted housing.

Timeline: From Oct. 2007 to Sept. 2013

Current status: The Dallas HFO distributes a government-assisted program resource guide and conducts ongoing fair housing training annually for staff of the Dallas Housing Authority and their resident councils. The FHO also conducted training for the Dallas County Housing staff. However, there is no evidence of coordination of fair housing outreach between the Housing Department and the Fair Housing Office and the action/goal is unclear. See current impediments.

Updated Action(s): The City has addressed the impediment for the most part and should maintain efforts at maintaining and distributing resource guide on government- assisted housing and providing related training and outreach to government-assisted housing staff. However, it is recommended that the City clearly define Action/Goal #3(b) and determine ways to better align the roles of the Housing Department and the Fair Housing Office on fair housing issues in general.

Previous Impediment #4: Limited opportunities in mortgage financing due to funding and lending procedures

Planned Action/Goal(s):

- a. **Planned Action/Goal #4(a):** Develop and implement a fair housing training program for lenders to address barriers.
- b. **Planned Action/Goal #4(b):** Encourage lenders to enhance advertisement activities to racial and ethnic diverse communities on mortgage lending products

Timeline: From Oct. 2007 to Sept. 2013

Current status: While the City's FHO has partnered with lenders and realtors to provide home loan and fair housing education, there is no evidence that a fair housing training program for lenders was implemented. Encouraging lenders to diversify advertising and outreach has not been documented.

Updated Action(s): It is recommended that the City's FHO work with lender associations to implement a fair housing training program or provide support to existing lender fair housing education programs.

Previous Impediment #5: Significant higher declination rate to African American (23.9 percent) and Hispanic (22.2 percent) families when compared to the declination rate for White families (11.9 percent).

Planned Action/Goal #5: Develop and implement a fair housing training program for lenders to address barriers.

Timeline: From Oct. 2007 to Sept. 2013

Current status: The status of this action/goal and impediment is similar to #4 above.

Updated Action(s): It is recommended that the City's FHO work with lender associations to implement a training program or provide support to existing lender education programs.

Previous Impediment #6: Underrepresented populations in fair housing complaints.

Planned Action/Goal #6: Enhance fair housing education and outreach to underrepresented populations.

Timeline: From Oct. 2007 to Sept. 2013

Current status: The Dallas FHO, over the period, has expanded its outreach to cover underrepresented populations such as Asians, Hispanics, and persons with disabilities. Over the five-year period, the FHO has targeted Spanish newspapers and radio stations, worked with the Dallas Hispanic Chamber of Commerce, and consistently invests in advertising for this outreach. Since FY 2010-2011, the FHO has partnered with LULAC to provide fair housing education to the LGBT community. In FY 2013-2014, the City has increased its efforts to reach out to veterans, the homeless, and persons with disabilities by purchasing materials for distribution and hiring a bilingual intern. The FHO also started using the City's Facebook page to disseminate information. This impediment has been addressed with the actions of the City's FHO. Current activities should be continued.

Updated Action(s): It is recommended that the City also utilize its government cable station and fair housing videos from HUD YouTube channel along with Public Service Announcements (PSA) to expand its coverage.

Previous Impediment #7: Underrepresented populations among public housing residents

Planned Action/Goal(s):

- a. **Planned Action/Goal #7(a):** Encourage DHA outreach to underrepresented populations.
- b. **Planned Action/Goal #7(b):** Provide fair housing training to DHA staff and resident councils.

Timeline: From Oct. 2007 to Sept. 2013

Current status: The City's FHO provides fair housing training to DHA staff annually seemingly when new staff is hired. There is no formal documentation of encouraging DHA outreach to underrepresented populations. There is no evidence of a strong partnership between the housing authority and the FHO. There have been complaints from DHA tenants that have been processed by the FHO which suggest a need for overall and ongoing fair housing training.

Updated Action(s): It is recommended that the FHO and DHA establish a memorandum of understanding that could include annual joint staff training, incorporation of DHA information in the City's outreach to underrepresented populations, and promote greater cooperation on fair housing issues.

Current 2015 Impediments and Actions

Based on the research and data available, the following are the current impediments to fair housing choice in both the public and private sectors which were identified in the AI. It must be noted that there are some impediments that were previously identified that are also identified in this current list. For each impediment, actions were formulated to address them and are listed below. The fair housing actions will be addressed through a variety of means including the following:

- Development of a Fair Housing Action Plan (FHAP)
- Preparation of a Neighborhood Plus implementation plan
- Development of an Affordable Housing Policy
- Any planned update of the Housing Element of the City's Comprehensive Plan and Zoning Code

A. Impediment: Lack of affordable housing for Dallas residents.

Action: Increase the production and preservation of affordable housing units.¹⁵

Action #A-1: Increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding. **(This action is also identified in the FHAP)**

Status: The review of CHAS data and an analysis of housing affordability in the City of Dallas indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden as a result of economic pressures and other external conditions. In recent years, public funding, including CDBG and HOME funds have been declining in many jurisdictions and in order to increase the number of affordable housing units, the City shall work towards leveraging, as much as possible, with private sector funds and other government funds to increase the variety and affordability of housing suitable for different types of households.

Action #A-2: Improve partnerships with non-profit housing developers, such as Community Housing Development Organizations (CHDOs), which are familiar with the development process, aware of neighborhood issues, and that have a mission to improve the lives of low- and moderate-income persons. **(This action is also identified in the FHAP)**

Status: The City is considering partnering with experienced nonprofit developers with the goal of creating affordable and sustainable developments. To involve nonprofit developers, the City will review its land use policies to ensure that they encourage the construction of affordable housing for lower income families.

Action #A-3: Provide a fast-track permitting and site development review process for affordable housing projects and dedicate staff in the Planning and Economic Development departments to assist non-profit developers to move small scale, infill housing projects through each stage of development. **(This action is also identified in the FHAP)**

¹⁵ As previously explained, under the FHA there is no requirement to create affordable housing but is nonetheless discussed in this AI.

Status: Input from affordable housing developers that serve the Dallas area indicated that small scale developers have issues navigating the development process and require assistance from City staff in order to efficiently develop housing and reduce costs that will in the long term benefit the end users.

Action #A-4: Offer new or continue existing development incentives such as density bonuses, waivers of setbacks, lot widths, and height restrictions, and reduce or waive impact fees in order to increase the supply of buildable lots for infill housing and lower costs for housing development. ***(This action is also identified in the FHAP)***

Status: Offsetting the cost of development encourages affordable housing and regulations that permit innovative development strategies increases housing productions. Housing constructed on small lots are usually built on unutilized, substandard lots or on subdivided lots which will assist the City in reducing blight. Structures on small lots are typically less costly because any savings from lower acquisition and construction costs can be passed on the homebuyer or renter.

Action #A-5: Establish a policy that requires deed restrictions with housing developers to maintain long-term affordability even when federal/state funds are not used in the project. ***(This action can be addressed through the development of an affordable housing policy)***

Status: The City currently requires that 20% of units in TIF funded developments are reserved for households earning at or below 80% AMI (10% in the central business district). Staff is exploring opportunities to expand that policy to all publicly funded development. In order to enforce this current and proposed policy, the City will consider executing deed restrictions that impose income guidelines and disposition requirements such as affordability limits.

Action #A-6: In order to maintain or increase homeownership in Dallas, the City will increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate income households. ***(This action can be addressed through the development of an affordable housing policy)***

Status: Some of the affordable homeownership stock in the City of Dallas is being reduced by foreclosures in minority concentrated areas. An analysis of the foreclosure rates throughout the City indicated that foreclosures occurred at higher rates in lower income areas and were not attributed to predatory lending practices or other discriminatory housing practices but more likely attributable to personal circumstances such as unemployment, underemployment, or creditworthiness.

Action #A-7: Work towards increasing leveraging as much as possible with private sector funds and other public funding to fund the development of a variety of affordable and accessible housing units suitable for different types of households. The City will also implement policies which encourage the creation, construction, and/or preservation of affordable and accessible housing for families in all areas of the City. ***(This action is also identified in the FHAP)***

Status: Input gathered from residents and housing providers in Dallas indicated that there is a lack of resources to produce an adequate supply of affordable housing options. CHAS data also supports the need for an increase in the affordable housing stock. Minority populations are also disproportionately impacted by cost burden. The City will continue to fund affordable housing needs through the housing rehabilitation and repair programs to assist in the preservation of the existing affordable housing stock.

B. Impediment: Lack of accessible housing limiting housing choices for seniors and persons with disabilities.

Action: Increase the number of accessible housing units based on need.

Action #B-1: Based on current supply and projected growth of residents with disabilities and an aging population, the City will determine the need for accessible units and seek out additional resources to fill the gap. **(This action is also identified in the FHAP)**

Status: It is clear from the City's Consolidated Plan that there are currently not enough resources available to meet the housing needs of disabled persons. In order to address this issue, the City of Dallas will develop a listing of housing units available to disabled persons that are both affordable and accessible. This listing will also be updated on a regular basis and made available to the public to assist in locating accessible housing. The City can support the development or retrofitting of additional accessible housing units and will establish a reasonable goal to increase the number of accessible units based on available funding.

Action #B-2: Review its policies, staff training needs, and awareness related to accessibility inspections of new multi-family housing to ensure that builders are meeting accessibility design requirements. **(This action is also identified in the FHAP)**

Status: The City has a system in place to ensure ongoing compliance with accessible design requirements. City staff will review existing policies as fair housing advocacy and compliance agencies have identified properties that don't meet the requirements. The City will ensure that the necessary training and awareness is in place to ensure that any covered projects that do not meet the requirements of the FHA or other accessibility requirements projects are reviewed and brought into compliance.

Action #B-3: Consider incorporating the visitability standards into its building requirements for new single-family housing and housing not covered by federal accessibility regulations. **(This action can be addressed through the development of an affordable housing policy)**

Status: The City has existing adaptable design features in its building code that apply to multifamily dwellings. However, visitability standards would allow persons with disabilities to access housing throughout the community. These standards include at least one zero step entrance into the house, interior doorways providing unobstructed passage space for wheel chairs, and at least a half bathroom on the main floor. Adopting visitability guidelines will increase the supply of accessible housing and also make it easier for landlords and property owners to make future reasonable accommodations and/or modifications if needed.

C. Impediment: Poor condition of affordable rental housing in the City especially in neighborhoods with high poverty and low opportunities..

Action: Develop strategies to address rehabilitation needs including repairs and accessibility modifications for rental properties.

Action #C-1: Develop plans to meet rehabilitation needs of target neighborhood through City of Dallas and partnering agencies. **(This action is also identified in the FHAP)**

Action #C-2: Adopt and Implement changes to Chapter 27 Code Enforcement. *(This action is also identified in the FHAP)*

Action #C-3: Implement risk based multi-tenant property inspection program. *(This action is also identified in the FHAP)*

Action #C- 4: Initiate high impact landlord program to bring properties in compliance. *(This action is also identified in the FHAP)*

Action #C- 5: Develop Citywide Affordable Housing policy that addresses quality and location of rental housing. *(This action is also identified in the FHAP)*

Status: Affordable housing is a high priority in the City's Consolidated Plan partly because data reflects that renter households experience overcrowding and the rate of housing cost burden is greater for renter occupied housing units. The Consolidated Plan also states that costs are high for repairs on rental properties. Property owners struggle with financing repairs for families who pay lower rents. Despite this need, the City does not currently use CDBG or HOME funds for smaller rental rehabilitation projects. Renter households with disabled members face greater housing challenges than owner households with a disabled member. However, the City's rehabilitation programs including the programs that target the disabled and the elderly are geared towards owner-occupied units. Private market rental units typically account for a large percentage of housing stock and **many of these rental housing developments were in poor condition and had limited accessibility.** The City's Fair Housing Office is responsible for working with landlords and property managers to educate them about the rights of persons with disabilities and the responsibilities of property owners to make reasonable accommodations.

D. Impediment: Lack of awareness of a reasonable accommodation procedure to provide relief to individuals with disabilities.

Action: Ensure that persons with disabilities are aware of the procedure by which such persons may request reasonable accommodations or modifications on the basis of disability.

Action #D-1: Coordinate outreach and education about the procedures to seek reasonable accommodation that allows certain deviations from the City's zoning and land use requirements and development standards. *(This action is also identified in the FHAP)*

Status: Chapter 20A of the Dallas City Code, Fair Housing, indicates that it is an offense for a person to (i) deny reasonable modifications of existing premises and (ii) refuse to make reasonable accommodations to rules, policies, and practices when necessary to afford a handicapped persons equal opportunity to use a housing accommodation. However, the code does not reference a procedure to apply for reasonable accommodation.

E. Impediment: Historic patterns of concentration of racial/ethnic and low income populations in the City.

Action: Develop a strategy to address historic patterns of concentration and move towards achieving a balance in housing investments between the northern and southern sectors.

Action #E-1: Adopt policies that increase the supply of affordable housing for families in all areas and neighborhoods of the City. *(This action is also identified in the FHAP)*

Status: The City adopted a comprehensive housing policy known as the Neighborhood Plus Plan. The Plan encourages the revitalization of neighborhoods within southern Dallas so that middle class residents will want to move into those areas. In addition, the City plans to incentivize the development of mixed income housing in non-minority areas.

Action #E-2: Increase coordination and collaboration between the City's Fair Housing Office, the Housing and Community Services and other departments in the housing strategy and annual planning process. *(This action is also identified in the FHAP)*

Status: Currently the City's FHO and the Housing and Community Services Department interact in terms of the Consolidated Plan process and reporting for the CAPER. The FHO also review affirmative marketing plans for developer projects. However, it may be helpful to include the Fair Housing Office in housing strategy development especially for comments regarding set-aside for affordable and accessible housing in order to communicate the needs they see on the ground and to address any potential compliance issues.

Action #E-3: Annually monitor residential concentration by race and/or ethnicity. *(This action can be addressed through the development of an affordable housing policy)*

Status: As part of the City's existing fair housing strategy, it monitors the marketing plans of publicly-assisted multi-family developments in several areas including the racial demographics of the census tracts where the projects are located. Upon implementation of the Neighborhood Plus Plan, the City will collect similar data and conduct analyses to ensure that the concentration occurring in the housing market is declining.

Action #E-4: Assess the feasibility of using strategies such as developing housing on smaller non-conforming lots, scattered site infill rental housing and land donation in neighborhoods throughout the City. *(This action can be addressed through the development of an affordable housing policy)*

Status: The above actions have been used effectively in other communities and would help to address some of the issues that make it easier to develop accessible and affordable housing across the City.

F. Impediment: Lending practices may be disproportionately impacting minority and ethnic populations based on loan denial rates.

Action: *Work with lenders in Dallas and request that they review their underwriting standards to determine that loan decisions are being made equitably.*

Action #F-1: Coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated. *(This action is also identified in the FHAP)*

Status: It appears that based on the review of HMDA data and the denial rate in census tracts with higher racial and ethnic minorities, there may be discriminatory lending occurring in Dallas. If after closer examination of the data racial disparities are found to exist, the City and its partners will provide fair housing training to loan originators and underwriters and consider creating a committee to conduct continuous review and monitoring of residential loan products.

G. Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.

Action #G-1: Work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability. **(This action is also identified in the FHAP)**

Status: The City's FHO has received cases involving potential loss of housing due to mental disabilities and the need for adjustments to assist persons who may be affected. For example, a person with a mental disability may lose housing because they have not heeded recertification notices due to hospitalization or failure to follow directions due to their disability.

H. Impediment: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP)

Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian Americans, persons with disabilities including the hearing impaired, the Lesbian, Gay, Bisexual, and Transgender (LGBT) community, and persons with LEP.

Action #H-1: Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas. **(This action is also identified in the FHAP)**

Status: As part of the AI process, the City's FHO sought input from several minority populations that are underrepresented in its client pool such as Asian Americans and the LGBT community. The City was able to identify unique fair housing challenges for these populations. The City has also increased its outreach to minority populations especially persons of Hispanic/Latino ethnicity and the elderly.

Action #H-2: Use the City's cable television channel(s) and social media as a source of fair housing information and public education efforts including the use of public service announcements and fair housing videos from HUD's YouTube channel. **(This action is also identified in the FHAP)**

Status: The use of Facebook and other social media may have contributed in part to a higher response on the resident surveys. Input from focus groups and key person interviews also suggest that these are effective mediums to disseminate information on fair housing.

Action #H-3: Increase education and awareness of the City's FHO through partnerships with agencies that represent individuals and families with LEP. **(This action is also identified in the FHAP)**

Status: The City's FHO has initiated outreach programs to LEP populations and as a part of the AI process sought the input of many underrepresented groups as clients. The City worked reached out to agencies that serves Native Americans, Asian Americans, Hispanics, Africans, etc. The City's FHO is

also developing a LEP plan. Fair housing materials and posters have been acquired in several different languages from HUD.

I. Impediment: Residents face challenges accessing public transportation especially special needs population members including persons with disabilities and homeless persons.

Action: Increase access to public transportation and transit services for low- and moderate income persons, persons with disabilities, and other protected class members.

Action #I-1: When conducting transportation planning and seeking funding opportunities to improve public transportation and infrastructure, the City will ensure that consideration is given to the transportation needs of protected class members as well as low- and moderate income persons. Attention will be given to the cost of utilizing transit services, service areas, availability and time of routes, fleet size for alternative transit services such as Dial-A-Ride, and access to employment opportunities. ***(This action is also identified in the FHAP)***

Status: The City's Consolidated Plan identified the need for transportation services as a high priority. The lack of adequate transportation is cited in resident input as one of the reasons for the segregation of housing between the northern and southern areas of the City.

J. Impediment: "Not in my Backyard" (NIMBYism) sentiment is an impediment to fair housing choice.

Action: Increase education and outreach to dispel myths and false perceptions about "affordable housing."

Action #J-1: Focus training and public hearings throughout the City on NIMBYism to provide residents an opportunity to express their concerns and learn about affordable and accessible housing. ***(This action is also identified in the FHAP)***

Status: The City's Fair Housing Office addresses NIMBYism as part of fair housing training.

Action #J-2: Work with partners throughout the region to raise awareness of the concepts of "housing affordability" and "affordable financing." ***(This action is also identified in the FHAP)***

Status: The City's Fair Housing Office currently engages with regional partners through events such as the recent fair housing symposium. The discussion on affordable housing can be framed around making decent, adequate and architecturally sound housing available to all and provide financing to make market rate housing affordable to low income households. The intent would be to disassociate housing for certain groups with low quality or inadequate housing. **The City's FHO staff started attending meetings of housing authorities which includes discussion on regional fair housing issues.**

VIII. FAIR HOUSING PLANNING

Introduction

In “the Future of Fair Housing,” a 2008 report of the National Commission on Fair Housing and Equal Opportunity, the authors state that “...despite the strong statutory underpinning for the affirmatively furthering obligation, the testimony unanimously reported that the process was not functioning as intended. HUD has not been successful in bringing the affirmatively furthering obligation to life.”¹⁶ Such statements and studies that demonstrate that segregation of housing by race and ethnicity and housing discrimination still occurs at levels that surprise us raises the question of what is the disconnect between desire and execution.

The Dallas 2015 AI has identified barriers that impede the desire and vision of a City where all residents are guaranteed the “right to choose where to live without facing discrimination or legally imposed obstacles” as envisioned by Congress when the Fair Housing Act of 1968 was passed. As a result of data gathered from research, meetings with residents and stakeholders, document reviews, and surveys, and to address impediments, recommendations were made which included education and awareness, legislative review, development of a housing policy, forming local and regional partnerships, investment and leveraging of resources, and using accessibility and Universal Design concepts.

While the City must continue to work to achieve fair housing choice for its residents, it is recognized that the City may not have the resources to reduce or remove these impediments without local and regional partnerships. Perhaps, the challenge in moving from desire and execution is the planning that takes place out of a study such as the AI.

Fair Housing Action Planning Framework

In response to the impediments identified and recommended actions to address them contained in this report, the City of Dallas has started to develop a Fair Housing Action Plan (FHAP) in accordance with chapter 2 of the HUD Fair Housing Planning Guide: Volume 1. In light of constrained federal, state, and local budgets, Dallas, like many other jurisdictions, may not have all of the resources that will be needed to carry out the actions contained in this report. The recommended actions are intended to serve as a basis for fair housing planning by the City. Priorities will have to be determined, goals established, and human and financial resources as well as partnerships identified to ensure that the City addresses the fair housing choice issues raised in the study.

A summary list of the impediments and recommended actions are included in a matrix at Appendix #2. The matrix also includes columns with specific actions to be undertaken to address each impediment based on the resources available to the City and established priorities. A timeframe for implementation of the actions will also be prepared as determined by the City consisting of one, three, and five-year increments as well as activities that will be carried out on an ongoing basis over the five years covered by the City’s Consolidated Plan. There are some resources, partnerships, and systems that are currently in place and can be deployed in the short term while other issues may have to be addressed over a longer time period. The FHAP will be developed with input from City Council, City Departments

¹⁶ National Fair Housing Organization website, The Future of Fair Housing Report, page 9
http://www.nationalfairhousing.org/Portals/33/reports/Future_of_Fair_Housing.PDF accessed April 21, 2015

that participated in the AI process, the City's Manager's office, housing providers, realtors, lenders, non-profits, fair housing advocates, and the general public. The FHAP is being developed within the context of the City's **plans to develop a new Affordable Housing Policy and the implementation plan for the City's Neighborhood Plus Plan that was adopted in October 2015.**

The following steps are proposed for the fair housing planning process:

1. Establish an AI Implementation Coordinator

Upon completion of the AI, someone must be responsible for and held accountable for the implementation and ongoing compliance of the affirmatively furthering fair housing activities. It is recommended that the City's Fair Housing Office in collaboration with the Housing and any other Departments is serve in the coordinating role with the Assistant Director of the Fair Housing Office as the AI Implementation Coordinator. The FHO shall serve as liaison between the City, external agencies and other City departments and ensure that the AI activities are carried out in a timely manner.

2. Communicate AI Results

The City will communicate the results of the AI to the public and all stakeholders through the following means:

- Print copies of the AI and provide to locations such as community centers, libraries, and City hall for the public to review;
- Communicate conclusions and recommendations to policy makers, planners, key city staff, community organizations, and the public;
- Provide access to a copy of the AI on the City's website;
- Provide a means other than public forums for other citizen participation (e.g. written comments, comment via the electronic and social media) regarding the conclusions and recommended actions resulting from the AI;
- Utilize alternative formats (e.g. braille, large type, tapes or readers) for persons with visual impairments; and
- Solicit broad-based community support for developing the fair housing action plan in order to meet the City's certification to "affirmatively further fair housing."

