



GARLAND

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**Analysis of Impediments
to
Fair Housing Choice**

City of Garland, Texas

September 2015

**Fair Housing Services
City of Garland
200 N Fifth Street
Garland, TX 75040**

**Prepared in conjunction with:
ASK Development Solutions, Inc.**

**THIS DOCUMENT CAN BE PROVIDED IN ALTERNATIVE
FORMAT IF REQUESTED**



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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 Garland, 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 (CPD) office of HUD. The City, through its Fair Housing Services Division, contracted with ASK Development Solutions, Inc. to conduct an Analysis of Impediments to Fair Housing Choice (AI) study. The previous AI was completed in November 2011 and covered the period 2011-2014 which coincided with the City's five-year Consolidated Plan for the same period, also required by HUD.

The current AI covers the period 2015-2019 and is a part of the City's certification for "affirmatively furthering fair housing (AFFH)."

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 Garland 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 City of Garland expanded the protected class categories to include age in order to protect the rights of the growing senior population in Garland.² 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 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

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

² Fair Housing Service webpage FAQs on the City of Garland website retrieved June 3, 2015.

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 Garland 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.*”³ The State does not recognize any other protected classes. Locally, the City adopted the Garland Fair Housing Ordinance which is substantially equivalent to the FHA. The City also adopted Ordinance No. 6283 which was approved and became effective November 18, 2008 providing for reasonable accommodation from zoning ordinance requirements for persons with disabilities.

³ Texas Workforce Commission website, <http://www.twc.state.tx.us/partners/housing-discrimination#overview>, accessed April 12, 2015

Responsible Agency

Under the City's Fair Housing Ordinance, the Garland Fair Housing Services, a division under the Housing and Community Services Department, is the City agency responsible for educating citizens on Fair Housing laws and eliminating housing discrimination according to its mission statement on the agency's website.⁴ The agency 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. The goals of the Fair Housing Services are to:

- “Significantly reduce incidents of housing discrimination through effective education concerning housing rights to landlords and tenants; and provide investigation, conciliation and remediation services.
- Continue to promote Garland as an inclusive, affordable, and accessible community.
- Address discriminatory housing practices in accordance with the Garland Fair Housing Ordinance and the FHA, as amended, through investigation, conciliation, and resolution services.”

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, and 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.⁵

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

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

⁴ Fair Housing Service webpage on the City of Garland website retrieved April 30, 2015.

<http://www.garlandtx.gov/gov/hk/housing/fair/default.asp>

⁵ 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.⁶

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's Citizen Participation Plan and Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i), the City of Garland 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 Services 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 survey was targeted to persons who resided within the City and was also provided in a Spanish language version.
2. Print and Broadcast Media – The City also promoted the AI requirements, the public meetings and focus groups, and the surveys on the City's government television station, CGTV, the "Garland City Press," a publication that is distributed with the City's water bill, and a notice in Garland Morning News, a newspaper of general circulation.
3. Public meetings, Presentations and Focus Groups – Meetings were held between November 5-7 to solicit input on housing discrimination and impediments to fair housing in the City. Three (3) focus group meetings were held. The focus groups included realtors, lenders, property managers, chamber of commerce, agencies serving the homeless, persons with disabilities, and faith based organizations. One public meeting was also held with the general public and neighborhood associations. Presentations on the AI and the AI process were made at these meetings. Additional AI presentations were made by the staff of the City's Fair Housing Services 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 Fair Housing Services, Neighborhood Vitality, the Garland Housing Agency, the Code Enforcement Office, Housing and Community Services, Economic Development, Planning and Zoning, and the City Attorney's office. Interviews were also conducted with fair housing and housing related agencies and the HUD Fort Worth Regional Office. The key person interviews were used to solicit feedback on fair

⁶ 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

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.

Planning and Research Methodology

The consultant's methodology in conducting the Garland 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)."⁷ 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; 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) reporting website.

Task 2 - Regulatory Review: Researched and collected information regarding Garland'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 received by HUD, the City of Garland Fair Housing Services and legal cases in the City, County, and State and nationally that may have a bearing on fair housing practices in the City of Garland.

Task 4 - Review of Previous Studies: A previous AI was completed in 2011 which identified impediments to fair housing choice and made recommendations. A review was conducted to determine the status of the 2011 recommendations, actions taken, resources invested, and 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 October 7, 2014 and ending December 1, 2014, online surveys were available to all Garland residents and industry stakeholders on the City's website and through email links. Surveys were also directly administered at meetings or through non-profit agencies

⁷ 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

and public meetings conducted by both City staff and the consultant to secure input. Responses to fair housing surveys included 17 residents, 10 housing providers, and one (1) lender. No one responded to the Spanish and lender surveys.

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 recommendations and an action matrix (see section below) 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 prioritize the recommendations and develop a set of action steps 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:

<p>Component 1:</p> <p>A review of the grantee’s laws, regulations, etc.; An assessment of how those laws, etc. affect the location, 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>Assembling Fair Housing Information:</p> <p>Housing policies, practices, and procedures; zoning and land use policies; Fair housing complaints/suits or other data; Demographic 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>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 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>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>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>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>	

Component 3	Maintenance of Records
<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 Garland 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 Garland 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 Garland will be determined by the City’s financial and human resources and the City leadership’s perceptions of the findings presented and actions that it wishes to take.

Affordable Housing

Throughout this document, there will references and data on “affordable housing.” Affordable housing is defined as the availability of housing for persons at a rate they can afford usually measured in terms of the percentage of their income that one pays to rent or own housing. While usually associated with substandard affordable housing is considered standard housing that is affordable to a variety of income levels. It must be noted here that fair housing is not synonymous with affordable housing and lack of affordable housing in and of itself is not an impediment to fair housing choice but affects its.

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.

Summary of 2011 Impediments and Recommendations

The following is a summary of impediments and actions identified in the 2011 AI. A complete status of the 2011 recommendations is included herein as Appendix III 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 2011 impediments.

Previous Impediment #1: Lack of adequate funding for fair housing enforcement and outreach activities.

Current status: The City’s CDBG’s allocation was used for fair housing and various methods were used to disseminate fair housing information. CDBG funds in the amount of \$36,600 was allocated to fair outreach and enforcement activities over two years.

Updated Recommendation(s): Continue efforts to disseminate Fair Housing information.

Previous Impediment #2: Lack of Fair Housing Testing to determine where Fair Housing discrimination is taking place.

Current status: The City Fair Housing Services Department reviewed the findings of a rental audit by the North Texas Fair Housing Center and national findings and review of fair housing testing programs and literature to assess the need and/or feasibility of a fair housing testing component.

Updated Recommendation(s): City staff determined that no further action is required.

Previous Impediment #3: Need for ADA Education and Evaluation of Accessible/Disabled Housing Needs.

Current status: The City of Garland’s building development process requires that plans involving construction in excess of \$50K follows State of Texas applicable laws and the City’s Fair Housing Services website links to several fair housing and accessibility/disability resources. The recommendation continues to be reviewed to determine if the objectives can be achieved through the existing process. The City adopted a reasonable accommodation ordinance in 2008.

Updated Recommendation(s): Continue to review the cost and feasibility of the current recommendation and pursue partnerships with the recommended agencies.

Previous Impediment #4: Multifamily and Senior Housing Zoning Ordinances.

Current status: The City of Garland is updating and consolidating its development codes, including the Zoning Ordinance, Subdivision Ordinance and Site Development Standards, into the Garland Development Code (GDC). The GDC will allow for more diverse housing types.

Updated Recommendation(s): City staff determined that no further action is required.

Previous Impediment #5: Price of Vacant Land

Current status: The City of Garland uses resources such as the Residential Idea Book to update and improve smaller, older homes for greater functionality, preserving affordable housing, and enhancing neighborhood stability. The City also adopted the Envision Garland 2030 Comprehensive Plan in March, 2012, with one of its Guiding Principles of providing opportunities for a range of housing types meeting the income, household needs and preferences with a focus on housing and neighborhoods.

Updated Recommendation(s): Review existing policies regarding acquisition of land through auctions and tax foreclosures to determine if these are viable options for reducing the price of land. The City could also encourage its non-profit developers and community housing development organizations (CHDOs) under the HOME program to use resources such as the National Community Stabilization Trust to access foreclosed properties before they go on the open market.

Previous Impediment #6: Lack of Income.

Current status: The City of Garland Economic Development Department works closely with the Garland Chamber of Commerce to recruit new businesses for job creation and job training is provided by Richland College – Garland campus. City staff determined that no further action is required.

Updated Recommendation(s): Continue and expand efforts.

Previous Impediment #7: Cost Burden (Housing Cost vs. Income Available)

Current status: The City's GREAT Homes program contributes to affordable housing by purchasing and upgrading existing foreclosed homes with emphasis on energy efficiency and increasing values.

Updated Recommendation(s): Continue and expand efforts.

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, recommendations were formulated to address them and are listed in more detail in section VII, page 129 herein.

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

Action: Increase the production and preservation of affordable housing units.⁸

Recommendation #A-1: Increase the supply of affordable rental housing through inclusive housing projects and leveraging other public and private funding.

Recommendation #A-2: Encourage non-profit developers and HOME community housing development organizations (CHDOs) to use the National Community Stabilization Trust (NCST) to access foreclosed properties.

⁸ As previously explained, under the FHA there is no requirement to create affordable housing but is nonetheless discussed in this AI.

Recommendation #A-3: Facilitate relationships between non-profit developers and individual banks to use foreclosed properties and rehabilitation funding to produce affordable housing.

Recommendation #A-4: Increase services including housing, credit, and foreclosure prevention counseling and financial assistance to minorities and low- and moderate income households.

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.

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

Recommendation #B-2: Review public awareness, staff capacity, and use of the benefits related to the City's reasonable accommodation ordinance.

C. Impediment: Housing rehabilitation resources available to the City are not distributed between owner and renter households.

Action: The City should expand its rehabilitation programs to cover repairs including accessibility modifications for rental properties.

Recommendation #C-1: Develop and implement a rental rehabilitation program for low and moderate income persons including persons with disabilities.

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

Action: The City should 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.

Recommendation #D-1: The City should coordinate outreach and education about the procedures to seek reasonable accommodation from zoning, land use, and development standards.

E. Impediment: Lending practices may be disproportionately impacting minority and ethnic populations based on loan denial rates and incidences of scamming.

Action: The City should work with lenders in Garland and request that they review their underwriting standards to determine that loan decisions are being made equitably and continue to educate the public on loan scams.

Recommendation #E-1: Coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

Recommendation #E-2: Continue its education of the public on loan scams and invite lenders to participate in the education process.

F. 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.

Recommendation #F-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.

G. 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.

Recommendation #G-1: Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients.

Recommendation #G-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.

H. 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.

Recommendation #H-1: Through the preparation of fact sheets and incorporation of NIMBYism as a topic in fair housing training to provide residents an opportunity to learn more about affordable and accessible housing and help dispel negative preconceptions.

Recommendation #H-2: Work with partners throughout the region to raise awareness of the concepts of "housing affordability" and "affordable financing."

I. Impediment: A disproportionate number of Section 8 voucher recipients are minority which contributes to segregated housing patterns

Action: The GHA should conduct periodic analysis of the distribution of vouchers by family type and race/ethnicity to determine if there is a pattern of segregation.

Recommendation #I-1: The City should take actions to promote housing choices for voucher holders including continuing to educate private landlords in non-minority census tracts about the Section 8 Housing Choice Voucher Program and provide voucher users with information on available rental units outside of predominantly minority areas.

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 of the informational items included in 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; official City of Garland 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.

Demographic Data

The Office of Community Planning and Development provides estimates of the number of persons that can be considered Low, Low to Moderate, and Low, Moderate, and Medium income persons according to annually revised income limits. The ACS Survey 5-year 2006-2010 Low and Moderate Income Summary Data went into effect on July 1, 2014. According to the Low/Mod Income data, the City of Garland is comprised of 62 census tracts and 163 census block groups. Of the 163 census block groups, 61 have a low- and moderate-income percentage of over 51%. Map 1 below shows Garland's low- and moderate-income census areas as defined by HUD.

Population, Race, and Ethnicity

The City of Garland had a total population of 226,876 persons at the time of the 2010 Census. The 2000 Census reflects a population of 215,768. Garland's population grew by 11,108 persons (5.1%) over the ten-year period from 2000 to 2010. Each year, the Garland Planning & Community Development Department prepares an Annual Housing and Population Summary that includes a population projection based on building permit data, changes to occupancy rates, and household size. Based on the methodology, the January 1, 2015 population estimate is 234,533 persons which is 3.4% greater than the 2010 population.

According to the 2010 Census, the racial makeup of the community was majority White (57.5%), but also included populations identifying themselves as Black or African American (14.5%), Asian (9.4%), American Indian and Alaska Native (0.8%), and other races, including two or more races (3.3%). Approximately 38% of the Garland population identified themselves as being of Latino or Hispanic ethnic origin. See Table 1 below.

Map 1. Low and Moderate Income Census Tracts 2010-City of Garland, TX

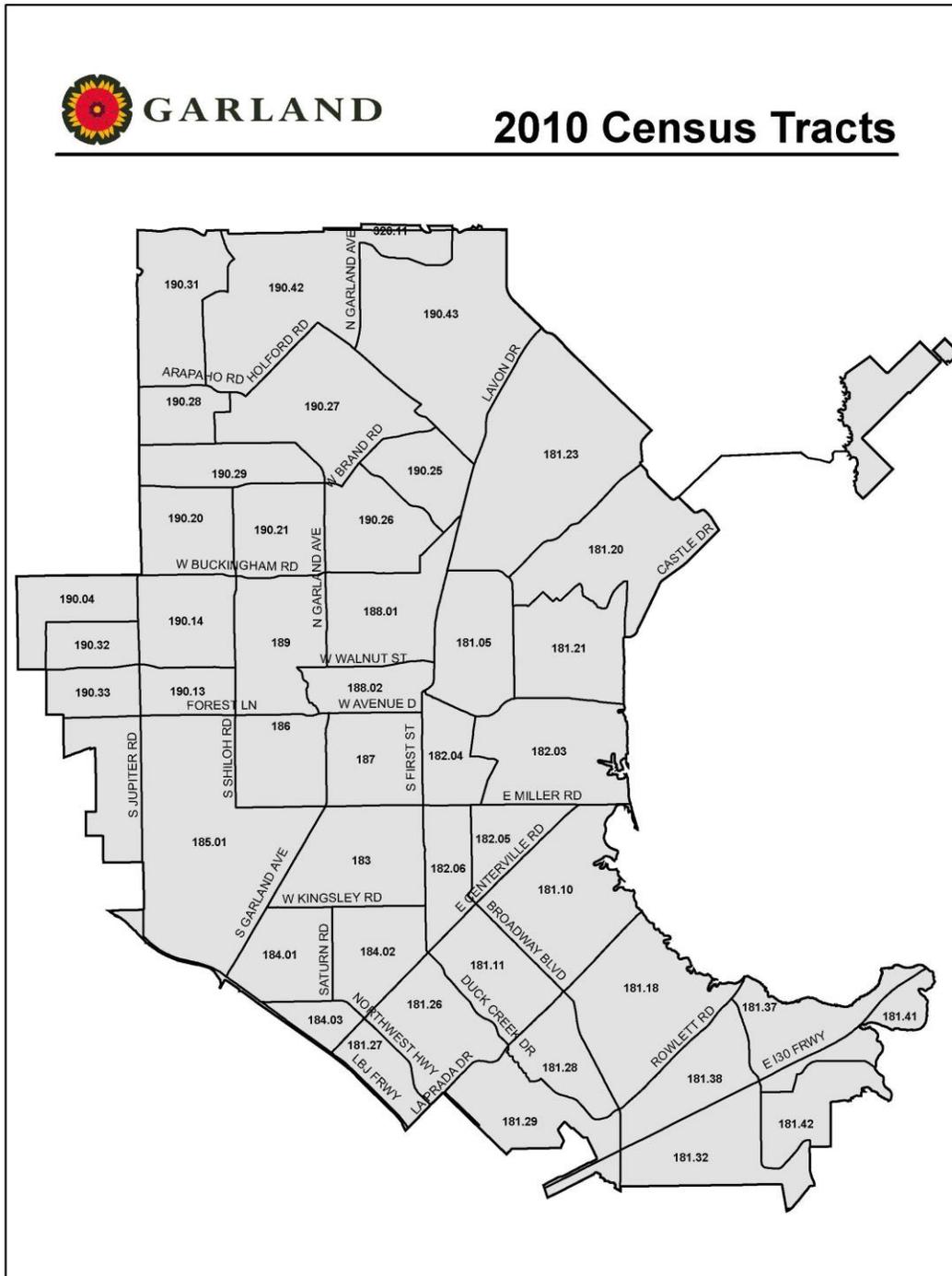


Table 1 shows the percentage of each racial and ethnic population grouping as a percentage of the total population for each census period and then the percentage change in the number of persons between the two census periods.

The demographic trends indicate that there are significant changes occurring in the City. From the 2000 to 2010 Census counts, the White population declined by 7.4% while all other population groups increased. Garland’s Black or African American population increased by 28.8%; Asian population increased by 35.1%; American Indian and Alaska Native population increased by 44.2%; persons with two or more races increased by 18.4%, and persons of Hispanic or Latino Origin grew by the largest overall percentage at 55.4%. Maps 2 and 3 below shows the distribution of Black or African American persons and persons of Hispanic origin. The maps indicate that the highest percentage of persons of Hispanic origin are primarily located in the areas of low and moderate income.

Table 1. Population/Race/Ethnicity: 2000 and 2010 Census Changes - City of Garland, TX

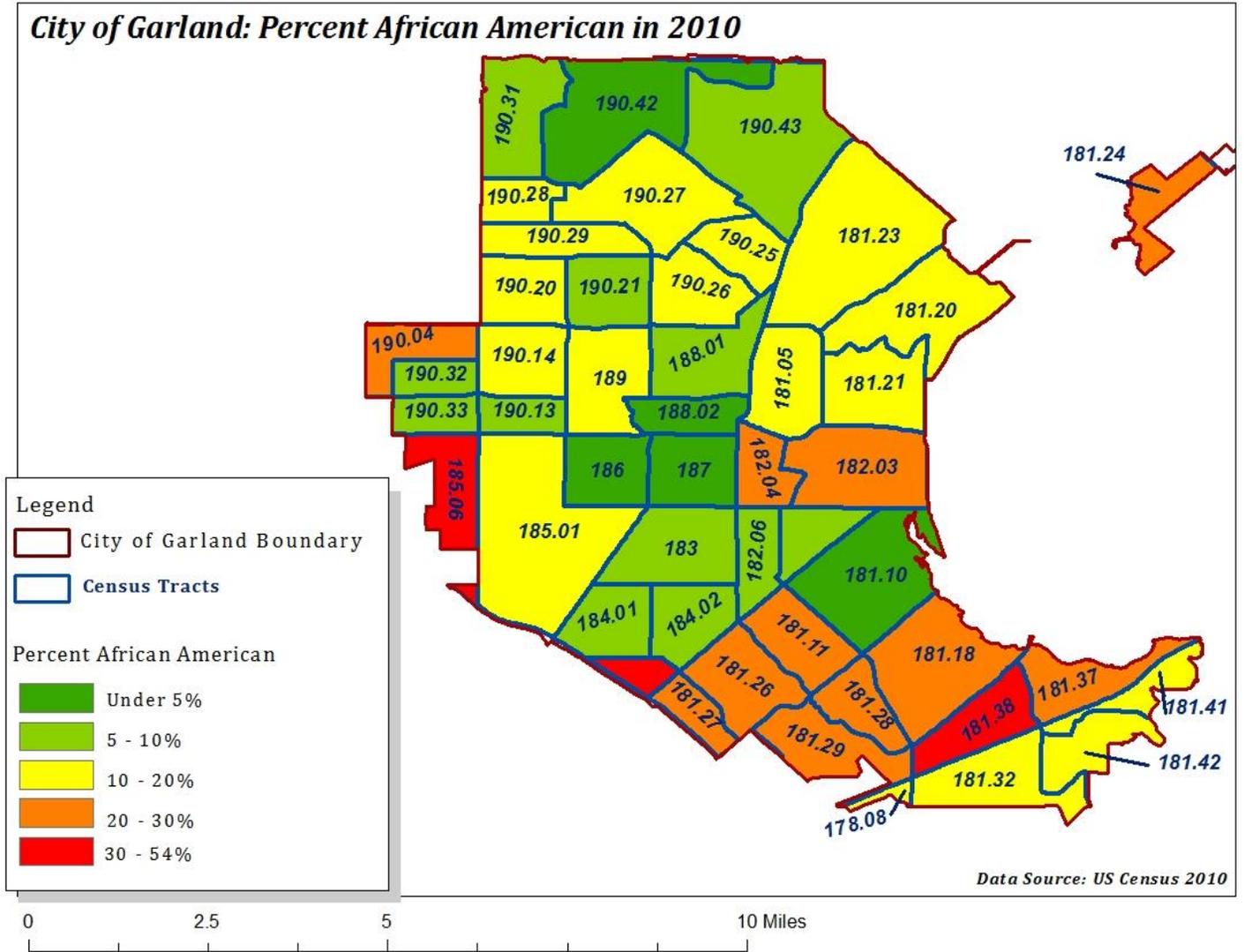
	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 % Change
Total Population	215,768	100.0 %	226,876	100.0%	5.1%
Black or African American	25,609	11.9%	32,980	14.5%	28.8%
Asian	15,806	7.3%	21,352	9.4%	35.1%
American Indian and Alaska Native	1,284	0.6%	1,851	0.8%	44.2%
White	140,835	65.3%	130,368	57.5%	7.4%
Two or More Races	6,231	2.9%	7,539	3.3%	21.0%
Hispanic or Latino Origin	55,192	25.6%	85,784	37.8%	55.4%

Source: 2000 and 2010 U.S. Census

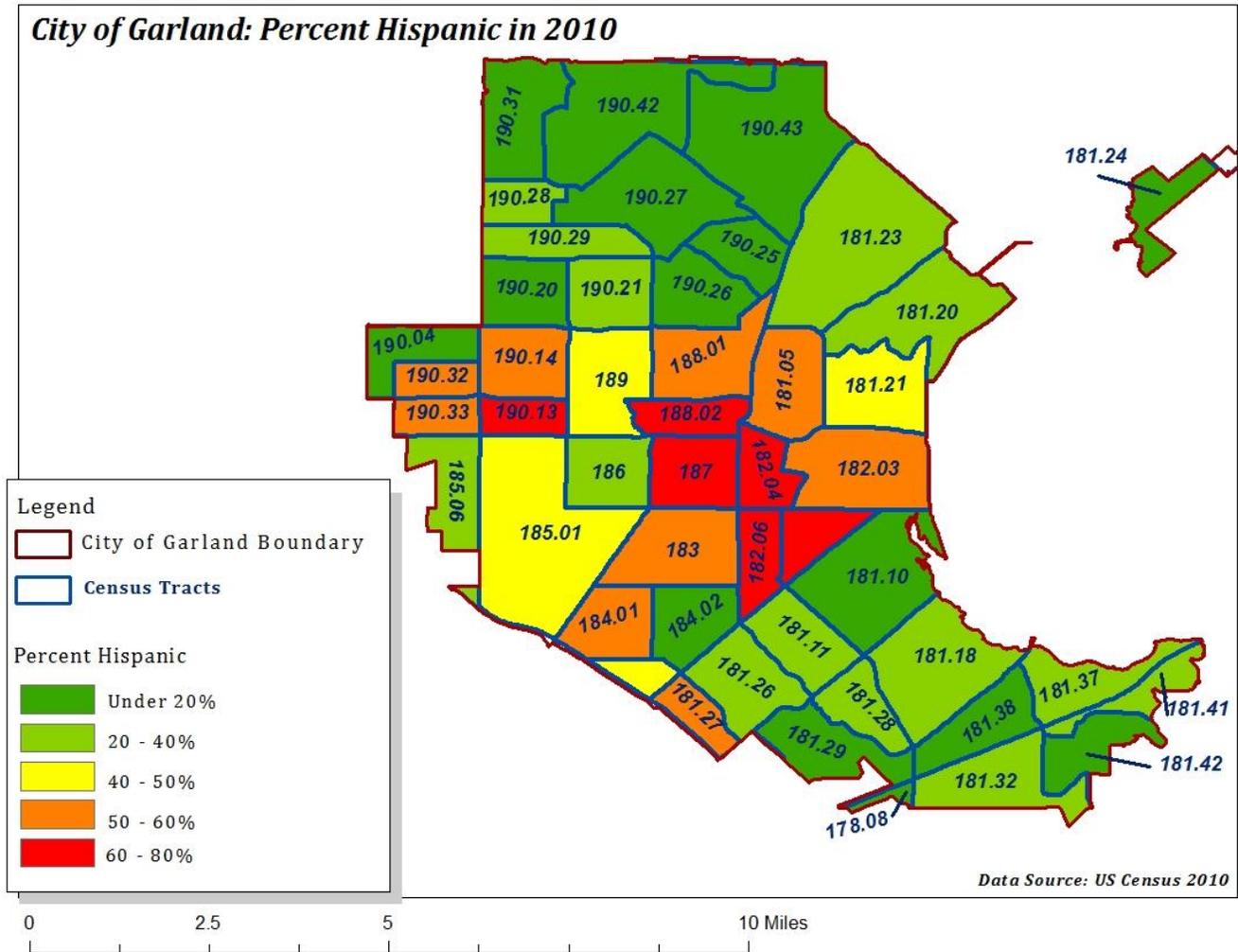
These overall demographic shifts especially in the increases in persons of Hispanic or Latino origin impacts several areas such as employment, transportation, and housing needs. The minority growth trend could potentially impact housing discrimination and segregation among those groups. As such the City should 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.

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Map 2. . Percentage Black or African American 2010 - City of Garland, TX



Map 3. Percentage Persons of Hispanic Origin 2010 - City of Garland, TX



According to the 2013 American Community Survey (ACS 5-year estimate), 73.0% of the people living in Garland were native residents of the United States. This is a decrease from the 2000 Census count of 79.8%. Fifty-two percent (52%) of 2013 ACS residents were living in the state in which they were born.

In 2013, 27.0% of the people living in Garland were foreign born (defined by the ACS as those born outside of the United States). This represents a 6.8 percentage point increase since the 2000 Census count of 20.2%. Of the foreign born population, 35.3% were naturalized U.S. citizens, and 64.7% were not U.S. citizens. As noted in Table 2 below, the mix of male and female population did not change significantly.

Table 2. Gender: 2000 and 2010 Census Count Changes - City of Garland, TX

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 % Change
Male	106,937	49.6%	111,193	49.0%	4.0%
Female	108,831	50.4%	115,683	51.0%	6.3%

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.

Based on the HUD definition, there are no census tracts in Garland that are considered racially/ethnically-concentrated areas of poverty. Data used to make this determination was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. There are 36 census tracts in Garland that have a tract minority percentage of 50% or more however, there are no tracts that have an individual poverty rate of 40% or more or an individual poverty rate that is 3 times the tract average for the area.

Household Characteristics

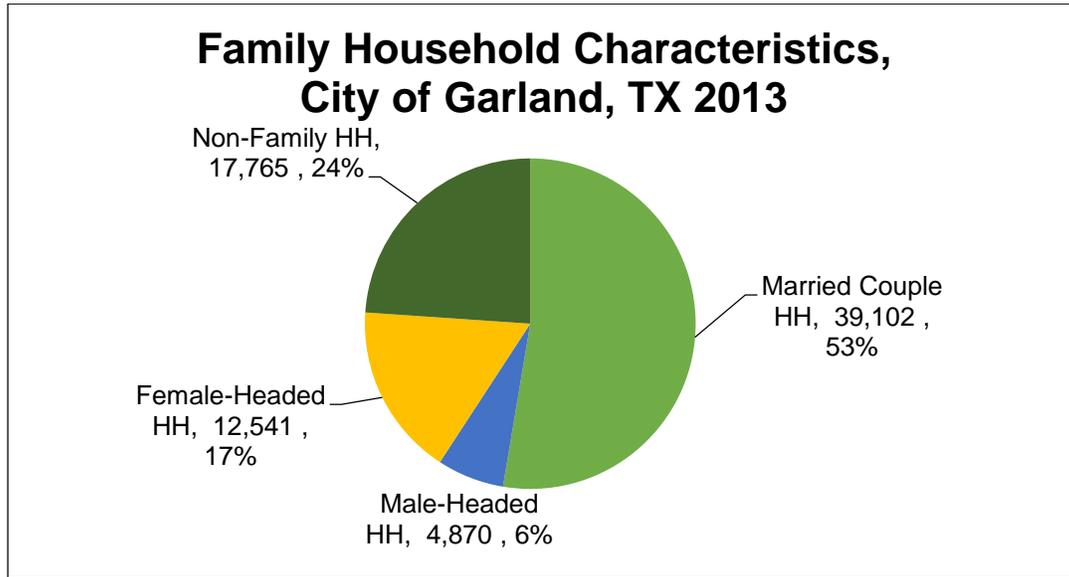
The average household size in Garland in 2000 was 2.93 persons and according to the 2013 ACS, the average household size increased to 3.09 persons per household. According to the 2013 ACS, among the 74,189 Garland households, family households (households with family members related through birth, marriage, or adoption) represented 76.1% of all households (56,424 households), including 39,102 (52.7%) married couple family households; 4,870 (6.6%) male-headed households; and 12,542 (16.9%) female-headed households. Non-family households comprised a significant amount of the population at 17,765 (23.9%) of all households.

Table 3. Households by Type 2013 - City of Garland, TX

Households	74,189	100.0%
Family households	56,424	76.1%
With own children under 18 years	28,423	38.3%
Married-couple family	39,102	52.7%
With own children under 18 years	18,541	25.0%
Male householder, no wife present, family	4,870	6.6%
With own children under 18 years	2,595	3.5%
Female householder, no husband present, family	12,542	16.9%
With own children under 18 years	7,287	9.8%
Non-family households	17,765	23.9%

Source: U.S. Census Bureau, 2013 American Community Survey

Figure 1. Household Characteristics 2013 - City of Garland, TX



Source: U.S. Census Bureau, 2013 American Community Survey

Among persons 15 and older, 49.6% of the population was married. The ACS provides the following information on marital status.

Table 4. Marital Status 2013 - City of Garland, TX

Population 15 years and over	Persons	Percentage
Total	175,640	100.0%
Never married	57,261	32.6%
Now married, except separated	87,096	49.6%
Separated	4,635	2.6%
Widowed	8,324	4.7%
Divorced	18,324	10.4%

Source: U.S. Census Bureau, 2013 American Community Survey

Income, Education, and Employment

Income Characteristics

The City of Garland is primarily located in Dallas County with a small area located in Rockwall and Collin counties. Dallas County is part of the Dallas, TX HUD Metro FMR Area which contains Collin County, Dallas County, Delta County, Denton County, Ellis County, Hunt County, Kaufman County, and Rockwall County. HUD's 2013 Income Limits for the Dallas County, TX 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 Dallas County. Although Income Limits were available from HUD for 2014, 2013 data was used for comparison with 2013 ACS data.

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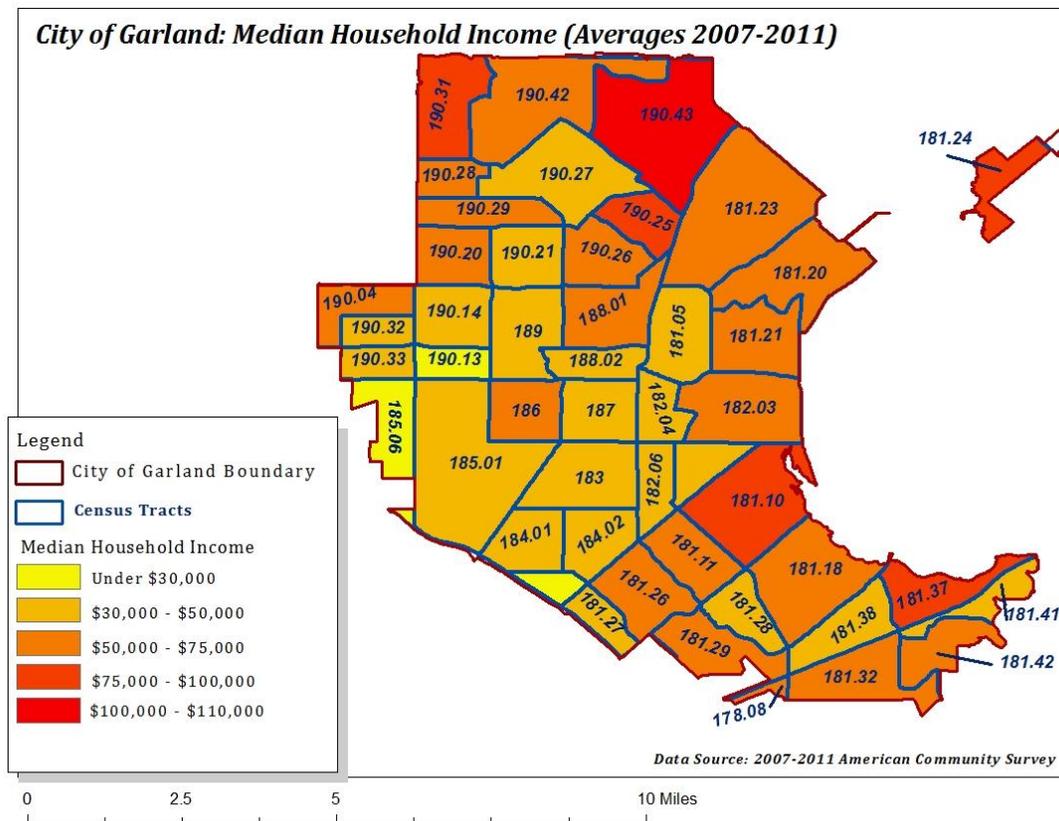
Table 5. FY 2013 Income Limits Summary Dallas County, TX

FY 2013 Income Limit Category	1 Person Household	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 Dallas County was \$67,500. Within just the city limits of Garland, however, there was a lower median household income of \$51,842 (2013 ACS). In 2000, the City of Garland’s median household income was \$49,156 (2000 U.S. Census). Map 4 shows the median household income distribution in the City of Garland.

Map 4. Median Household Income 2007-2011 - City of Garland, TX



The 2013 ACS further illustrates that of the 74,189 households in Garland, 18.6% (13,794) earned less than \$25,000 annually, with another 29.6% (21,992) having earned between \$25,000 and \$50,000. For the middle and upper income brackets in 2013, 21.1% (15,671) earned between \$50,000 and \$75,000; 12.4% (9,227) earned between \$75,000 and \$100,000; and 18.2% (13,505) earned \$100,000 and up.

Table 6. Household Income Levels 2013 - City of Garland, TX

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	3,151	4.2%
\$10,000 to \$14,999	2,743	3.7%
\$15,000 to \$24,999	7,900	10.6%
\$25,000 to \$34,999	9,445	12.7%
\$35,000 to \$49,999	12,547	16.9%
\$50,000 to \$74,999	15,671	21.1%
\$75,000 to \$99,999	9,227	12.4%
\$100,000 to \$149,99	9,190	12.4%
\$150,000 to \$199,999	2,920	3.9%
\$200,000 or more	1,395	1.9%

Source: U.S. Census Bureau, 2013 American Community Survey

Per the 2013 American Community Survey, 16.2% of the Garland population subsists below the poverty level. This reflects a significant increase from 2000, when 8.9% of the population was below poverty level. In 2013, people ages 65 years and over had experienced an overall lower rate of poverty at 7.9%. People in families also experienced an overall lower rate of poverty in 2013 at 15.1%. Married couple families had the lowest poverty rate at 7.7%. Female-headed households experienced poverty at the greatest rate of all groups: 26.9% of female households with no husband present; 35.1% of female households with related children less than 18 years old; and 45.0% of female households with related children less than 5 years old only. This measurement is particularly stark when compared to their incidence in the total population (female headed households with children make up 9.8% of all Garland households).

Of the 74,189 Garland households in 2013, 22.6% received Social Security income; 3.8% received Supplemental Security Income; 1.7% received cash public assistance income; 12.2% received retirement income; and 12.4% received Food Stamp/SNAP benefits.

Table 7. People Living Below the Poverty Level 2013-Garland, TX

All People	16.2%
Under 18 Years	24.3%
Related Children Under 18 Years	24.1%
Related Children Under 5 Years	28.2%
Related Children 5 to 17 Years	22.6%
18 Years and Over	12.9%
18 to 64 Years	13.6%
65 Years and Over	7.9%
People in Families	15.1%
Unrelated Individuals 15 Years and Over	23.8%

Source: U.S. Census Bureau, 2013 American Community Survey

Table 8. Families Living Below the Poverty Level 2013, Garland, TX

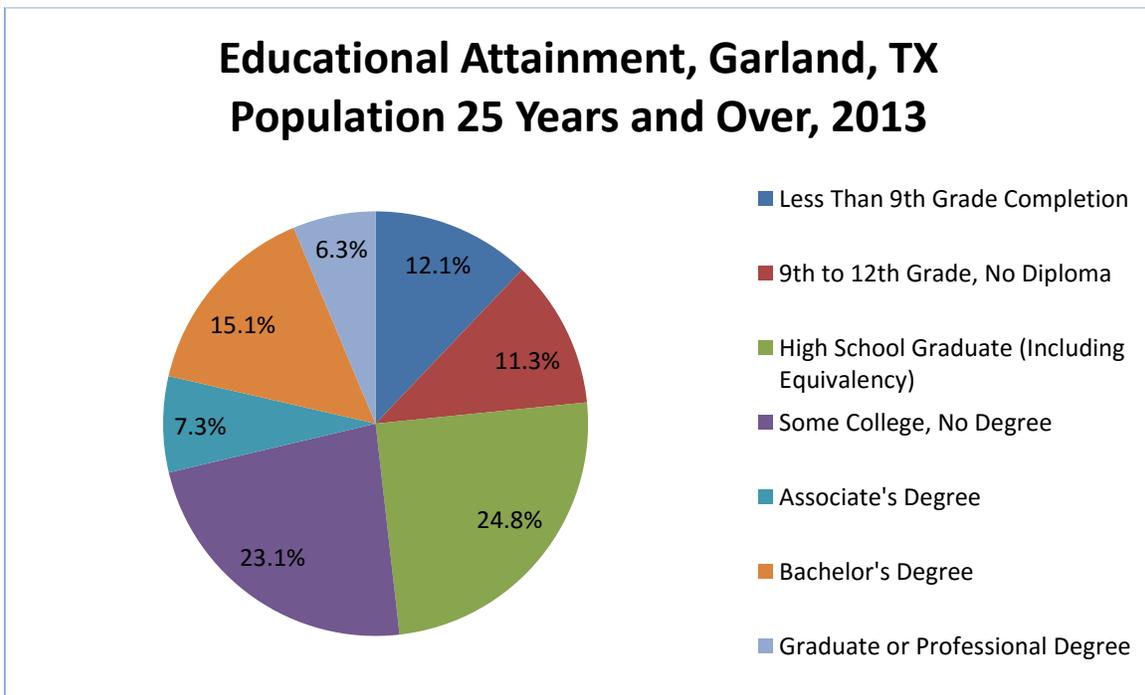
All Families	12.8%
With Related Children Under 18 Years	19.4%
With Related Children Under 5 Years Only	18.7%
Married Couple Families	7.7%
With Related Children Under 18 Years	12.3%
With Related Children Under 5 Years Only	6.3%
Families With Female Householder, No Husband Present	26.9%
With Related Children Under 18 Years	35.1%
With Related Children Under 5 Years Only	45.0%

Source: U.S. Census Bureau, 2013 American Community Survey

Educational Attainment

Within the 2013 Garland population of persons 25 years and over (ACS), 24.8% of people had at least graduated from high school (including equivalency), 15.1% had a bachelor's degree, and 6.3% had a graduate or professional degree. Of the same population (25 years and older), 23.4% had less than a high school education diploma.

Figure 2. Educational Attainment, City of Garland, TX 2013



Source: U.S. Census Bureau, 2013 American Community Survey

The total school enrollment for the population aged 3 years and over in Garland was 66,139 in 2013 (ACS). School enrollment is broken down into the following categories: 5.3% in nursery school/preschool; 6.2% in kindergarten; 44.2% in elementary school (grades 1-8); 23.0% in high school (grades 9-12); and 21.3% in college or graduate school.

Employment

As of 2013, the Garland population aged 16 years and over numbered 171,649 persons, of which approximately 71.4% (122,551) were in the labor force and 64.1% (110,097) were employed. This reflects a significant increase

in the unemployment since 2000 when Garland had 158,599 persons aged 16 and over. In 2000, 70.4% (111,712) of those persons were in the labor force and 67.1% (106,449) were employed.

The following figures give a larger view of the labor force changes within Dallas County, Texas, from January 1990 to November 2014.

Figure 3. Dallas County, TX Civilian Labor Force, 1990-2014



Source: Federal Reserve Bank of St. Louis, Missouri

The national economic downturn in recent years has affected the Garland area, and civilian labor force unemployment in Garland rose from 3.3% in 2000 (U.S. Census) to 10.1% in 2013 (ACS). Further illustration of the regional trends can be found in the following figures. Dallas County’s unemployment rate rose from 4.4% in April 2008 to 9.1% in January 2010. As of November 2014, the unemployment rate in Dallas County was down to 4.9%.