3. Set up Structure for Action Planning to Eliminate Identified Impediments

Prior to taking actions to address the identified impediments, the City will prepare the community for the process as follows:

- Develop a system for diverse community groups to be involved in the fair housing action plan developmental process;
- Create a structure for the design and implementation of the actions or incorporate the design and implementation of housing and community development activities;
- Determine which local and County partners and subrecipients at the local and County levels and City departments will have primary and secondary responsibilities for designing and carrying out activities; and
- Ensure that partners and subrecipients solicit input from community stakeholders.

4. Establish Fair Housing Objectives and Goals

In determining actions to be taken to successfully address the impediments identified in the AI, the City will define a clear set of objectives with measurable and achievable results. According to the HUD *Fair*

Housing Planning Guide, “the objectives should be directly related to the conclusions and recommendations contained in the AI. For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective.”¹⁷

5. Determine Fair Housing Actions

The HUD *Fair Housing Planning Guide* outlines the following steps for determining fair housing actions which shall serve as guide for the City of Dallas:¹⁸

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities.
- Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities.
- Schedule actions for a time period which is consistent with the City’s Five Year Consolidated Plan cycle.

6. Develop and/or Participate in Regional Approaches to Fair Housing

As part of the City’s Voluntary Compliance Agreement with HUD, the City has agreed to “work with adjoining County and City government representatives and public housing officials and the North Central Texas Council of Governments, State Housing representatives and housing advocates, to develop a 10-year regional housing plan to provide affordable and assisted housing in the Dallas metropolitan area.” This plan will be developed within the limits of voluntary participation other jurisdictions and stakeholders and within the limits of Texas law. The City of Dallas FHO has sponsored two successful fair housing symposiums over the past two years and invited regional governments and stakeholders. The City also participates with regional partners on fair housing events and is a part of the Continuum of Care addressing the needs of homeless persons in metro Dallas. The City’s FHAP shall as far as practical include regional approaches and strategies for addressing fair housing.

¹⁷ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

¹⁸ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

Fair Housing Implementation Tracking

The City's AI Implementation Coordinator will be responsible for the oversight and tracking of the implementation of the FHAP. The AI Implementation Coordinator will track the progress of the actions to address the impediments to fair housing choice. The purpose of the implementation tracking is to analyze the impact of the actions taken and demonstrate that the City has met its obligation to affirmatively further fair housing. This section describes the process for tracking the City's progress in carrying out the recommendations to address the impediments to fair housing choice.

Ongoing Self-assessment

It is recommended that the City conduct an ongoing self-assessment annually to determine its progress in addressing the identified impediments and recommendations. The City's fair housing activities will be compared to the timelines stipulated in the fair housing action plan. If the City notices any deviations from the timeline, it will take the necessary steps to address any deficiencies or revise the timeline and document its files. Each recommendation proposed in the AI includes a timeframe for completion in periods of one, three, and five-years, or on an ongoing basis.

Recordkeeping

A key element of the monitoring process is recordkeeping. The City will maintain a fair housing file where all actions taken are recorded and updates are made on a regular basis. HUD requires that at a minimum, the file contain:

- A copy of the AI;
- Copies of community feedback including correspondence, meeting notes, and notices; and
- Records that show the grantee has taken actions to overcome the effects of impediments identified in the AI.

City staff shall maintain information in the fair housing file through the use of the suggested Fair Housing Compliance File Checklist (see page 191 below).

Reporting

In addition to the on-going self-assessment, the City will prepare its Consolidated Annual Performance Evaluation Report (CAPER), explaining how the jurisdiction is carrying out its housing and community development strategies, projects, and activities. As part of the report, the City must describe how it is carrying out its certification to affirmatively further fair housing by a) identifying the actions taken during the year; b) providing a summary of impediments to fair housing choice in the AI, and c) identifying actions taken to overcome effects of impediments identified in the AI.

Mid-period Assessment

The AI is typically updated every five years. However, much can change within a five-year span of time and as such, it is recommended that the City conduct a mid-period assessment. The purpose of the mid-period assessment is to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions outlined in the fair housing action plan and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice. The mid-period assessment will be conducted at the end of the third year of implementation and will include the annual assessment for the year as well as a cumulative review of the actions taken and their impact for the three-year period.

The City will compile and include the following in the mid-period assessment:

- Population demographic data relating to race, ethnic group, sex, age, and head of household;
- Characteristics of program beneficiaries;
- Affirmative marketing strategy and actions;
- Discrimination complaints filed and trends;
- Amendments or revisions to policies impacting land development, site selection, and zoning;
- Actions taken to affirmatively further fair housing; and
- Results of any needs assessments or studies for the area impacting fair housing.

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Fair Housing Compliance File Checklist

Grantee: _____

Fiscal Year: _____

DATE	DESCRIPTION
_____	Current Consolidated Plan section applicable to Fair Housing
_____	Analysis of Impediments to Fair Housing Choice
_____	Annual Resolution or Proclamation of Fair Housing Month
_____	A summary report of all activities related to the AI
_____	List of the actions taken during the program year
_____	Notice of public meetings showing the fair housing and equal opportunity logo. Will also include language providing for accommodations for persons with Limited English Proficiency, disabilities including the hearing impaired.
_____	Summary or transcript of all public meetings, hearings, and citizen comments or other public input
_____	Sign-in sheet or list of attendees at public meetings or hearings
_____	Fair housing brochures and publications including subrecipient educational material
_____	Information about housing discrimination complaints and the disposition of each
_____	Notice of training or workshops regarding fair housing and list of attendees
_____	Description of funding or fair housing providers and bi-annual reports from such agencies
_____	Studies or reports evaluating the impact of the actions undertaken including applicable sections of its required CDBG Annual Report CAPER to HUD.
_____	Other:

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Appendix 2- Fair Housing Planning Matrix

REMEDIAL ACTIONS	RESPONSIBLE PARTIES	TIME FRAME
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS		
A. Impediment: Lack of affordable housing for Dallas residents, especially racial/ethnic minorities.		
Action: Increase the production and preservation of affordable housing units.		
Action #A-1: Increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects and leveraging public funding with private sector funding.	Developers; Lenders; Housing Providers; Housing & Community Services Dept.	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #A-2: Improve partnerships with non-profit housing developers, such as CHDOs and CLTs, which are familiar with the development process, aware of neighborhood issues, and that have a mission to improve the lives of low- and moderate-income persons.	Developers; CLTs; CHDOs; Housing & Community Services Dept.	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #A-3: Provide a fast-track permitting and site development review process for affordable housing projects and dedicate staff in the Planning and Economic Development departments to assist non-profit developers to move small scale, infill housing projects through each stage of development.	Building Dept.; Planning; Housing & Community Services Dept.; Developers; City Council; City Manager's Office	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #A-4: Offer new or continue existing development incentives such as density bonuses, waivers of setbacks, lot widths, and height restrictions, and reduce or waive impact fees in order to increase the supply of buildable lots for infill housing and lower costs for housing development.	Planning; City Council; City Manager's Office	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #A-5: Establish a policy that requires deed restrictions with housing developers to maintain long-term affordability even when federal/state funds are not used in the project.	Housing & Community Services Dept.; City Attorney; Developers;	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #A-6: In order to maintain or increase homeownership in Dallas, the City will increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate income households.	Lenders; Housing Counseling Agencies; Housing & Community Services Dept.	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>

REMEDIAL ACTIONS	RESPONSIBLE PARTIES	TIME FRAME
Action #A-7: Continue and increase leveraging with private sector funds and other public funding for the development of a variety of affordable and accessible housing units suitable for different types of households. Implement land use policies which encourage the creation, construction, and/or preservation of affordable and accessible housing for families in all areas of the City.	Developers, Lenders, Housing Providers, Housing & Community Services Dept.; City Manager's Office	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
B. Impediment: Lack of accessible housing limiting housing choices for seniors and persons with disabilities. Action: Increase the number of accessible housing units based on need.		
Action #B-1: Determine the need for accessible units and seek out additional resources to fill the gap.	Planning; Housing & Community Services Dept.	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #B-2: Review its policies, staff training, and awareness regarding accessibility inspections for new multi-family housing to ensure that builders are meeting accessibility design requirements.	Building Inspection; Fair Housing Office; fair housing agencies	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #B-3: Consider incorporating visitability standards into its building requirements for new single-family housing and housing not covered by federal accessibility regulations.	Planning; City Manager's Office; City Council; Fair Housing Office; Housing & Community Development Services	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
C. Impediment: Poor condition of affordable rental housing in the City especially in neighborhoods with high poverty and low opportunities. Action: Develop strategies to address rehabilitation needs including repairs and accessibility modifications for rental properties.		
Action #C-1: Develop plans to meet needs of target neighborhood through City of Dallas and partnering agencies.	Housing & Community Services Dept.; City Manager's Office; City Council	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #C-2: Adopt and Implement changes to Chapter 27 Code Enforcement.	Housing & Community Services Dept.; City Manager's	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>

REMEDIAL ACTIONS	RESPONSIBLE PARTIES	TIME FRAME
	Office; City Council	
Action #C-3: Implement risk based multi-tenant property inspection program.	Housing & Community Services Dept.; City Manager's Office; City Council	<u>Check one</u> Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #C- 4: Initiate high impact landlord program to bring properties in compliance.	Housing & Community Services Dept.; City Manager's Office; City Council	<u>Check one</u> Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #C- 5: Develop Citywide Affordable Housing policy that addresses quality and location of rental housing.	Housing & Community Services Dept.; City Manager's Office; City Council	<u>Check one</u> Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<p><i>D. Impediment: Lack of awareness of a reasonable accommodation procedure to provide relief from codes that may limit housing opportunities to individuals with disabilities.</i></p> <p><i>Action: Ensure that persons with disabilities are aware of the procedure by which such persons may request reasonable accommodations or modifications on the basis of a disability.</i></p>		
Action #D-1: Coordinate outreach and education about the procedure to seek reasonable accommodations that allows certain deviations from City's zoning and land use requirements and development standards.	City Manager's Office; City Council; Planning Dept.; Fair Housing Office, fair housing agencies, developers	<u>Check one</u> Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<p><i>E. Impediment: Historic pattern of concentration of racial/ethnic and low income populations in Southern Dallas.</i></p> <p><i>Action: Develop a strategy to address historic patterns of concentration and move towards achieving a balance of housing investment between the northern and southern sectors.</i></p>		
Action #E-1: Adopt policies that increase the supply of affordable housing for families in all areas and neighborhoods in the City.	Housing & Community Services Dept.; Fair Housing Office; City	<u>Check one</u> Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>

REMEDIAL ACTIONS	RESPONSIBLE PARTIES	TIME FRAME
	Manager's Office; City Council	
Action #E-2: Increase greater coordination and collaboration between the City's Fair Housing Office, the Housing and Community Services, and other departments in the housing strategy and annual planning process.	Fair Housing Office; Housing and Community Services Dept. Other Depts.	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #E-3: Annually monitor residential concentration by race or ethnicity.	Fair Housing Office; Developers; Housing & Community Services, Dept.; fair housing agencies	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Action #E-4: Assess the feasibility of using strategies such as developing affordable housing on smaller, non-conforming lots, scattered site infill rental housing, and land donation in a wider variety of neighborhoods throughout the City.	Planning and Zoning, Developers; Housing & Community Services Dept. City Manager, City Council	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<p><i>F. Impediment: Lending practices may be disproportionately impacting racial and ethnic minority populations based on loan denial rates.</i></p> <p><i>Action: Work with lenders in Dallas and request that they review their underwriting standards to determine that loan decisions are being made equitably.</i></p>		
Action #F-1: Coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.	Lenders; Fair housing agencies, Fair Housing Office	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<p><i>G. Impediment Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.</i></p> <p><i>Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.</i></p>		
Action #G-1: Work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.	Dallas Housing Authority; Housing Providers; Fair Housing Office; fair housing agencies	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<p><i>H. Impediment: Inadequate fair housing education and awareness, especially for underrepresented and minority populations with Limited English Proficiency (LEP).</i></p>		

REMEDIAL ACTIONS	RESPONSIBLE PARTIES	TIME FRAME
<p>Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as persons with LEP, persons with disabilities including the hearing impaired, and the LGBT community.</p>		
<p>Action #H-1: Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.</p>	<p>Fair Housing Office, fair housing agencies, social service agencies</p>	<p>Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/></p>
<p>Action #H-2: Use the City’s cable television channel(s) and social media as a source of fair housing information and public education efforts including the use of public service announcements and fair housing videos from HUD’s YouTube channel.</p>	<p>Fair Housing Office; Communications Dept.</p>	<p>Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/></p>
<p>I. Impediment Residents face challenges accessing public transportation especially special needs population members including persons with disabilities and homeless persons.</p> <p>Action: Increase access to public transportation and transit services for low- and moderate income persons, persons with disabilities, and other protected class members.</p>		
<p>Action #I-1: When conducting transportation planning and seeking funding opportunities to improve public transportation and infrastructure, the City will ensure that consideration is given to the transportation needs of protected class members as well as low- and moderate income persons.</p>	<p>Planning Department; DART; City Manager’s Office; City Council</p>	<p>Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/></p>
<p>J. Impediment: “Not in my Backyard” (NIMBYism) sentiment is an impediment to fair housing choice.</p> <p>Action: Increase education and outreach to dispel myths and false perceptions about affordable housing</p>		
<p>Action #J-1: Focus training and public hearings throughout the City on NIMBYism to provide residents an opportunity to express their concerns and learn about affordable and accessible housing.</p>	<p>Fair Housing Office, Planning Dept. fair housing agencies, social service agencies, DHA</p>	<p>Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/></p>
<p>Action #J-2: Work with partners throughout the region to raise awareness of the concepts of “housing affordability” and “affordable financing.”</p>	<p>Fair Housing Office, fair housing agencies, regional partners,</p>	<p>Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/></p>

Appendix 3 - List of Dallas Low Income Housing Tax Credit Projects

Development Name	Project Address	Total Units	LIHTC Units	Population Served	Disabled Units	Census Tract	Tract Minority %	Tract Median Family Income %
Rosemont at Arlington Park	1716 Chattanooga Place	100	75	General	10	1.00	19.11	197.88
The Pegasus	7200 North Stemmon Fwy.	156	124	Elderly	9			
Providence Mockingbird	1893 West Mockingbird Lane	251	251	General/Elderly	19			
Birchwood Apartments	4829 Coles Manor Place	276	276	General	0	8.00	80.71	39.01
Treymore North Apartments-CityPlace II	4144 Office Parkway	70	52	General	8			
Monarch Townhomes	2008 Kirby St.	65	65	General	3			
Carroll Townhomes	1917 N. Carroll Ave.	71	71	General	4			
Diamond Creek Apartments (fka Skyline Apartments)	3402 S. Buckner Blvd.	272	272	General	0			
Sphinx at Delafield	4101 Delafield Lane	204	204	General	15	9.00	72.97	46.45
Royal Palm	5520 Gaston Ave.	23	23	General	0			
Lakewood Gardens Apartments	5909 Gaston Ave.	40	40	General	0	14.00	59.72	90.52
Fitzhugh Place Apartments	1428-1518 N. Fitzhugh	52	52	General	0			
Trinity Works Community Living Center (fka Prince of Wales)	4515 Live Oak Street	61	61	General	15			
Bryan Place Apartments	3219 San Jacinto St.	22	22	General	0	15.04	65.00	43.13
Treymore @ Cityplace Apartments	2101 N. Haskell	180	72	General	5			
Roseland Townhomes	1949 N. Washington Ave.	192	144	General	16			
Roseland Gardens	2255 N. Washington Ave.	101	100	Elderly	0			
Roseland Estates	1949 N. Washington Ave.	138	104	General	20			
Hillcrest House	834 Marsalis	64	64	General	68			
City Walk at Akard	511 N. Akard	209	204	General	0			
Carpenter's Point	3326 Mingo St.	150	150	Elderly	15	25.00	96.61	47.23
Frazier Fellowship	4848 Hatcher Street	76	60	General	0			
Wahoo Frazier Townhomes	4848 Hatcher St.	118	95	General	8	27.01	99.34	22.53
Mill City Parc Apartments	4848 Hatcher Street	116	116	General	9			
Atmos Lofts	1900 Jackson St.	107	107	General	11			
South Boulevard Retirement Center	1811/1821 South Blvd.	30	30	Elderly	3	34.00	87.78	39.17
Southern Terrace Apartments	4722 Meadow Street	264	264	General	0			
Telstar Apartments	510 Westmount Ave.	100	100	General	0	45.00	84.92	74.80
Ewing Villas	811 S. Morrell Avenue	80	60	General	4			
Sphinx at Fiji Senior	201 Fran Way	130	130	Elderly	13			
Sphinx At Reese Court	1201 Ewing Ave.	80	80	General	4	54.00	94.53	42.63
Serenity Place Apartments	3124 Denley	45	45	Supportive Housing	0			
Madison Point Apartments	220 W. Overton	176	140	General	13	60.02	82.16	39.47
Providence at Village Fair	5151 Village Fair Drive	236	236	General	18			

Development Name	Project Address	Total Units	LIHTC Units	Population Served	Disabled Units	Census Tract	Tract Minority %	Tract Median Family Income %
Parks At Wynnewood Apartments, The	1910 Argentia Dr.	172	172	General	0	62.00	90.42	63.39
Wynnewood Seniors Housing	1500 Block of S. Zang Blvd. (W. side of street)	140	140	Elderly	7			
Wynnewood Family Housing	~2048 South Zang Boulevard	160	160	General	9			
The Oaks at Hampton	2514 Perryton	250	250	Elderly	0	63.01	92.89	54.98
Mill Run	2732 W. Colorado	112	112	General	0	69.00	89.73	53.39
Villas at Remond	3050 Remond Dr.	131	131	Elderly	21			
March Street Apartments	4500 March Ave.	60	60	General	0	71.02	74.30	73.52
Lakeridge Apartments	2510 Community Drive	66	66	General	0	72.01	97.47	39.80
Starlight Apartments	9709 Starlight Rd.	71	64	General	0			
Primavera Apartments	2610 Community Drive #127	137	137	General	0			
Willow Pond (fka Glen Hills)	6003 Abrams Rd.	386	386	General	55	78.09	43.23	55.51
Junction Apartments	7111 Fair Oaks Ave.	208	208	General	0	78.15	84.98	30.55
Market Apartments	7001 Fair Oaks Ave.	131	131	General	0			
Santa Fe Trails	6318 Ridgecrest Rd.	88	88	General	0	78.18	89.77	41.52
White Rock Creek Apartments	1041 Knob Oak Dr.	152	152	General	0	81.00	19.60	141.18
Southern Oaks Apartments	3303 Southern Oaks Blvd.	256	256	General	0	86.04	98.73	25.14
The Villas Of Sorrento	3130 Stag Rd.	245	245	General	37	87.01	99.04	37.83
Oakwood Place Apartments	4950 Wadsworth Dr.	206	155	General	23			
Rosemont of Oak Hollow	3015 E. Ledbetter	153	153	General	11	87.04	98.30	32.54
Las Lomas Apartments	6161 Trail Glen Drive	230	138	General	22	93.04	98.26	26.42
Rosemont at Pemberton Hill	220 Stoneport Dr.	236	236	General	0			
Grove Village	7209 South Loop 12	232	232	General	0			
Pleasant Village	378 North Jim Miller Road	200	200	General	0	96.10	98.54	33.39
Sierra Vista Apartments (fka Cherry Walk Apt)	2775 Northaven Rd.	224	224	General	0			
Manor On The Park	3122 Park Lane	108	86	General	1			
Cornerstone Chase Apartments	3120 Valley Meadow Dr.	165	165	General	0	98.04	97.95	31.44
The Trails Apartments	3109 Chapel Creek	302	302	General	8			
Arbor Woods	3000 N. Hampton Rd.	151	120	General	11	101.01	98.88	37.46
Churchill at Pinnacle Park	1411 Cockrell Hill Rd.	200	200	General	14	107.01	91.44	46.91
Taylor Farms	32 Pinnacle Park Blvd.	160	144	General	0			
Hillside West Seniors	Near 32 Pinnacle Park Blvd.	130	130	Elderly	0			
Preakness Ranch	5480 Preakness Lane	264	264	General	0	107.04	94.66	49.22
Residence at the Oaks	2740 Duncanville Rd.	212	212	Elderly	10	108.01	93.28	53.82
Oakridge Apartments	2803 West Illinois Ave.	46	46	General	0	108.04	96.15	48.51
Potter's House at Primrose	2515 Perryton	280	280	General	0			
Columbia Luxar Townhomes	3120 Guadalupe Ave.	120	120	General	20			
Sphinx at Luxar	3110 Cockrell Hill Rd.	100	96	General	5	108.05	95.60	62.28
Park @ Cliff Creek	7310 Marvin D. Love Freeway	280	280	General	14			
						109.02	97.75	47.68