Figure 4. Dallas County, TX Unemployment Rate, 1990-2014



Source: Federal Reserve Bank of St. Louis, Missouri

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The City of Garland 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 73.1% of the City’s civilian workforce:

Education services, and health care and social assistance -----	18.8%
Manufacturing -----	13.2%
Professional, scientific, and management, and administrative, and waste management services -----	11.5%
Retail trade -----	11.5%
Construction -----	9.3%
Arts, entertainment, and recreation, and accommodation and food services -----	8.9%

The top employer in Garland is the Garland Independent School District with 7,300 employees followed by the City of Garland which hires 2,000 persons according to Garland Economic Development Partnership. The following table lists the major employers within Garland.

Table 9. Major Employers - Garland, TX

Employer	Number of Employees
ISD	7,300
City of Garland	2,000
Raytheon	1,700
Wal-Mart Super Centers (3)	1,250
Baylor Medical Center Garland	1,185
US Food Service	520
APEX Tool Group	467
Atlas Copco	409
Home Depot	339
KARLEE	330
SilverLine Window	307
Plastipak Packaging	269
Hatco (Resistol)	262
Interceramic	259
Valspar	250
Kraft Foods	250
General Dynamics OTS	220
Daisy Brand	216
Sherwin Williams	210
Arrow Fabricated Tubing	200
Sears Logistic Services	200

Source: Garland Economic Development Partnership

Transportation and Commuting

Transportation

Dallas Area Rapid Transit (DART) is a regional transportation agency serving 13 cities including the City of Garland. The major transit services include fixed-route bus service, light rail, and paratransit services.

In terms of services to protected class members, DART buses and trains are accessible by persons with disabilities and fares are reduced for seniors, age 65 and older, persons with disabilities, and persons with a Medicare card. Certified paratransit-eligible riders may use the bus and train services for free. The reduced fare structure for the bus and train service is:

- Day Pass is \$2.50
- 2-hr pass is \$1.25
- Monthly pass is \$40.00

The hours of operation for DART services are convenient with hours between 4 a.m. and 12 a.m.

Paratransit services are available to persons with disabilities who are unable to use DART buses or trains. The service is operated with accessible vehicles and taxi cabs. In order to utilize the paratransit service, riders must meet the ADA eligibility standards. Paratransit services operates on a daily schedule that is similar to the fixed route bus or rail services. Fares for paratransit is \$3 and personal care attendants ride free of charge.

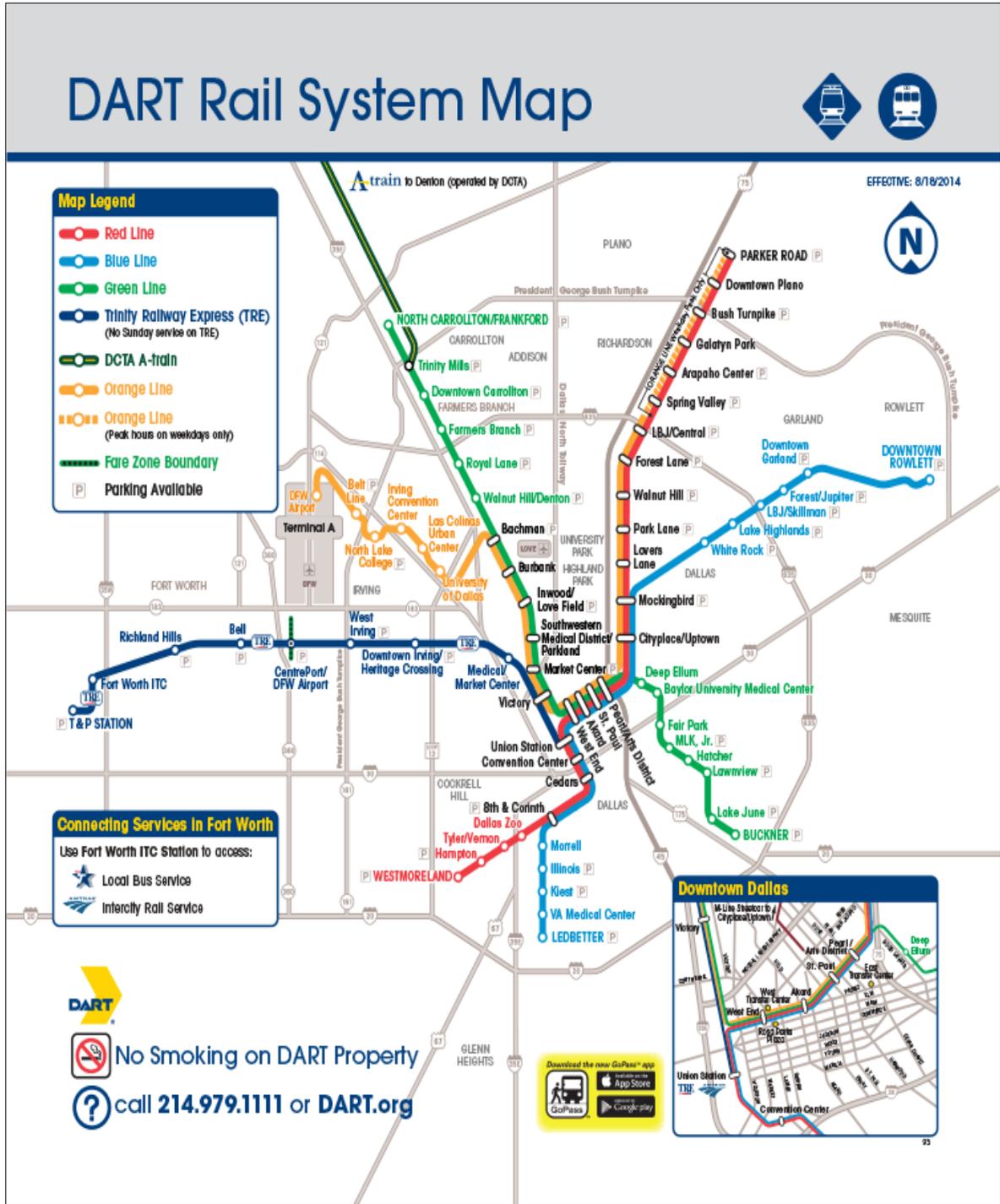
Map #5 shows the service area of DART light rail. There are two stations located in the City of Garland. They are the Forest/Jupiter Station and the Downtown Garland Station both of which are within Garland's largest employment centers. Garland's largest employer, Garland Independent School District and major employer in the City, Raytheon, are located within a ½ mile radius of the Forest/Jupiter Station. The Downtown Garland Station has the Garland City Hall, the second top employer, within its ½ mile radius. Both stations are an example of successful transit oriented development (TOD). According to the DART website, DART rail is seen as a catalyst for TOD and over \$8 billion in new projects is clustered near stations. The City's Comprehensive Plan, Envision Garland 2030, states that Garland's existing transportation network provides convenient access to the urban center and major employment corridors in the region. Envision Garland 2030 includes a goal of integrating public transit into land use planning and development projects by:

- Advocating for a partner with DART in the planning and development of additional light rail/transit stations adjacent to major activity centers;
- Working with transit providers, developers, and property owners to integrate transit services and facilities in activity centers and other major destinations; and
- Continuing to support transit-oriented development.

In addition to jobs in close proximity to the transit stations, affordable housing is also available in close proximity thereby connecting low and moderate income persons to employment opportunities. The Forest/Jupiter Station has several apartment complexes nearby including Forest Glen Apartments, Garland Gardens Apartments, Whisperwood Apartments, Jupiter Place Apartments, Shadowwood Apartments, Spanish Villa Apartments, and Parkwood Apartments. The Legacy Point Apartments is a Low Income Housing Tax Credit (LIHTC) project that is also in the immediate vicinity of the station and is comprised of 183 affordable housing units.

Insufficient public transportation and the siting of public transportation can have an impact on fair housing choice when it restricts access for riders who are of low- and moderate-income, persons with disabilities, and persons who are elderly. The City of Garland is currently providing transportation and affordable housing in relation to employment sites thus allowing minorities and low- and moderate-income persons more opportunities to secure employment and reducing barriers to fair housing.

Map 5. DART Rail System Map

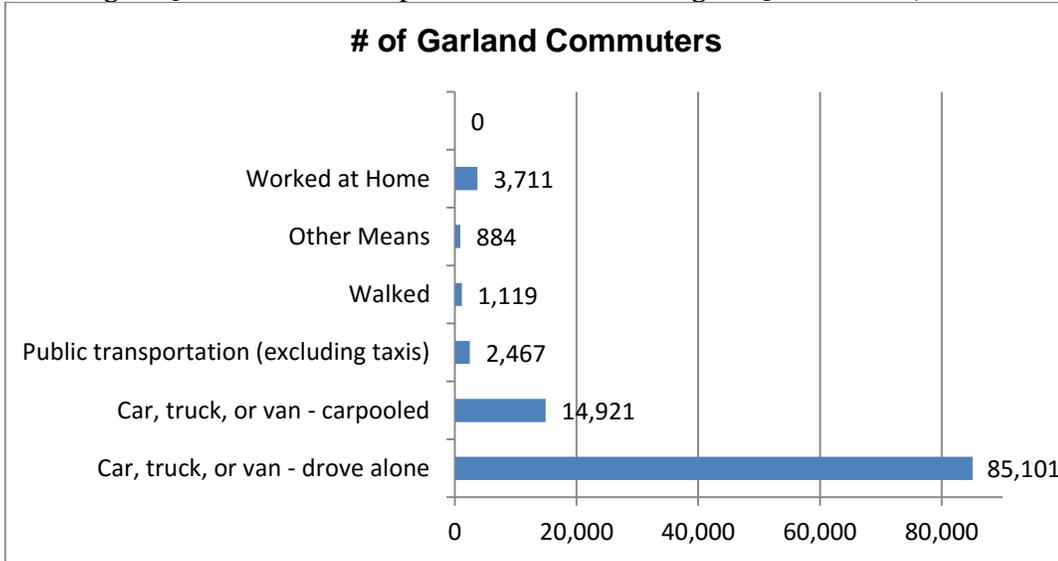


Commuting

According to the 2013 ACS, 78.6% of Garland workers drove to work alone, 13.8% carpooled, and 2.3% used public transportation. Among those who commuted to work, it took them on average 27.6 minutes to get to work. A review of the ACS data shows that approximately 17.5% of commuters spent less than 15 minutes or more commuting one way to work. An additional 35.7% spent less than 30 minutes commuting one way to work. The largest group of commuters (21.3% of all commuters) spent less than 30 to 34 minutes commuting one way to work. The figure and table below show the modes of transportation used by Garland commuters and the commute time.

The City’s Future Land Use Plan includes several ‘Building Blocks’ including the Employment Centers Building Block. This block provides accessible employment opportunities and due to the proximity of employment and residential uses, this type of development reduces commute times and distances.

Figure 5. Modes of Transportation – Commuting 2013 – Garland, TX



Source: U.S. Census Bureau, 2013 American Community Survey

Table 10. Commute Times – 2013- City of Garland, TX

Travel Time to Work (one way)	Rate (%)
Less than 10 minutes	6.4%
10 to 14 minutes	11.1%
15 to 19 minutes	14.9%
20 to 24 minutes	14.2%
25 to 29 minutes	6.6%
30 to 34 minutes	21.3%
35 to 44 minutes	8.4%
45 to 59 minutes	10.4%
60 or more minutes	6.8%

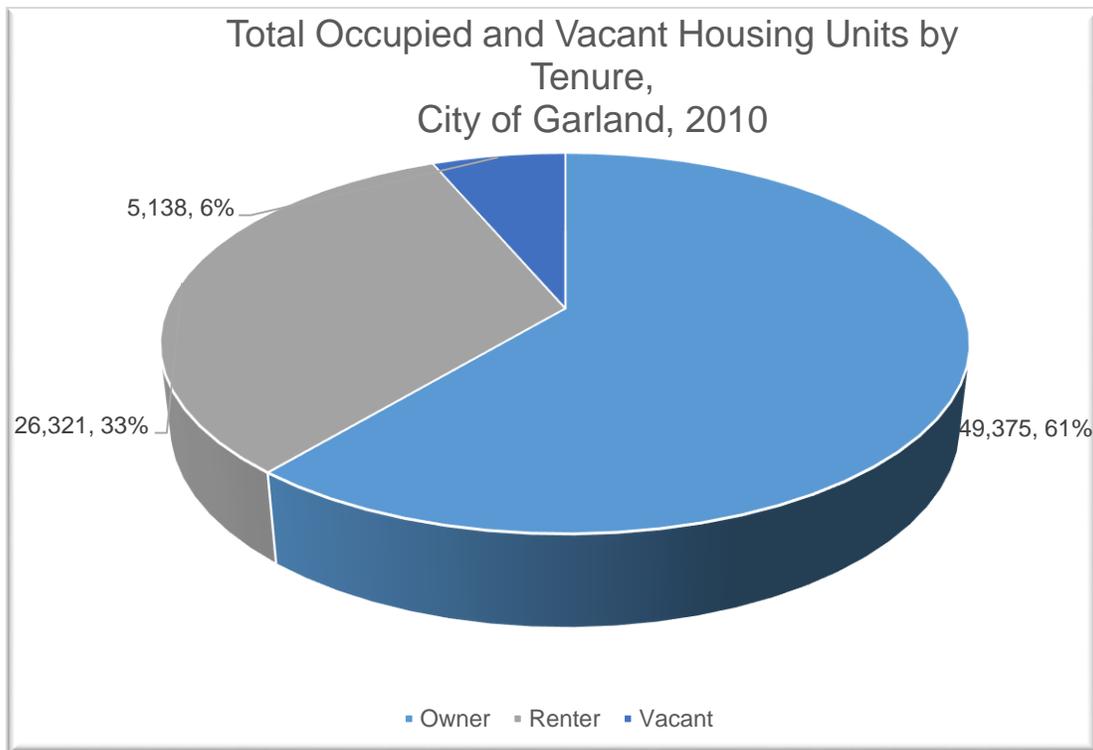
Source: U.S. Census Bureau, 2013 American Community Survey

III. HOUSING PROFILE

Housing by Tenure

According to the 2010 U.S. Census, there are 80,834 housing units in Garland. The number of housing units has grown by 7.3% from 75,300 in 2000. The City's vacancy rate also rose from 2.7% in 2000 to 6.4% in 2010. In 2010, the City of Garland contained 75,696 owner-occupied units (61.1%), 26,321 renter-occupied units (32.5%), and 5,138 vacant units (6.4%). Figure 6 below shows housing tenure for Garland.

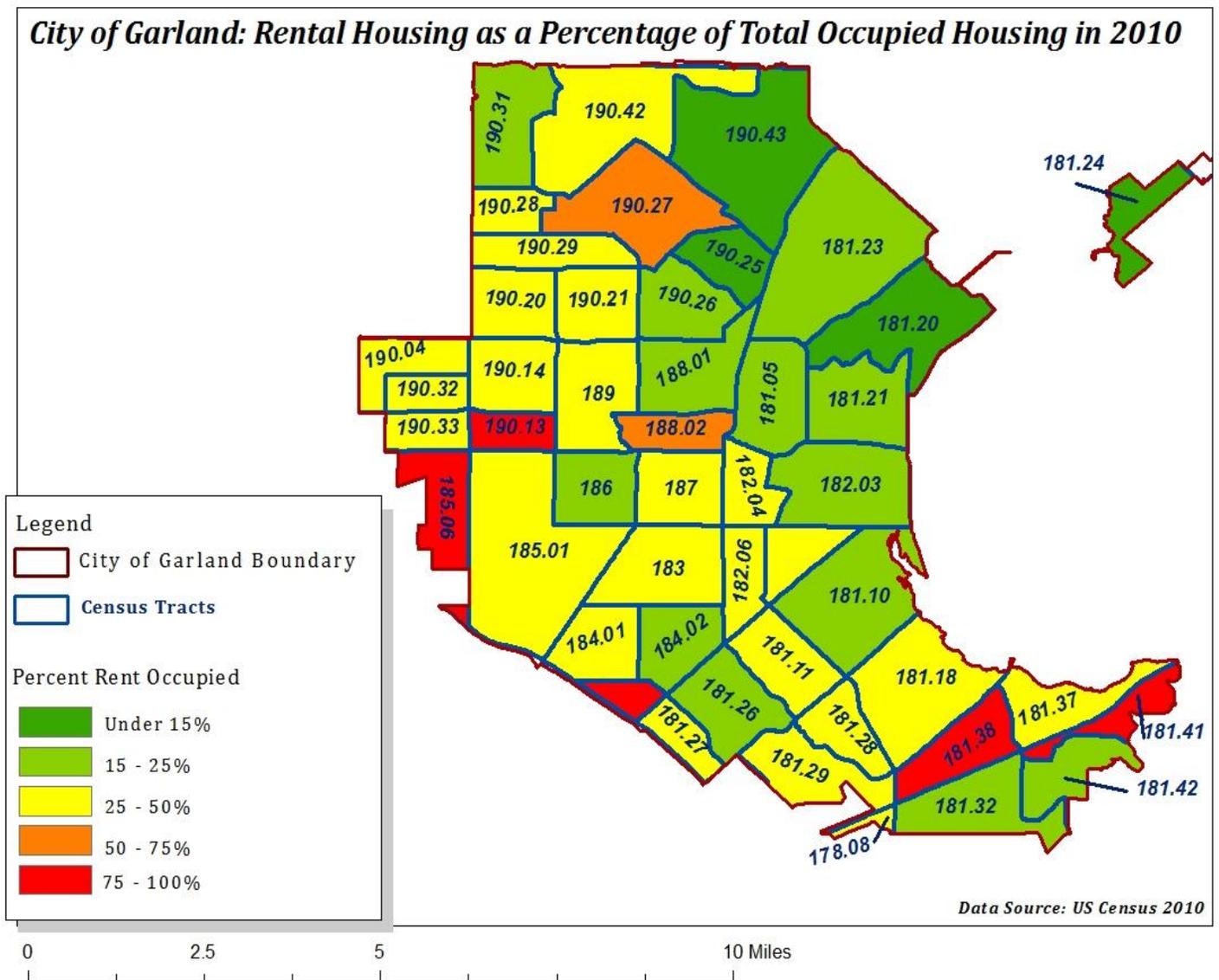
Figure 6. Housing Units by Tenure - Garland, TX



Source: 2010 U.S. Census

Not including vacant units, of the 75,696 occupied housing units in Garland in 2010, approximately 65.2% (49,375) were owner-occupied and 34.8% (26,321) were renter-occupied. This represents a slight decrease in the rate of homeownership, down from 65.6% in 2000, and a corresponding increase in rental tenure, 34.4% in 2000.

The following map shows the renter occupied units as a percentage of all occupied units by census tract for 2010.



Source: 2010 U.S. Census

Housing Condition

The predominant type of housing in Garland, as noted in Table 11, is single unit detached structures (72.2%), followed by structures with 5-19 units (13.2%), and structures with 20 or more units (6.5%).

The age of the housing stock in Garland as shown in Table 12 has an aging housing stock with 52.3% being built between 1970 and 1989 and 80% of units built before 1990. In terms of housing needs, the older units, may be in need of repair if they have not been rehabilitated or properly maintained since constructions. Persons, especially children under the age of 6, occupying housing units constructed prior to 1978 may be a risk for lead-based paint poisoning.

Table 11. Housing Units by Type - Garland, TX

Property Type	Number	Percent (%)
1-unit detached structure	56,511	72.2%
1-unit, attached structure	3,286	4.2%
2-4 units	2,735	3.5%
5-19 units	10,296	13.2%
20 or more units	5,103	6.5%
Mobile Home, boat, RV, van, etc.	291	0.4%
Total	78,222	100.0%

Source: 2012 American Community Survey

Table 12. Year Structure Built - Garland, TX

YEAR STRUCTURE BUILT		
Total:	78,222	100.0%
Built 2010 or later	76	0.1%
Built 2000 to 2009	7,645	9.8%
Built 1990 to 1999	7,906	10.1%
Built 1980 to 1989	19,401	24.8%
Built 1970 to 1979	21,481	27.5%
Built 1960 to 1969	11,432	14.6%
Built 1950 to 1959	8,097	10.4%
Built 1940 to 1949	1,793	2.3%
Built 1939 or earlier	391	0.5%

Source: 2012 American Community Survey

Housing Affordability

The median value of an owner-occupied housing unit in 2000 was \$86,400, compared to the 2012 median value of \$116,900 a 35.3% increase. Using the industry standard of three times the income to afford a median priced home, a household would need to earn \$38,967 annually to affordably own a home in Garland based on the 2012 value.