Development Name	Project Address	Total Units	LIHTC Units	Population Served	Disabled Units	Census Tract	Tract Minority %	Tract Median Family Income %
Woodglen Park Apartments	6800 S. Cockrell Hill Rd.	112	112	General	5	109.03	95.92	42.13
Woodglen Park II (fka Red Bird Ridge)	6800 S. Cockrell Hill Rd.	120	120	General	1			
Redbird Trails Apartments	3636 West Redbird Lane	252	252	General	23	109.04	97.44	45.24
Woodhollow Apartments	4424 Woodhollow Drive	236	212	General	12			
Rosemont at Laureland	330 E. Camp Wisdom	250	250	General	18	112.00	97.73	57.88
Magnolia Trace	S. of Crouch Rd. & W. of Lancaster Rd.	112	112	Elderly	0	113.00	98.27	75.52
Homes of Persimmon	3245 Simpson Stuart Rd.	180	135	General	29	114.01	98.64	27.44
Homes of Pecan Grove	3131 Simpson Stuart	250	250	General	13			
Southdale Apartments	3727 Dixon Ave.	188	188	General	0	115.00	99.06	31.51
Buckeye Trail Commons	6717 Buckeye Commons Way	207	206	General	14			
Buckeye Trail Commons II	6717 Bexar Street	116	106	General	11			
Sphinx @ Murdeaux	125 S. Murdeaux	240	240	General	12	116.01	94.32	44.40
Hacienda Del Sol	9200 Mountain Cabin Rd.	55	55	General	6	116.02	85.93	49.63
The Masters Apartments	1180 N. Masters Dr.	144	144	General	11	118.00	89.88	52.57
St. Augustine Estates	2222 N. St. Augustine Dr.	150	150	Elderly	11	120.00	92.27	46.77
Crestshire Village	2300 N. St. Augustine Dr.	74	74	General	6			
Bruton Apartments	9415 Bruton Road	264	264	General	0			
Prairie Commons	9850 Military Parkway	72	72	General	4			
Rosemont at Scyene	9901 Scyene Road	250	250	General	18	121.00	94.99	49.7
Enchanted Hills	7802 Villa Cliff Dr.	229	229	General	11	122.08	96.75	31.31
Primrose at Highland	2000 Highlands	150	120	Elderly	11			
Fairway Crossing Apartments	7229 Ferguson Road	310	297	General	0			
Primrose at Highland	2000 Highlands	0	0	Elderly	0			
Fairway Crossing	7229 Ferguson Rd.	0	0	General	0			
Treymore at LaPrada, The	2631 John West Rd.	196	150	General	20	123.02	88.6	37.36
Ash Creek Apartments	2563 John West Blvd.	280	280	General	0			
Shiloh Village Apartments	8702 Shiloh Road	168	168	General	0			
Cherrycrest Villas	North side of 2500 Block of John West Road	232	232	Elderly	16			
Autumn Creek	10765 E. North West Highway	82	82	General	1	130.05	12.58	149.05
Summit Place	SWC of Merit Dr and Hwy 635	98	75	General	0	132.00	23.06	212.36
Dallas North Apartments	5557 Alpha Rd.	206	206	General	4	136.15	82.14	54.50
Peterson Place Apartments	5423 Peterson Lane	168	168	General	3	136.26	69.42	82.38
Rosemont at Bluff Ridge	8125 Clark Rd.	256	256	General	0	165.21	66.20	63.15
Cedar Ridge Apartments	7905 Marvin D. Love Freeway	192	192	General	2	166.05	91.63	37.71
Greens of Hickory Trail Apartments	8613 Old Hickory Trail	250	248	General	14			
Rosemont at Timbercreek	801 Beckleymeade Avenue	100	100	General	5			
Hickory Trace	8410 S Westmoreland Rd.	180	180	General	0			
Rose Court at Thortree	8501 Old Hickory Trail	280	280	General	20			

Development Name	Project Address	Total Units	LIHTC Units	Population Served	Disabled Units	Census Tract	Tract Minority %	Tract Median Family Income %
West Virginia Apartments	8004 West Virginia Dr.	202	202	General	0			
Amber Dawn Apartments (fka Amber Tree)	8542 Spring Valley Rd.	157	145	General	0	192.02	49.3	83.15
Spring Hill Apartments	13750 Maham Rd.	248	246	General	0	192.12	98.32	38.40
The Waterford At Goldmark	13695 Goldmark Drive	220	165	General	0	192.13	78.69	36.89
The Tuscany at Goldmark	13731 Goldmark Dr.	184	138	Elderly	30			
Eban Village I Apartments	2710 Jefferies St.	110	110	General	0	203.00	94.08	27.61
Eban Village II Apartments	3011 Park Row Ave.	220	165	General	27			
1400 Belleview	1401 Browder St.	164	164	General	0	204.00	56.00	124.08
Lakewest Community Townhomes	3020 Bickers St.	152	152	General	0	205.00	96.93	31.13
Village at Lakewest Apartments I	2696 Bickers Street	180	180	Elderly	0			
Village at Lakewest Apartments II	120 ft. West of corner of Morris Dr. and Fishtrap St.	180	180	Elderly	0			
Fountains of Rosemeade	3440 E. Rosemeade Parkway	0	0	General	0	216.16	59.31	88.14

Appendix 4- List of Acronyms

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Appendix 5- Dallas, TX HUD Metro Small Area FY 2013 Fair Market Rents

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75001	\$620	\$740	\$940	\$1,250	\$1,510
75002	\$750	\$900	\$1,140	\$1,520	\$1,840
75006	\$590	\$710	\$900	\$1,200	\$1,450
75007	\$650	\$780	\$990	\$1,320	\$1,590
75009	\$610	\$730	\$920	\$1,230	\$1,480
75010	\$740	\$890	\$1,120	\$1,490	\$1,800
75011	\$570	\$690	\$870	\$1,160	\$1,400
75013	\$760	\$910	\$1,150	\$1,530	\$1,850
75014	\$570	\$690	\$870	\$1,160	\$1,400
75015	\$570	\$690	\$870	\$1,160	\$1,400
75016	\$570	\$690	\$870	\$1,160	\$1,400
75017	\$570	\$690	\$870	\$1,160	\$1,400
75019	\$740	\$890	\$1,120	\$1,490	\$1,800
75022	\$750	\$900	\$1,140	\$1,520	\$1,840
75023	\$700	\$840	\$1,060	\$1,410	\$1,710
75024	\$680	\$810	\$1,030	\$1,370	\$1,660
75025	\$750	\$900	\$1,140	\$1,520	\$1,840
75026	\$660	\$790	\$1,000	\$1,330	\$1,610
75027	\$610	\$730	\$920	\$1,230	\$1,480
75028	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75029	\$610	\$730	\$920	\$1,230	\$1,480
75030	\$570	\$690	\$870	\$1,160	\$1,400
75032	\$810	\$970	\$1,230	\$1,640	\$1,980
75033	\$620	\$740	\$940	\$1,250	\$1,510
75034	\$730	\$870	\$1,100	\$1,470	\$1,770
75035	\$860	\$1,040	\$1,310	\$1,750	\$2,110
75038	\$580	\$700	\$880	\$1,170	\$1,420
75039	\$720	\$860	\$1,090	\$1,450	\$1,760

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75040	\$730	\$870	\$1,100	\$1,470	\$1,770
75041	\$580	\$700	\$880	\$1,170	\$1,420
75042	\$550	\$660	\$840	\$1,120	\$1,350
75043	\$610	\$740	\$930	\$1,240	\$1,500
75044	\$670	\$810	\$1,020	\$1,360	\$1,640
75045	\$570	\$690	\$870	\$1,160	\$1,400
75046	\$570	\$690	\$870	\$1,160	\$1,400
75047	\$570	\$690	\$870	\$1,160	\$1,400
75048	\$740	\$890	\$1,120	\$1,490	\$1,800
75049	\$570	\$690	\$870	\$1,160	\$1,400
75050	\$550	\$660	\$830	\$1,110	\$1,340
75051	\$540	\$650	\$820	\$1,090	\$1,320
75052	\$710	\$850	\$1,080	\$1,440	\$1,740
75053	\$570	\$690	\$870	\$1,160	\$1,400
75056	\$790	\$950	\$1,200	\$1,600	\$1,930
75057	\$610	\$730	\$920	\$1,230	\$1,480
75060	\$530	\$640	\$810	\$1,080	\$1,300
75061	\$500	\$600	\$760	\$1,010	\$1,220
75062	\$550	\$660	\$840	\$1,120	\$1,350
75063	\$670	\$810	\$1,020	\$1,360	\$1,640
75065	\$650	\$780	\$990	\$1,320	\$1,590
75067	\$610	\$730	\$920	\$1,230	\$1,480
75068	\$710	\$850	\$1,070	\$1,430	\$1,720
75069	\$590	\$700	\$890	\$1,190	\$1,430
75070	\$840	\$1,000	\$1,270	\$1,690	\$2,050
75071	\$620	\$740	\$940	\$1,250	\$1,510
75074	\$630	\$750	\$950	\$1,270	\$1,530
75075	\$640	\$770	\$970	\$1,290	\$1,560
75077	\$770	\$930	\$1,170	\$1,560	\$1,880
75078	\$740	\$890	\$1,120	\$1,490	\$1,800
75080	\$690	\$830	\$1,050	\$1,400	\$1,690
75081	\$710	\$850	\$1,070	\$1,430	\$1,720
75082	\$730	\$880	\$1,110	\$1,480	\$1,790

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75083	\$570	\$690	\$870	\$1,160	\$1,400
75085	\$570	\$690	\$870	\$1,160	\$1,400
75086	\$660	\$790	\$1,000	\$1,330	\$1,610
75087	\$750	\$890	\$1,130	\$1,510	\$1,820
75088	\$840	\$1,010	\$1,280	\$1,710	\$2,060
75089	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75093	\$680	\$810	\$1,030	\$1,370	\$1,660
75094	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75098	\$730	\$880	\$1,110	\$1,480	\$1,790
75101	\$530	\$640	\$810	\$1,080	\$1,300
75104	\$760	\$910	\$1,150	\$1,530	\$1,850
75106	\$570	\$690	\$870	\$1,160	\$1,400
75114	\$730	\$870	\$1,100	\$1,470	\$1,770
75115	\$610	\$730	\$920	\$1,230	\$1,480
75116	\$610	\$740	\$930	\$1,240	\$1,500
75119	\$540	\$650	\$820	\$1,090	\$1,320
75123	\$570	\$690	\$870	\$1,160	\$1,400
75125	\$540	\$650	\$820	\$1,090	\$1,320
75126	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75132	\$760	\$920	\$1,160	\$1,550	\$1,870
75134	\$610	\$730	\$920	\$1,230	\$1,480
75135	\$530	\$640	\$810	\$1,080	\$1,300
75137	\$750	\$900	\$1,140	\$1,520	\$1,840
75138	\$570	\$690	\$870	\$1,160	\$1,400
75141	\$550	\$660	\$830	\$1,110	\$1,340
75142	\$530	\$640	\$810	\$1,080	\$1,300
75143	\$510	\$610	\$770	\$1,030	\$1,240
75146	\$600	\$720	\$910	\$1,210	\$1,470
75147	\$500	\$600	\$760	\$1,010	\$1,220
75149	\$650	\$770	\$980	\$1,310	\$1,580
75150	\$610	\$730	\$920	\$1,230	\$1,480
75152	\$480	\$580	\$730	\$970	\$1,180
75154	\$730	\$880	\$1,110	\$1,480	\$1,790

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75156	\$560	\$670	\$850	\$1,130	\$1,370
75157	\$430	\$510	\$650	\$870	\$1,050
75158	\$510	\$620	\$780	\$1,040	\$1,260
75159	\$610	\$730	\$920	\$1,230	\$1,480
75160	\$570	\$680	\$860	\$1,150	\$1,390
75161	\$570	\$690	\$870	\$1,160	\$1,400
75164	\$550	\$660	\$840	\$1,120	\$1,350
75165	\$590	\$710	\$900	\$1,200	\$1,450
75166	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75167	\$740	\$890	\$1,120	\$1,490	\$1,800
75168	\$590	\$700	\$890	\$1,190	\$1,430
75169	\$490	\$590	\$740	\$990	\$1,190
75172	\$470	\$570	\$720	\$960	\$1,160
75173	\$730	\$880	\$1,110	\$1,480	\$1,790
75180	\$540	\$650	\$820	\$1,090	\$1,320
75181	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75182	\$570	\$690	\$870	\$1,160	\$1,400
75185	\$570	\$690	\$870	\$1,160	\$1,400
75187	\$570	\$690	\$870	\$1,160	\$1,400
75189	\$670	\$800	\$1,010	\$1,350	\$1,630
75201	\$820	\$990	\$1,250	\$1,670	\$2,010
75202	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75203	\$440	\$530	\$670	\$890	\$1,080
75204	\$750	\$900	\$1,140	\$1,520	\$1,840
75205	\$720	\$860	\$1,090	\$1,450	\$1,760
75206	\$600	\$720	\$910	\$1,210	\$1,470
75207	\$580	\$700	\$880	\$1,170	\$1,420
75208	\$510	\$610	\$770	\$1,030	\$1,240
75209	\$750	\$890	\$1,130	\$1,510	\$1,820
75210	\$440	\$530	\$670	\$890	\$1,080
75211	\$520	\$620	\$790	\$1,050	\$1,270
75212	\$510	\$610	\$770	\$1,030	\$1,240
75214	\$550	\$660	\$830	\$1,110	\$1,340

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75215	\$480	\$580	\$730	\$970	\$1,180
75216	\$510	\$620	\$780	\$1,040	\$1,260
75217	\$570	\$680	\$860	\$1,150	\$1,390
75218	\$650	\$770	\$980	\$1,310	\$1,580
75219	\$590	\$710	\$900	\$1,200	\$1,450
75220	\$490	\$590	\$740	\$990	\$1,190
75221	\$570	\$690	\$870	\$1,160	\$1,400
75222	\$570	\$690	\$870	\$1,160	\$1,400
75223	\$530	\$630	\$800	\$1,070	\$1,290
75224	\$490	\$590	\$750	\$1,000	\$1,210
75225	\$880	\$1,050	\$1,330	\$1,770	\$2,140
75226	\$700	\$840	\$1,060	\$1,410	\$1,710
75227	\$530	\$640	\$810	\$1,080	\$1,300
75228	\$470	\$560	\$710	\$950	\$1,140
75229	\$550	\$660	\$840	\$1,120	\$1,350
75230	\$490	\$590	\$740	\$990	\$1,190
75231	\$470	\$560	\$710	\$950	\$1,140
75232	\$520	\$620	\$790	\$1,050	\$1,270
75233	\$550	\$660	\$830	\$1,110	\$1,340
75234	\$590	\$700	\$890	\$1,190	\$1,430
75235	\$570	\$690	\$870	\$1,160	\$1,400
75236	\$560	\$670	\$850	\$1,130	\$1,370
75237	\$520	\$620	\$790	\$1,050	\$1,270
75238	\$500	\$600	\$760	\$1,010	\$1,220
75240	\$530	\$630	\$800	\$1,070	\$1,290
75241	\$610	\$740	\$930	\$1,240	\$1,500
75242	\$570	\$690	\$870	\$1,160	\$1,400
75243	\$510	\$610	\$770	\$1,030	\$1,240
75244	\$740	\$890	\$1,120	\$1,490	\$1,800
75246	\$440	\$530	\$670	\$890	\$1,080
75247	\$480	\$580	\$730	\$970	\$1,180
75248	\$640	\$770	\$970	\$1,290	\$1,560
75249	\$720	\$860	\$1,090	\$1,450	\$1,760

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75250	\$570	\$690	\$870	\$1,160	\$1,400
75251	\$780	\$930	\$1,180	\$1,570	\$1,900
75252	\$530	\$640	\$810	\$1,080	\$1,300
75253	\$550	\$660	\$840	\$1,120	\$1,350
75254	\$580	\$700	\$880	\$1,170	\$1,420
75287	\$570	\$680	\$860	\$1,150	\$1,390
75313	\$570	\$690	\$870	\$1,160	\$1,400
75315	\$570	\$690	\$870	\$1,160	\$1,400
75342	\$570	\$690	\$870	\$1,160	\$1,400
75354	\$570	\$690	\$870	\$1,160	\$1,400
75355	\$570	\$690	\$870	\$1,160	\$1,400
75356	\$570	\$690	\$870	\$1,160	\$1,400
75360	\$570	\$690	\$870	\$1,160	\$1,400
75367	\$570	\$690	\$870	\$1,160	\$1,400
75370	\$660	\$790	\$1,000	\$1,330	\$1,610
75371	\$570	\$690	\$870	\$1,160	\$1,400
75372	\$570	\$690	\$870	\$1,160	\$1,400
75374	\$570	\$690	\$870	\$1,160	\$1,400
75378	\$570	\$690	\$870	\$1,160	\$1,400
75379	\$570	\$690	\$870	\$1,160	\$1,400
75380	\$570	\$690	\$870	\$1,160	\$1,400
75381	\$570	\$690	\$870	\$1,160	\$1,400
75382	\$570	\$690	\$870	\$1,160	\$1,400
75401	\$480	\$580	\$730	\$970	\$1,180
75402	\$500	\$600	\$760	\$1,010	\$1,220
75403	\$480	\$580	\$730	\$970	\$1,180
75404	\$480	\$580	\$730	\$970	\$1,180
75407	\$670	\$800	\$1,010	\$1,350	\$1,630
75409	\$630	\$760	\$960	\$1,280	\$1,550
75415	\$540	\$650	\$820	\$1,090	\$1,320
75422	\$510	\$610	\$770	\$1,030	\$1,240
75423	\$510	\$620	\$780	\$1,040	\$1,260
75424	\$630	\$750	\$950	\$1,270	\$1,530

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75428	\$400	\$470	\$600	\$800	\$970
75432	\$510	\$620	\$780	\$1,040	\$1,260
75441	\$540	\$650	\$820	\$1,090	\$1,320
75442	\$540	\$650	\$820	\$1,090	\$1,320
75448	\$540	\$650	\$820	\$1,090	\$1,320
75449	\$400	\$480	\$610	\$810	\$980
75450	\$540	\$650	\$820	\$1,090	\$1,320
75452	\$530	\$630	\$800	\$1,070	\$1,290
75453	\$650	\$770	\$980	\$1,310	\$1,580
75454	\$730	\$880	\$1,110	\$1,480	\$1,790
75469	\$540	\$650	\$820	\$1,090	\$1,320
75474	\$440	\$530	\$670	\$890	\$1,080
75491*	\$660	\$790	\$1,000	\$1,330	\$1,610
75495*	\$560	\$670	\$850	\$1,130	\$1,370
75496	\$380	\$450	\$570	\$760	\$920
76041	\$590	\$700	\$890	\$1,190	\$1,430
76052	\$880	\$1,050	\$1,330	\$1,770	\$2,140
76055	\$590	\$700	\$890	\$1,190	\$1,430
76064	\$670	\$810	\$1,020	\$1,360	\$1,640
76065	\$620	\$740	\$940	\$1,250	\$1,510
76084	\$600	\$720	\$910	\$1,210	\$1,470
76177	\$580	\$700	\$880	\$1,170	\$1,420
76201	\$460	\$550	\$700	\$930	\$1,130
76202	\$610	\$730	\$920	\$1,230	\$1,480
76205	\$570	\$680	\$860	\$1,150	\$1,390
76206	\$610	\$730	\$920	\$1,230	\$1,480
76207	\$550	\$660	\$830	\$1,110	\$1,340
76208	\$610	\$740	\$930	\$1,240	\$1,500
76209	\$560	\$670	\$850	\$1,130	\$1,370
76210	\$710	\$850	\$1,080	\$1,440	\$1,740
76226	\$880	\$1,050	\$1,330	\$1,770	\$2,140
76227	\$820	\$990	\$1,250	\$1,670	\$2,010
76247	\$700	\$840	\$1,060	\$1,410	\$1,710

Dallas, TX HUD Metro FMR Area Small Area Demonstration Rents By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
76249	\$740	\$890	\$1,120	\$1,490	\$1,800
76258*	\$560	\$670	\$850	\$1,130	\$1,370
76259	\$620	\$740	\$940	\$1,250	\$1,510
76262	\$710	\$850	\$1,070	\$1,430	\$1,720
76266	\$620	\$740	\$940	\$1,250	\$1,510
76272	\$610	\$730	\$920	\$1,230	\$1,480
76623	\$590	\$700	\$890	\$1,190	\$1,430
76651	\$660	\$790	\$1,000	\$1,330	\$1,610
76670	\$470	\$560	\$710	\$950	\$1,140

Appendix 6- HMDA Loan Applications and Denials Raw Tables

Table 1: City of Dallas Loan Applications and Denials by Census Tract

Loan Applications and Denials, Minority Percentage, and Percent of MSA Median Income by Census Tract Dallas, Texas 2010-2013								
Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
1	1907	209	11.0%	114	20	17.5%	15.23	196.93
2.01	1655	155	9.4%	81	9	11.1%	9.13	212.58
2.02	1687	172	10.2%	136	21	15.4%	13.61	166.74
3	1978	213	10.8%	159	30	18.9%	16.71	195.5
4.01	120	24	20.0%	51	18	35.3%	90.62	45.47
4.04	800	134	16.8%	179	42	23.5%	67.03	57.05
4.05	126	21	16.7%	35	11	31.4%	82.12	30.55
4.06	187	66	35.3%	118	57	48.3%	91.26	54.09
5	913	149	16.3%	128	26	20.3%	70.07	33.9
6.01	863	131	15.2%	131	38	29.0%	79.4	59.58
6.03	1914	246	12.9%	254	42	16.5%	27.15	208.11
6.05	652	78	12.0%	129	18	14.0%	25.64	168.14
6.06	856	102	11.9%	85	10	11.8%	16.14	246.42
7.01	1313	153	11.7%	193	29	15.0%	29.7	208.33
7.02	1056	122	11.6%	155	21	13.5%	28.25	130.92
8	319	61	19.1%	102	25	24.5%	87.82	38.82
9	509	81	15.9%	58	17	29.3%	88.86	46.22
10.01	814	94	11.5%	75	6	8.0%	36.32	164.38
10.02	560	65	11.6%	111	30	27.0%	70.58	69.01
11.01	1518	164	10.8%	164	18	11.0%	42.19	98.95
11.02	1207	118	9.8%	89	15	16.9%	17.94	249.99
12.02	682	68	10.0%	28	8	28.6%	53.29	70.55
12.03	399	45	11.3%	45	14	31.1%	60.41	78.7
12.04	78	26	33.3%	50	21	42.0%	93.83	32.76
13.01	620	83	13.4%	67	15	22.4%	38.72	111.38
13.02	474	69	14.6%	59	16	27.1%	71.34	50.05
14	575	81	14.1%	40	8	20.0%	70.29	90.09
15.02	264	51	19.3%	48	14	29.2%	86.03	50.87
15.03	54	13	24.1%	21	5	23.8%	92.1	38.5
15.04	182	42	23.1%	32	13	40.6%	77.48	42.92
16	899	119	13.2%	177	25	14.1%	62.49	48.21
17.01	72	19	26.4%	9	2	22.2%	100	No Data Available
17.03	447	43	9.6%	56	6	10.7%	17.04	204.39
17.04	230	26	11.3%	23	2	8.7%	16.57	204.39
18	501	80	16.0%	66	9	13.6%	18.51	155.41

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
19	761	140	18.4%	119	22	18.5%	34.68	206.78
20	173	42	24.3%	65	19	29.2%	94.8	41.09
21	60	16	26.7%	18	8	44.4%		144.1
22	377	58	15.4%	81	18	22.2%	36.77	84.72
24	142	32	22.5%	70	16	22.9%	91.5	48.18
25	135	45	33.3%	87	34	39.1%	96.89	47
27.01	77	24	31.2%	59	17	28.8%	99.39	22.42
27.02	27	12	44.4%	20	10	50.0%	99.2	31.31
31.01	659	113	17.1%	133	23	17.3%	35.64	145.63
34	49	19	38.8%	14	9	64.3%	86.99	38.99
37	91	28	30.8%	64	22	34.4%	99.27	52.04
38	47	21	44.7%	32	19	59.4%	99.46	32.43
39.01	21	10	47.6%	13	7	53.8%	98.75	26.34
39.02	77	28	36.4%	49	18	36.7%	98.95	32.96
40	22	4	18.2%	14	5	35.7%	98.13	58.86
41	21	12	57.1%	15	11	73.3%	99.03	16.22
42.01	916	130	14.2%	117	27	23.1%	72.88	62.48
42.02	604	77	12.7%	89	18	20.2%	78.6	59.25
43	72	27	37.5%	25	13	52.0%	90.94	54.51
44	1484	142	9.6%	136	20	14.7%	22.9	149.24
45	715	123	17.2%	216	66	30.6%	81.18	74.44
46	463	66	14.3%	72	23	31.9%	67.54	156.73
47	81	27	33.3%	30	19	63.3%	92.65	44.07
48	50	17	34.0%	24	14	58.3%	96.51	52.52
49	115	44	38.3%	88	37	42.0%	98.16	51.29
50	102	42	41.2%	64	32	50.0%	91.27	68.42
51	240	52	21.7%	104	35	33.7%	89.4	44.32
52	351	85	24.2%	131	50	38.2%	84.3	61.75
53	602	161	26.7%	298	113	37.9%	85.36	61.26
54	238	66	27.7%	111	42	37.8%	95.2	42.42
55	127	37	29.1%	92	32	34.8%	98.1	46.16
56	183	85	46.4%	138	70	50.7%	98.25	44.67
57	99	39	39.4%	72	34	47.2%	98.62	47.64
59.01	244	74	30.3%	154	51	33.1%	99.23	44.33
59.02	102	39	38.2%	67	31	46.3%	92.38	45.77
60.01	186	61	32.8%	132	51	38.6%	95.58	45.02
60.02	72	28	38.9%	36	12	33.3%	68.02	39.28
61	387	90	23.3%	220	55	25.0%	87.13	51.81
62	509	107	21.0%	210	70	33.3%	87.6	63.08
63.01	427	101	23.7%	271	79	29.2%	85.21	54.71

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
63.02	574	103	17.9%	235	66	28.1%	75.83	60.06
64.01	104	33	31.7%	74	27	36.5%	94.05	62.72
64.02	104	26	25.0%	74	23	31.1%	95.91	51.79
65.01	334	96	28.7%	247	81	32.8%	91.52	65.43
65.02	211	56	26.5%	151	42	27.8%	84.92	56.69
67	263	76	28.9%	156	58	37.2%	90.33	51.96
68	244	52	21.3%	104	25	24.0%	83.86	60.92
69	212	25	11.8%	56	12	21.4%	86.99	53.13
71.01	799	101	12.6%	36	4	11.1%	9.66	198.14
71.02	1144	172	15.0%	252	68	27.0%	83.81	73.17
72.01	57	17	29.8%	33	12	36.4%	96.16	39.6
72.02	56	18	32.1%	30	13	43.3%	98.06	34.45
73.01	1147	138	12.0%	32	2	6.3%	4.2	304.52
73.02	1722	195	11.3%	138	23	16.7%	20.03	202.12
76.01	676	69	10.2%	59	8	13.6%	11.51	225.3
76.04	1470	215	14.6%	128	19	14.8%	5.52	370.36
76.05	653	97	14.9%	44	10	22.7%	7.09	220.36
77	1846	230	12.5%	100	11	11.0%	4.56	226.93
78.01	640	64	10.0%	45	4	8.9%	5.17	204.66
78.04	125	42	33.6%	70	24	34.3%	71.72	72.86
78.05	665	109	16.4%	186	53	28.5%	42.69	119.44
78.09	617	54	8.8%	38	5	13.2%	48.42	55.24
78.1	1097	112	10.2%	111	25	22.5%	49.93	178.93
78.11	381	51	13.4%	65	21	32.3%	64.59	44.24
78.12	1258	100	7.9%	114	7	6.1%	6.86	209.31
78.15	78	24	30.8%	37	13	35.1%	83.22	30.41
78.18	15	7	46.7%	6	4	66.7%	88.67	33.5
78.19	44	10	22.7%	5	2	40.0%	73.45	36.28
78.2	37	11	29.7%	10	7	70.0%	87.61	52.88
78.21	13	7	53.8%	4	3	75.0%	91.68	81.81
78.22	7	4	57.1%	2	2	100.0%	40.55	81.81
78.23	10	4	40.0%	4	2	50.0%	72.82	36.79
78.24	362	29	8.0%	16	1	6.3%	9.85	233.18
78.25	496	53	10.7%	41	6	14.6%	57.43	99.53
78.26	9	1	11.1%	4	1	25.0%	84.57	29.62
78.27	70	17	24.3%	18	8	44.4%	76.94	60.58
79.02	1939	182	9.4%	130	20	15.4%	25.79	133.47
79.03	699	64	9.2%	32	7	21.9%	43.55	120.31
79.06	837	107	12.8%	30	2	6.7%	4.85	216.54
79.09	1	0	0.0%	0	0	0.0%	48.22	83.88

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
79.1	4	2	50.0%	1	0	0.0%	46.66	84.52
79.11	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available
79.12	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available
79.13	343	56	16.3%	56	12	21.4%	44.57	96.45
79.14	150	25	16.7%	28	7	25.0%	34.24	93.74
80	3850	389	10.1%	178	14	7.9%	6.33	221.68
81	2215	264	11.9%	193	35	18.1%	11.92	140.5
82	1025	112	10.9%	89	12	13.5%	37.28	104.44
84	368	102	27.7%	210	81	38.6%	79.82	51.43
85	222	80	36.0%	110	49	44.5%	74.09	50.44
86.03	24	9	37.5%	15	8	53.3%	98.28	46.26
86.04	34	13	38.2%	25	13	52.0%	98.31	25.02
87.01	118	60	50.8%	79	48	60.8%	99.04	37.65
87.03	83	39	47.0%	57	30	52.6%	99.02	48.22
87.04	74	32	43.2%	55	27	49.1%	97.12	32.38
87.05	47	25	53.2%	31	21	67.7%	99.08	63.01
88.01	160	52	32.5%	94	39	41.5%	99.46	56.14
88.02	144	66	45.8%	97	57	58.8%	99.39	34.77
89	54	19	35.2%	31	13	41.9%	99.16	38.51
90	432	125	28.9%	292	93	31.8%	77.24	57.08
91.01	325	88	27.1%	197	56	28.4%	82.19	54.56
91.03	168	43	25.6%	93	28	30.1%	93.17	53.89
91.04	144	50	34.7%	93	40	43.0%	84.13	47.22
91.05	110	35	31.8%	57	27	47.4%	84.33	52.36
92.01	334	96	28.7%	197	68	34.5%	72.94	68.25
92.02	206	80	38.8%	114	51	44.7%	75.89	50.95
93.01	145	46	31.7%	92	40	43.5%	79.97	51.15
93.03	69	37	53.6%	51	34	66.7%	92.92	50.57
93.04	92	37	40.2%	63	29	46.0%	96.96	26.29
94.01	758	110	14.5%	166	52	31.3%	60.82	68.24
94.02	1295	145	11.2%	102	18	17.6%	19.11	142.82
95	1089	118	10.8%	102	8	7.8%	10.65	188.55
96.03	1558	191	12.3%	151	26	17.2%	13.98	203.96
96.04	1049	165	15.7%	98	33	33.7%	36.64	84.21
96.05	295	73	24.7%	158	56	35.4%	55.62	54.1
96.07	1101	157	14.3%	194	51	26.3%	24.07	110.94
96.08	976	110	11.3%	110	19	17.3%	46.11	100.1
96.09	1301	115	8.8%	73	14	19.2%	8.85	179.83

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

Dallas, Texas

2010-2013

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
96.1	2	2	100.0%	1	1	100.0%	98.54	33.23
96.11	588	116	19.7%	262	67	25.6%	52.95	69.65
97.01	797	117	14.7%	273	61	22.3%	63.4	59.99
97.02	1258	158	12.6%	111	22	19.8%	16.05	156.34
98.02	263	89	33.8%	189	77	40.7%	90.28	53.76
98.03	274	51	18.6%	107	30	28.0%	78.7	64.19
98.04	35	14	40.0%	21	11	52.4%	96.17	31.29
99	34	12	35.3%	13	6	46.2%	83.31	48.1
100	87	32	36.8%	54	21	38.9%	61.95	50.73
101.01	226	54	23.9%	165	43	26.1%	99.39	37.28
101.02	58	28	48.3%	49	21	42.9%	96.88	45.16
105	136	38	27.9%	101	30	29.7%	99.62	56.43
106.01	193	62	32.1%	154	54	35.1%	96.63	56
106.02	96	28	29.2%	78	27	34.6%	95.88	39.83
107.01	73	36	49.3%	58	26	44.8%	80.23	46.69
107.03	128	42	32.8%	88	34	38.6%	92.37	45.24
107.04	239	66	27.6%	161	54	33.5%	85.89	48.98
108.01	456	123	27.0%	324	101	31.2%	85.05	53.56
108.03	987	191	19.4%	522	122	23.4%	80.23	48.27
108.04	54	11	20.4%	32	10	31.3%	96.15	61.98
108.05	288	64	22.2%	194	54	27.8%	95.6	61.98
109.02	605	115	19.0%	433	89	20.6%	97.34	47.45
109.03	78	21	26.9%	43	15	34.9%	95.92	41.92
109.04	35	7	20.0%	19	5	26.3%	97.44	45.02
110.01	607	173	28.5%	415	120	28.9%	90.23	82.4
110.02	476	106	22.3%	315	77	24.4%	86.76	103.76
111.01	513	138	26.9%	329	90	27.4%	93.49	83.94
111.03	214	66	30.8%	137	49	35.8%	88.73	59.25
111.04	143	64	44.8%	81	51	63.0%	97.07	77.15
111.05	128	46	35.9%	81	41	50.6%	98.32	51.98
112	773	161	20.8%	413	103	24.9%	94.76	57.6
113	463	133	28.7%	311	99	31.8%	98.34	75.16
114.01	131	48	36.6%	95	38	40.0%	98.9	27.31
115	109	29	26.6%	84	22	26.2%	99.19	31.36
116.01	94	41	43.6%	66	35	53.0%	88.19	44.18
116.02	458	101	22.1%	291	73	25.1%	61.54	49.39
117.01	246	82	33.3%	171	72	42.1%	82.78	51.23
117.02	289	98	33.9%	199	79	39.7%	61.67	57.18
118	414	126	30.4%	234	84	35.9%	80.21	52.32
119	437	141	32.3%	248	96	38.7%	86.08	67.78

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
120	219	68	31.1%	142	54	38.0%	86.87	46.54
121	448	118	26.3%	267	91	34.1%	90.22	49.46
122.04	1108	156	14.1%	263	60	22.8%	55.25	97.44
122.06	1121	204	18.2%	498	121	24.3%	68.96	98.09
122.07	625	148	23.7%	388	92	23.7%	90.45	68.09
122.08	11	5	45.5%	5	5	100.0%	93.77	31.16
122.09	674	70	10.4%	74	16	21.6%	60.03	86.6
122.1	264	44	16.7%	66	16	24.2%	75.72	40.28
122.11	155	30	19.4%	84	21	25.0%	86.46	49.85
123.01	359	71	19.8%	160	43	26.9%	66.46	59.09
123.02	440	86	19.5%	279	62	22.2%	78.72	37.18
124	1221	174	14.3%	188	47	25.0%	31.73	86.84
125	636	140	22.0%	291	86	29.6%	52.41	76.2
126.01	451	97	21.5%	264	62	23.5%	77.23	69.64
126.03	101	21	20.8%	36	9	25.0%	64.25	52.67
126.04	165	34	20.6%	41	15	36.6%	78.76	59.64
127.01	337	85	25.2%	165	53	32.1%	52.5	64.14
127.02	286	73	25.5%	108	37	34.3%	52.02	86.85
128	1910	215	11.3%	291	43	14.8%	33.66	128.23
129	1691	202	11.9%	152	27	17.8%	13.58	128.23
130.04	2738	200	7.3%	112	13	11.6%	9.45	161.49
130.05	1427	130	9.1%	109	14	12.8%	32.88	148.33
130.07	747	111	14.9%	130	34	26.2%	44.85	114.11
130.08	959	98	10.2%	32	5	15.6%	29.58	161.57
130.09	904	75	8.3%	44	7	15.9%	46.17	106.47
130.1	73	7	9.6%	8	2	25.0%	81.52	46.9
130.11	35	8	22.9%	5	4	80.0%	90.32	41.01
131.01	1186	142	12.0%	78	16	20.5%	4.37	225.39
131.02	756	101	13.4%	52	8	15.4%	7.03	173.45
131.04	202	32	15.8%	37	9	24.3%	21.42	44.55
131.05	285	40	14.0%	42	11	26.2%	68.6	211.33
132	1589	229	14.4%	130	19	14.6%	10.59	320.82
133	908	111	12.2%	55	5	9.1%	5.9	297.94
134	934	111	11.9%	76	15	19.7%	8.25	325.92
135	1144	143	12.5%	71	21	29.6%	6.4	325.92
136.05	1847	194	10.5%	176	23	13.1%	13.29	190.62
136.06	1376	143	10.4%	131	21	16.0%	26.88	117.75
136.07	1047	115	11.0%	64	6	9.4%	12.61	143.6
136.08	1019	166	16.3%	91	16	17.6%	8.54	302.58
136.09	630	72	11.4%	66	16	24.2%	40.32	99.38

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

Dallas, Texas

2010-2013

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
136.1	906	146	16.1%	182	54	29.7%	45.32	104.48
136.11	891	137	15.4%	72	23	31.9%	10.69	256.7
136.15	253	39	15.4%	64	13	20.3%	65.25	54.24
136.16	439	97	22.1%	99	29	29.3%	33.27	92.8
136.17	920	92	10.0%	75	7	9.3%	16.89	159.87
136.18	784	79	10.1%	62	9	14.5%	13.68	195.24
136.19	1949	210	10.8%	142	14	9.9%	13.36	201.82
136.2	250	57	22.8%	44	15	34.1%	36.96	92.11
136.21	182	34	18.7%	27	6	22.2%	59.77	77.95
136.22	231	31	13.4%	39	4	10.3%	40.81	109.67
136.23	195	30	15.4%	55	6	10.9%	73.68	47.28
136.24	136	15	11.0%	37	4	10.8%	56.73	82.47
136.25	1	0	0.0%	1	0	0.0%	85.41	46.39
136.26	23	3	13.0%	10	2	20.0%	69.42	81.99
140.01	806	143	17.7%	144	36	25.0%	34.8	113.35
140.02	40	17	42.5%	9	5	55.6%	34.51	53.36
141.27	1295	118	9.1%	903	94	10.4%	73.47	151.28
158	93	33	35.5%	55	25	45.5%	57.95	60.39
159	176	40	22.7%	98	24	24.5%	52.55	51.02
163.01	1061	224	21.1%	643	170	26.4%	68.54	74.55
164.08	882	177	20.1%	414	102	24.6%	50.67	93.48
164.09	840	141	16.8%	308	66	21.4%	38.74	141.88
164.12	739	104	14.1%	293	47	16.0%	57.4	167.25
165.1	3021	476	15.8%	1692	308	18.2%	68.27	99.74
165.11	565	121	21.4%	316	85	26.9%	78.13	84.72
165.2	313	68	21.7%	176	49	27.8%	88.44	61.06
165.21	420	56	13.3%	204	26	12.7%	66.2	62.85
165.22	373	55	14.7%	119	26	21.8%	41.26	87.52
166.05	134	59	44.0%	101	52	51.5%	73.09	37.53
166.07	7	6	85.7%	4	4	100.0%	96.62	40.97
167.01	696	159	22.8%	436	114	26.1%	99.14	61.88
167.03	1665	317	19.0%	1075	210	19.5%	60.42	86.56
170.01	885	257	29.0%	354	105	29.7%	33.74	69.54
170.03	1585	279	17.6%	816	157	19.2%	23.66	58.01
170.04	1404	372	26.5%	728	215	29.5%	33.92	47.41
171.01	589	167	28.4%	286	85	29.7%	39.48	48.18
171.02	400	94	23.5%	241	64	26.6%	49.92	55.42
176.05	157	49	31.2%	90	33	36.7%	96.11	53.55
181.04	2073	328	15.8%	571	116	20.3%	20.42	146.94
181.1	1257	203	16.1%	269	57	21.2%	10	130.05

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
181.18	1605	286	17.8%	755	147	19.5%	41.17	81.31
181.24	5448	824	15.1%	1510	286	18.9%	21.96	139.72
181.33	379	56	14.8%	82	21	25.6%	34.89	116.58
181.34	839	147	17.5%	238	49	20.6%	38.42	117.27
181.35	432	67	15.5%	109	25	22.9%	41.98	73.83
181.36	1341	185	13.8%	294	46	15.6%	29.2	161.89
181.37	443	73	16.5%	179	30	16.8%	58.37	128.02
181.4	829	139	16.8%	236	59	25.0%	44.32	133.92
181.41	109	23	21.1%	32	8	25.0%	45.9	60.76
181.42	326	45	13.8%	94	15	16.0%	55.22	95.71
185.03	88	24	27.3%	39	15	38.5%	77.1	51.05
185.05	19	7	36.8%	9	5	55.6%	89.34	35.75
185.06	13	4	30.8%	2	2	100.0%	93.29	42.18
190.16	333	78	23.4%	112	29	25.9%	67.34	63
190.18	594	110	18.5%	172	40	23.3%	51.89	90.75
190.19	438	83	18.9%	146	33	22.6%	71.93	42.44
190.34	395	59	14.9%	106	34	32.1%	62.69	71.92
190.35	341	66	19.4%	77	23	29.9%	63.25	56.68
190.4	271	37	13.7%	114	15	13.2%	67.03	104.35
192.05	1124	76	6.8%	78	4	5.1%	8.46	155.02
192.08	276	55	19.9%	123	28	22.8%	77.74	44.05
192.12	4	0	0.0%	0	0	0.0%	98.32	38.22
192.13	8	1	12.5%	3	0	0.0%	78.69	36.72
199	156	59	37.8%	116	52	44.8%	87.1	51.04
202	69	32	46.4%	44	26	59.1%	98.69	38.86
203	36	11	30.6%	18	8	44.4%	94.08	27.47
204	336	52	15.5%	73	13	17.8%	56	123.49
205	124	25	20.2%	66	19	28.8%	96.93	30.98
206	423	78	18.4%	26	4	15.4%	10.68	370.36
216.16	697	89	12.8%	183	28	15.3%	38.46	87.72
216.34	2	0	0.0%	0	0	0.0%	70.27	58.81
216.35	232	24	10.3%	49	10	20.4%	63.86	92.85
216.36	132	10	7.6%	45	6	13.3%	58.86	89.46
216.37	407	50	12.3%	129	20	15.5%	65.2	79.22
216.38	259	35	13.5%	103	18	17.5%	62.05	101.55
312.02	834	95	11.4%	132	20	15.2%	27.56	96.58
313.1	1445	206	14.3%	247	40	16.2%	27.97	110.29
317.04	885	107	12.1%	106	18	17.0%	24.41	180.21
317.06	940	119	12.7%	106	24	22.6%	15.24	340.68
317.08	1102	131	11.9%	122	15	12.3%	20.34	147.09

Loan Applications and Denials, Minority Percentage, and

Percent of MSA Median Income by Census Tract

Dallas, Texas

2010-2013

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %
317.09	1121	106	9.5%	132	12	9.1%	22.06	139.15
317.11	462	42	9.1%	76	8	10.5%	33.27	192.91
317.12	496	70	14.1%	86	12	14.0%	42.66	106.7
317.13	124	19	15.3%	19	6	31.6%	54.58	94.52
317.14	84	15	17.9%	17	6	35.3%	58.89	57.17
317.15	502	54	10.8%	79	6	7.6%	24.17	243.47
317.16	344	31	9.0%	43	2	4.7%	35.55	163.75
317.17	171	16	9.4%	31	0	0.0%	48.48	111.37
317.18	402	49	12.2%	50	11	22.0%	24.18	143.57
317.19	285	32	11.2%	38	1	2.6%	33.64	209.37
317.2	31	6	19.4%	17	4	23.5%	78.22	32.73
318.04	540	47	8.7%	51	7	13.7%	20.07	130.09
401.01	1357	141	10.4%	126	16	12.7%	17.1	150.92
401.02	1412	173	12.3%	191	33	17.3%	21.9	148.03
402	2529	267	10.6%	295	45	15.3%	6.88	138.55
403.01	1309	172	13.1%	231	27	11.7%	16.54	114.68
403.02	1658	259	15.6%	159	38	23.9%	15.46	92.42
405.04	1244	160	12.9%	78	14	17.9%	12.12	171.75
502.01	2419	273	11.3%	425	40	9.4%	10.08	130.32
9801	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available	No Data Available

Source: Data extracted for City of Dallas from HMDA, LAR Files

Census Tracts where the denial rate exceeds their tracts overall average of are highlighted in **YELLOW**.