According to the 2012 ACS, median contract rent in Garland was \$737 monthly. This reflects an increase of \$154 (26.4%) since the 2000 Census (\$583) median contract 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 2012 household would need to earn \$29,480 annually to afford the median contract rent. Table 13 shows a comparison between Garland and other nearby communities. Of the nine communities assessed, the City of Garland has a median rent at \$737 per month which is about mid-range for the assessed area. The City of Rowlett has the highest median rent at \$1,047 per month. In terms of home value, the City of Garland has the second lowest median home value with the City of Mesquite having the lowest median home value of \$111,300. The Cities of Carrollton, Richardson, and Plano have the highest median home values at \$167,300, \$183,500, and \$217,100, respectively.

Table 13. Median Contract Rent and Median Home Value – Garland and surrounding communities, TX

Geographic Area	Median Contract Rent	Annual Income Required to Afford Median Rent	Median Home Value	Annual Income Required To Afford Median Home Value
Garland	\$737	\$29,480	\$116,900	\$38,967
Carrollton	\$807	\$32,280	\$167,300	\$55,767
Dallas	\$675	\$27,000	\$129,300	\$43,100
Dallas County	\$711	\$28,440	\$129,100	\$43,033
Irving	\$733	\$29,320	\$138,200	\$46,067
Mesquite	\$753	\$30,120	\$111,300	\$37,100
Plano	\$877	\$35,080	\$217,100	\$72,367
Richardson	\$888	\$35,520	\$183,500	\$61,167
Rowlett	\$1,047	\$41,880	\$162,000	\$54,00

Source: American Community Survey, U.S Census Bureau (2012)

- 1) Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) 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.
- 3) According to the 2012 American Community Survey (ACS) data, Garland has 38,056 owners with mortgages. Of these owners, 3,439 or 9.03% pay more than 30 to 34.9% of their household income on housing costs; and 10,504 or 28 pay 35% or more. Also, there are 9,224 owners without mortgages, 352 or 3.82% pay 30 to 34.9 % on housing costs; and 1,232 or 13.35% pay 35% or more on housing costs.

Map 7. Percent Homeowners Spending more than 30% Income on Housing – Garland, TX

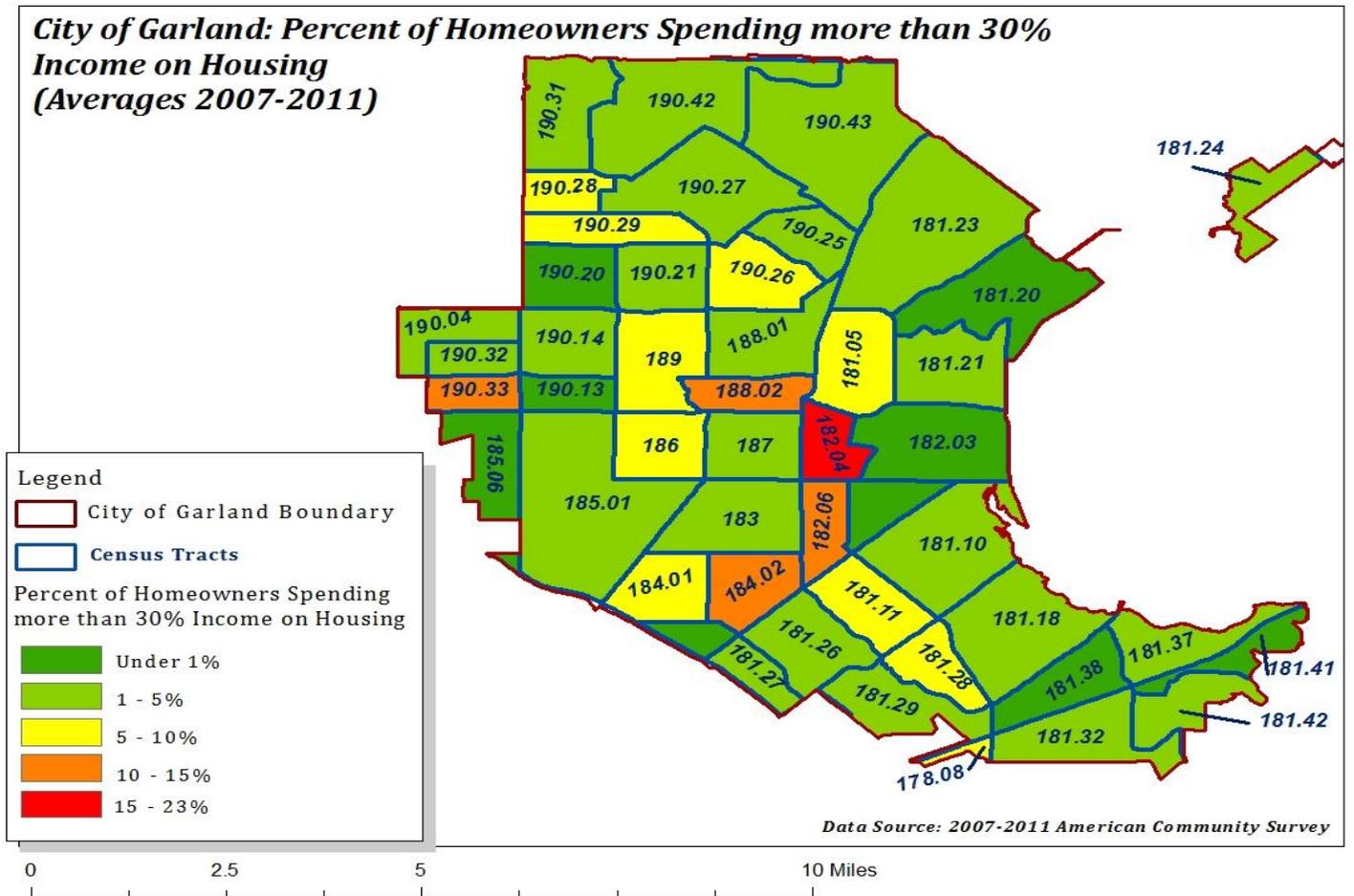


Table 14. Selected Monthly Owner Costs - Garland, TX

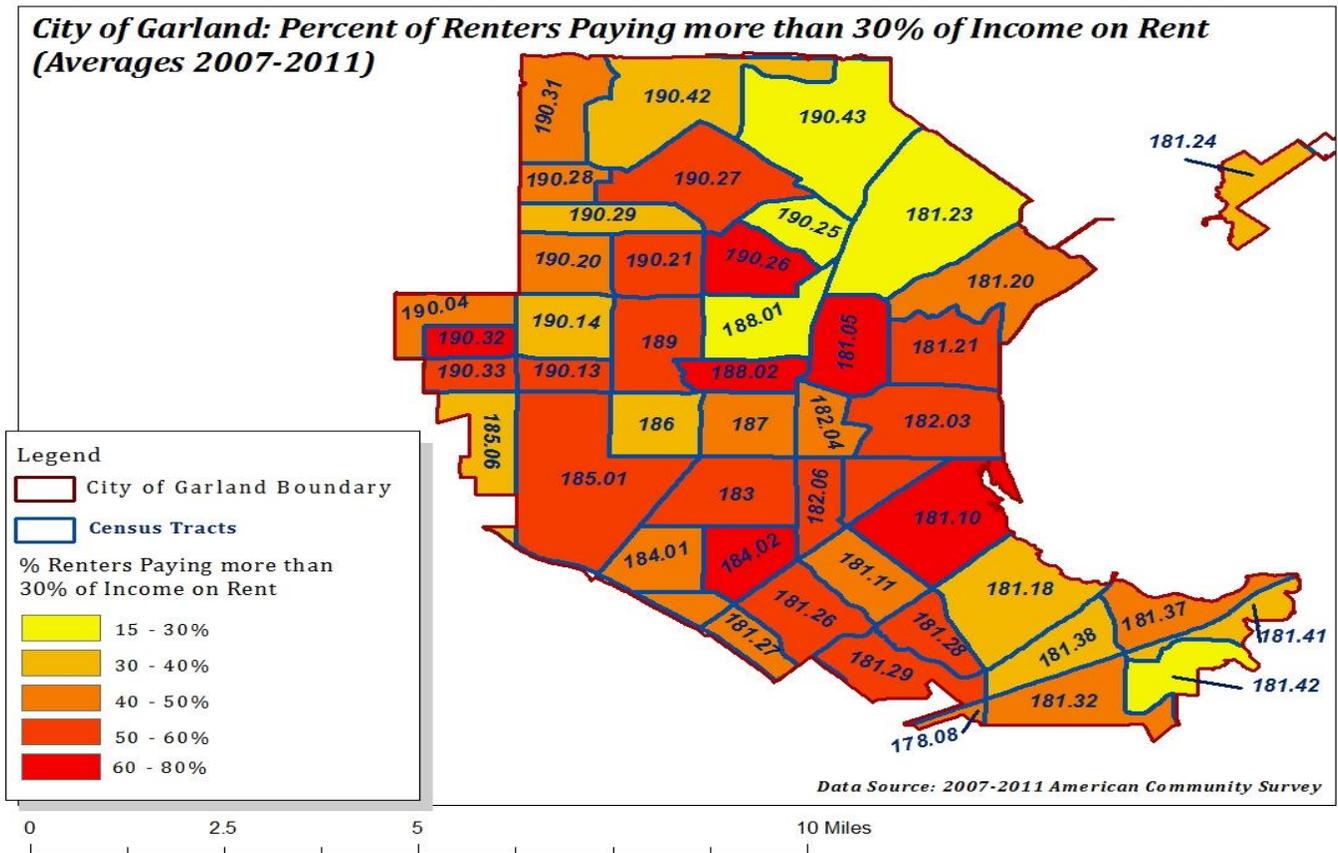
Total:	47,510	100.0%
Less than \$100	14	0.03%
\$100 to \$199	227	0.5%
\$200 to \$299	1,201	2.5%
\$300 to \$399	2,256	4.7%
\$400 to \$499	2,480	5.2%
\$500 to \$599	2,813	5.9%
\$600 to \$699	2,119	4.5%
\$700 to \$799	2,228	4.7%
\$800 to \$899	2,186	4.6%
\$900 to \$999	2,239	4.7%
\$1,000 to \$1,499	16,587	34.9%
\$1,500 to \$1,999	8,768	18.5%
\$2,000 or more	4,392	9.2%

Source: 2012 American Community Survey

As shown in Table 14, the majority of owner households spend between \$1,000 and \$1,499 per month on housing costs. According to the 2012 ACS, there are 33,780 housing units with a mortgage and 12,709 or 38% of these households pay 30% or more of their household income on owner costs. There are 13,541 households without a

mortgage and 1,781 or 13.2% of these households spend more than 30% of their household income on owner costs.

Map 8. Percent Renters Paying more than 30% Income on Rent 2007-2011- Garland, TX



Source: U.S. Census, 2007-2011 ACS

Table 15. Gross Rent - Garland, TX

Occupied units paying rent	24,555	100.0%
Less than \$200	137	0.6%
\$200 to \$299	300	1.2%
\$300 to \$499	582	2.4%
\$500 to \$749	5,510	22.4%
\$750 to \$999	7,882	32.1%
\$1,000 to \$1,499	7,751	31.6%
\$1,500 or more	2,393	9.7%

Source: 2012 American Community Survey

There are 24,555 occupied units paying rent and 12,140 or 49.4% pay 30% or more of their household income on rental housing costs monthly; of this number 2,495 or 10.3% pay 30 to 34.9% of their income on rental housing costs. Another 9,645 or 39.8% pay 35% or more on renter housing costs. Table 15 shows that the majority of renters in Garland pay between \$750 and \$1,499 per month on rent. Table 16 provides the fair market rents by number of bedrooms by zip codes in Garland.

Table 16. FY 2013 Fair Market Rents (FMR) – Garland, TX

Garland, TX FMR 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
75042	\$550	\$660	\$840	\$1,120	\$1,350
75044	\$670	\$810	\$1,020	\$1,360	\$1,640
75048	\$740	\$890	\$1,120	\$1,490	\$1,800
75082	\$730	\$880	\$1,110	\$1,480	\$1,790

Data Source: U.S. HUD

Comprehensive Housing Affordability Strategy (CHAS)

As an additional measure of determining housing affordability and its impact on members of the protected classes, the AI uses HUD’s Comprehensive Housing Affordability Study (CHAS) to gauge housing affordability, or lack thereof. In this section, CHAS and 2007-2011 ACS data will be used to assess affordability and its impact on members of the protected classes.

It should be noted here that lack of affordability is not a fair housing impediment in itself because income is not a protected class. However, census and HUD CHAS data shows that lack of affordability often has the potential to disparately impact some members of the protected classes.

In using CHAS data to assess housing affordability, the following definitions are used:

Cost Burdened: 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. 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. Generally, for renters, housing costs include rent and utilities; and for owners, housing costs include mortgage payments, taxes, insurance, and utilities.

Severely Cost Burdened: In the situation where the household expends greater than 50% of its income on housing cost, the household is considered **severely** cost burdened.

Housing Problems: According to HUD, a household with housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.01 persons/room); or
4. Cost burdened (paying more than 30% of income for housing, including utilities).

Severe Housing Problems: According to HUD, a household with severe housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.5 persons/room); or
4. Cost burdened (paying more than 50% of income for housing, including utilities).

Disproportionately Greater Housing Need: According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Income Categories: Data on the following income groups were assessed for the AI:

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: greater than 30%-50% of the AMI
- Moderate Income: greater than 50%-80% of the AMI
- Middle and Upper Income: greater than 80% or more of the AMI

Although the 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 Garland that had housing problems as well as the size and type of household. The below analysis is based on this data.

Number of Households

According to the City of Garland’s Consolidated Plan for FY 2015-2019, there were a total of 72, 531 households in the City for the most recent year 2011 based on the ACS. Garland, had a total of 78,206 housing units, of which 72,531 or 92.7% are occupied and 7.3% are vacant. Of the occupied housing units, 47,355 or 65.3% were owner-occupied and 25,176 or 34.7% were renter-occupied. For the same period, CHAS data show that of the total occupied housing units 31,055 or 42.8% are occupied by low- to moderate-income households (0-80% HAMFI). Of the total households, 16,885 or 23% were considered to be Extremely-Low and Low - Income households, with 14,170 or 20% being moderate-income households as defined above. Therefore, a total of 43% of the households were low- and moderate-income households. In addition, 17,575 or 24% of the total households contain at least one person who is age 62 and older. Age is a protected class in Garland and in addition, elderly persons are more likely to have a higher percentage of persons with disabilities. Of the total households 14,544 or 23% are households with one or more children six years old or younger. These families are likely to encounter housing discrimination based on familial status. Garland’s median household income for 2011 is \$52,441.

Table 17 - Housing Needs Assessment Demographics

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	215,794	225,424	4%
Households	73,287	72,531	-1%
Median Income	\$49,156.00	\$52,441.00	7%

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Analysis of Impediments to Fair Housing Choice, September 2015
City of Garland, TX

Table 18. Households by Income Category - Garland, TX

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI	TOTALS
Total Households (HHs)	6,550	10,335	14,170	8,590	32,885	72,530
Percentage of Total HHs	9%	14%	20%	12%	45%	100%
Small Family Households	2,535	4,280	6,655	4,660	18,975	37,105
Large Family Households	1,265	2,015	2,520	1,185	3,970	10,955
Household contains at least one person 62-74 years of age	915	2,015	1,970	1,150	6,020	12,070
Household contains at least one person age 75 or older	775	1,015	1,390	565	1,760	5,505
Households with one or more children 6 years old or younger	1,925	3,180	4,025	1,894	3,520	14,544

Data source: 2007-2011 CHAS

In reviewing housing problems that would serve to limit fair housing choice, it was noted 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. Among renters, of the number of households with one or more of four housing problems, 50% were extremely low-income households, 34% were low-income and 94% were households with incomes at or below 80% AMI. For homeowners, a similar pattern was seen with 95% of homeowners with one or more of four housing problems having incomes at or below 80% AMI. The smaller percentage of extremely-low-income households (25%) having one or more housing problems were owners. Only extremely low-income households (1%) had negative income but none of the other housing problems. See table below.

The most common housing problems experienced by both renters and owners in Garland is cost burden, particularly low- and moderate-income households at a high rate of 68%. Of the total low-and moderate-income households, 51.5% renters and 48.5% owners were cost burdened (> 30%); and 52.8% renters and 47.2% owners were severely cost burdened (> 50%).

Table 19. Housing Problems by Income Category - Garland, TX

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,490	2,360	970	190	7,010	1,620	2,585	1,935	320	6,460
Having none of four housing problems	640	2,840	5,080	2,945	11,505	410	2,550	6,185	5,140	14,285
Household has negative income, but none of the other housing problems	260	0	0	0	260	130	0	0	0	130

Data Source: 2007-2011 CHAS

Of the total low-and moderate-income renter households experiencing cost burden, 51% are Small Related Households, followed by 23.4% Other Households. Of those renters experiencing severe cost burden, 44.8% are Small Related Households with 61% of those households in the 0-30% AMI, followed by Other Households at 21.8% and Large Related Households at 19.1%.

Of the total low-and moderate-income owner households experiencing cost burden, 41% are Small Related Households with 55% in the >50-80% AMI, followed by Elderly Households at 24.5%, and Large Related Households at 22.7%. Of those owners experiencing severe cost burden, 41% are Small Related Households, followed by, Elderly Households at 24.5%.

For households that are cost burdened (the occupant household spends no more than 30% of its income on housing cost) 10,915 were renters versus 10,280 were owners. Of both renters and owners, low income households (those between 31-50% of AMI) had the highest percentage of households that were cost burdened.

Table 20. Cost Burden (> 30%) for Renters and Owners by Income Category - Garland, TX

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,695	2,365	1,495	5,555	595	1,290	2,310	4,195
Large Related	855	505	180	1,540	320	1,150	870	2,340
Elderly	430	440	400	1,270	710	1,125	685	2,520
Other	745	1,055	750	2,550	315	305	605	1,225
Total need by income	3,725	4,365	2,825	10,915	1,940	3,870	4,470	10,280

Data Source: 2007-2011 CHAS

For households that are severely cost burdened (the occupant household spends no more than 50% of its income on housing cost) 5,565 were renters versus 4,970 were owners. Of severely cost burdened households, among renters, extremely low-income households (0-30% of AMI) had the highest percentage of households that were severely cost burdened. For owners, the highest percentage of severely cost burdened households were those in the low income category (>30-50% of AMI).

Table 21. Severe Cost Burden (> 50%) for Renters and Owners by Income Category - Garland, TX

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,525	885	85	2,495	500	905	635	2,040
Large Related	825	240	0	1,065	295	535	90	920
Elderly	350	225	215	790	460	550	210	1,220
Other	665	475	75	1,215	295	190	305	790
Total need by income	3,365	1,825	375	5,565	1,550	2,180	1,240	4,970

Data source – 2007-2011 CHAS

Overcrowding represents a problem for low- and moderate-income single family renter and owner households as 75.6% of renter and 61.3% owner households were living in overcrowded conditions. According to the CHAS there are 16,414 Households with Children, of which 9,130 are low/mod income households. Manipulation of

CHAS data for overcrowding conditions for Households with Children Present estimated that 10% of low/mod Households with Children Present were living in overcrowded conditions.

For both renter and owner households that experienced overcrowding (more than one person per room), there were more renters (1,935) experiencing overcrowding than owners (1,485) with more renters at incomes of 50% AMI and below. For owners, more overcrowding occurred at income levels of 50-80% AMI than 9-30%AMI. See table below.

Table 22. Overcrowding for Renters and Owners by Income Category - Garland, TX

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	520	460	355	130	1,465	75	270	425	100	870
Multiple, unrelated family households	80	100	165	40	385	20	165	300	130	615
Other, non-family households	0	0	85	0	85	0	0	0	0	0
Total need by income	600	560	605	170	1,935	95	435	725	230	1,485

Data source – 2007-2011CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	175	165	175	515	30	130	213	373

Source: CHAS data Table 11; 2007-11 ACS for Households and Families, and for Selected Housing Characteristics.

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. This Section will analyze disproportionate greater need for income levels 0-30%, >30-50%, >50-80%, >80-100% AMI, by race or ethnicity. Housing problems were defined in the introduction to this section and are as follows: lacks complete kitchen facilities, lacks complete plumbing facilities, overcrowding –more than one person per room, and cost burden greater than 30% and less than 50%.