Table 2: City of Dallas Loan Applications and Denials by Minority Census Tract

Loan Applications and Denials, Minority Percentage, and Percent of MSA Median Income by Minority Census Tract							
Dallas, Texas 2010-2013							
Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
4.01	120	24	20.0%	51	18	35.3%	90.62
4.04	800	134	16.8%	179	42	23.5%	67.03
4.05	126	21	16.7%	35	11	31.4%	82.12
4.06	187	66	35.3%	118	57	48.3%	91.26
5	913	149	16.3%	128	26	20.3%	70.07
6.01	863	131	15.2%	131	38	29.0%	79.4
8	319	61	19.1%	102	25	24.5%	87.82
9	509	81	15.9%	58	17	29.3%	88.86
10.02	560	65	11.6%	111	30	27.0%	70.58
12.02	682	68	10.0%	28	8	28.6%	53.29
12.03	399	45	11.3%	45	14	31.1%	60.41
12.04	78	26	33.3%	50	21	42.0%	93.83
13.02	474	69	14.6%	59	16	27.1%	71.34
14	575	81	14.1%	40	8	20.0%	70.29
15.02	264	51	19.3%	48	14	29.2%	86.03
15.03	54	13	24.1%	21	5	23.8%	92.1
15.04	182	42	23.1%	32	13	40.6%	77.48
16	899	119	13.2%	177	25	14.1%	62.49
17.01	72	19	26.4%	9	2	22.2%	100
20	173	42	24.3%	65	19	29.2%	94.8
24	142	32	22.5%	70	16	22.9%	91.5
25	135	45	33.3%	87	34	39.1%	96.89
27.01	77	24	31.2%	59	17	28.8%	99.39
27.02	27	12	44.4%	20	10	50.0%	99.2
34	49	19	38.8%	14	9	64.3%	86.99
37	91	28	30.8%	64	22	34.4%	99.27
38	47	21	44.7%	32	19	59.4%	99.46
39.01	21	10	47.6%	13	7	53.8%	98.75
39.02	77	28	36.4%	49	18	36.7%	98.95
40	22	4	18.2%	14	5	35.7%	98.13
41	21	12	57.1%	15	11	73.3%	99.03
42.01	916	130	14.2%	117	27	23.1%	72.88
42.02	604	77	12.7%	89	18	20.2%	78.6
43	72	27	37.5%	25	13	52.0%	90.94
45	715	123	17.2%	216	66	30.6%	81.18
46	463	66	14.3%	72	23	31.9%	67.54
47	81	27	33.3%	30	19	63.3%	92.65
48	50	17	34.0%	24	14	58.3%	96.51
49	115	44	38.3%	88	37	42.0%	98.16

**Loan Applications and Denials, Minority Percentage, and
Percent of MSA Median Income by Minority Census Tract**

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
50	102	42	41.2%	64	32	50.0%	91.27
51	240	52	21.7%	104	35	33.7%	89.4
52	351	85	24.2%	131	50	38.2%	84.3
53	602	161	26.7%	298	113	37.9%	85.36
54	238	66	27.7%	111	42	37.8%	95.2
55	127	37	29.1%	92	32	34.8%	98.1
56	183	85	46.4%	138	70	50.7%	98.25
57	99	39	39.4%	72	34	47.2%	98.62
59.01	244	74	30.3%	154	51	33.1%	99.23
59.02	102	39	38.2%	67	31	46.3%	92.38
60.01	186	61	32.8%	132	51	38.6%	95.58
60.02	72	28	38.9%	36	12	33.3%	68.02
61	387	90	23.3%	220	55	25.0%	87.13
62	509	107	21.0%	210	70	33.3%	87.6
63.01	427	101	23.7%	271	79	29.2%	85.21
63.02	574	103	17.9%	235	66	28.1%	75.83
64.01	104	33	31.7%	74	27	36.5%	94.05
64.02	104	26	25.0%	74	23	31.1%	95.91
65.01	334	96	28.7%	247	81	32.8%	91.52
65.02	211	56	26.5%	151	42	27.8%	84.92
67	263	76	28.9%	156	58	37.2%	90.33
68	244	52	21.3%	104	25	24.0%	83.86
69	212	25	11.8%	56	12	21.4%	86.99
71.02	1144	172	15.0%	252	68	27.0%	83.81
72.01	57	17	29.8%	33	12	36.4%	96.16
72.02	56	18	32.1%	30	13	43.3%	98.06
78.04	125	42	33.6%	70	24	34.3%	71.72
78.1	1097	112	10.2%	111	25	22.5%	49.93
78.11	381	51	13.4%	65	21	32.3%	64.59
78.15	78	24	30.8%	37	13	35.1%	83.22
78.18	15	7	46.7%	6	4	66.7%	88.67
78.19	44	10	22.7%	5	2	40.0%	73.45
78.2	37	11	29.7%	10	7	70.0%	87.61
78.21	13	7	53.8%	4	3	75.0%	91.68
78.23	10	4	40.0%	4	2	50.0%	72.82
78.25	496	53	10.7%	41	6	14.6%	57.43
78.26	9	1	11.1%	4	1	25.0%	84.57
78.27	70	17	24.3%	18	8	44.4%	76.94
84	368	102	27.7%	210	81	38.6%	79.82
85	222	80	36.0%	110	49	44.5%	74.09

**Loan Applications and Denials, Minority Percentage, and
Percent of MSA Median Income by Minority Census Tract**

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
86.03	24	9	37.5%	15	8	53.3%	98.28
86.04	34	13	38.2%	25	13	52.0%	98.31
87.01	118	60	50.8%	79	48	60.8%	99.04
87.03	83	39	47.0%	57	30	52.6%	99.02
87.04	74	32	43.2%	55	27	49.1%	97.12
87.05	47	25	53.2%	31	21	67.7%	99.08
88.01	160	52	32.5%	94	39	41.5%	99.46
88.02	144	66	45.8%	97	57	58.8%	99.39
89	54	19	35.2%	31	13	41.9%	99.16
90	432	125	28.9%	292	93	31.8%	77.24
91.01	325	88	27.1%	197	56	28.4%	82.19
91.03	168	43	25.6%	93	28	30.1%	93.17
91.04	144	50	34.7%	93	40	43.0%	84.13
91.05	110	35	31.8%	57	27	47.4%	84.33
92.01	334	96	28.7%	197	68	34.5%	72.94
92.02	206	80	38.8%	114	51	44.7%	75.89
93.01	145	46	31.7%	92	40	43.5%	79.97
93.03	69	37	53.6%	51	34	66.7%	92.92
93.04	92	37	40.2%	63	29	46.0%	96.96
94.01	758	110	14.5%	166	52	31.3%	60.82
96.05	295	73	24.7%	158	56	35.4%	55.62
96.1	2	2	100.0%	1	1	100.0%	98.54
96.11	588	116	19.7%	262	67	25.6%	52.95
97.01	797	117	14.7%	273	61	22.3%	63.4
98.02	263	89	33.8%	189	77	40.7%	90.28
98.03	274	51	18.6%	107	30	28.0%	78.7
98.04	35	14	40.0%	21	11	52.4%	96.17
99	34	12	35.3%	13	6	46.2%	83.31
100	87	32	36.8%	54	21	38.9%	61.95
101.01	226	54	23.9%	165	43	26.1%	99.39
101.02	58	28	48.3%	49	21	42.9%	96.88
105	136	38	27.9%	101	30	29.7%	99.62
106.01	193	62	32.1%	154	54	35.1%	96.63
106.02	96	28	29.2%	78	27	34.6%	95.88
107.01	73	36	49.3%	58	26	44.8%	80.23
107.03	128	42	32.8%	88	34	38.6%	92.37
107.04	239	66	27.6%	161	54	33.5%	85.89
108.01	456	123	27.0%	324	101	31.2%	85.05
108.03	987	191	19.4%	522	122	23.4%	80.23
108.04	54	11	20.4%	32	10	31.3%	96.15

**Loan Applications and Denials, Minority Percentage, and
Percent of MSA Median Income by Minority Census Tract**

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
108.05	288	64	22.2%	194	54	27.8%	95.6
109.02	605	115	19.0%	433	89	20.6%	97.34
109.03	78	21	26.9%	43	15	34.9%	95.92
109.04	35	7	20.0%	19	5	26.3%	97.44
110.01	607	173	28.5%	415	120	28.9%	90.23
110.02	476	106	22.3%	315	77	24.4%	86.76
111.01	513	138	26.9%	329	90	27.4%	93.49
111.03	214	66	30.8%	137	49	35.8%	88.73
111.04	143	64	44.8%	81	51	63.0%	97.07
111.05	128	46	35.9%	81	41	50.6%	98.32
112	773	161	20.8%	413	103	24.9%	94.76
113	463	133	28.7%	311	99	31.8%	98.34
114.01	131	48	36.6%	95	38	40.0%	98.9
115	109	29	26.6%	84	22	26.2%	99.19
116.01	94	41	43.6%	66	35	53.0%	88.19
116.02	458	101	22.1%	291	73	25.1%	61.54
117.01	246	82	33.3%	171	72	42.1%	82.78
117.02	289	98	33.9%	199	79	39.7%	61.67
118	414	126	30.4%	234	84	35.9%	80.21
119	437	141	32.3%	248	96	38.7%	86.08
120	219	68	31.1%	142	54	38.0%	86.87
121	448	118	26.3%	267	91	34.1%	90.22
122.04	1108	156	14.1%	263	60	22.8%	55.25
122.06	1121	204	18.2%	498	121	24.3%	68.96
122.07	625	148	23.7%	388	92	23.7%	90.45
122.08	11	5	45.5%	5	5	100.0%	93.77
122.09	674	70	10.4%	74	16	21.6%	60.03
122.1	264	44	16.7%	66	16	24.2%	75.72
122.11	155	30	19.4%	84	21	25.0%	86.46
123.01	359	71	19.8%	160	43	26.9%	66.46
123.02	440	86	19.5%	279	62	22.2%	78.72
125	636	140	22.0%	291	86	29.6%	52.41
126.01	451	97	21.5%	264	62	23.5%	77.23
126.03	101	21	20.8%	36	9	25.0%	64.25
126.04	165	34	20.6%	41	15	36.6%	78.76
127.01	337	85	25.2%	165	53	32.1%	52.5
127.02	286	73	25.5%	108	37	34.3%	52.02
130.1	73	7	9.6%	8	2	25.0%	81.52
130.11	35	8	22.9%	5	4	80.0%	90.32
131.05	285	40	14.0%	42	11	26.2%	68.6

**Loan Applications and Denials, Minority Percentage, and
Percent of MSA Median Income by Minority Census Tract**

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
136.15	253	39	15.4%	64	13	20.3%	65.25
136.21	182	34	18.7%	27	6	22.2%	59.77
136.23	195	30	15.4%	55	6	10.9%	73.68
136.24	136	15	11.0%	37	4	10.8%	56.73
136.25	1	0	0.0%	1	0	0.0%	85.41
136.26	23	3	13.0%	10	2	20.0%	69.42
141.27	1295	118	9.1%	903	94	10.4%	73.47
158	93	33	35.5%	55	25	45.5%	57.95
159	176	40	22.7%	98	24	24.5%	52.55
163.01	1061	224	21.1%	643	170	26.4%	68.54
164.08	882	177	20.1%	414	102	24.6%	50.67
164.12	739	104	14.1%	293	47	16.0%	57.4
165.1	3021	476	15.8%	1692	308	18.2%	68.27
165.11	565	121	21.4%	316	85	26.9%	78.13
165.2	313	68	21.7%	176	49	27.8%	88.44
165.21	420	56	13.3%	204	26	12.7%	66.2
166.05	134	59	44.0%	101	52	51.5%	73.09
166.07	7	6	85.7%	4	4	100.0%	96.62
167.01	696	159	22.8%	436	114	26.1%	99.14
167.03	1665	317	19.0%	1075	210	19.5%	60.42
171.02	400	94	23.5%	241	64	26.6%	49.92
176.05	157	49	31.2%	90	33	36.7%	96.11
181.37	443	73	16.5%	179	30	16.8%	58.37
181.42	326	45	13.8%	94	15	16.0%	55.22
185.03	88	24	27.3%	39	15	38.5%	77.1
185.05	19	7	36.8%	9	5	55.6%	89.34
185.06	13	4	30.8%	2	2	100.0%	93.29
190.16	333	78	23.4%	112	29	25.9%	67.34
190.18	594	110	18.5%	172	40	23.3%	51.89
190.19	438	83	18.9%	146	33	22.6%	71.93
190.34	395	59	14.9%	106	34	32.1%	62.69
190.35	341	66	19.4%	77	23	29.9%	63.25
190.4	271	37	13.7%	114	15	13.2%	67.03
192.08	276	55	19.9%	123	28	22.8%	77.74
192.12	4	0	0.0%	0	0	0.0%	98.32
192.13	8	1	12.5%	3	0	0.0%	78.69
199	156	59	37.8%	116	52	44.8%	87.1
202	69	32	46.4%	44	26	59.1%	98.69
203	36	11	30.6%	18	8	44.4%	94.08
204	336	52	15.5%	73	13	17.8%	56

**Loan Applications and Denials, Minority Percentage, and
Percent of MSA Median Income by Minority Census Tract**

**Dallas, Texas
2010-2013**

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
205	124	25	20.2%	66	19	28.8%	96.93
216.34	2	0	0.0%	0	0	0.0%	70.27
216.35	232	24	10.3%	49	10	20.4%	63.86
216.36	132	10	7.6%	45	6	13.3%	58.86
216.37	407	50	12.3%	129	20	15.5%	65.2
216.38	259	35	13.5%	103	18	17.5%	62.05
317.13	124	19	15.3%	19	6	31.6%	54.58
317.14	84	15	17.9%	17	6	35.3%	58.89
317.2	31	6	19.4%	17	4	23.5%	78.22

Table 3: Total Median Income Categories for All Dallas Census Tracts: 2010-2013

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
41	16.22	Very Low	99.03
27.01	22.42	Very Low	99.39
86.04	25.02	Very Low	98.31
93.04	26.29	Very Low	96.96
39.01	26.34	Very Low	98.75
114.01	27.31	Very Low	98.9
203	27.47	Very Low	94.08
78.26	29.62	Very Low	84.57
78.15	30.41	Low	83.22
4.05	30.55	Low	82.12
205	30.98	Low	96.93
122.08	31.16	Low	93.77
98.04	31.29	Low	96.17
27.02	31.31	Low	99.2
115	31.36	Low	99.19
87.04	32.38	Low	97.12
38	32.43	Low	99.46
317.2	32.73	Low	78.22
12.04	32.76	Low	93.83
39.02	32.96	Low	98.95
96.1	33.23	Low	98.54
78.18	33.5	Low	88.67
5	33.9	Low	70.07
72.02	34.45	Low	98.06
88.02	34.77	Low	99.39
185.05	35.75	Low	89.34
78.19	36.28	Low	73.45
192.13	36.72	Low	78.69
78.23	36.79	Low	72.82
123.02	37.18	Low	78.72
101.01	37.28	Low	99.39
166.05	37.53	Low	73.09
87.01	37.65	Low	99.04
192.12	38.22	Low	98.32
15.03	38.5	Low	92.1
89	38.51	Low	99.16
8	38.82	Low	87.82
202	38.86	Low	98.69
34	38.99	Low	86.99
60.02	39.28	Low	68.02
72.01	39.6	Low	96.16
106.02	39.83	Low	95.88
122.1	40.28	Low	75.72

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
166.07	40.97	Low	96.62
130.11	41.01	Low	90.32
20	41.09	Low	94.8
109.03	41.92	Low	95.92
185.06	42.18	Low	93.29
54	42.42	Low	95.2
190.19	42.44	Low	71.93
15.04	42.92	Low	77.48
192.08	44.05	Low	77.74
47	44.07	Low	92.65
116.01	44.18	Low	88.19
78.11	44.24	Low	64.59
51	44.32	Low	89.4
59.01	44.33	Low	99.23
131.04	44.55	Low	21.42
56	44.67	Low	98.25
60.01	45.02	Low	97.44
109.04	45.02	Low	95.58
101.02	45.16	Low	96.88
107.03	45.24	Low	92.37
4.01	45.47	Low	90.62
59.02	45.77	Low	92.38
55	46.16	Low	98.1
9	46.22	Low	88.86
86.03	46.26	Low	98.28
136.25	46.39	Low	85.41
120	46.54	Low	86.87
107.01	46.69	Low	80.23
130.1	46.9	Low	81.52
25	47	Low	96.89
91.04	47.22	Low	84.13
136.23	47.28	Low	73.68
170.04	47.41	Low	33.92
109.02	47.45	Low	97.34
57	47.64	Low	98.62
99	48.1	Low	83.31
24	48.18	Low	91.5
171.01	48.18	Low	39.48
16	48.21	Low	62.49
87.03	48.22	Low	99.02
108.03	48.27	Low	80.23
107.04	48.98	Low	85.89
116.02	49.39	Low	61.54
121	49.46	Low	90.22

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
122.11	49.85	Low	86.46
13.02	50.05	Moderate	71.34
85	50.44	Moderate	74.09
93.03	50.57	Moderate	92.92
100	50.73	Moderate	61.95
15.02	50.87	Moderate	86.03
92.02	50.95	Moderate	75.89
159	51.02	Moderate	52.55
199	51.04	Moderate	87.1
185.03	51.05	Moderate	77.1
93.01	51.15	Moderate	79.97
117.01	51.23	Moderate	82.78
49	51.29	Moderate	98.16
84	51.43	Moderate	79.82
64.02	51.79	Moderate	95.91
61	51.81	Moderate	87.13
67	51.96	Moderate	90.33
111.05	51.98	Moderate	98.32
37	52.04	Moderate	99.27
118	52.32	Moderate	80.21
91.05	52.36	Moderate	84.33
48	52.52	Moderate	96.51
126.03	52.67	Moderate	64.25
78.2	52.88	Moderate	87.61
69	53.13	Moderate	86.99
140.02	53.36	Moderate	34.51
176.05	53.55	Moderate	96.11
108.01	53.56	Moderate	85.05
98.02	53.76	Moderate	90.28
91.03	53.89	Moderate	93.17
4.06	54.09	Moderate	91.26
96.05	54.1	Moderate	55.62
136.15	54.24	Moderate	65.25
43	54.51	Moderate	90.94
91.01	54.56	Moderate	82.19
63.01	54.71	Moderate	85.21
78.09	55.24	Moderate	48.42
171.02	55.42	Moderate	49.92
106.01	56	Moderate	96.63
88.01	56.14	Moderate	99.46
105	56.43	Moderate	99.62
190.35	56.68	Moderate	63.25
65.02	56.69	Moderate	84.92
4.04	57.05	Moderate	67.03

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
90	57.08	Moderate	77.24
317.14	57.17	Moderate	58.89
117.02	57.18	Moderate	61.67
112	57.6	Moderate	94.76
170.03	58.01	Moderate	23.66
216.34	58.81	Moderate	70.27
40	58.86	Moderate	98.13
123.01	59.09	Moderate	66.46
42.02	59.25	Moderate	88.73
111.03	59.25	Moderate	78.6
6.01	59.58	Moderate	79.4
126.04	59.64	Moderate	78.76
97.01	59.99	Moderate	63.4
63.02	60.06	Moderate	75.83
158	60.39	Moderate	57.95
78.27	60.58	Moderate	76.94
181.41	60.76	Moderate	45.9
68	60.92	Moderate	83.86
165.2	61.06	Moderate	88.44
53	61.26	Moderate	85.36
52	61.75	Moderate	84.3
167.01	61.88	Moderate	99.14
108.04	61.98	Moderate	96.15
108.05	61.98	Moderate	95.6
42.01	62.48	Moderate	72.88
64.01	62.72	Moderate	94.05
165.21	62.85	Moderate	66.2
190.16	63	Moderate	67.34
87.05	63.01	Moderate	99.08
62	63.08	Moderate	87.6
127.01	64.14	Moderate	52.5
98.03	64.19	Moderate	78.7
65.01	65.43	Moderate	91.52
119	67.78	Moderate	86.08
122.07	68.09	Moderate	90.45
94.01	68.24	Moderate	60.82
92.01	68.25	Moderate	72.94
50	68.42	Moderate	91.27
10.02	69.01	Moderate	70.58
170.01	69.54	Moderate	33.74
126.01	69.64	Moderate	77.23
96.11	69.65	Moderate	52.95
12.02	70.55	Moderate	53.29
190.34	71.92	Moderate	62.69

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
78.04	72.86	Moderate	71.72
71.02	73.17	Moderate	83.81
181.35	73.83	Moderate	41.98
45	74.44	Moderate	81.18
163.01	74.55	Moderate	68.54
113	75.16	Moderate	98.34
125	76.2	Moderate	52.41
111.04	77.15	Moderate	97.07
136.21	77.95	Moderate	59.77
12.03	78.7	Moderate	60.41
216.37	79.22	Moderate	65.2
181.18	81.31	Middle	41.17
78.21	81.81	Middle	91.68
78.22	81.81	Middle	40.55
136.26	81.99	Middle	69.42
110.01	82.4	Middle	90.23
136.24	82.47	Middle	56.73
79.09	83.88	Middle	48.22
111.01	83.94	Middle	93.49
96.04	84.21	Middle	36.64
79.1	84.52	Middle	46.66
22	84.72	Middle	78.13
165.11	84.72	Middle	36.77
167.03	86.56	Middle	60.42
122.09	86.6	Middle	60.03
124	86.84	Middle	31.73
127.02	86.85	Middle	52.02
165.22	87.52	Middle	41.26
216.16	87.72	Middle	38.46
216.36	89.46	Middle	58.86
14	90.09	Middle	70.29
190.18	90.75	Middle	51.89
136.2	92.11	Middle	36.96
403.02	92.42	Middle	15.46
136.16	92.8	Middle	33.27
216.35	92.85	Middle	63.86
164.08	93.48	Middle	50.67
79.14	93.74	Middle	34.24
317.13	94.52	Middle	54.58
181.42	95.71	Middle	55.22
79.13	96.45	Middle	44.57
312.02	96.58	Middle	27.56
122.04	97.44	Middle	55.25
122.06	98.09	Middle	68.96

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
11.01	98.95	Middle	42.19
136.09	99.38	Middle	40.32
78.25	99.53	Middle	57.43
165.1	99.74	Middle	68.27
96.08	100.1	Middle	46.11
216.38	101.55	Middle	62.05
110.02	103.76	Middle	86.76
190.4	104.35	Middle	67.03
82	104.44	Middle	37.28
136.1	104.48	Middle	45.32
130.09	106.47	Middle	46.17
317.12	106.7	Middle	42.66
136.22	109.67	Middle	40.81
313.1	110.29	Middle	27.97
96.07	110.94	Middle	24.07
317.17	111.37	Middle	48.48
13.01	111.38	Middle	38.72
140.01	113.35	Middle	34.8
130.07	114.11	Middle	44.85
403.01	114.68	Middle	16.54
181.33	116.58	Middle	34.89
181.34	117.27	Middle	38.42
136.06	117.75	Middle	26.88
78.05	119.44	Middle	42.69
79.03	120.31	High	43.55
204	123.49	High	56
181.37	128.02	High	58.37
128	128.23	High	33.66
129	128.23	High	13.58
181.1	130.05	High	10
318.04	130.09	High	20.07
502.01	130.32	High	10.08
7.02	130.92	High	28.25
79.02	133.47	High	25.79
181.4	133.92	High	44.32
402	138.55	High	6.88
317.09	139.15	High	22.06
181.24	139.72	High	21.96
81	140.5	High	11.92
164.09	141.88	High	38.74
94.02	142.82	High	19.11
317.18	143.57	High	24.18
136.07	143.6	High	12.61
21	144.1	High	