Table 23. Disproportionately Greater Need 0-30% AMI: Housing Problems by Income and Race - Garland

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	6,210	420	445
White	1,955	210	180
Black / African American	1,565	70	180
Asian	430	60	0
American Indian, Alaska Native	4	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Pacific Islander	0	0	0
Hispanic	2,060	85	70

Data Source 2007-2011 CHAS

Table 24. Disproportionately Greater Need 30-50% AMI: Housing Problems by Income and Race - Garland, TX

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	8,030	1,645	0
White	2,275	790	0
Black / African American	1,170	190	0
Asian	665	45	0
American Indian, Alaska Native	20	25	0
Pacific Islander	0	0	0
Hispanic	3,685	565	0

Data Source 2007-2011 CHAS

Table 25. Disproportionately Greater Need 50-80% AMI: Housing Problems by Income and Race - Garland, TX

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	7,255	7,245	0
White	2,420	3,245	0
Black / African American	1,135	595	0
Asian	490	505	0
American Indian, Alaska Native	0	65	0
Pacific Islander	0	0	0
Hispanic	2,875	2,545	0

Data Source: 2007-2011 CHAS

Table 26. Disproportionately Greater Need 80-100% AMI: Housing Problems by Income and Race - Garland, TX

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	2,550	5,960	0
White	1,070	2,700	0
Black / African American	445	655	0
Asian	275	485	0
American Indian, Alaska Native	4	10	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Pacific Islander	0	0	0
Hispanic	700	1,785	0

Data Source: 2007-2011 CHAS

The racial makeup of the Garland community was White at 34.74%, Black or African American at 14.14%, American Indian and Alaska Native at 0.19%, Asian at 9.36%, Native Hawaiian and Other Pacific Islander at 0.08%, Some other Race or Two or More Races at 4.0%, and 37.53% are of Hispanic origin.

Analysis of the 2007-2011 CHAS data for Garland indicates that several racial or ethnic groups are experiencing *housing problems* at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- American Indian and Alaska Native in the 0-30% AMI, and >30-50% AMI;
- Asian in the >30-50% AMI
- Black or African American in the >50-80% AMI, and >80-100% AMI

Severe Housing Problems and Disproportionately Greater Need

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience *severe housing problems* at a greater rate (10 percentage points or more) than the income level as a whole. This Section will analyze disproportionate greater need for income levels 0-30%, >30-50%, >50-80%, >80-100% AMI, by race or ethnicity. The severe housing problems included are as follows: overcrowding –more than one person per room, not including bathrooms, porches, foyers, halls, or half-rooms; and cost burden greater than 50%.

Table 27. Severe Housing Problems by Income Category and Race 0-30% AMI – Garland, TX

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	5,490	1,140	445
White	1,630	535	180
Black / African American	1,410	225	180
Asian	385	100	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	1,880	270	70

Data Source 2007-2011 CHAS

Table 28. Severe Housing Problems by Income Category and Race 30-50% AMI – Garland, TX

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	4,655	5,030	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
White	1,165	1,895	0
Black / African American	800	560	0
Asian	450	265	0
American Indian, Alaska Native	4	40	0
Pacific Islander	0	0	0
Hispanic	2,110	2,140	0

Data 2007-2011 CHAS

Source:

Table 29. Severe Housing Problems by Income Category and Race 50-80% AMI – Garland, TX

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	2,280	12,220	0
White	610	5,060	0
Black / African American	230	1,500	0
Asian	175	820	0
American Indian, Alaska Native	0	65	0
Pacific Islander	0	0	0
Hispanic	1,140	4,280	0

Data 2007-2011 CHAS

Source:

Table 30. Severe Housing Problems by Income Category and Race 80-100% AMI – Garland, TX

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Has no/negative income, but no other housing problems
Jurisdiction as a whole	700	7,810	0
White	235	3,535	0
Black / African American	100	1,000	0
Asian	75	685	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	280	2,200	0

Data Source: 2007-2011 CHAS

Analysis of the 2007-2011 CHAS data for Garland indicates that various racial or ethnic group at given income levels are experiencing *severe housing problems*, including cost burden greater than 50%, at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- American Indian, Alaska Native in the 0-30% AMI;
- White in the >30-50% AMI;
- Black/African American in the >30-50% AMI;
- Asian in the >30-50% AMI.

Table 31. Housing Cost Burden - Garland, TX

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	43,374	13,915	10,545	460
White	23,789	5,275	3,390	180
Black / African American	4,570	2,150	2,275	180
Asian	3,195	1,150	990	15
American Indian, Alaska Native	185	40	4	0
Pacific Islander	0	0	0	0
Hispanic	10,390	4,850	3,520	70

Data Source: 2007-2011 CHAS

Analysis of the 2007-2011 CHAS data for Garland, indicates that that none of the racial or ethnic groups are experiencing housing cost burden (30-50%) at a disproportionate rate, and only American Indian/Alaska Native are experiencing severe housing cost burden (>50%) at a disproportionate rate.

In regards to housing problems within various racial and ethnic groups, according to the CHAS data, the racial and ethnic groups with a disproportionately overall greater incidence of housing problems are Hispanic, American Indian and Alaska Native, African American/Black and Asian owners and renters. Within the low and moderate income households, the same groups also experience a disproportionately greater incidence of housing problems. For Black or African American in the >50-80% AMI and 80-100% AMI income categories, they are experiencing housing problems at a proportionally greater rate in comparison to the jurisdiction as a whole. For severe housing problems, Whites in the >30-50% AMI were also disproportionately affected as the minority groups were.

Subsidized Multi-Family Affordable Housing Stock

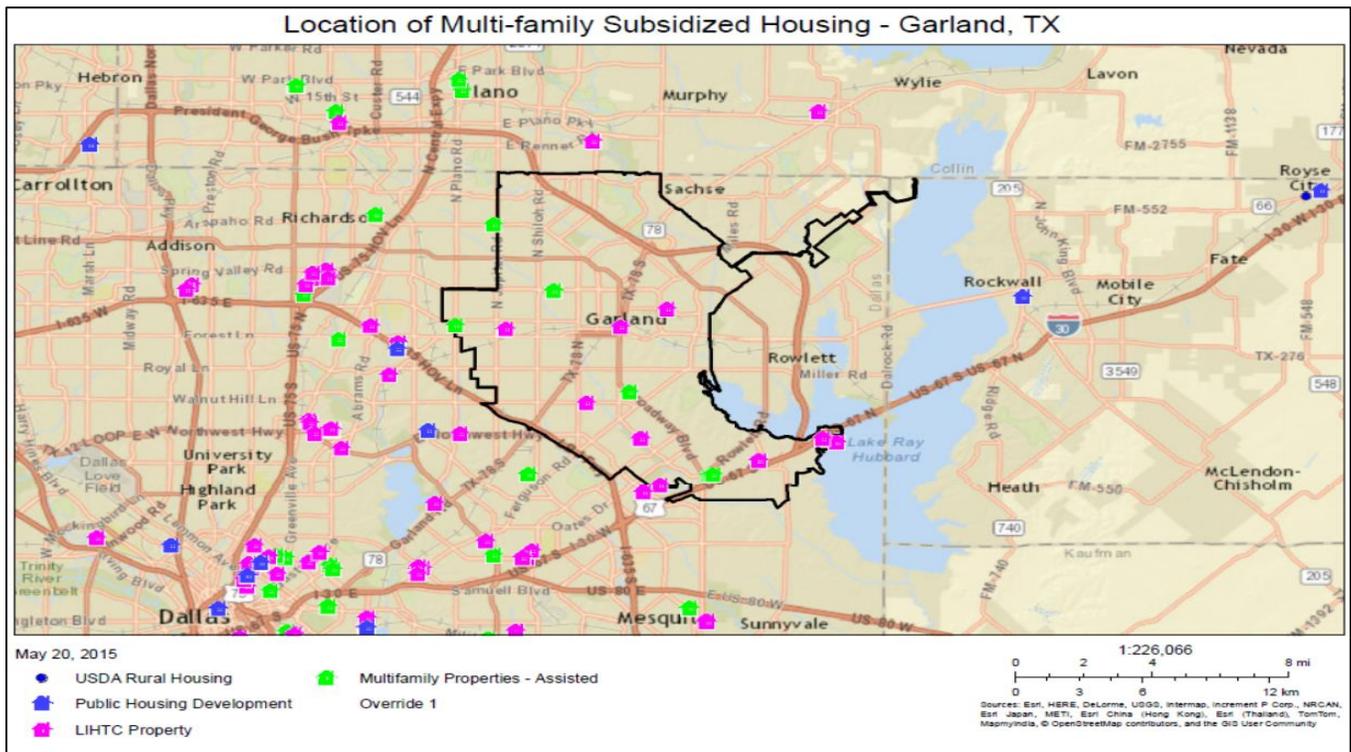
One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. In regards to rental housing, subsidized multi-family housing developments for a variety of income groups and ages such as the elderly, often serve the housing needs for several groups protected by the FHA. 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 following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City of Garland:

- Low income housing tax credits (LIHTC) – The LIHTC program administered by the Texas Department of Housing and Community Affairs (TDHCA) 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 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 Garland is administered by the Garland Housing Agency.

Map 9 below is a visual depiction of the distribution of subsidized housing in Garland including LIHTC units, and other multi-family assisted properties.

Map 9. Location of Multifamily Subsidized Housing – Garland, TX



The following section provides information on housing available in the City under the above 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 1992 and 2010, the TDCHA funded 6 multi-family rental projects in Garland. The funding of close to \$4 million resulted in the development of 1,202 housing units including 1,101 LIHTC units including 50 disabled units.

Table 32 below provides information on each of the LIHTC projects in Garland including the project address, population served, total number of units, LIHTC units, number of disabled units, and location by census tract. The location characteristics, minority population and median family income, for each project is also provided based on U.S. Census data from the FFIEC Census reports for 2014.

Table 32. LIHTC Housing Units – Garland, TX

Project Name	Project Address	Zip Code	Total Units	LIHTC Units	Clients Served	Accessible Units	Census Tract	Tract Minority %	Tract Median Family Income %
Lake Colony Apts.	4605 Chaha Rd.	75043	268	268	General	2	181.41	45.9%	61.1%
The Meadows Apts.	3826 Easton Meadows Dr.	75043	152	152	General	7	181.38	64.4%	82.1%
Centerville Pointe	4266 Duck Creek Dr.	75043	250	150	General	40	181.11	67.0%	82.5%
Edgewood Drive Apts.	238 Barnes Dr.	75042	184	183	General	1	190.13	94.1%	36.2%
Primrose at Crist	202 N. Beltline Rd.	75040	204	204	Elderly	16	190.26	43.1%	95.7%
Home Towne at Garland	1520 Castle Dr.	75040	144	144	Elderly	0	181.21	70.4%	74.3%

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 Garland as a whole (55.0% based on 2013 ACS 5-Year estimates). Therefore, tracts with a 60.0% or greater minority tract percentage are considered to be a “minority” tract.

The LIHTC projects are located in 6 census tracts of which 4 tracts meet the definition of a minority tract. Over 57% (629) of the LIHTC housing units are located in minority tracts and 472 (42.9%) of the LIHTC housing units are located in non-minority areas.

Location of Affordable Housing by Income

Utilizing the median family income percentage per census tract, the majority of LIHTC housing units are located in low- and moderate income census tracts. A total of 596 (49.6%) of the total housing units and 595 (54.0%) LIHTC units are located in tracts with 0-80% median family income. There are no LIHTC units in very low income census tracts. Over 37% of the LIHTC housing units are located in moderate income (51-80% AMI) census tracts and 16.7% are located in low income (31-50% AMI) census tracts. About 46% of the LIHTC housing units are located in middle and upper income (>80%) tracts. The table below shows the distribution of LIHTC units by income category.

Table 33. Distribution of LIHTC Housing Units by Income Category - Garland, TX

Income Category	Total Units	LIHTC Units
0-30%	0	0
31-50%	184	183
51-80%	412	412
Subtotal LMI	596	595
>80%	606	506
TOTAL	1,202	1,101

Concentration of Affordable Housing

Based on the review of the distribution of LIHTC housing units, the majority of the LIHTC units are located in low- and moderate income areas and in minority areas however, when compared to LIHTC units in other areas of the City, the difference is not that significant. Therefore, there is not an over-concentration of LIHTC housing units by income and/or race/ethnicity in Garland. Table 34 below compares the location of multi-family subsidized projects by income category and minority area.

Table 34. LIHTC Units by Census Tracts - Garland, TX

Census Tract	Total Units	LIHTC Units	Income Category	Minority Area
181.41	268	268	Moderate	No
181.38	152	152	Middle	Yes
181.11	250	150	Middle	Yes
190.12	184	183	Low	Yes
190.26	204	204	Middle	No
181.21	144	144	Moderate	Yes

Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for persons with disabilities, you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a person with disabilities 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 most recent comprehensive data on disability status among Garland’s population was the U.S. Census 2013 ACS. According to the 2013 ACS, 10.7% (24,551 persons) in Garland’s civilian non-institutionalized population reported a disability. The data included the following breakdown of the persons with disabilities by age group. The highest percentage of persons with disabilities occurred in the 65 and over population group (38.6%).

Table 35. Disability Status of the Civilian Non-Institutionalized Population – Garland, TX

Population Status	Number	Percentage
Total Population	229,713	100%
With a Disability	24,551	10.7%
Population Under 5 years	18,241	7.9%
With a Disability	129	0.7%
Population 5 to 17 years	48,291	21.0%
With a Disability	3,209	6.6%
Population 18 to 64 years	142,350	62.0%
With a Disability	13,174	9.3%
Population 65 years and over	20,831	9.1%
With a Disability	8,039	38.6%

Source: American Community Survey, US. Census Bureau (2013)

The 2013 ACS also provides information regarding types of disabilities within the Garland 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 and the least common disability reported among Garland residents was vision and self-care difficulty. Within the 65 and over age group, the most common disabilities are ambulatory, independent living, and hearing while the majority of persons with disabilities in the 18 to 64 age group have ambulatory and cognitive difficulties. Garland’s total population with disabilities is 10.7% compared to Dallas County and the State of Texas, where 9.3% and 11.5% report a disability, respectively. The population group with the largest percentage of persons with disabilities in Dallas County and Texas is also the elderly, where 37.7% and 40.2% of senior residents report some type of disability. Table 36 below, shows the breakdown of persons with disabilities based on type of disability and age for 2013.

Table 36. Disability Characteristics of the Garland, TX Population

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	229,713	24,551	10.7%
Population under 5 years	18,241	129	0.7%
With a hearing difficulty		66	0.4%
With a vision difficulty		129	0.7%
Population 5 to 17 years	48,291	3,209	6.6%
With a hearing difficulty		449	0.9%
With a vision difficulty		897	1.9%
With a cognitive difficulty		2,189	4.5%
With an ambulatory difficulty		452	0.9%
With a self-care difficulty		525	1.1%
Population 18 to 64 years	142,350	13,174	9.3%
With a hearing difficulty		2,343	1.6%
With a vision difficulty		3,686	2.6%
With a cognitive difficulty		4,776	3.4%
With an ambulatory difficulty		5,915	4.2%
With a self-care difficulty		2,175	1.5%
With an independent living difficulty		4,523	3.2%
Population 65 years and over	20,831	8,039	38.6%
With a hearing difficulty		3,065	14.7%
With a vision difficulty		1,678	8.1%
With a cognitive difficulty		2,378	11.4%
With an ambulatory difficulty		5,749	27.6%
With a self-care difficulty		2,228	10.7%
With an independent living difficulty		3,908	18.8%

Source: American Community Survey, US. Census Bureau (2013)

Many of the persons with disabilities in Garland have more than one reported disability. Therefore, there is duplication between categories of disability items. Of the number of persons with disabilities, 11,598 (47.2%) report having two or more disabilities. Approximately 61% of elderly persons with a disability report having two or more disabilities and 43% of persons between the ages of 18 and 64 with disabilities have two or more disabilities.

Table 37. Age and Number of Disabilities – Garland, TX

Population	Number
Total Population	229,713
Population under 18 years	66,532
With one type of disability	2,388
With two or more types of disability	950
No disability	63,194
Population 18 to 64 years	142,350
With one type of disability	7,463
With two or more types of disability	5,711
No disability	129,176
Population 65 years and over	20,831
With one type of disability	3,102
With two or more types of disability	4,937
No disability	12,792

Source: American Community Survey, US. Census Bureau (2013)

To further analyze the housing challenges of persons with disabilities in Garland, CHAS data was examined to determine the extent of housing problems and housing needs, particularly for low- and moderate-income independent disabled households. Information on disability status is available in the 2008-2010 ACS. The data provides the most recent detailed data of housing problems of disabled residents based on their household income.

In Garland, there were 31,780 independent disabled households, of which 17,040 (53.6%) were low- and moderate-income. Among the disabled low- and moderate-income households, there was almost an even split between the number of renter and owner households. There were 8,060 (47.3%) disabled renter households and 8,980 (52.7%) disabled owner households.

According to the CHAS data, 11,625 low- and moderate-income disabled households had housing problems. Within disabled renter households, 6,140 (76.2%) households had a housing problem while 5,485 (61.1%) disabled owner households had a housing problem. Low-income disabled renter households and extremely low income disabled owner households are the income groups most troubled with housing problems.

Table 38. Independent Disabled Households with Housing Problems – Garland, TX

Income Category	Number of Independent Disabled Households	# of Independent Disabled Households with Housing Problem	% of Independent Disabled Households with Housing Problem
Extremely Low Income	3,835	3,020	78.7%
Low Income	6,885	5,315	77.2%
Moderate Income	6,320	3,290	52.1%
TOTAL Low/Moderate-Income	17,040	11,625	68.2%
Middle Income	14,740	2,615	17.7%
TOTAL	31,780	14,240	44.8%

Table 39. Independent Disabled Renter Households with Housing Problems - Garland, TX

Income Category	Number of Disabled Member Renter Households	# of Disabled Member Renter Households with Housing Problem	% of Disabled Member Renter Households with Housing Problem
Extremely Low Income	2,505	1,765	70.5%
Low Income	3,295	2,860	86.8%
Moderate Income	2,260	1,515	67.0%
TOTAL Low/Moderate-Income	8,060	6,140	76.2%
Middle Income	4,485	720	16.1%
TOTAL	12,545	6,860	54.7%

Table 40. Independent Disabled Owner Households with Housing Problems

Income Category	Number of Disabled Member Owner Households	# of Disabled Member Owner Households with Housing Problem	% of Disabled Member Owner Households with Housing Problem
Extremely Low Income	1,330	1,255	94.4%
Low Income	3,590	2,455	68.1%
Moderate Income	4,060	1,775	43.7%
TOTAL Low/Moderate-Income	8,980	5,485	61.1%
Middle Income	10,255	1,895	18.5%
TOTAL	19,235	7,380	38.4%

The CHAS data does not provide details on the type of housing problems faced by persons in disabled households. The four housing problems reported by CHAS are incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30% and 50%. Typically having a disability impacts earning potential therefore, residents with disabilities often face housing affordability challenges. According to the 2013 ACS, among the Garland population age 16 and over, 6,572 (30.2%) employed persons have a disability and 13,818 (63.5%) persons with a disability are not in the labor force. The median annual earnings for a person with a disability was \$22,018 which was \$5,058 less than persons without a disability.

With over 21,000 disabled persons over the age of 18 years residing in Garland (2013 ACS) of which 8,431 have an independent living difficulty and 11,664 have an ambulatory difficulty and with 11,625 (68.2%) disabled low- and moderate-income households having a housing problem according to the CHAS, there is a significant need for affordable, accessible housing as well as institutional living options. The extent of the need is difficult to quantify because of insufficient data on the number of accessible units in the City, particularly in the private market.

In 2005, the Texas Department of Housing and Community Affairs conducted a study titled The Housing Needs of Texans with Disabilities. The report found that the lack of affordable housing and the lack of supportive services due to long waiting lists are major barriers to persons with disabilities residing in the State. One of the factors that contributed to the lack of accessible units is that rental properties were not built in accordance with federal accessibility requirements.

In Garland, housing for disabled persons consists of subsidized rental developments including LIHTC units, Section 8 units, Section 202 units, and adult living facilities.

According to the HUD LIHTC Database, there are nine LIHTC properties in Garland with a total of 1,357 low income units. None of the LIHTC projects are targeted to disabled persons however these units can be accessed by persons with disabilities. Primrose at Park Place is a 204-unit LIHTC development that is targeted to elderly persons. Since 38.6% of persons with a disability in Garland are also seniors, some of these units are therefore available to low-income disabled renters.

The Garland Housing Agency does not own any public housing units but manages 1,525 housing choice vouchers under the Section 8 program. According to the housing agency’s Five-year Plan, there were 16,315 families on the waiting list for Section 8 tenant-based assistance and 2,425 or 15% were families with disabilities. To address this need, the Garland Housing Agency planned to apply for special-purpose vouchers targeted to families with disabilities, if such vouchers became available. The HUD Picture of Subsidized Households for 2013 reported that there were 3,550 persons in Section 8 housing units and 746 or 21% had a disability.