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
31.01	145.63	High	35.64
181.04	146.94	High	20.42
317.08	147.09	High	20.34
401.02	148.03	High	21.9
130.05	148.33	High	32.88
44	149.24	High	22.9
401.01	150.92	High	17.1
141.27	151.28	High	73.47
192.05	155.02	High	8.46
18	155.41	High	18.51
97.02	156.34	High	16.05
46	156.73	High	67.54
136.17	159.87	High	16.89
130.04	161.49	High	9.45
130.08	161.57	High	29.58
181.36	161.89	High	29.2
317.16	163.75	High	35.55
10.01	164.38	High	36.32
2.02	166.74	High	13.61
164.12	167.25	High	57.4
6.05	168.14	High	25.64
405.04	171.75	High	12.12
131.02	173.45	High	7.03
78.1	178.93	High	49.93
96.09	179.83	High	8.85
317.04	180.21	High	24.41
95	188.55	High	10.65
136.05	190.62	High	13.29
317.11	192.91	High	33.27
136.18	195.24	High	13.68
3	195.5	High	16.71
1	196.93	High	15.23
71.01	198.14	High	9.66
136.19	201.82	High	13.36
73.02	202.12	High	20.03
96.03	203.96	High	13.98
17.03	204.39	High	17.04
17.04	204.39	High	16.57
78.01	204.66	High	5.17
19	206.78	High	34.68
6.03	208.11	High	27.15
7.01	208.33	High	29.7
78.12	209.31	High	6.86
317.19	209.37	High	33.64

Census Tract	Tract Median Family Income %	Income Category	2013 Tract Minority %
131.05	211.33	High	68.6
2.01	212.58	High	9.13
79.06	216.54	High	4.85
76.05	220.36	High	7.09
80	221.68	High	6.33
76.01	225.3	High	11.51
131.01	225.39	High	4.37
77	226.93	High	4.56
78.24	233.18	High	9.85
317.15	243.47	High	24.17
6.06	246.42	High	16.14
11.02	249.99	High	17.94
136.11	256.7	High	10.69
133	297.94	High	5.9
136.08	302.58	High	8.54
73.01	304.52	High	4.2
132	320.82	High	10.59
134	325.92	High	8.25
135	325.92	High	6.4
317.06	340.68	High	15.24
76.04	370.36	High	10.68
206	370.36	High	5.52

Table 4: City of Dallas Census Tracts with Highest Overall Applicant Denial Rates: 2010-2013

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
96.1	100.0%	100.0%	98.54	33.23	Low
166.07	85.7%	100.0%	96.62	40.97	Low
41	57.1%	73.3%	99.03	16.22	Very Low
78.22	57.1%	100.0%	40.55	81.81	Middle
78.21	53.8%	75.0%	91.68	81.81	Middle
93.03	53.6%	66.7%	92.92	50.57	Moderate
87.05	53.2%	67.7%	99.08	63.01	Moderate
87.01	50.8%	60.8%	99.04	37.65	Low
79.1	50.0%	0.0%	46.66	84.52	Middle
107.01	49.3%	44.8%	80.23	46.69	Low
101.02	48.3%	42.9%	96.88	45.16	Low
39.01	47.6%	53.8%	98.75	26.34	Very Low
87.03	47.0%	52.6%	99.02	48.22	Low
78.18	46.7%	66.7%	88.67	33.5	Low
56	46.4%	50.7%	98.25	44.67	Low
202	46.4%	59.1%	98.69	38.86	Low
88.02	45.8%	58.8%	99.39	34.77	Low
122.08	45.5%	100.0%	93.77	31.16	Low
111.04	44.8%	63.0%	97.07	77.15	Moderate
38	44.7%	59.4%	99.46	32.43	Low
27.02	44.4%	50.0%	99.2	31.31	Low
166.05	44.0%	51.5%	73.09	37.53	Low
116.01	43.6%	53.0%	88.19	44.18	Low
87.04	43.2%	49.1%	97.12	32.38	Low
140.02	42.5%	55.6%	34.51	53.36	Moderate
50	41.2%	50.0%	91.27	68.42	Moderate
93.04	40.2%	46.0%	96.96	26.29	Very Low
78.23	40.0%	50.0%	72.82	36.79	Low
98.04	40.0%	52.4%	96.17	31.29	Low
57	39.4%	47.2%	98.62	47.64	Low
60.02	38.9%	33.3%	68.02	39.28	Low
92.02	38.8%	44.7%	75.89	50.95	Moderate
34	38.8%	64.3%	86.99	38.99	Low
49	38.3%	42.0%	98.16	51.29	Moderate
59.02	38.2%	46.3%	92.38	45.77	Low
86.04	38.2%	52.0%	98.31	25.02	Very Low
199	37.8%	44.8%	87.1	51.04	Moderate
43	37.5%	52.0%	90.94	54.51	Moderate
86.03	37.5%	53.3%	98.28	46.26	Low
185.05	36.8%	55.6%	89.34	35.75	Low
100	36.8%	38.9%	61.95	50.73	Moderate
114.01	36.6%	40.0%	98.9	27.31	Very Low
39.02	36.4%	36.7%	98.95	32.96	Low

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
85	36.0%	44.5%	74.09	50.44	Moderate
111.05	35.9%	50.6%	98.32	51.98	Moderate
158	35.5%	45.5%	57.95	60.39	Moderate
4.06	35.3%	48.3%	91.26	54.09	Moderate
99	35.3%	46.2%	83.31	48.1	Low
89	35.2%	41.9%	99.16	38.51	Low
91.04	34.7%	43.0%	84.13	47.22	Low
48	34.0%	58.3%	96.51	52.52	Moderate
117.02	33.9%	39.7%	61.67	57.18	Moderate
98.02	33.8%	40.7%	90.28	53.76	Moderate
78.04	33.6%	34.3%	71.72	72.86	Moderate
12.04	33.3%	42.0%	93.83	32.76	Low
25	33.3%	39.1%	96.89	47	Low
47	33.3%	63.3%	92.65	44.07	Low
117.01	33.3%	42.1%	82.78	51.23	Moderate
107.03	32.8%	38.6%	92.37	45.24	Low
60.01	32.8%	38.6%	95.58	45.02	Low
88.01	32.5%	41.5%	99.46	56.14	Moderate
119	32.3%	38.7%	86.08	67.78	Moderate
72.02	32.1%	43.3%	98.06	34.45	Low
106.01	32.1%	35.1%	96.63	56	Moderate
91.05	31.8%	47.4%	84.33	52.36	Moderate
64.01	31.7%	36.5%	94.05	62.72	Moderate
93.01	31.7%	43.5%	79.97	51.15	Moderate
176.05	31.2%	36.7%	96.11	53.55	Moderate
27.01	31.2%	28.8%	99.39	22.42	Very Low
120	31.1%	38.0%	86.87	46.54	Low
111.03	30.8%	35.8%	88.73	59.25	Moderate
37	30.8%	34.4%	99.27	52.04	Moderate
78.15	30.8%	35.1%	83.22	30.41	Low
185.06	30.8%	100.0%	93.29	42.18	Low
203	30.6%	44.4%	94.08	27.47	Very Low
118	30.4%	35.9%	80.21	52.32	Moderate
59.01	30.3%	33.1%	99.23	44.33	Low
72.01	29.8%	36.4%	96.16	39.6	Low
78.2	29.7%	70.0%	87.61	52.88	Moderate
106.02	29.2%	34.6%	95.88	39.83	Low
55	29.1%	34.8%	98.1	46.16	Low
170.01	29.0%	29.7%	33.74	69.54	Moderate
90	28.9%	31.8%	77.24	57.08	Moderate
67	28.9%	37.2%	90.33	51.96	Moderate
65.01	28.7%	32.8%	91.52	65.43	Moderate
92.01	28.7%	34.5%	72.94	68.25	Moderate
113	28.7%	31.8%	98.34	75.16	Moderate

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
110.01	28.5%	28.9%	90.23	82.4	Middle
171.01	28.4%	29.7%	39.48	48.18	Low
105	27.9%	29.7%	99.62	56.43	Moderate
54	27.7%	37.8%	95.2	42.42	Low
84	27.7%	38.6%	79.82	51.43	Moderate
107.04	27.6%	33.5%	85.89	48.98	Low
185.03	27.3%	38.5%	77.1	51.05	Moderate
91.01	27.1%	28.4%	82.19	54.56	Moderate
108.01	27.0%	31.2%	85.05	53.56	Moderate
109.03	26.9%	34.9%	95.92	41.92	Low
111.01	26.9%	27.4%	93.49	83.94	Middle
53	26.7%	37.9%	85.36	61.26	Moderate
21	26.7%	44.4%		144.1	High
115	26.6%	26.2%	99.19	31.36	Low
65.02	26.5%	27.8%	84.92	56.69	Moderate
170.04	26.5%	29.5%	33.92	47.41	Low
121	26.3%	34.1%	90.22	49.46	Low
91.03	25.6%	30.1%	93.17	53.89	Moderate
127.02	25.5%	34.3%	52.02	86.85	Middle
127.01	25.2%	32.1%	52.5	64.14	Moderate
64.02	25.0%	31.1%	95.91	51.79	Moderate
96.05	24.7%	35.4%	55.62	54.1	Moderate
78.27	24.3%	44.4%	76.94	60.58	Moderate
20	24.3%	29.2%	94.8	41.09	Low
52	24.2%	38.2%	84.3	61.75	Moderate
15.03	24.1%	23.8%	92.1	38.5	Low
101.01	23.9%	26.1%	99.39	37.28	Low
122.07	23.7%	23.7%	90.45	68.09	Moderate
63.01	23.7%	29.2%	85.21	54.71	Moderate
171.02	23.5%	26.6%	49.92	55.42	Moderate
190.16	23.4%	25.9%	67.34	63	Moderate
61	23.3%	25.0%	87.13	51.81	Moderate
15.04	23.1%	40.6%	77.48	42.92	Low
130.11	22.9%	80.0%	90.32	41.01	Low
167.01	22.8%	26.1%	99.14	61.88	Moderate
136.2	22.8%	34.1%	36.96	92.11	Middle
78.19	22.7%	40.0%	73.45	36.28	Low
159	22.7%	24.5%	52.55	51.02	Moderate
24	22.5%	22.9%	91.5	48.18	Low
110.02	22.3%	24.4%	86.76	103.76	Middle
108.05	22.2%	27.8%	95.6	61.98	Moderate
136.16	22.1%	29.3%	33.27	92.8	Middle
116.02	22.1%	25.1%	61.54	49.39	Low
125	22.0%	29.6%	52.41	76.2	Moderate

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
165.2	21.7%	27.8%	88.44	61.06	Moderate
51	21.7%	33.7%	89.4	44.32	Low
126.01	21.5%	23.5%	77.23	69.64	Moderate
165.11	21.4%	26.9%	78.13	84.72	Middle
68	21.3%	24.0%	83.86	60.92	Moderate
163.01	21.1%	26.4%	68.54	74.55	Moderate
181.41	21.1%	25.0%	45.9	60.76	Moderate
62	21.0%	33.3%	87.6	63.08	Moderate
112	20.8%	24.9%	94.76	57.6	Moderate
126.03	20.8%	25.0%	64.25	52.67	Moderate
126.04	20.6%	36.6%	78.76	59.64	Moderate
108.04	20.4%	31.3%	96.15	61.98	Moderate
205	20.2%	28.8%	96.93	30.98	Low
164.08	20.1%	24.6%	50.67	93.48	Middle
4.01	20.0%	35.3%	90.62	45.47	Low
109.04	20.0%	26.3%	97.44	45.02	Low
192.08	19.9%	22.8%	77.74	44.05	Low
123.01	19.8%	26.9%	66.46	59.09	Moderate
96.11	19.7%	25.6%	52.95	69.65	Moderate
123.02	19.5%	22.2%	78.72	37.18	Low
122.11	19.4%	25.0%	86.46	49.85	Low
190.35	19.4%	29.9%	63.25	56.68	Moderate
317.2	19.4%	23.5%	78.22	32.73	Low
108.03	19.4%	23.4%	80.23	48.27	Low
15.02	19.3%	29.2%	86.03	50.87	Moderate
8	19.1%	24.5%	87.82	38.82	Low
167.03	19.0%	19.5%	60.42	86.56	Middle
109.02	19.0%	20.6%	97.34	47.45	Low
190.19	18.9%	22.6%	71.93	42.44	Low
136.21	18.7%	22.2%	59.77	77.95	Moderate
98.03	18.6%	28.0%	78.7	64.19	Moderate
190.18	18.5%	23.3%	51.89	90.75	Middle
206	18.4%	15.4%	10.68	370.36	High
19	18.4%	18.5%	34.68	206.78	High
122.06	18.2%	24.3%	68.96	98.09	Middle
40	18.2%	35.7%	98.13	58.86	Moderate
63.02	17.9%	28.1%	75.83	60.06	Moderate
317.14	17.9%	35.3%	58.89	57.17	Moderate
181.18	17.8%	19.5%	41.17	81.31	Middle
140.01	17.7%	25.0%	34.8	113.35	Middle
170.03	17.6%	19.2%	23.66	58.01	Moderate
181.34	17.5%	20.6%	38.42	117.27	Middle
45	17.2%	30.6%	81.18	74.44	Moderate
31.01	17.1%	17.3%	35.64	145.63	High

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
164.09	16.8%	21.4%	38.74	141.88	High
181.4	16.8%	25.0%	44.32	133.92	High
4.04	16.8%	23.5%	67.03	57.05	Moderate
4.05	16.7%	31.4%	82.12	30.55	Low
79.14	16.7%	25.0%	34.24	93.74	Middle
122.1	16.7%	24.2%	75.72	40.28	Low
181.37	16.5%	16.8%	58.37	128.02	High
78.05	16.4%	28.5%	42.69	119.44	Middle
79.13	16.3%	21.4%	44.57	96.45	Middle
5	16.3%	20.3%	70.07	33.9	Low
136.08	16.3%	17.6%	8.54	302.58	High
181.1	16.1%	21.2%	10	130.05	High
136.1	16.1%	29.7%	45.32	104.48	Middle

Table 5: City of Dallas Census Tracts with Highest Minority Applicant Denial Rates: 2010-2013

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
122.08	45.5%	100.0%	93.77	31.16	Low
96.1	100.0%	100.0%	98.54	33.23	Low
166.07	85.7%	100.0%	96.62	40.97	Low
185.06	30.8%	100.0%	93.29	42.18	Low
78.22	57.1%	100.0%	40.55	81.81	Middle
130.11	22.9%	80.0%	90.32	41.01	Low
78.21	53.8%	75.0%	91.68	81.81	Middle
41	57.1%	73.3%	99.03	16.22	Very Low
78.2	29.7%	70.0%	87.61	52.88	Moderate
87.05	53.2%	67.7%	99.08	63.01	Moderate
78.18	46.7%	66.7%	88.67	33.5	Low
93.03	53.6%	66.7%	92.92	50.57	Moderate
34	38.8%	64.3%	86.99	38.99	Low
47	33.3%	63.3%	92.65	44.07	Low
111.04	44.8%	63.0%	97.07	77.15	Moderate
87.01	50.8%	60.8%	99.04	37.65	Low
38	44.7%	59.4%	99.46	32.43	Low
202	46.4%	59.1%	98.69	38.86	Low
88.02	45.8%	58.8%	99.39	34.77	Low
48	34.0%	58.3%	96.51	52.52	Moderate
185.05	36.8%	55.6%	89.34	35.75	Low
140.02	42.5%	55.6%	34.51	53.36	Moderate
39.01	47.6%	53.8%	98.75	26.34	Very Low
86.03	37.5%	53.3%	98.28	46.26	Low
116.01	43.6%	53.0%	88.19	44.18	Low
87.03	47.0%	52.6%	99.02	48.22	Low
98.04	40.0%	52.4%	96.17	31.29	Low
86.04	38.2%	52.0%	98.31	25.02	Very Low
43	37.5%	52.0%	90.94	54.51	Moderate
166.05	44.0%	51.5%	73.09	37.53	Low
56	46.4%	50.7%	98.25	44.67	Low
111.05	35.9%	50.6%	98.32	51.98	Moderate
27.02	44.4%	50.0%	99.2	31.31	Low
78.23	40.0%	50.0%	72.82	36.79	Low
50	41.2%	50.0%	91.27	68.42	Moderate
87.04	43.2%	49.1%	97.12	32.38	Low
4.06	35.3%	48.3%	91.26	54.09	Moderate
91.05	31.8%	47.4%	84.33	52.36	Moderate
57	39.4%	47.2%	98.62	47.64	Low
59.02	38.2%	46.3%	92.38	45.77	Low
99	35.3%	46.2%	83.31	48.1	Low
93.04	40.2%	46.0%	96.96	26.29	Very Low
158	35.5%	45.5%	57.95	60.39	Moderate

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
107.01	49.3%	44.8%	80.23	46.69	Low
199	37.8%	44.8%	87.1	51.04	Moderate
92.02	38.8%	44.7%	75.89	50.95	Moderate
85	36.0%	44.5%	74.09	50.44	Moderate
203	30.6%	44.4%	94.08	27.47	Very Low
78.27	24.3%	44.4%	76.94	60.58	Moderate
21	26.7%	44.4%		144.1	High
93.01	31.7%	43.5%	79.97	51.15	Moderate
72.02	32.1%	43.3%	98.06	34.45	Low
91.04	34.7%	43.0%	84.13	47.22	Low
101.02	48.3%	42.9%	96.88	45.16	Low
117.01	33.3%	42.1%	82.78	51.23	Moderate
49	38.3%	42.0%	98.16	51.29	Moderate
12.04	33.3%	42.0%	93.83	32.76	Low
89	35.2%	41.9%	99.16	38.51	Low
88.01	32.5%	41.5%	99.46	56.14	Moderate
98.02	33.8%	40.7%	90.28	53.76	Moderate
15.04	23.1%	40.6%	77.48	42.92	Low
114.01	36.6%	40.0%	98.9	27.31	Very Low
78.19	22.7%	40.0%	73.45	36.28	Low
117.02	33.9%	39.7%	61.67	57.18	Moderate
25	33.3%	39.1%	96.89	47	Low
100	36.8%	38.9%	61.95	50.73	Moderate
119	32.3%	38.7%	86.08	67.78	Moderate
60.01	32.8%	38.6%	95.58	45.02	Low
107.03	32.8%	38.6%	92.37	45.24	Low
84	27.7%	38.6%	79.82	51.43	Moderate
185.03	27.3%	38.5%	77.1	51.05	Moderate
52	24.2%	38.2%	84.3	61.75	Moderate
120	31.1%	38.0%	86.87	46.54	Low
53	26.7%	37.9%	85.36	61.26	Moderate
54	27.7%	37.8%	95.2	42.42	Low
67	28.9%	37.2%	90.33	51.96	Moderate
39.02	36.4%	36.7%	98.95	32.96	Low
176.05	31.2%	36.7%	96.11	53.55	Moderate
126.04	20.6%	36.6%	78.76	59.64	Moderate
64.01	31.7%	36.5%	94.05	62.72	Moderate
72.01	29.8%	36.4%	96.16	39.6	Low
118	30.4%	35.9%	80.21	52.32	Moderate
111.03	30.8%	35.8%	88.73	59.25	Moderate
40	18.2%	35.7%	98.13	58.86	Moderate
96.05	24.7%	35.4%	55.62	54.1	Moderate
4.01	20.0%	35.3%	90.62	45.47	Low
317.14	17.9%	35.3%	58.89	57.17	Moderate

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
78.15	30.8%	35.1%	83.22	30.41	Low
106.01	32.1%	35.1%	96.63	56	Moderate
109.03	26.9%	34.9%	95.92	41.92	Low
55	29.1%	34.8%	98.1	46.16	Low
106.02	29.2%	34.6%	95.88	39.83	Low
92.01	28.7%	34.5%	72.94	68.25	Moderate
37	30.8%	34.4%	99.27	52.04	Moderate
78.04	33.6%	34.3%	71.72	72.86	Moderate
127.02	25.5%	34.3%	52.02	86.85	Middle
136.2	22.8%	34.1%	36.96	92.11	Middle
121	26.3%	34.1%	90.22	49.46	Low
96.04	15.7%	33.7%	36.64	84.21	Middle
51	21.7%	33.7%	89.4	44.32	Low
107.04	27.6%	33.5%	85.89	48.98	Low
60.02	38.9%	33.3%	68.02	39.28	Low
62	21.0%	33.3%	87.6	63.08	Moderate
59.01	30.3%	33.1%	99.23	44.33	Low
65.01	28.7%	32.8%	91.52	65.43	Moderate
78.11	13.4%	32.3%	64.59	44.24	Low
127.01	25.2%	32.1%	52.5	64.14	Moderate
190.34	14.9%	32.1%	62.69	71.92	Moderate
46	14.3%	31.9%	67.54	156.73	High
136.11	15.4%	31.9%	10.69	256.7	High
90	28.9%	31.8%	77.24	57.08	Moderate
113	28.7%	31.8%	98.34	75.16	Moderate
317.13	15.3%	31.6%	54.58	94.52	Middle
4.05	16.7%	31.4%	82.12	30.55	Low
94.01	14.5%	31.3%	60.82	68.24	Moderate
108.04	20.4%	31.3%	96.15	61.98	Moderate
108.01	27.0%	31.2%	85.05	53.56	Moderate
12.03	11.3%	31.1%	60.41	78.7	Moderate
64.02	25.0%	31.1%	95.91	51.79	Moderate
45	17.2%	30.6%	81.18	74.44	Moderate
91.03	25.6%	30.1%	93.17	53.89	Moderate
190.35	19.4%	29.9%	63.25	56.68	Moderate
171.01	28.4%	29.7%	39.48	48.18	Low
105	27.9%	29.7%	99.62	56.43	Moderate
136.1	16.1%	29.7%	45.32	104.48	Middle
170.01	29.0%	29.7%	33.74	69.54	Moderate
135	12.5%	29.6%	6.4	325.92	High
125	22.0%	29.6%	52.41	76.2	Moderate
170.04	26.5%	29.5%	33.92	47.41	Low
9	15.9%	29.3%	88.86	46.22	Low
136.16	22.1%	29.3%	33.27	92.8	Middle

Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Tract Median Family Income %	Income Category
20	24.3%	29.2%	94.8	41.09	Low
15.02	19.3%	29.2%	86.03	50.87	Moderate
63.01	23.7%	29.2%	85.21	54.71	Moderate
6.01	15.2%	29.0%	79.4	59.58	Moderate
110.01	28.5%	28.9%	90.23	82.4	Middle
27.01	31.2%	28.8%	99.39	22.42	Very Low
205	20.2%	28.8%	96.93	30.98	Low
12.02	10.0%	28.6%	53.29	70.55	Moderate
78.05	16.4%	28.5%	42.69	119.44	Middle
91.01	27.1%	28.4%	82.19	54.56	Moderate
63.02	17.9%	28.1%	75.83	60.06	Moderate
98.03	18.6%	28.0%	78.7	64.19	Moderate
165.2	21.7%	27.8%	88.44	61.06	Moderate
108.05	22.2%	27.8%	95.6	61.98	Moderate
65.02	26.5%	27.8%	84.92	56.69	Moderate
111.01	26.9%	27.4%	93.49	83.94	Middle
13.02	14.6%	27.1%	71.34	50.05	Moderate
10.02	11.6%	27.0%	70.58	69.01	Moderate
71.02	15.0%	27.0%	83.81	73.17	Moderate
165.11	21.4%	26.9%	78.13	84.72	Middle
123.01	19.8%	26.9%	66.46	59.09	Moderate
171.02	23.5%	26.6%	49.92	55.42	Moderate
163.01	21.1%	26.4%	68.54	74.55	Moderate
109.04	20.0%	26.3%	97.44	45.02	Low
96.07	14.3%	26.3%	24.07	110.94	Middle
115	26.6%	26.2%	99.19	31.36	Low
131.05	14.0%	26.2%	68.6	211.33	High
130.07	14.9%	26.2%	44.85	114.11	Middle
167.01	22.8%	26.1%	99.14	61.88	Moderate
101.01	23.9%	26.1%	99.39	37.28	Low
190.16	23.4%	25.9%	67.34	63	Moderate
181.33	14.8%	25.6%	34.89	116.58	Middle
96.11	19.7%	25.6%	52.95	69.65	Moderate
116.02	22.1%	25.1%	61.54	49.39	Low

Table 6: City of Dallas Home Purchase Loan Applications: 2010-2013

Home Purchase Loans (Conventional) Applications					
Dallas, Texas 2010-2013					
Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %	
1	584	43	7.36%	15.23	
2.01	582	27	4.64%	9.13	
2.02	632	33	5.22%	13.61	
3	801	55	6.87%	16.71	
4.01	26	2	7.69%	90.62	
4.04	264	35	13.26%	67.03	
4.05	38	2	5.26%	82.12	
4.06	38	7	18.42%	91.26	
5	411	44	10.71%	70.07	
6.01	362	28	7.74%	79.4	
6.03	877	63	7.18%	27.15	
6.05	274	22	8.03%	25.64	
6.06	396	32	8.08%	16.14	
7.01	549	36	6.56%	29.7	
7.02	512	43	8.40%	28.25	
8	118	15	12.71%	87.82	
9	143	13	9.09%	88.86	
10.01	268	14	5.22%	36.32	
10.02	209	17	8.13%	70.58	
11.01	607	38	6.26%	42.19	
11.02	511	32	6.26%	17.94	
12.02	256	20	7.81%	53.29	
12.03	119	4	3.36%	60.41	
12.04	13	4	30.77%	93.83	
13.01	196	8	4.08%	38.72	
13.02	144	15	10.42%	71.34	
14	203	21	10.35%	70.29	
15.02	53	10	18.87%	86.03	
15.03	23	6	26.09%	92.1	
15.04	32	3	9.38%	77.48	
16	259	24	9.27%	62.49	
17.01	29	4	13.79%	100	
17.03	190	16	8.42%	17.04	
17.04	103	7	6.80%	16.57	
18	246	24	9.76%	18.51	
19	376	44	11.70%	34.68	
20	45	14	31.11%	94.8	
21	37	11	29.73%	.	
22	125	14	11.20%	36.77	
24	29	2	6.90%	91.5	

Home Purchase Loans (Conventional) Applications

Dallas, Texas
2010-2013

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
25	22	7	31.82%	96.89
27.01	39	2	5.13%	99.39
27.02	5	2	40.00%	99.2
31.01	241	25	10.37%	35.64
34	11	2	18.18%	86.99
37	14	4	28.57%	99.27
38	10	6	60.00%	99.46
39.01	3	1	33.33%	98.75
39.02	11	2	18.18%	98.95
40	9	0	0.00%	98.13
41	1	1	100.00%	99.03
42.01	258	18	6.98%	72.88
42.02	218	19	8.72%	78.6
43	19	6	31.58%	90.94
44	579	29	5.01%	22.9
45	150	15	10.00%	81.18
46	129	7	5.43%	67.54
47	22	4	18.18%	92.65
48	15	5	33.33%	96.51
49	15	5	33.33%	98.16
50	13	3	23.08%	91.27
51	54	5	9.26%	89.4
52	76	10	13.16%	84.3
53	79	8	10.13%	85.36
54	51	7	13.73%	95.2
55	19	4	21.05%	98.1
56	21	11	52.38%	98.25
57	14	4	28.57%	98.62
59.01	16	4	25.00%	99.23
59.02	6	4	66.67%	92.38
60.01	16	6	37.50%	95.58
60.02	5	0	0.00%	68.02
61	40	7	17.50%	87.13
62	90	7	7.78%	87.6
63.01	44	8	18.18%	85.21
63.02	86	10	11.63%	75.83
64.01	8	0	0.00%	94.05
64.02	9	1	11.11%	95.91
65.01	34	3	8.82%	91.52
65.02	22	8	36.36%	84.92
67	33	12	36.36%	90.33

Home Purchase Loans (Conventional) Applications

**Dallas, Texas
2010-2013**

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
68	54	11	20.37%	83.86
69	48	3	6.25%	86.99
71.01	271	21	7.75%	9.66
71.02	326	28	8.59%	83.81
72.01	12	3	25.00%	96.16
72.02	10	2	20.00%	98.06
73.01	444	31	6.98%	4.2
73.02	576	28	4.86%	20.03
76.01	173	8	4.62%	11.51
76.04	462	36	7.79%	5.52
76.05	218	14	6.42%	7.09
77	705	53	7.52%	4.56
78.01	219	13	5.94%	5.17
78.04	16	7	43.75%	71.72
78.05	156	15	9.62%	42.69
78.09	183	9	4.92%	48.42
78.1	320	20	6.25%	49.93
78.11	114	15	13.16%	64.59
78.12	336	16	4.76%	6.86
78.15	32	7	21.88%	83.22
78.18	7	2	28.57%	88.67
78.19	14	3	21.43%	73.45
78.2	11	4	36.36%	87.61
78.21	2	1	50.00%	91.68
78.22	3	1	33.33%	40.55
78.23	3	2	66.67%	72.82
78.24	95	4	4.21%	9.85
78.25	188	14	7.45%	57.43
78.26	4	0	0.00%	84.57
78.27	19	3	15.79%	76.94
79.02	654	35	5.35%	25.79
79.03	253	5	1.98%	43.55
79.06	249	21	8.43%	4.85
79.1	1	0	0.00%	46.66
79.13	146	23	15.75%	44.57
79.14	47	6	12.77%	34.24
80	1327	72	5.43%	6.33
81	658	31	4.71%	11.92
82	296	19	6.42%	37.28
84	40	6	15.00%	79.82
85	23	8	34.78%	74.09

Home Purchase Loans (Conventional) Applications

**Dallas, Texas
2010-2013**

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
86.03	6	2	33.33%	98.28
86.04	6	3	50.00%	98.31
87.01	8	4	50.00%	99.04
87.03	22	5	22.73%	99.02
87.04	6	6	100.00%	97.12
87.05	5	3	60.00%	99.08
88.01	8	1	12.50%	99.46
88.02	16	4	25.00%	99.39
89	10	1	10.00%	99.16
90	53	8	15.09%	77.24
91.01	34	9	26.47%	82.19
91.03	16	2	12.50%	93.17
91.04	12	2	16.67%	84.13
91.05	17	3	17.65%	84.33
92.01	37	4	10.81%	72.94
92.02	36	14	38.89%	75.89
93.01	26	7	26.92%	79.97
93.03	8	3	37.50%	92.92
93.04	17	6	35.29%	96.96
94.01	206	13	6.31%	60.82
94.02	443	30	6.77%	19.11
95	342	26	7.60%	10.65
96.03	438	35	7.99%	13.98
96.04	337	35	10.39%	36.64
96.05	39	5	12.82%	55.62
96.07	263	16	6.08%	24.07
96.08	254	19	7.48%	46.11
96.09	418	10	2.39%	8.85
96.11	77	8	10.39%	52.95
97.01	176	12	6.82%	63.4
97.02	342	28	8.19%	16.05
98.02	35	10	28.57%	90.28
98.03	51	6	11.77%	78.7
98.04	11	4	36.36%	96.17
99	21	5	23.81%	83.31
100	14	4	28.57%	61.95
101.01	49	2	4.08%	99.39
101.02	7	4	57.14%	96.88
105	9	2	22.22%	99.62
106.01	15	4	26.67%	96.63
106.02	15	6	40.00%	95.88

Home Purchase Loans (Conventional) Applications

Dallas, Texas
2010-2013

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
107.01	18	11	61.11%	80.23
107.03	13	1	7.69%	92.37
107.04	20	3	15.00%	85.89
108.01	32	8	25.00%	85.05
108.03	140	17	12.14%	80.23
108.04	5	1	20.00%	96.15
108.05	20	3	15.00%	95.6
109.02	63	9	14.29%	97.34
109.03	3	1	33.33%	95.92
109.04	3	1	33.33%	97.44
110.01	44	10	22.73%	90.23
110.02	59	12	20.34%	86.76
111.01	55	12	21.82%	93.49
111.03	18	4	22.22%	88.73
111.04	19	3	15.79%	97.07
111.05	14	3	21.43%	98.32
112	118	16	13.56%	94.76
113	31	7	22.58%	98.34
114.01	39	13	33.33%	98.9
115	35	3	8.57%	99.19
116.01	12	7	58.33%	88.19
116.02	67	11	16.42%	61.54
117.01	27	5	18.52%	82.78
117.02	35	7	20.00%	61.67
118	35	6	17.14%	80.21
119	59	19	32.20%	86.08
120	33	14	42.42%	86.87
121	39	12	30.77%	90.22
122.04	224	11	4.91%	55.25
122.06	163	12	7.36%	68.96
122.07	59	12	20.34%	90.45
122.08	6	2	33.33%	93.77
122.09	172	12	6.98%	60.03
122.1	45	7	15.56%	75.72
122.11	28	2	7.14%	86.46
123.01	70	12	17.14%	66.46
123.02	60	6	10.00%	78.72
124	246	19	7.72%	31.73
125	100	11	11.00%	52.41
126.01	41	11	26.83%	77.23
126.03	11	1	9.09%	64.25

Home Purchase Loans (Conventional) Applications

Dallas, Texas
2010-2013

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
126.04	24	1	4.17%	78.76
127.01	46	10	21.74%	52.5
127.02	45	5	11.11%	52.02
128	576	29	5.04%	33.66
129	485	32	6.60%	13.58
130.04	838	31	3.70%	9.45
130.05	412	21	5.10%	32.88
130.07	169	11	6.51%	44.85
130.08	264	7	2.65%	29.58
130.09	234	8	3.42%	46.17
130.1	31	1	3.2%	81.52
130.11	13	0	0.00%	90.32
131.01	434	0	0.00%	4.37
131.02	259	24	9.27%	7.03
131.04	52	4	7.69%	21.42
131.05	102	8	7.84%	68.6
132	486	41	8.44%	10.59
133	275	17	6.18%	5.9
134	314	29	9.24%	8.25
135	381	34	8.92%	6.4
136.05	477	16	3.35%	13.29
136.06	393	26	6.62%	26.88
136.07	312	14	4.49%	12.61
136.08	277	39	14.08%	8.54
136.09	184	11	5.98%	40.32
136.1	217	21	9.68%	45.32
136.11	258	22	8.53%	10.69
136.15	63	5	7.94%	65.25
136.16	194	42	21.65%	33.27
136.17	279	16	5.74%	16.89
136.18	224	16	7.14%	13.68
136.19	570	28	4.91%	13.36
136.2	106	16	15.09%	36.96
136.21	60	8	13.33%	59.77
136.22	86	9	10.47%	40.81
136.23	64	7	10.94%	73.68
136.24	39	0	0.00%	56.73
136.26	10	0	0.00%	69.42
140.01	178	21	11.80%	34.8
140.02	19	8	42.11%	34.51
141.27	368	32	8.70%	73.47

Home Purchase Loans (Conventional) Applications

**Dallas, Texas
2010-2013**

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
158	10	3	30.00%	57.95
159	28	5	17.86%	52.55
163.01	110	28	25.46%	68.54
164.08	95	14	14.74%	50.67
164.09	119	13	10.92%	38.74
164.12	91	12	13.19%	57.4
165.1	311	37	11.90%	68.27
165.11	49	12	24.49%	78.13
165.2	66	6	9.09%	88.44
165.21	56	3	5.36%	66.2
165.22	68	12	17.65%	41.26
166.05	56	21	37.50%	73.09
166.07	2	2	100.00%	96.62
167.01	131	8	6.11%	99.14
167.03	139	25	17.99%	60.42
170.01	331	111	33.54%	33.74
170.03	446	88	19.73%	23.66
170.04	1110	313	28.20%	33.92
171.01	213	69	32.39%	39.48
171.02	56	11	19.64%	49.92
176.05	12	4	33.33%	96.11
181.04	484	60	12.40%	20.42
181.1	227	22	9.69%	10
181.18	323	37	11.46%	41.17
181.24	783	79	10.09%	21.96
181.33	72	8	11.11%	34.89
181.34	105	7	6.67%	38.42
181.35	66	9	13.64%	41.98
181.36	214	10	4.67%	29.2
181.37	52	7	13.46%	58.37
181.4	146	14	9.59%	44.32
181.41	26	7	26.92%	45.9
181.42	33	4	12.12%	55.22
185.03	20	5	25.00%	77.1
185.05	3	1	33.33%	89.34
185.06	6	2	33.33%	93.29
190.16	56	9	16.07%	67.34
190.18	108	18	16.67%	51.89
190.19	104	11	10.58%	71.93
190.34	49	7	14.29%	62.69
190.35	92	19	20.65%	63.25

Home Purchase Loans (Conventional) Applications

Dallas, Texas
2010-2013

Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2013 Tract Minority %
190.4	80	12	15.00%	67.03
192.05	372	14	3.76%	8.46
192.08	53	8	15.09%	77.74
192.12	1	0	0.00%	98.32
192.13	3	0	0.00%	78.69
199	14	4	28.57%	87.1
202	12	5	41.67%	98.69
203	8	1	12.50%	94.08
204	149	20	13.42%	56
205	21	1	4.76%	96.93
206	127	17	13.39%	10.68
216.16	109	5	4.59%	38.46
216.34	1	0	0.00%	70.27
216.35	75	2	2.67%	63.86
216.36	44	1	2.27%	58.86
216.37	102	3	2.94%	65.2
216.38	51	2	3.92%	62.05
312.02	159	16	10.06%	27.56
313.1	217	24	11.06%	27.97
317.04	269	23	8.55%	24.41
317.06	259	11	4.25%	15.24
317.08	312	20	6.41%	20.34
317.09	311	15	4.82%	22.06
317.11	136	7	5.15%	33.27
317.12	130	9	6.92%	42.66
317.13	32	7	21.88%	54.58
317.14	25	0	0.00%	58.89
317.15	153	10	6.54%	24.17
317.16	125	7	5.60%	35.55
317.17	48	2	4.17%	48.48
317.18	131	9	6.87%	24.18
317.19	80	6	7.50%	33.64
317.2	6	0	0.00%	78.22
318.04	167	5	2.99%	20.07
401.01	359	25	6.96%	17.1
401.02	351	34	9.69%	21.9
402	799	54	6.76%	6.88
403.01	196	16	8.16%	16.54
403.02	399	56	14.04%	15.46
405.04	365	33	9.04%	12.12
502.01	348	25	7.18%	10.08

Table 7: City of Dallas Refinance Loan Applications: 2010 – 2013

Refinance Loan Applications				
Dallas, Texas 2010-2013				
Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
1	1192	142	11.91%	15.23
2.01	949	111	11.70%	9.13
2.02	918	118	12.85%	13.61
3	1052	138	13.12%	16.71
4.01	72	16	22.22%	90.62
4.04	364	79	21.70%	67.03
4.05	68	15	22.06%	82.12
4.06	104	34	32.69%	91.26
5	444	88	19.82%	70.07
6.01	424	84	19.81%	79.4
6.03	916	160	17.47%	27.15
6.05	329	51	15.50%	25.64
6.06	433	66	15.24%	16.14
7.01	656	100	15.24%	29.7
7.02	497	69	13.88%	28.25
8	139	34	24.46%	87.82
9	322	60	18.63%	88.86
10.01	489	72	14.72%	36.32
10.02	287	37	12.89%	70.58
11.01	767	109	14.21%	42.19
11.02	639	78	12.21%	17.94
12.02	338	37	10.95%	53.29
12.03	216	26	12.04%	60.41
12.04	43	13	30.23%	93.83
13.01	345	61	17.68%	38.72
13.02	284	44	15.49%	71.34
14	327	50	15.29%	70.29
15.02	157	35	22.29%	86.03
15.03	27	5	18.52%	92.1
15.04	117	27	23.08%	77.48
16	505	83	16.44%	62.49
17.01	41	15	36.59%	100
17.03	246	26	10.57%	17.04
17.04	126	18	14.29%	16.57
18	226	47	20.80%	18.51
19	369	95	25.75%	34.68
20	84	15	17.86%	94.8
21	14	3	21.43%	.
22	176	36	20.46%	36.77
24	83	21	25.30%	91.5
25	61	24	39.34%	96.89
27.01	13	6	46.15%	99.39

Refinance Loan Applications

Dallas, Texas
2010-2013

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
27.02	13	6	46.15%	99.2
31.01	280	62	22.14%	35.64
34	27	11	40.74%	86.99
37	27	6	22.22%	99.27
38	18	7	38.89%	99.46
39.01	6	4	66.67%	98.75
39.02	17	9	52.94%	98.95
40	7	0	0.00%	98.13
41	8	3	37.50%	99.03
42.01	545	88	16.15%	72.88
42.02	321	51	15.89%	78.6
43	24	9	37.50%	90.94
44	783	96	12.26%	22.9
45	347	75	21.61%	81.18
46	270	46	17.04%	67.54
47	38	11	28.95%	92.65
48	22	5	22.73%	96.51
49	52	17	32.69%	98.16
50	42	24	57.14%	91.27
51	107	31	28.97%	89.4
52	175	51	29.14%	84.3
53	300	96	32.00%	85.36
54	113	38	33.63%	95.2
55	54	12	22.22%	98.1
56	65	24	36.92%	98.25
57	43	17	39.54%	98.62
59.01	124	38	30.65%	99.23
59.02	55	23	41.82%	92.38
60.01	70	30	42.86%	95.58
60.02	39	16	41.03%	68.02
61	216	57	26.39%	87.13
62	283	66	23.32%	87.6
63.01	175	52	29.71%	85.21
63.02	260	55	21.15%	75.83
64.01	56	21	37.50%	94.05
64.02	50	16	32.00%	95.91
65.01	161	50	31.06%	91.52
65.02	78	27	34.62%	84.92
67	120	41	34.17%	90.33
68	112	23	20.54%	83.86
69	113	17	15.04%	86.99
71.01	501	75	14.97%	9.66
71.02	603	111	18.41%	83.81

Refinance Loan Applications

**Dallas, Texas
2010-2013**

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
72.01	27	10	37.04%	96.16
72.02	32	7	21.88%	98.06
73.01	654	98	14.99%	4.2
73.02	1055	156	14.79%	20.03
76.01	463	57	12.31%	11.51
76.04	976	170	17.42%	5.52
76.05	418	78	18.66%	7.09
77	1061	163	15.36%	4.56
78.01	392	49	12.50%	5.17
78.04	65	22	33.85%	71.72
78.05	383	68	17.76%	42.69
78.09	343	34	9.91%	48.42
78.1	639	77	12.05%	49.93
78.11	175	22	12.57%	64.59
78.12	837	72	8.60%	6.86
78.15	25	7	28.00%	83.22
78.18	2	1	50.00%	88.67
78.19	25	6	24.00%	73.45
78.2	19	2	10.53%	87.61
78.21	7	2	28.57%	91.68
78.22	0	0	0.00%	40.55
78.23	5	1	20.00%	72.82
78.24	242	24	9.92%	9.85
78.25	269	33	12.27%	57.43
78.26	3	0	0.00%	84.57
78.27	32	9	28.13%	76.94
79.02	1038	122	11.75%	25.79
79.03	388	49	12.63%	43.55
79.06	561	79	14.08%	4.85
79.09	1	0	0.00%	48.22
79.1	1	0	0.00%	46.66
79.13	133	27	20.30%	44.57
79.14	67	13	19.40%	34.24
80	2337	283	12.11%	6.33
81	1328	203	15.29%	11.92
82	596	73	12.25%	37.28
84	174	45	25.86%	79.82
85	113	43	38.05%	74.09
86.03	7	3	42.86%	98.28
86.04	14	4	28.57%	98.31
87.01	56	28	50.00%	99.04
87.03	32	15	46.88%	99.02
87.04	38	9	23.68%	97.12

Refinance Loan Applications

**Dallas, Texas
2010-2013**

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
87.05	21	10	47.62%	99.08
88.01	83	30	36.15%	99.46
88.02	59	21	35.59%	99.39
89	26	11	42.31%	99.16
90	162	65	40.12%	77.24
91.01	153	54	35.29%	82.19
91.03	87	24	27.59%	93.17
91.04	68	25	36.77%	84.13
91.05	42	15	35.71%	84.33
92.01	164	59	35.98%	72.94
92.02	84	38	45.24%	75.89
93.01	63	20	31.75%	79.97
93.03	26	13	50.00%	92.92
93.04	41	13	31.71%	96.96
94.01	395	73	18.48%	60.82
94.02	718	99	13.79%	19.11
95	661	77	11.65%	10.65
96.03	999	124	12.41%	13.98
96.04	651	119	18.28%	36.64
96.05	135	41	30.37%	55.62
96.07	588	102	17.35%	24.07
96.08	590	68	11.53%	46.11
96.09	780	94	12.05%	8.85
96.1	1	1	100.00%	98.54
96.11	351	83	23.65%	52.95
97.01	404	77	19.06%	63.4
97.02	776	108	13.92%	16.05
98.02	140	55	39.29%	90.28
98.03	141	30	21.28%	78.7
98.04	18	9	50.00%	96.17
99	10	4	40.00%	83.31
100	37	12	32.43%	61.95
101.01	49	17	34.69%	99.39
101.02	26	12	46.15%	96.88
105	49	17	34.69%	99.62
106.01	95	27	28.42%	96.63
106.02	29	14	48.28%	95.88
107.01	27	15	55.56%	80.23
107.03	67	28	41.79%	92.37
107.04	138	44	31.88%	85.89
108.01	223	70	31.39%	85.05
108.03	498	121	24.30%	80.23
108.04	27	8	29.63%	96.15