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 the elderly and/or persons with disabilities. The latest available inventory is from 2010. The database includes two projects Section 202 projects in Garland. Garland Estates Senior Housing is a 40-unit development for elderly persons with four accessible units. Independent Living Center serves both elderly persons and persons with disabilities and all 40 units in this project are accessible. Table 41 provides details on each of the Section 202 properties that include units designated for persons with disabilities.

Table 41. Section 202 Inventory of Units for Persons with Disabilities – Garland, TX

Property Name	Occupancy Eligibility	Total Units	Units Designated for the Disabled	Units Designated for the Elderly	Units with Accessible Features	Available Bedroom Sizes
Garland Estates Senior Housing	Elderly	40	39	0	4	1-BR
Independent Living Center	Elderly and Disabled	40	0	0	40	1-BR; 2-BR; 3-BR

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

According to the Texas Department of Aging and Disability Services, there are six intermediate care facilities with a total of 36 beds in Garland for persons with mental retardation and related conditions.

The City of Garland administers the Minor Home Repair Program which assists in increasing housing supply for persons with disabilities. The program provides home improvement and accessibility modifications for eligible owner-occupied households.

Housing Stock Available to Elderly Persons

According to the 2010 U.S. Census, there are 20,919 elderly persons (over 65 years of age) living in Garland comprising 9.2% of the population. Of the 20,919 elderly persons, 8,468 persons (40.5%) are age of 75 and over and are considered to be extra elderly or frail elderly. The elderly population is smaller in Garland when compared to the State of Texas where the elderly population represents 10.4% of the total population.

In terms of population change, between 2000 and 2010, Garland residents over 55 years of age grew at the greatest rate, with a 42.8% increase. The population between 45-54 years grew by 13.9%, and the population under 44 years of age, declined by 4%. Overall, there was a 5.1% increase in Garland's total population. In regards to the aging of the population, similar trends occurred in Texas during the same period. In Texas, the largest percentage change was persons between 55 and 64 years with a growth rate of 62.5%. Persons over the age of 55 years grew at by 41.6% while persons under the age of 44 years grew by 13.3%. While the population over 55 years of age makes up a smaller percentage of the overall population, this segment of the population has been growing significantly faster than the younger age groups.

Table 42. Population Distribution by Age Group - Garland, TX and State of Texas

Garland	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	156,243	72.4%	150,043	66.1%	-4.0%
45-54	28,264	13.0%	32,179	14.2%	13.9%
55-64	15,945	7.4%	23,735	10.5%	48.8%
65-74	9,046	4.4%	12,451	5.5%	48.9%
Over 75	6,270	2.9%	8,468	3.7%	35.1%
Total	215,768	100.0%	226,876	100.0%	5.1%
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

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 household where either person is 75 years of age or older. The 2007-2011 CHAS data indicates that there were 17,485 elderly and extra elderly households. This figure is broken down into 3,090 renter households and 14,395 owner households.

Of the 3,090 elderly and extra elderly renter households, 2,185 (70.7%) are low- and moderate-income households. The renter households with the highest rate of housing problems are extra elderly 1 & 2 member households. According to the data, housing problems disproportionately impact low income extra elderly 1 & 2 member households and extremely low income and low income elderly 1 & 2 member households.

Table 43. Housing Problems for Renters with Mobility & Self Care Limitations – Garland, TX

Household by Type, Income, & Housing Problem	Extra Elderly 1 & 2 Member Households	Elderly 1 & 2 Member Households	Other Households	Total Renters
Extremely Low Income	250	395	3,480	4,390
% With Housing Problems	82.0%	70.9%	93.7%	85.4%
Low Income	200	555	4,445	5,200
% With Housing Problems	92.5%	69.4%	89.1%	87.1%
Moderate Income	505	280	5,270	6,050
% With Housing Problems	77.2%	58.9%	54.0%	56.2%
Middle/Upper Income	265	640	8,630	9,535
% With Housing Problems	37.8%	12.5%	13.4%	13.9%
Total Households	1,220	1,870	21,825	25,175
% With Housing Problems	72.1%	48.7%	51.4%	51.7%

Further analysis of the CHAS data shows that of the 14,395 elderly and extra elderly owner households, 5,810 (40.4%) are considered low- and moderate-income households. In general owner households have significantly less housing problems than renter households. Among the elderly, 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 households.

Table 44. Housing Problems for Owners with Mobility & Self Care Limitations – Garland, 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	470	485	1,080	2,160
% With Housing Problems	92.6%	100.0%	95.8%	90.5%
Low Income	820	1,460	2,860	5,135
% With Housing Problems	50.6%	72.3%	89.0%	78.1%
Moderate Income	885	1,690	5,545	8,120
% With Housing Problems	30.0%	45.6%	70.0%	60.5%
Middle/Upper Income	2,055	6,530	23,355	31,940
% With Housing Problems	7.8%	9.6%	16.9%	14.8%
Total Households	4,230	10,165	32,840	47,355
% With Housing Problems	30.1%	28.9%	34.7%	33.0%

The City’s Comprehensive Plan, Envision Garland 2030, includes an analysis of anticipated housing needs based on estimated population growth and demographic trends in North Texas. The trends include the doubling of the number of seniors by 2030. The growth in the senior population will have a significant impact on the types of

housing, supportive services, and subsidies needed. CHAS data included in the FY 2015-2019 Consolidated Plan shows that 14% and 17% of Elderly renter and owner households in Garland, respectively, are severely cost burdened. The CHAS data supports the need for affordable housing units that are suitable for elderly persons. Current housing programs, such as the Section 8 Program administered by the Garland Housing Agency also support the need for affordable and accessible housing units since 3% of the households on the waiting list are classified as elderly and another 16% have disabilities.

The Texas Department of Aging and Disability Services (DADS), administers long-term services and support for seniors as well as for people with intellectual and physical disabilities. The mission of the organization is to provide comprehensive and coordinated services based on individual needs. DADS conducts the Aging Texas Well Indicators Survey every four years and the 2013 survey found that transportation, assistance with personal care, safe and affordable housing, understanding benefits, advance life planning, nutrition and wellness, and caregiver issues are priority needs for older Texans.

Senior housing in Garland consists of subsidized rental developments including LIHTC units, Section 202 units, and assisted living facilities and nursing homes. There are also two LIHTC projects that are designated as housing for the elderly. They are Primrose at Crist with 204 units and Home Towne at Garland with 144 units. The Garland Volunteers of America Texas (VOA) Elderly Housing also operates 39 units of senior housing.

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 3 properties with 39 units designated for elderly persons and 47 units with accessible features. Table 45 provides details on each of the properties.

Table 45. Multi-family Inventory of Units for the Elderly and Disabled - Garland, TX

Property Name	Section of the Act	Occupancy Eligibility	Total Units	Units Designated for the Elderly	Units Designated for the Disabled	Units with Accessible Features
Garland Estates Senior Housing	202	Elderly	40	39	0	4
Independent Living Center	202	Elderly and Disabled	40	0	0	40
Legacy Pointe Apts.		Family	184	0	0	3

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

DADS maintains a database of housing facilities including the following list of assisted living facilities and nursing homes in Garland.

Table 46: Assisted Living Facilities and Nursing Homes - Garland, TX

Assisted Living Facilities & Nursing Homes	Number of Beds
Assisted Living Facilities	
Bethel Senior Care at West Shore	4
Chambrel at Club Hill	134
Mayberry Gardens Assisted Living 3	79
Abba Care Assisted Living - A	16
Abba Care Assisted Living - B	16
Avalon Care Group	32
Bethel Senior Care LLC	8
Joy Assisted Living	8
Mayberry Gardens Assisted Living	13
Mayberry Gardens Assisted Living 2	12
Springfield Senior Living	9
Stoneybrook Memory Care of Garland	46
Winter Park Assisted Living and Memory Care	134
Total Assisted Living Facility Beds	511
Nursing Homes	
Advanced Health & Rehab Center of Garland	202
Garland Nursing and Rehabilitation	109
Pleasant Valley Healthcare and Rehabilitation	124
Senior Center Beltline	120
Winters Park Nursing and Rehabilitation Center	132
Total Nursing Home Beds	687

Source: Texas Department of Aging and Disability Services

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.

The HUD Section 8 Housing Choice Voucher Program is a federal program for assisting very low-income families, the elderly, and the disabled to secure affordable, 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. Housing choice vouchers are administered locally by public housing agencies (PHAs). 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.

Since 1974, HUD has helped low income households obtain better rental housing and reduce the share of their income that goes toward rent through a program that relies on the private rental market. In 1997, 1.4 million

households held Section 8 certificates or vouchers, which allow them to rent eligible units in the private market and receive rental subsidies from the federal government. A key parameter in operating the certificate and voucher programs is the Fair Market Rent (FMR). The Housing Choice Voucher program in the Dallas, TX HUD Metro FMR Area uses Small Area FMRs as defined by zip codes. The following table shows the FY 2015 FMRs for Garland zip codes by unit bedrooms:

Table 47. Small Area FMRs by Unit Bedrooms FY 2015- Dallas, TX HD Metro Area

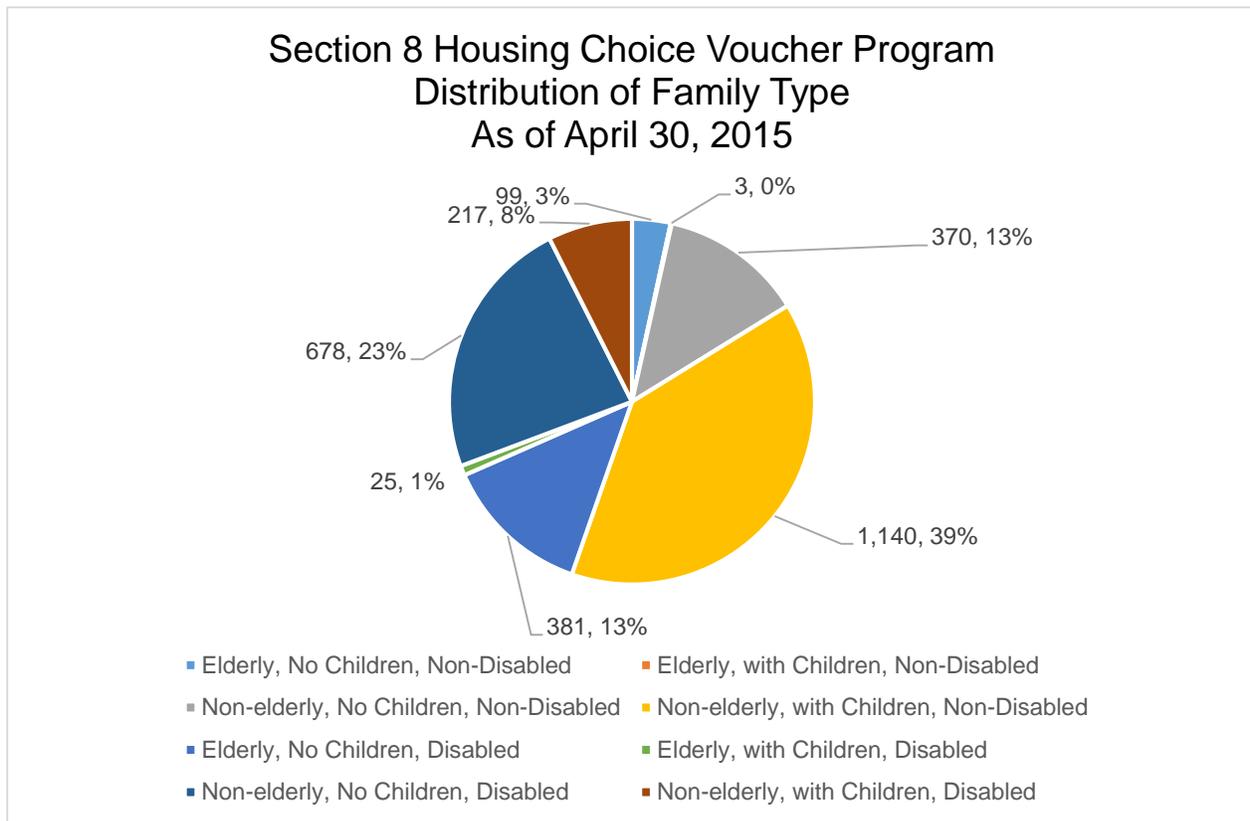
FY 2015 Small Area FMRs by Unit Bedrooms Dallas, TX HUD Metro Area					
	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
75040	\$750	\$900	\$1,140	\$1,520	\$1,840
75041	\$600	\$720	\$910	\$1,210	\$1,470
75042	\$570	\$690	\$870	\$1,160	\$1,400
75043	\$630	\$760	\$960	\$1,280	\$1,550
75044	\$700	\$840	\$1,060	\$1,410	\$1,710

The Garland Housing Agency (GHA) is the City Department that serves as the City’s public housing authority (PHA). The GHA administers the Section 8 Housing Choice Voucher and Family Self-Sufficiency programs. The GHA also operates the Disaster Housing Program and conducts housing inspections of rental properties to ensure that they meet the Housing Quality Standards established by HUD. GHA currently meets the rental needs of residents who cannot afford housing in the private market through the administration of 1,525 Section 8 housing choice vouchers. The housing choice vouchers can be used by holders to rent private homes. GHA does not own any public housing units.

The agency’s Resident Characteristic Report (as of April 30, 2015) shows that 74% of housing voucher recipients are extremely low income (< 30% AMI), 12% of recipients are very low income (31-50% AMI), and 3% of recipients are low income (51-80% AMI).⁹ The household composition of housing choice voucher receipts is shown in Figure 7 below. There are a total of 2,991 persons residing in publicly assisted units and of this amount, 1,309 or 45% are female headed households with children. There are 508 elderly households of which 28 households include children. Approximately 80% or 406 elderly households report a disability. Amongst non-elderly households, 1,265 households or 52.6% report a disability out of a total of 2,405 non-elderly households. About 1,357 non-elderly households include children.

⁹ Data was not available for all the housing choice voucher recipients.

Figure 7. Section 8 Voucher Distribution by Family Type 2015 – Garland, TX



The GHA Five-Year Plan described the characteristics of families on the waiting lists for Section 8 vouchers, as follows: 86% Black/African- American and 5% White. In regards to household’s income, 70% of families on the waiting list are extremely low income (<30% AMI) and 30% are very low income (31-50% AMI). According to the Five-Year Plan, 10% of those on the waiting list for Section 8 vouchers are elderly and 15% of the families are disabled.

Public housing authorities are required to certify that they will carry out the public housing program in conformity with several federal laws, including the Fair Housing Act. A review of the GHA’s 5-Year Plan and Annual Plan reveals that the agency has taken specific actions to promote fair housing:

- The PHA will not, on the grounds of race, color, creed, sex religion, age, disability, national origin or familial status:
 - Deny a person or family admission to housing or assistance;
 - Provide housing which is different than that provided others, except for elderly and/or disabled where accessibility features may be required;
 - Subject a person to segregation or disparate treatment;
 - Restrict a person's access to any benefit enjoyed by others in connection with housing programs;
 - Treat a person differently in determining eligibility or other requirements for admission or assistance;
 - Deny any person access to the same level of services provided to others;
 - Deny a person the opportunity to participate in a planning or advisory group that is an integral part of the housing programs.
- The PHA will not intimidate, threaten or take any retaliatory action against any applicant, resident, or participant because of a person’s participation in civil rights activities or assertions of civil rights.
- HUD Fair Housing Posters are posted at the PHA main administrative office and at each office where applications are taken.

- The PHA will ensure accessibility to offices to afford persons with disabilities the opportunity to apply for admission or assistance to the section 8 program.
- The PHA will make sure that all employees of the PHA are familiar with nondiscrimination requirements, especially those employees who are involved in the admissions process.
- The PHA's policies and practices are designed to provide assurance that all persons with disabilities will be provided reasonable accommodations so that they can fully access and utilize the housing programs and related services.
- The PHA will identify and eliminate situations and /or practices that create barriers to equal housing opportunity for all.
- The PHA reviews its policies and procedures, at least annually, to assure compliance with all civil rights requirements.

Public Housing Fair Housing Policies

Reasonable Accommodations

The Garland City Council adopted the GHA's Housing Choice Voucher Administrative Plan by Resolution No. 10147 in June 2014. The Administrative Plan establishes the policies and procedures for the Housing Choice Voucher Program. According to the GHA Five-year Plan, the agency has committed to affirmatively further fair housing by ensuring that all persons with disabilities will be provided reasonable accommodations to access and utilize housing programs and related services. The policy requires that the availability of reasonable accommodations is included on forms and letters to all families, and once verified, GHA will make accommodations that do not cause undue financial and administrative burden or requires a fundamental alteration in the nature of the program.

Tenant Selection

The GHA outlines its tenant screening process in the Five-year Plan and based on the policy and procedures, the tenant selection procedures do not limit the participation of persons with disabilities. The GHA does not have local preferences. The screening conducted by GHA includes criminal background checks with criminal records requested from local and State law enforcement agencies. The GHA examines criminal or drug-related activity as well as whether domestic violence has been a factor in poor tenancy history. In regards to criminal history, potential tenants may be denied admission to the program if any member of the household has a history of drug-related criminal activity within the last five years and/or violent criminal activity in less than ten years.

Portability

One of the goals of the GHA as outline in the Five-year Plan is to increase assisted housing choices. To achieve the goal, the GHA provides voucher mobility counseling to new and current program participants, conducts outreach efforts to potential landlords, and implements the Voucher Homeownership Program. The GHA follows the portability requirements in the administration of its programs.

Voucher Concentration

The GHA has certified that it will not subject voucher holders to segregation and seeks to integrate Section 8 voucher recipients throughout its service area. A review of the distribution of vouchers by census tract shows that approximately 83% of housing choice vouchers are for units located in minority areas (tracts with a 60.0% or greater minority tract percentage). The voucher location data for this analysis was provided by the GHA and

minority tract data is from the 2014 FFIEC Census reports. The HUD “Picture of Subsidized Households” reports that 85% of the GHA’s voucher recipients are minorities consisting of 72% Black/African American, 7% Asian or Pacific Islander, and 6% of Hispanic ethnicity. Based on the high percentage of minorities served by the GHA, it appears that minority voucher holders are concentrated primarily in neighborhoods with a high minority population. According to the data, of the 568 vouchers in the City of Garland, 472 or 83% are being utilized in minority tracts while 96 or 17% are being used in non-minority tracts. The minority tracts with the highest number of vouchers are tracts 190.13, 181.28, 190.27, 181.11, 181.21, and 181.38. There are 257 vouchers (45% of total vouchers) within these six minority tracts. Table 48 below, shows the number of vouchers in each census tract within Garland’s city limits.

Table 48. Section 8 Voucher Distribution by Census Tracts – Garland, TX

Census Tract	No. of Vouchers	% of Total Vouchers	Tract Minority %
178.08	0	0.0%	47.10%
181.05	12	2.1%	76.80%
181.11	37	6.5%	66.90%
181.18	5	0.9%	64.20%
181.2	3	0.5%	62.40%
181.21	37	6.5%	70.40%
181.23	7	1.2%	57.80%
181.24	0	0.0%	42.70%
181.26	7	1.2%	59.10%
181.27	3	0.5%	67.50%
181.28	46	8.1%	71.10%
181.29	2	0.4%	43.20%
181.32	1	0.2%	52.40%
181.37	0	0.0%	58.40%
181.38	31	5.5%	64.40%
181.41	28	4.9%	45.90%
181.42	1	0.2%	55.20%
182.03	16	2.8%	85.20%
182.04	8	1.4%	95.70%
182.05	10	1.8%	82.30%
182.06	5	0.9%	79.20%
183	18	3.2%	66.70%
184.01	6	1.1%	66.50%
184.02	11	1.9%	44.10%
184.03	3	0.5%	75.30%
185.01	7	1.2%	63.40%
185.06	0	0.0%	93.30%
186	0	0.0%	42.00%
187	12	2.1%	75.60%
188.01	6	1.1%	65.90%
188.02	5	0.9%	55.30%
189	13	2.3%	71.80%
190.04	16	2.8%	67.60%
190.13	68	12.0%	94.10%
190.14	25	4.4%	77.50%
190.2	1	0.2%	56.70%
190.21	14	2.5%	61.50%

Census Tract	No. of Vouchers	% of Total Vouchers	Tract Minority %
190.25	3	0.5%	48.10%
190.26	27	4.8%	43.10%
190.27	38	6.7%	66.50%
190.28	7	1.2%	64.90%
190.29	16	2.8%	60.90%
190.31	2	0.4%	36.00%
190.32	6	1.1%	82.50%
190.33	4	0.7%	83.70%
190.42	1	0.2%	48.70%
190.43	0	0.0%	25.80%

* The cells highlighted in Yellow are minority census tracts.