Refinance Loan Applications				
Dallas, Texas 2010-2013				
Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
108.05	150	44	29.33%	95.6
109.02	225	67	29.78%	97.34
109.03	42	11	26.19%	95.92
109.04	15	4	26.67%	97.44
110.01	326	109	33.44%	90.23
110.02	232	56	24.14%	86.76
111.01	272	84	30.88%	93.49
111.03	110	36	32.73%	88.73
111.04	57	25	43.86%	97.07
111.05	78	25	32.05%	98.32
112	264	69	26.14%	94.76
113	215	68	31.63%	98.34
114.01	40	16	40.00%	98.9
115	41	16	39.02%	99.19
116.01	46	16	34.78%	88.19
116.02	144	41	28.47%	61.54
117.01	120	52	43.33%	82.78
117.02	143	52	36.36%	61.67
118	193	71	36.79%	80.21
119	180	62	34.44%	86.08
120	88	34	38.64%	86.87
121	227	68	29.96%	90.22
122.04	544	103	18.93%	55.25
122.06	593	142	23.95%	68.96
122.07	388	100	25.77%	90.45
122.08	0	0	0.00%	93.77
122.09	391	48	12.28%	60.03
122.1	153	27	17.65%	75.72
122.11	74	19	25.68%	86.46
123.01	142	42	29.58%	66.46
123.02	170	49	28.82%	78.72
124	612	111	18.14%	31.73
125	292	82	28.08%	52.41
126.01	249	63	25.30%	77.23
126.03	58	13	22.41%	64.25
126.04	97	25	25.77%	78.76
127.01	186	57	30.65%	52.5
127.02	122	39	31.97%	52.02
128	1004	144	14.34%	33.66
129	959	139	14.49%	13.58
130.04	1656	141	8.51%	9.45
130.05	778	91	11.70%	32.88
130.07	428	80	18.69%	44.85

Refinance Loan Applications

Dallas, Texas
2010-2013

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
130.08	625	81	12.96%	29.58
130.09	549	51	9.29%	46.17
130.1	38	4	10.53%	81.52
130.11	9	1	11.11%	90.32
131.01	699	99	14.16%	4.37
131.02	427	68	15.93%	7.03
131.04	123	26	21.14%	21.42
131.05	142	21	14.79%	68.6
132	1058	179	16.92%	10.59
133	598	86	14.38%	5.9
134	582	77	13.23%	8.25
135	720	102	14.17%	6.4
136.05	1143	149	13.04%	13.29
136.06	805	96	11.93%	26.88
136.07	637	84	13.19%	12.61
136.08	697	115	16.50%	8.54
136.09	395	54	13.67%	40.32
136.1	554	101	18.23%	45.32
136.11	611	110	18.00%	10.69
136.15	137	26	18.98%	65.25
136.16	226	52	23.01%	33.27
136.17	538	61	11.34%	16.89
136.18	518	57	11.00%	13.68
136.19	1231	157	12.75%	13.36
136.2	113	29	25.66%	36.96
136.21	95	19	20.00%	59.77
136.22	119	20	16.81%	40.81
136.23	101	18	17.82%	73.68
136.24	50	10	20.00%	56.73
136.25	0	0	0.00%	85.41
136.26	7	1	14.29%	69.42
140.01	470	98	20.85%	34.8
140.02	16	8	50.00%	34.51
141.27	876	71	8.11%	73.47
158	54	19	35.19%	57.95
159	82	19	23.17%	52.55
163.01	397	106	26.70%	68.54
164.08	413	104	25.18%	50.67
164.09	532	104	19.55%	38.74
164.12	445	68	15.28%	57.4
165.1	1298	269	20.72%	68.27
165.11	289	68	23.53%	78.13
165.2	167	46	27.55%	88.44

Refinance Loan Applications

**Dallas, Texas
2010-2013**

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
165.21	137	24	17.52%	66.2
165.22	209	39	18.66%	41.26
166.05	34	16	47.06%	73.09
166.07	1	0	0.00%	96.62
167.01	184	59	32.07%	99.14
167.03	692	164	23.70%	60.42
170.01	321	97	30.22%	33.74
170.03	387	89	23.00%	23.66
170.04	139	41	29.50%	33.92
171.01	213	68	31.93%	39.48
171.02	156	48	30.77%	49.92
176.05	88	25	28.41%	96.11
181.04	1308	225	17.20%	20.42
181.1	719	141	19.61%	10
181.18	902	185	20.51%	41.17
181.24	3237	566	17.49%	21.96
181.33	207	30	14.49%	34.89
181.34	468	95	20.30%	38.42
181.35	234	40	17.09%	41.98
181.36	867	138	15.92%	29.2
181.37	285	54	18.95%	58.37
181.4	478	93	19.46%	44.32
181.41	64	14	21.88%	45.9
181.42	215	31	14.42%	55.22
185.03	43	13	30.23%	77.1
185.05	11	5	45.46%	89.34
185.06	5	0	0.00%	93.29
190.16	162	49	30.25%	67.34
190.18	348	67	19.25%	51.89
190.19	241	55	22.82%	71.93
190.34	257	38	14.79%	62.69
190.35	168	33	19.64%	63.25
190.4	174	23	13.22%	67.03
192.05	639	55	8.61%	8.46
192.08	137	35	25.55%	77.74
192.12	3	0	0.00%	98.32
192.13	5	1	20.00%	78.69
199	76	33	43.42%	87.1
202	25	10	40.00%	98.69
203	18	7	38.89%	94.08
204	148	29	19.60%	56
205	67	18	26.87%	96.93
206	281	56	19.93%	10.68

Refinance Loan Applications

**Dallas, Texas
2010-2013**

Census Tracts	Total Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	2013 Tract Minority %
216.16	399	67	16.79%	38.46
216.34	1	0	0.00%	70.27
216.35	121	15	12.40%	63.86
216.36	81	7	8.64%	58.86
216.37	208	28	13.46%	65.2
216.38	140	27	19.29%	62.05
312.02	364	49	13.46%	27.56
313.1	810	135	16.67%	27.97
317.04	554	71	12.82%	24.41
317.06	665	102	15.34%	15.24
317.08	700	103	14.71%	20.34
317.09	706	78	11.05%	22.06
317.11	273	32	11.72%	33.27
317.12	286	53	18.53%	42.66
317.13	85	9	10.59%	54.58
317.14	58	14	24.14%	58.89
317.15	310	41	13.23%	24.17
317.16	195	21	10.77%	35.55
317.17	118	13	11.02%	48.48
317.18	232	34	14.66%	24.18
317.19	170	21	12.35%	33.64
317.2	21	5	23.81%	78.22
318.04	323	35	10.84%	20.07
401.01	764	84	11.00%	17.1
401.02	748	100	13.37%	21.9
402	955	130	13.61%	6.88
403.01	765	109	14.25%	16.54
403.02	891	166	18.63%	15.46
405.04	719	106	14.74%	12.12
502.01	1070	169	15.79%	10.08

Table 8: City of Dallas Home Improvement Loan Applications: 2010-2013

Home Improvement Loan Applications				
Dallas, Texas				
2010-2013				
Census Tracts	Home Improvement Loan Applications	Home Improvement Loan Application Denials	Home Improvement Loan Applications Denial Rates %	2013 Tract Minority %
1	60	16	26.67%	15.23
2.01	47	13	27.66%	9.13
2.02	52	20	38.46%	13.61
3	47	12	25.53%	16.71
4.01	5	5	100.00%	90.62
4.04	21	9	42.86%	67.03
4.05	3	1	33.33%	82.12
4.06	27	22	81.48%	91.26
5	20	9	45.00%	70.07
6.01	24	12	50.00%	79.4
6.03	30	10	33.33%	27.15
6.05	4	1	25.00%	25.64
6.06	12	2	16.67%	16.14
7.01	18	9	50.00%	29.7
7.02	5	3	60.00%	28.25
8	6	4	66.67%	87.82
9	11	4	36.36%	88.86
10.01	24	7	29.17%	36.32
10.02	21	5	23.81%	70.58
11.01	31	13	41.94%	42.19
11.02	17	2	11.77%	17.94
12.02	21	8	38.10%	53.29
12.03	23	11	47.83%	60.41
12.04	13	8	61.54%	93.83
13.01	21	11	52.38%	38.72
13.02	23	7	30.44%	71.34
14	21	7	33.33%	70.29
15.02	11	4	36.36%	86.03
15.03	3	1	33.33%	92.1
15.04	13	9	69.23%	77.48
16	17	3	17.65%	62.49
17.01	0	.	.	100
17.03	0	1	.	17.04
17.04	1	.	0.00%	16.57
18	6	2	33.33%	18.51
19	5	6	120.00%	34.68
20	10	1	10.00%	94.8
21	1	2	200.00%	.
22	2	6	300.00%	36.77
24	10	.	0.00%	91.5
25	19	11	57.90%	96.89
27.01	17	16	94.12%	99.39
27.02	6	4	66.67%	99.2

31.01	3	2	66.67%	35.64
34	5	5	100.00%	86.99
37	23	16	69.57%	99.27
38	9	5	55.56%	99.46
39.01	7	3	42.86%	98.75
39.02	18	15	83.33%	98.95
40	5	3	60.00%	98.13
41	9	8	88.89%	99.03
42.01	51	18	35.29%	72.88
42.02	22	4	18.18%	78.6
43	7	5	71.43%	90.94
44	57	12	21.05%	22.9
45	37	21	56.76%	81.18
46	24	9	37.50%	67.54
47	14	10	71.43%	92.65
48	6	6	100.00%	96.51
49	24	19	79.17%	98.16
50	19	13	68.42%	91.27
51	20	14	70.00%	89.4
52	30	17	56.67%	84.3
53	55	37	67.27%	85.36
54	19	17	89.47%	95.2
55	26	21	80.77%	98.1
56	49	43	87.76%	98.25
57	25	18	72.00%	98.62
59.01	40	30	75.00%	99.23
59.02	15	11	73.33%	92.38
60.01	22	18	81.82%	95.58
60.02	12	11	91.67%	68.02
61	28	18	64.29%	87.13
62	41	27	65.85%	87.6
63.01	45	32	71.11%	85.21
63.02	36	24	66.67%	75.83
64.01	19	12	63.16%	94.05
64.02	7	5	71.43%	95.91
65.01	28	23	82.14%	91.52
65.02	27	17	62.96%	84.92
67	28	16	57.14%	90.33
68	23	15	65.22%	83.86
69	10	3	30.00%	86.99
71.01	19	4	21.05%	9.66
71.02	56	27	48.21%	83.81
72.01	4	3	75.00%	96.16
72.02	9	8	88.89%	98.06
73.01	44	9	20.46%	4.2
73.02	47	8	17.02%	20.03
76.01	28	4	14.29%	11.51
76.04	27	7	25.93%	5.52
76.05	16	4	25.00%	7.09

77	43	12	27.91%	4.56
78.01	19	1	5.26%	5.17
78.04	21	9	42.86%	71.72
78.05	28	19	67.86%	42.69
78.09	18	11	61.11%	48.42
78.1	40	9	22.50%	49.93
78.11	8	3	37.50%	64.59
78.12	46	9	19.57%	6.86
78.15	8	5	62.50%	83.22
78.18	6	4	66.67%	88.67
78.19	3	1	33.33%	73.45
78.2	4	3	75.00%	87.61
78.21	3	3	100.00%	91.68
78.22	4	3	75.00%	40.55
78.23	2	1	50.00%	72.82
78.24	12	.	0.00%	9.85
78.25	19	4	21.05%	57.43
78.26	1	1	100.00%	84.57
78.27	5	4	80.00%	76.94
79.02	55	16	29.09%	25.79
79.03	24	5	20.83%	43.55
79.06	23	6	26.09%	4.85
79.09	0	.	.	48.22
79.1	2	2	100.00%	46.66
79.13	0	.	.	44.57
79.14	1	.	0.00%	34.24
80	125	31	24.80%	6.33
81	74	23	31.08%	11.92
82	42	14	33.33%	37.28
84	49	36	73.47%	79.82
85	23	18	78.26%	74.09
86.03	6	4	66.67%	98.28
86.04	7	6	85.71%	98.31
87.01	30	24	80.00%	99.04
87.03	18	17	94.44%	99.02
87.04	19	15	78.95%	97.12
87.05	14	12	85.71%	99.08
88.01	22	16	72.73%	99.46
88.02	47	36	76.60%	99.39
89	10	7	70.00%	99.16
90	48	37	77.08%	77.24
91.01	24	18	75.00%	82.19
91.03	14	11	78.57%	93.17
91.04	24	19	79.17%	84.13
91.05	17	15	88.24%	84.33
92.01	46	29	63.04%	72.94
92.02	29	23	79.31%	75.89
93.01	18	17	94.44%	79.97
93.03	24	19	79.17%	92.92

93.04	19	13	68.42%	96.96
94.01	32	16	50.00%	60.82
94.02	55	15	27.27%	19.11
95	57	14	24.56%	10.65
96.03	62	25	40.32%	13.98
96.04	26	7	26.92%	36.64
96.05	24	15	62.50%	55.62
96.07	45	23	51.11%	24.07
96.08	41	16	39.02%	46.11
96.09	59	11	18.64%	8.85
96.1	1	1	100.00%	98.54
96.11	19	13	68.42%	52.95
97.01	33	21	63.64%	63.4
97.02	32	15	46.88%	16.05
98.02	24	14	58.33%	90.28
98.03	13	10	76.92%	78.7
98.04	1		0.00%	96.17
99	1	1	100.00%	83.31
100	13	13	100.00%	61.95
101.01	31	27	87.10%	99.39
101.02	17	10	58.82%	96.88
105	18	16	88.89%	99.62
106.01	37	27	72.97%	96.63
106.02	11	6	54.55%	95.88
107.01	16	10	62.50%	80.23
107.03	14	9	64.29%	92.37
107.04	20	15	75.00%	85.89
108.01	32	27	84.38%	85.05
108.03	54	30	55.56%	80.23
108.04	2	1	50.00%	96.15
108.05	10	8	80.00%	95.6
109.02	30	24	80.00%	97.34
109.03	3	3	100.00%	95.92
109.04	3	2	66.67%	97.44
110.01	57	36	63.16%	90.23
110.02	31	18	58.07%	86.76
111.01	41	29	70.73%	93.49
111.03	32	23	71.88%	88.73
111.04	40	35	87.50%	97.07
111.05	14	13	92.86%	98.32
112	46	36	78.26%	94.76
113	50	40	80.00%	98.34
114.01	15	14	93.33%	98.9
115	6	6	100.00%	99.19
116.01	20	15	75.00%	88.19
116.02	37	26	70.27%	61.54
117.01	24	16	66.67%	82.78
117.02	44	33	75.00%	61.67
118	53	43	81.13%	80.21

119	60	47	78.33%	86.08
120	20	14	70.00%	86.87
121	32	26	81.25%	90.22
122.04	46	22	47.83%	55.25
122.06	47	27	57.45%	68.96
122.07	31	17	54.84%	90.45
122.08	5	3	60.00%	93.77
122.09	21	8	38.10%	60.03
122.1	15	7	46.67%	75.72
122.11	7	5	71.43%	86.46
123.01	14	9	64.29%	66.46
123.02	19	14	73.68%	78.72
124	54	23	42.59%	31.73
125	40	32	80.00%	52.41
126.01	34	19	55.88%	77.23
126.03	9	4	44.44%	64.25
126.04	8	4	50.00%	78.76
127.01	25	15	60.00%	52.5
127.02	23	16	69.57%	52.02
128	69	32	46.38%	33.66
129	70	20	28.57%	13.58
130.04	124	22	17.74%	9.45
130.05	43	13	30.23%	32.88
130.07	35	16	45.71%	44.85
130.08	38	9	23.68%	29.58
130.09	42	14	33.33%	46.17
130.1	4	2	50.00%	81.52
130.11	4	3	75.00%	90.32
131.01	37	9	24.32%	4.37
131.02	26	4	15.39%	7.03
131.04	3		0.00%	21.42
131.05	8	3	37.50%	68.6
132	32	8	25.00%	10.59
133	29	8	27.59%	5.9
134	28	5	17.86%	8.25
135	40	7	17.50%	6.4
136.05	67	21	31.34%	13.29
136.06	51	16	31.37%	26.88
136.07	48	11	22.92%	12.61
136.08	24	9	37.50%	8.54
136.09	23	6	26.09%	40.32
136.1	28	14	50.00%	45.32
136.11	17	3	17.65%	10.69
136.15	11	4	36.36%	65.25
136.16	2	2	100.00%	33.27
136.17	25	12	48.00%	16.89
136.18	20	6	30.00%	13.68
136.19	72	20	27.78%	13.36
136.2	9	7	77.78%	36.96

136.21	5	4	80.00%	59.77
136.22	3	1	33.33%	40.81
136.23	2	2	100.00%	73.68
136.24	3	2	66.67%	56.73
136.25	0	.	.	85.41
136.26	1	1	100.00%	69.42
140.01	33	16	48.49%	34.8
140.02	1	.	0.00%	34.51
141.27	18	8	44.44%	73.47
158	14	9	64.29%	57.95
159	14	10	71.43%	52.55
163.01	38	27	71.05%	68.54
164.08	58	35	60.35%	50.67
164.09	31	16	51.61%	38.74
164.12	26	10	38.46%	57.4
165.1	84	52	61.91%	68.27
165.11	39	27	69.23%	78.13
165.2	16	9	56.25%	88.44
165.21	14	11	78.57%	66.2
165.22	9	2	22.22%	41.26
166.05	16	14	87.50%	73.09
166.07	3	3	100.00%	96.62
167.01	74	59	79.73%	99.14
167.03	72	63	87.50%	60.42
170.01	39	32	82.05%	33.74
170.03	63	38	60.32%	23.66
170.04	15	9	60.00%	33.92
171.01	26	17	65.39%	39.48
171.02	33	23	69.70%	49.92
176.05	21	18	85.71%	96.11
181.04	72	27	37.50%	20.42
181.1	57	22	38.60%	10
181.18	51	29	56.86%	41.17
181.24	184	94	51.09%	21.96
181.33	14	10	71.43%	34.89
181.34	43	29	67.44%	38.42
181.35	17	6	35.29%	41.98
181.36	55	25	45.46%	29.2
181.37	16	6	37.50%	58.37
181.4	35	16	45.71%	44.32
181.41	3	2	66.67%	45.9
181.42	12	7	58.33%	55.22
185.03	6	5	83.33%	77.1
185.05	2	1	50.00%	89.34
185.06	1	1	100.00%	93.29
190.16	7	5	71.43%	67.34
190.18	26	17	65.39%	51.89
190.19	21	14	66.67%	71.93
190.34	17	8	47.06%	62.69

190.35	13	9	69.23%	63.25
190.4	6	2	33.33%	67.03
192.05	34	5	14.71%	8.46
192.08	15	10	66.67%	77.74
192.12	0	.	.	98.32
192.13	0	.	.	78.69
199	22	14	63.64%	87.1
202	22	16	72.73%	98.69
203	4	3	75.00%	94.08
204	3	1	33.33%	56
205	6	4	66.67%	96.93
206	13	5	38.46%	10.68
216.16	28	7	25.00%	38.46
216.34	0	.	.	70.27
216.35	7	3	42.86%	63.86
216.36	5	1	20.00%	58.86
216.37	18	13	72.22%	65.2
216.38	9	3	33.33%	62.05
312.02	26	13	50.00%	27.56
313.1	38	22	57.90%	27.97
317.04	18	5	27.78%	24.41
317.06	14	6	42.86%	15.24
317.08	16	2	12.50%	20.34
317.09	32	6	18.75%	22.06
317.11	8	.	0.00%	33.27
317.12	6	4	66.67%	42.66
317.13	6	3	50.00%	54.58
317.14	1	1	100.00%	58.89
317.15	12	1	8.33%	24.17
317.16	5	1	20.00%	35.55
317.17	1	1	100.00%	48.48
317.18	11	5	45.46%	24.18
317.19	6	2	33.33%	33.64
317.2	0	.	.	78.22
318.04	19	5	26.32%	20.07
401.01	73	21	28.77%	17.1
401.02	73	23	31.51%	21.9
402	77	33	42.86%	6.88
403.01	61	27	44.26%	16.54
403.02	51	20	39.22%	15.46
405.04	36	12	33.33%	12.12
502.01	63	28	44.44%	10.08

Appendix 7- Newspaper Ads for Public Meetings

NOTICE OF PUBLIC MEETING

Attention: All Dallas Residents

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Dallas will hold a Public Meeting on Thursday, September 26, 2013 at 6:30 p.m. at Dallas City Hall, 1500 Marilla St., L1 Auditorium. This meeting will inform Dallas residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

This information will be used in the preparation of the AI; a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector.

If you have any questions about the meeting, please contact the Fair Housing Office at (214) 670-3247 or email at

www.dallasfairhousing.com

Individuals with disabilities requiring auxiliary aids or services should contact Chalisa Warren at (214) 670-0605.

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Comisión de Calidad Ambiental de Texas

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City of Dallas

NOTICE OF PUBLIC MEETING

ATTENTION: ALL DALLAS RESIDENTS



LENDER

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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Chalisa Warren at (214) 670-0605

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NOTICE OF PUBLIC MEETING

Attention: All Dallas Residents

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Dallas will hold a Public Meeting on **Thursday, September 26, 2013 at 6:30 p.m. at Dallas City Hall, 1500 Marilla St., - L1 Auditorium.** This meeting will inform Dallas residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

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**SATURDAY, SEPTEMBER 28 • 6 P.M.
SHERATON DALLAS HOTEL**

SUPPORT THE MISSION OF ST. JUDE CHILDREN'S RESEARCH HOSPITAL
AND HELP SAVE KIDS LIKE CAMRYN.

ENJOY COCKTAILS, DINNER, LIVE ENTERTAINMENT & SILENT AUCTION.



By Deborah O'Connell

Appendix 8- Neighborhood Plus Plan (Incorporated by reference & web link)

Dallas City Council Briefing Presentation – February 18, 2015

Full document incorporated by reference and can be accessed at the following web link:

http://dallascityhall.com/government/ layouts/15/WopiFrame.aspx?sourcedoc=/government/Council%20Meeting%20Documents/NeighborhoodPlus_021815.pdf&action=default&DefaultItemOpen=1

Neighborhood Plus

The future of living in our city

Dallas City Council Briefing
February 18, 2015



Fair Housing/Human Rights Office
City of Dallas, Texas
1500 Marilla Street
Dallas, TX 75201

Phone: (214) 670-FAIR (3247)
Fax: (214) 670-0665