Homeownership by Race and Ethnicity

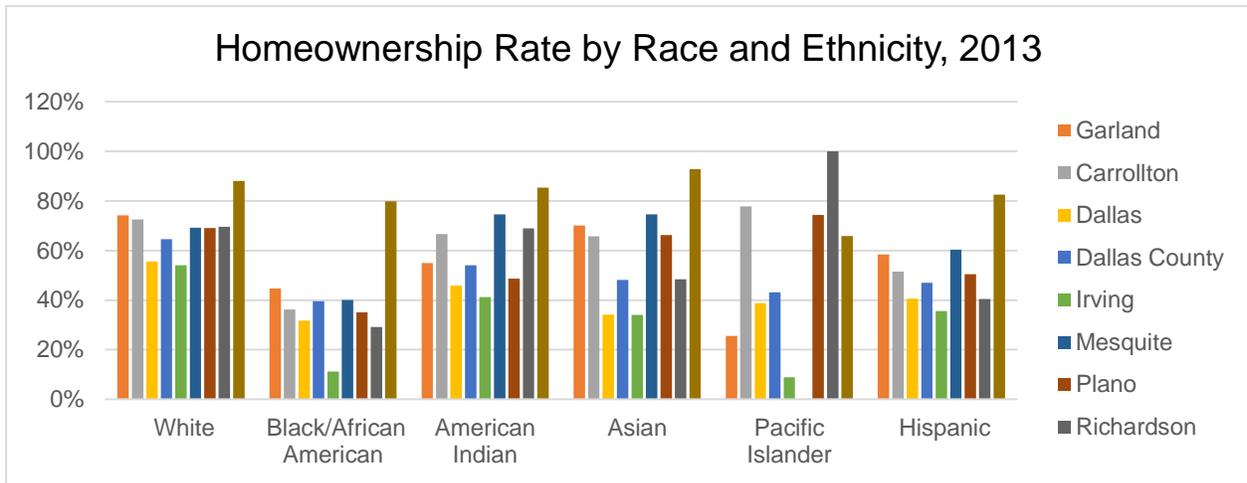
Table 49 depicts homeownership rates by race and ethnicity in Garland, Dallas County, and other neighboring communities. Rates of homeownership vary widely by race/ethnicity in the City of Garland and its neighboring communities. The overall rate of homeownership in Garland for all races, was 63.7% (2013 ACS). White households in Garland had the highest homeownership rate followed by Asians and persons of Hispanic ethnicity. In the majority of the communities examined, Whites have the highest rate of homeownership. Black/African Americans and Hispanic households had the highest homeownership rate in the Cities of Rowlett and Mesquite and the lowest in the City of Irving. The Home Mortgage Disclosure Act (HMDA) Data Analysis section of this document will evaluate whether there are any discriminatory lending practices in Garland that contribute to the lower homeownership rate for minorities.

Table 49. Comparison of Homeownership Rates by Race/Ethnicity by Jurisdiction

Jurisdiction	Overall Ownershi p Rate	Ownersh i p Rate - White	Ownership Rate – Black/Africa n American	Ownersh i p Rate – American Indian	Ownersh i p Rate - Asian	Ownersh i p Rate – Pacific Islander	Ownersh i p Rate – Hispanic
Garland	63.7%	74.2%	44.7%	54.9%	70.1%	25.5%	58.4%
Carrollton	62.8%	72.6%	36.2%	66.6%	65.7%	77.8%	51.5%
Dallas	43.6%	55.6%	31.7%	45.8%	34.1%	38.8%	40.6%
Dallas County	52.5%	64.6%	39.6%	54.1%	48.1%	43.2%	47.0%
Irving	38.8%	54.1%	11.2%	41.2%	34.0%	8.9%	35.6%
Mesquite	60.3%	69.2%	40.1%	74.6%	74.6%	0.0%	60.3%
Plano	64.0%	69.1%	35.0%	48.7%	66.2%	74.3%	50.5%
Richardson	60.2%	69.6%	29.2%	69.0%	48.4%	100.0%	40.4%
Rowlett	86.4%	88.1%	79.8%	85.4%	92.8%	65.9%	82.6%

Source: American Community Survey, U.S. Census (2013)

Figure 8. Homeownership Rates by Race/Ethnicity - Garland, TX



Source: American Community Survey, U.S. Census (2013)

The City of Garland furthers fair housing efforts by funding activities including homeownership programs. The City administers and implements programs that encourage homeownership and partners with developers such as Habitat for Humanity which builds new affordable homes.

Some of the homeownership programs administered by the City are the First Time Homebuyer Program, Home Infill Program, and GREAT Homes Initiative. A brief description of each of these programs is provided below.

First Time Homebuyer Program

This program provides down payment assistance and closing cost assistance to low- and moderate-income homebuyers who desire to purchase a home in Garland. Eligible applicants may receive up to \$10,000 in down payment assistance. Assistance is provided as a forgivable loan that may be due under certain conditions such as if the home is sold, leased, or transferred within the first five years of ownership.

Home Infill Program

This is a city-wide program that funds the construction of new single homes for low- and moderate-income households. The City partners with developers with the goal of increasing the rate of homeownership in Garland’s neighborhoods.

GREAT Homes Initiative

Under this program, the City conducts a wide range of projects such as new home construction, rehabilitation, and infrastructure improvements in target neighborhoods. The program allows low- and moderate-income households to afford purchasing a home as well as continue to reside in the home due to reduced costs for energy efficient construction and energy efficient appliances.

The Garland Housing Agency also supports homeownership through the Family Self-Sufficiency (FSS) Program and the Housing Choice Voucher Home Ownership Program. The FSS program assists families in public housing achieve economic independence. The program requires that clients sign a contract which includes personal goals; commit to meeting the goals within five years; and seek and maintain employment for the duration of the contract. At the end of the program, client savings are generally used for down payments on home purchases.

The Housing Choice Voucher Home Ownership Program allows current rental voucher recipients who qualify to purchase a home to use the voucher to subsidize monthly mortgage expenses. The program requires annual recertification and payments may not exceed 10 to 15 years depending on the mortgage term. There is however, no time limit on payments for elderly and disabled families.

Recent City Housing Accomplishments and Use of Resources

The City of Garland 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), 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 2010-2013 program years, the 2014 Federal Grant Accomplishments report, as well as the 2015-2019 Consolidated Plan were reviewed to determine recent housing accomplishments and actions taken to promote fair housing.

The City of Garland's housing objective are to expand the supply of owner-occupied housing, provide a broad spectrum of housing programs to those who are homeless or at risk of homelessness, and to assist low income homeowners to maintain safe and affordable housing. 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.

The City administers and implements several housing programs to achieve the objectives of the Consolidated Plan and to address fair housing choice through providing a variety of affordable and accessible housing opportunities. The housing programs offered by the City of Garland include the following:

Home Infill Program: The City partners with developers to construct new single family homes within the City of Garland for low- and moderate-income families. The goal of the program is to promote revitalization of neighborhoods and increase the rate of homeownership.

GREAT Homes Initiative: The GREAT Homes Initiative includes a variety of housing programs and is targeted to certain neighborhoods. Projects include new construction and renovation of existing homes or public infrastructure. The program also offers energy efficient and aesthetic upgrades while maintaining the architectural integrity of the neighborhoods.

Minor Home Repair Program: This program provides up to \$5,000 in grant funding to eligible households for minor repairs including roof repairs, replacement of gas or sewer lines, handicapped accessibility features, HVAC repairs, plumbing, electrical, exterior door replacement, and water heater replacement. The program is targeted to seniors or persons with disabilities who lack the resources to make the repairs or accessibility modifications.

Single Family Rehabilitation Program: Eligible households may receive up to \$25,000 for major repair or replacement of plumbing systems, electrical systems, roofing, HVAC, and painting. Funding for this program is provided as a partial grant that is forgiven after seven years and a partial repayment loan that is amortized for up to ten years.

Section 8 Housing Choice Voucher Program: Administered by the Garland Housing Agency, the Section 8 HCV Program subsidizes a tenant's rent and allows voucher recipients to reside in privately owned rental properties.

Section 8 Housing Choice Voucher Home Ownership Program: This program encourages voucher recipients to become first-time homebuyers by subsidizing the monthly mortgage expenses. Eligible applicants must be current rental voucher program participants for a least one year. The homeownership assistance may be paid for 10-15 years depending on the mortgage term. There is no limit on the assistance for elderly and disabled families.

The City uses ESG funding to provide homeless prevention assistance, rapid re-housing, and financial assistance to persons who are homeless or at risk of homelessness. The City selects neighborhood partners to implement these programs.

The Garland Housing Finance Corporation assists low- and moderate-income households to acquire and own decent, safe, and sanitary housing. The GHFC offers a First Time Homebuyer Program for down payment and closing cost assistance and administers the Mortgage Certificate Program (MCC) which provides a tax credit of up to \$2,000 a year for as long as the homebuyers occupies the home and has a mortgage. The GHFC also develops or rehabilitation existing multi-family and single family housing. Some of the projects include HomeTowne at Garland, a senior living community, Primrose at Park Place, and scattered site single family homes.

The Garland Housing and Community Services Department prepared a report of its Federal Grant Accomplishments for December 2014. The housing related accomplishments are summarized below:

- Between FY 2005 and FY 2014, the City utilized CDBG funds to assist over 1.2 million low- and moderate-income homeowners rehabilitate their homes, provided down payment and closing costs assistance for homebuyers, and assisted homeowners with lead-based paint abatement.
- Under the HOME Program, 493,000 housing units were developed for new homebuyers, over 230,000 owner-occupied units were rehabilitated, and over 464,000 rental units were rehabilitated.
- For the last five years, 178 families were assisted with housing repairs utilizing CDBG funds.
- Between FY 2011 and FY 2015, the HOME Program assisted 190 households: 95 new affordable units developed, 70 households received down payment assistance, 25 new homes constructed.
- Under ESG, between FY 2013-2014, 474 persons were assisted with homeless prevention, rapid re-housing activities, and domestic violence shelter activities.

The following figures extracted from the FY 2010 to FY 2013 CAPERS represent the number of households assisted with housing related activities by year.

Table 50. Home Repair Assistance Accomplishments Projects Completed 2009-2011- Garland, TX

	No. of Households Assisted (2010)	No. of Households Assisted (2011)	No. of Households Assisted (2012)	No. of Households Assisted (2013)
Construction of New Homes	4	5	7	7
Down payment assistance	17	15	16	17
Single Family Rehabilitation program; Minor Home Repair Program, and People Helping People	30	19	33	24
Section 8 Vouchers	1,463	1,549	1,452	1,499

Fair Housing Actions

Fair Housing is a shared concern, regionally and locally, in the City and the County. The City of Garland completed its last Analysis of Impediments (AI) to Fair Housing Choice in 2011. 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 detailed in Appendix III to specifically address the impediments identified then and fair housing issues in general.

City of Garland Fair Housing Services

The City of Garland has a designated fair housing unit, Garland Fair Housing Services (GFHS), which addresses discriminatory housing practices in the city. The GFHS is a substantially equivalent fair housing agency meaning 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. On March 18, 1997, the City of Garland passed its Fair Housing Ordinance and on January 9, 1998, the City's Fair Housing Ordinance was reviewed and approved by HUD as being "Substantially Equivalent" to the Fair Housing Act. This paved the way for the City to proceed with an interim agreement for fair housing referrals to HUD. The interim referral period provided the GFHS with a three-year capacity- building period, during which the City developed its policies and procedures. On April 1, 2002, the City of Garland began implementing the Fair Housing Assistance Program (FHAP) Education and Outreach component. A Memorandum of Understanding between HUD and Garland was executed on July 3, 2003, for a five-year period ending July 3, 2008. An Addendum to the Memorandum of Understanding was executed on August 22, 2008, between HUD and Garland, for a five-year period ending August 22, 2013. In June 2010, HUD conducted an on-site agency review of administration and operations, and found all areas to be fully compliant.

According to its website, the mission of the GFHS is "to educate citizens on Fair Housing laws and eliminate housing discrimination and the vision for everyone to have the opportunity to enjoy his or her home and community as a fundamental human concept, free from discrimination. We strive to emphasize the rich cultural diversity of our citizens."¹⁰ The goal of the GFHS is to "significantly reduce incidents of housing discrimination through effective education concerning housing rights to landlords and tenants; and provide investigation, conciliation, and mediation services."

To address fair housing, the GFHS provides the following services:

- Discrimination complaint Intake
- Investigates and enforces discrimination complaints
- Conciliation and mediation
- Fair housing training, education and awareness
- Housing and Disability Resource Guide

Fair Housing Accomplishments

According to Garland's Consolidated Annual Performance Evaluation Reports (CAPERs) that were reviewed, the City positively impacted fair housing through a combination of planning and execution of programs designed to expand fair housing opportunities, increase affordable housing stock, and increase access to housing choice. The CAPERs demonstrate that the City through the GFHS has participated in several activities to address its pledge to "affirmatively further fair housing" by:

- Engaging in education of its citizens, employees, and housing providers on fair housing rights and responsibilities;
- Observing Fair Housing Awareness Month and conducting seminars and other meetings that increases awareness and knowledge of fair housing.

The GFHS provided residents the opportunity to file complaints alleging discrimination in housing. Many of the complaints were settled with resolution or conciliation, while other complaints were issued a final investigative

¹⁰ Garland Fair Housing Services website, <http://www.garlandtx.gov/gov/hk/housing/fair/default.asp>
Accessed April 21, 2015

report after thorough investigations. Additional information on this can be found in the Compliance Data and Analysis section of this AI.

Education and outreach services were provided to all segments of the community, including outreach services to persons with disabilities, new immigrants, non-English speaking populations, and other various populations. Outreach education was also provided to prospective homebuyers and persons interested in managing, improving or repairing their credit. Workshops were offered to persons to learn about avoiding predatory lending activities; landlord and tenant responsibilities; and effective money management. Outreach education and services were also imparted to Code Compliance landlords, Housing Agency landlords, service providers, area apartment managers, and other interested organizations. Information about fair housing and responsibilities and alternatives were presented to gain full compliance with the Garland Fair Housing Ordinance and the Fair Housing Act, as amended.

The Garland Fair Housing Services carries out the following fair housing activities annually:

- Homebuyers housing workshops including fair housing information
- Workshops on tenant’s rights and responsibilities
- Facilitating Fair Housing Month City Council resolutions

Fair Housing staff works closely with the Code Compliance Department, Customer Service Department, Garland Housing Agency, Neighborhood Services Department, Human Resources Department, and the Emergency Management Department to address critical issues concerning the residents of the City of Garland.

Through the Fair Housing Assistance Program (FHAP) grants, the GFHS was able to carry out many educational and outreach activities. The Fair Housing Assistance Program (FHAP) budget for FY14 was \$207,203.00. Deliverables under the 2014 FHAP grant concluded on December 31, 2014. The Garland Fair Housing Services also received \$18,300.00 in CDBG Grant Administration funding for FY 2014 to carry out HUD fair housing objectives.

Between FYs 2010 – 2013, the City received, processed and made available referrals for 16,602 residents; filed and investigated 201 housing discriminations complaints; fielded 1,364 inquiries to determine if they were fair housing related; and conducted outreach through fair housing events held year-round as well as fair housing month activities held in April of each year. A summary of the fair housing accomplishments from the City’s CAPERs are provided in the table below.

Table 51. City of Garland Fair Housing Accomplishments against Goals 2010-2013

Fair Housing Activities	Accomplishments			
	2010	2011	2012	2013
Complaints investigated	62	52	37	50
Inquiries	360	416	385	203
Education and Outreach Attendance	1,700	1,062	465	290
Information and Referral	3,105	5,205	4,350	3,942

Regional Fair Housing Initiatives

In consideration of the fact that fair housing is often a regional issue, the City of Garland has initiated and/or participated in regional activities as outlined below. Fair Housing staff participated in national and regional training and participated in professional staff development activities to enhance Fair Housing Office skills and knowledge.

- The City of Garland has collaborated with neighboring cities such as the City of Dallas to carry out fair housing activities.

- During Fair Housing month in 2014, the City’s Fair Housing staff participated in a Fair Housing Symposium on Affirmatively Furthering Fair Housing sponsored by the City of Dallas. Other neighboring communities, HUD officials, lending community development community and the real estate community also participated.
- In April 2015, the City participated in a fair housing symposium sponsored by the City of Dallas and titled “Sustainable Communities: Strategies for Innovation and Regional Cooperation” on April 27, 2015. Neighboring communities will participate.
- The Fair Housing Services staff continually researched best practices from other Texas communities and national fair housing organizations.

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. 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.

In order to make this determination, the Consultant examined the Envision Garland 2030 Comprehensive Plan¹¹, Municipal Zoning and Building Codes¹², and other small area plans including the Forest-Jupiter Transit-Oriented Redevelopment Plan (2013)¹³. 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.

Review of the Envision Garland 2030 Comprehensive 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.

The Envision Garland 2030 Comprehensive Plan was adopted by the Garland City Council in March 2012. Envision Garland is a 20-year plan that seeks to guide the physical and economic development of the City. The framework for the Plan includes a vision statement, guiding principles to achieve the vision, the policy plans which details the action steps, and implementation strategy.

The vision statement for the City of Garland is “In 2030, Garland is a community that blends old and new into a distinctive destination for people and businesses. We successfully adapt to changing needs and benefit from new opportunities, strengthening our identity as a sustainable community with a hometown feel. We are a community known for our appealing neighborhoods, globally-connected business hub, and beautiful parks, active lakefront, and natural areas.”

¹¹ <http://www.garlandtx.gov/civicax/filebank/blobdload.aspx?blobid=7242>

¹² <http://z2.franklinlegal.net/franklin/Z2Browser2.html?showset=garlandset>

¹³ <http://www.garlandtx.gov/civicax/filebank/blobdload.aspx?blobid=9601>

To achieve the vision, the City, with input from residents of Garland and numerous stakeholders, developed the following guiding principles:

1. Maintain a hometown character while providing opportunities for compact, higher density activity centers of services, amenities, employment, and recreation.
2. Facilitate a thriving economy through strategic investments, partnerships, and wise stewardship of existing assets.
3. Provide opportunities for a range of housing types meeting the income, household needs, and preferences of those seeking to call the city home.
4. Foster high-quality community character by modeling and supporting enhanced aesthetic and maintenance standards.
5. Promote an integrated regional mobility network for pedestrians, bicycles, transit, roadways, and freeways efficiently linking neighborhoods and centers of activity and employment to the Dallas/Fort Worth region.
6. Support a connected open and public space network formed by parks, greenbelts, trails, lakefront, and public/private spaces.
7. Encourage the efficient use of resources.
8. Practice planning and decision-making that is inclusive, transparent, and consistent.

The policy plan focuses on five key areas: Land Use, Economic Development, Housing and Neighborhoods, Transportation and Infrastructure, and Community Character and Design. Each element of the Envision Garland plays a role in providing housing options for residents of Garland. The Land Use element addresses future land uses and planning tools that will form “Building Blocks”¹⁴ and includes a description of the suitable housing types throughout each area of the City. The Economic Development element is based on a market analysis and reviews the demographic and economic profile of Garland residents. It also considers commute times to work and proximity of the population to employment centers. The Housing and Neighborhoods Element addresses the provision of a range of housing options that meet the needs of the current and future population. Transportation and Infrastructure addresses various modes of transportation and includes the goal of integrating public transit into land use planning and development projects which is key for members of protected groups like persons with disabilities, elderly persons and other disadvantaged groups such as low income persons that are generally predominantly minority persons. Finally, the Community Character and Design element addresses all the other elements of the Plan by encouraging the use of practices, tools, and methods to achieve a cohesive design that incorporates the goals and objectives of the other elements.

The purpose of reviewing the Envision Garland 2030 Comprehensive Plan is to identify to what extent the plan helps the City to implement its commitment to equal housing opportunity and to what extent 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. Community Participation in the Planning Process

1. 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

¹⁴ General locations for the broad categories of activities and land uses.

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 comprehensive plans and other neighborhood planning documents.

Throughout the Envision Garland Plan, there are analyses and references to the changing population in Garland as well as the Dallas/Fort Worth Region. The main changes are an aging population and the growth in persons of Hispanic ethnicity and Asians. According to the Plan, senior citizens will increase as a share of the population in the Region and the number of persons between ages 65 and 84 years is expected to double to 13% by 2030 as compared to 7% in 2007.

The Forest-Jupiter Transit-Oriented Redevelopment Plan, adopted in May 2013 was also reviewed. The Forest-Jupiter Plan identifies potential redevelopment opportunities within the Forest-Jupiter-Walnut area and includes strategies to develop the area as an employment center. Like, the Envision Garland Plan, the Forest-Jupiter Plan discusses population growth and make-up and includes a detailed analysis of population trends by age, household size, race/ethnicity, and income and compares each demographic trend to the City of Garland and the Dallas/Fort Worth Metro Area.

While the planning documents reviewed include demographic data for most of the FHA protected groups, the number of persons with disabilities in the City or an analysis of the types of disabilities is not addressed. The Envision Garland Plan does however consider the needs of persons with disabilities in regard to street design and housing and supportive services. In addition, the City's Consolidated Plan is summarized in the Envision Garland Plan and identifies housing and services for persons with disabilities as a priority.

2. Plans for Affordable Housing/Diverse Community

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". Although affordable housing is not equivalent to fair housing, increasing the availability of affordable housing would benefit minority families and persons with disabilities. Therefore, 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 "diverse" communities are therefore viewed by HUD as "affirmatively furthering fair housing actions".

The City of Garland's strategy for addressing housing and neighborhood issues consists of four main objectives – vital neighborhoods, housing diversity, strategic investment, and engaged residents. In regards to housing diversity, changes in demographics has necessitated the provision of diverse housing types. As stated above, Envision Garland 2030 describes the demographic shifts that are occurring in the City and throughout the region. The Comprehensive Plan includes goals and strategies to meet the changing needs of seniors and minorities. These needs include transportation, access to services, employment, and housing needs. One of the goals included in the Comprehensive Plan is the provision of housing and services for residents with unique needs such as senior, persons with disabilities, low- and moderate-income households, and other residents with special needs. According to the Housing and Neighborhood Element of the Comprehensive Plan, seniors typically desire smaller housing units with less maintenance and access to senior services and amenities while minority households with larger families, require larger housing units. The Forest-Jupiter Transit-Oriented Redevelopment Plan also emphasized the growing need for senior housing and affordable housing in light of a growing market with higher employment.

The housing stock in Garland, according to the Comprehensive Plan is traditional with a mix of townhomes, apartments, and condominiums. Data in the Comprehensive Plan shows that approximately 76% of the housing stock consists of single family, duplex, and townhomes and 24% multifamily units. The Comprehensive Plan states that the demographic changes created the need for transit-oriented development, mixed-use, urban communities, and small lot detached residential development. The City views the demographic changes as an opportunity for different types of housing. The changes also encourage the rehabilitation of older housing units and development of infill housing in existing communities.

3. 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 Garland. 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. On the other hand, the HOME Program is 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 have become reliable and important parts of the community development programs for communities throughout the nation, including the City of Garland. 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.

Envision Garland 2030 did not include any specific reference to the CDBG or HOME programs however, the Comprehensive Plan does include a summary of the City's Consolidated Plan and other planning documents that utilize CDBG, HOME, and other public resources to address housing needs. The Forest-Jupiter Transit-Oriented Redevelopment Plan includes implementation strategies to encourage and attract private investment in the area. Some of the financial sources identified for gap financing are CDBG, Section 108 Loan Program, LIHTC, and HUD 221(d)(4) Mortgage Insurance Program.

4. 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 furthering fair housing", Chapter 32, Article III of the Code of Ordinances, Garland's Fair Housing Ordinance (Ordinance 4610, sec.1, adopted 8/4/92; Ordinance 5060, sec. 1., adopted 3/18/97) 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 Fair Housing Ordinance describes discriminatory housing practices, the role of the Fair Housing Administrator, and the process to file a complaint and the penalties for violation.

5. 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; and Section 3 of the HCD Act of 1968.

In regards to 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 multifamily 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 City's Fair Housing Ordinance includes these design features for covered multifamily units.

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.

6. Community Participation in Planning Process

Over 1,700 individuals provided input during the development of the Envision Garland 2030 Comprehensive Plan. Input was gathered from an informal community survey, community visioning workshop, and neighborhoods summits. Over 475 survey responses were received identifying key issues and priorities. There were informational meetings and presentations to community groups and a "Growing the Vision: workshop series. The information about the Comprehensive Plan and meeting information was disseminated utilizing several tools including website, the City's television channel (CGTV), email, displays at City Hall, Main Street Municipal Building, the Carver Center, and libraries, the Garland City Press news publication, and press releases.

The Forest-Jupiter Transit-Oriented Redevelopment Plan was developed with input gathered from three public meetings with residential and business owners, community meetings, and one-on-one interviews with key property owners and potential developers/investors. In all, over 100 property owners, stakeholders, residents, and business owners participated in the planning process.

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 Comprehensive Plan states that the City will actively engage the public and provide forums to get public input. In addition, public participation will be sought in small area planning, capital improvements and services planning, housing and community development planning, and other planning efforts. The City is encouraged to continue with citizen participation activities and include persons from diverse backgrounds that reflect the socio-demographic makeup of the City.

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”. Garland’s Comprehensive Zoning Ordinance, No. 4647, was updated in April 2009 and covers 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 Ordinance relating to residential development reveals that there are six residential districts in the City comprised of single family, duplex, townhouse, and multifamily districts. The residential districts are Single Family (SF-16), Single Family (SF-10), Single Family (SF-7), Duplex (D), Multifamily (MF-12), Multifamily (MF-18), and portions of any Planned Development (PD) which permits residential occupancy. According to the Zoning Ordinance, the minimum requirements established in the single family districts encourage housing variety and protects neighborhood character. Of the six residential districts, three are single family districts with minimum lot sizes ranging from 7,000 square feet to 16,000 square feet lots. The table below is adapted from the Section 15-310 of the Zoning Ordinance, Schedule of Minimum Lot Area for Single Family Districts and Section 17-510, Schedule of Minimum Dwelling Unit Area.

Residential Zoning District	Minimum Lot Area	Minimum Dwelling Unit Area
SF-16	16,000 sq. ft.	1,900 – 2,300 sq. ft.
SF-10	10,000 sq. ft.	1,700 - 2,300 sq. ft.
SF-7	7,000 sq. ft.	900 - 1,700 sq. ft.

The minimum lot area of a lot may be reduced by ten percent in the SF-16 District and by five percent in the SF-10 and SF-7 Districts when the average lot area for the entire subdivision meets the minimum lot areas of Section 15-310.

The Townhouse District (TH) permits the development of attached single family dwelling units. This district accommodates smaller lot sizes of at least 2,000 square foot. The maximum density in the TH district is 12 dwelling units per acre.

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 Zoning Ordinance defines a family as any number of individuals living together as a single housekeeping unit, in which not more than four individuals are unrelated by blood, marriage, or adoption. The City indicated in the questionnaire on public policies and practices that the definition of family in the Zoning Ordinance does not discriminate against unrelated individuals with disabilities who reside in a group living arrangement because of reasonable accommodations that may be granted by the Board of Adjustment to allow persons with disabilities to occupy a single family residence without regard to whether those persons are related.

Senior Living Facilities

The Zoning Ordinance includes two senior living facilities that are classified as residential uses and that serve persons with disabilities and the elderly. The senior living facilities include assisted living facilities and independent senior living facilities, defined as follows:

- **Assisted Living Facility:** An establishment that furnishes, in one or more facilities, food and shelter to four or more persons who are unrelated to the proprietor of the establishment and that provides personal care services as defined by Chapter 247 of the Texas Administrative Code. Personal care services include assistance with meals, dressing, movement, bathing, or other personal needs or maintenance; the administration of medication; or the general supervision or oversight of a person's physical and mental well-being.
- **Independent Senior Living Facility:** A facility containing dwelling units, accessory uses and support services specifically designed for occupancy by persons sixty (60) years of age or older. Such facilities may include accommodations for persons who are fully ambulatory or who require no medical or personal assistance or supervision, as well as accommodations for persons who require only limited or intermittent medical or personal assistance.

Neither assisted living facilities nor independent senior living facilities are permitted by right or as a conditional use in single family districts. Assisted Living Facilities require a special use permit to be cited in the MF-12, MF-18 districts, and Freeway Districts. They are permitted by right in the Health Services, Central Area-1, and Central Area-2 districts. Required parking for assisted living facilities includes one parking space for three units, one parking space for each day staff person, and one parking space per 20 units for guests.

Independent Senior Living Facilities are permitted by right in the MF-12 and MF-18 districts and Central Area-1 and Central Area-2 districts. These facilities require a special use permit in the Health Services and Freeway Districts. In regards to parking requirements, one parking space is required per unit plus an additional space for each day staff person and one parking space for each 20 units for guests.

According to the questionnaire prepared by the City, there are land use classifications for Care of Alcoholic, Drug Dependent or Psychiatric patients, In-Home, Institutionalized and Residential however, these classifications do not apply to facilities for persons with disabilities as defined by the ADA and FHA.

Group Living Facilities

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

The inclusion of multifamily and high density housing in municipal codes typically encourages the development of affordable housing. In Garland, there are two multifamily districts, MF-12 and MF-18. These districts provide

for low and medium density multifamily developments with no more than 12 units per acre for the MF-12 district and 18 units per acre for the MF-18 district. The districts support single family dwelling units as well as multifamily developments including duplexes, triplexes, quadruplexes, apartments, and condominiums. The maximum building height in these districts is 30 feet.

Other Comments

Planned Development District: Section 32 of the Zoning Ordinance provides regulations for Planned Development District (PD). The purpose of this district as stated in the Zoning Ordinance is to promote more efficient use of land and public services, encourage creative and innovative site design, and provide an increased level of amenities and aesthetic enhancement. Each PD is designed according to a detailed site plan and permitted uses are contained within the ordinance written specifically for the PD.

Building Codes and Accessibility: Local jurisdictions such as the City of Garland 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 Garland.

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.

The City of Garland adopted the 2009 edition of the International Building Code with certain changes. Section R320.1 of the Building Code states that accessible dwelling units shall comply with the Texas Accessibility Standards, as applicable. Chapter 32 of the Municipal Code is the City's Fair Housing Ordinance and it addresses accessibility requirements of multifamily dwellings. Covered multifamily dwellings, for first occupancy after March 13, 1991, must have a building entrance on an accessible route in such manner that:

- 1) The public and common use areas of the dwelling are readily accessible to and usable by a handicapped person;
- 2) All the doors designed to allow passage into and within all premises are sufficiently wide to allow passage by a handicapped person in a wheelchair; and
- 3) All premises within a dwelling unit contain the following features of adaptive design:
 - a) An accessible route into and through the dwelling unit;
 - b) Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
 - c) Reinforcements in the bathroom walls to allow later installation of grab bars; and
 - d) Usable kitchens and bathrooms that allow a person in a wheelchair to maneuver about the space.

Off-Street and Handicap Parking: Section 12 of the Zoning Ordinance, Off-Street Parking and Loading Requirements, addresses off-street parking provisions in all zoning districts. In residential districts, required parking must be provided on the site to be served or with City Council approval, parking may be provided off-site within a 600 feet radius of the use. For single family detached units, the parking requirement is two spaces per dwelling unit. Single family attached units require 2.25 spaces per dwelling units. Multifamily units require two spaces per dwelling unit and according to the questionnaire completed by the City, the Zoning Ordinance does not regulate the provision of handicap parking in multifamily developments.

Accessory Structures: The Zoning Ordinance defines an accessory building as a subordinate building containing more than twenty square feet of area and more than four feet in height which is detached from the main building and used for purposes customarily incidental to the residential occupancy of the main building and not involving the conduct of a business or service not normally found in conjunction with the residential use

and not rented as a dwelling unit. The City does not permit accessory buildings to be utilized for habitation. The total floor area of an accessory building should not exceed 30 percent of the floor area of the main building and no less than 600 square feet.

Reasonable Accommodations: The City of Garland adopted Ordinance No. 6283, Reasonable Accommodation from Zoning Ordinance Requirements, in November 2008. Ordinance No.6283 provides a procedure for requesting reasonable accommodations from zoning requirements by persons with disabilities. Reasonable accommodations are granted by the Board of Adjustment if the applicant is disabled per the FHA definition of disability and if the accommodation is reasonable and necessary. According to the City's website, Garland Fair Housing Services has hosted Tenant's Rights and Responsibilities Workshops that cover the procedure for requesting reasonable accommodations however, outside of the Code of Ordinances and the brief update on the aforementioned Tenant workshop, there is not a lot of information on the reasonable accommodations procedure on the City's website and persons with disabilities may be unaware of the policy.

Boards and Commissions: The City of Garland has several boards and commissions that relate to fair housing issues¹⁵. The boards and commissions members are resident volunteers that give input and assist in the functions of the City. Maintaining active boards and commissions allows residents of Garland with diverse backgrounds to have input on the programs and the actions of the City. Some of the City's board include but are not limited to:

Board of Adjustment – The Board of Adjustments is a nine-member board that considers applications for variances to zoning regulations. The Board of Adjustment also hears appeals regarding determinations made by the Zoning Administration and considers actions concerning non-conforming uses.

Community Multicultural Commission – The Community Multicultural Commission researches issues and make recommendations to City Council in regards to Garland's changing demographics and diverse needs.

Housing Standards Board – Issues orders requiring the repair or demolition of dwelling units and/or civil penalties.

Plan Commission – Reviews zoning applications, subdivision plats and site plans, and advises Council regarding comprehensive planning issues.

Parks & Recreation Board – The Parks & Recreation Board advises on acquisitions, maintenance, operation, and use of parks, playgrounds, and open spaces.

Senior Citizens Advisory Commission - Provides advice to the Town Council on issues affecting seniors.

Visitability and Universal Design: The City of Garland's Fair Housing Ordinance includes adaptive design features for covered multifamily dwellings which includes:

- accessible public and common use areas;
- doors that allow passage of a handicapped persons in a wheelchair;
- 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
- 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

¹⁵ Board & Commissions List: <https://www.garlandtx.gov/gov/ab/boards/boardlist.asp>

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*¹⁶ 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.

NIMBYism in the City of Garland

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.

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.

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.

¹⁶ 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 563, 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

Four banks based within the city limits of Garland have been CRA performance ratings between 1990 and 2013. It should be noted that a bank may have been rated more than once during this time period. Two banks were given ratings of “Needs to Improve”, Central Bank in 1990 and United Central Bank in 2012. In the most recent examinations, all four bank examinations received a rating of “Satisfactory.” All examinations and ratings are illustrated below, in alphabetical order, by bank/institution name.

Table 52. FFIEC CRA Performance Ratings – Garland, TX

Exam Date	Bank Name*	City	State	FFIEC CRA Rating	Asset Size (in thousands)
10/9/1990	Central Bank	Garland	TX	Needs to Improve	\$29,873
10/21/1991	Central Bank	Garland	TX	Satisfactory	\$31,892
5/3/1993	Central Bank	Garland	TX	Satisfactory	\$36,460
9/26/1994	Central Bank	Garland	TX	Satisfactory	\$37,382

Exam Date	Bank Name*	City	State	FFIEC CRA Rating	Asset Size (in thousands)
2/8/1999	Security Bank, N.A.	Garland	TX	Satisfactory	\$84,438
1/24/1992	Security Bank, N.A.	Garland	TX	Satisfactory	\$39,476
12/31/1994	Security Bank, N.A.	Garland	TX	Satisfactory	\$51,533
12/14/1992	Texas Bank of Garland	Garland	TX	Satisfactory	\$27,884
3/1/2007	Texas Bank of Garland	Garland	TX	Satisfactory	\$55,746
9/1/2010	Texas Bank of Garland	Garland	TX	Satisfactory	\$91,273
6/1/2005	United Central Bank	Garland	TX	Satisfactory	\$326,910
7/5/2008	United Central Bank	Garland	TX	Satisfactory	\$786,265
1/1/2012	United Central Bank	Garland	TX	Needs to Improve	\$2,569,614
6/1/2013	United Central Bank	Garland	TX	Satisfactory	\$1,852,389
5/6/1996	United Central Bank	Garland	TX	Satisfactory	\$69,048
9/15/1997	United Central Bank	Garland	TX	Satisfactory	\$109,328
8/17/1998	United Central Bank	Garland	TX	Satisfactory	\$139,600
2/3/2003	United Central Bank	Garland	TX	Satisfactory	\$293,366

*Institutions whose physical headquarters are in the City of Garland, TX

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

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 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 Dallas County, Texas. These reports were gathered from the FFIEC for the Census Tracts (or parts) fully or partially within the City of Garland.

Analysis of Impediments to Fair Housing Choice, September 2015
City of Garland, TX

Table 53. 2014 FFIEC Census Report - Summary Census Demographic Information- Garland, TX

Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
313.16	Upper	No	190.73	\$69,100	\$124,055	\$120,603	6399	60.49	3871		
320.0	Upper	No	170.81	\$69,100	\$118,030	\$114,744	6637	44.45	2950	2179	2305
320.11	Upper	No	177.04	\$69,100	\$122,335	\$118,929	5971	49.59	2961	1313	1461
126.01	Moderate	No	69.97	\$69,100	\$48,349	\$47,008	5734	88.72	5087	718	1063
126.04	Moderate	No	52.93	\$69,100	\$36,575	\$35,558	5348	78.76	4212	332	661
127.01	Moderate	No	59.93	\$69,100	\$41,412	\$40,259	6128	75.13	4604	1231	1611
130.10	Low	No	47.12	\$69,100	\$32,560	\$31,658	4388	81.52	3577	290	441
178.08	Middle	No	114.9	\$69,100	\$79,396	\$77,188	4600	47.09	2166	1219	1530
181.05	Moderate	No	54.51	\$69,100	\$37,666	\$36,620	6086	76.75	4671	1086	1661
181.10	Upper	No	130.68	\$69,100	\$90,300	\$87,788	4813	21.77	1048	1606	1783
181.11	Middle	No	82.51	\$69,100	\$57,014	\$55,428	6610	66.94	4425	1292	1789
181.18	Middle	No	81.7	\$69,100	\$56,455	\$54,888	7493	64.23	4813	1281	1929
181.20	Middle	No	104.92	\$69,100	\$72,500	\$70,482	4668	62.38	2912	1166	1505
181.21	Moderate	No	74.3	\$69,100	\$51,341	\$49,914	5294	70.44	3729	1103	1601
181.22	Upper	No	132.38	\$69,100	\$91,475	\$88,929	13028	38.32	4992	3248	3738
181.23	Middle	No	103.18	\$69,100	\$71,297	\$69,313	8497	57.79	4910	2086	2477
181.24	Upper	No	140.4	\$69,100	\$97,016	\$94,318	17151	42.74	7330	4274	5193

Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
181.26	Middle	No	100.62	\$69,100	\$69,528	\$67,596	6536	59.13	3865	1692	2136
181.27	Middle	No	86.92	\$69,100	\$60,062	\$58,393	3179	67.51	2146	573	806
181.28	Moderate	No	74.75	\$69,100	\$51,652	\$50,218	5577	71.1	3965	955	1482
181.29	Upper	No	120.18	\$69,100	\$83,044	\$80,734	4536	43.23	1961	942	1246
181.30	Moderate	No	75.07	\$69,100	\$51,873	\$50,431	4152	64.35	2672	506	908
181.32	Middle	No	101.64	\$69,100	\$70,233	\$68,281	5097	52.38	2670	1334	1654
181.37	Upper	No	128.64	\$69,100	\$88,890	\$86,417	4031	58.37	2353	928	1092
181.38	Middle	No	82.06	\$69,100	\$56,703	\$55,125	4076	64.4	2625	393	793
181.39	Upper	No	135.67	\$69,100	\$93,748	\$91,138	7096	45.36	3219	1840	2211
181.41	Moderate	No	61.05	\$69,100	\$42,186	\$41,016	3830	45.9	1758	200	487
181.42	Middle	No	96.17	\$69,100	\$66,453	\$64,606	3287	55.22	1815	893	1032
182.03	Moderate	No	72.82	\$69,100	\$50,319	\$48,922	6463	85.24	5509	1346	1810
182.04	Low	No	46.52	\$69,100	\$32,145	\$31,250	4712	95.65	4507	685	1195
182.05	Moderate	No	53.48	\$69,100	\$36,955	\$35,929	4564	82.25	3754	615	884
182.06	Moderate	No	62.56	\$69,100	\$43,229	\$42,031	4683	79.18	3708	859	1266
183.00	Moderate	No	73.55	\$69,100	\$50,823	\$49,412	7232	66.73	4826	1399	2109
184.01	Moderate	No	70.17	\$69,100	\$48,487	\$47,143	4731	66.46	3144	852	1286
184.02	Middle	No	96.96	\$69,100	\$66,999	\$65,139	3993	44.1	1761	981	1253
184.03	Moderate	No	63.12	\$69,100	\$43,616	\$42,404	920	75.33	693	0	111
185.01	Moderate	No	78.71	\$69,100	\$54,389	\$52,875	3709	63.41	2352	771	1202
185.06	Low	No	42.39	\$69,100	\$29,291	\$28,476	3265	93.29	3046	13	107

Analysis of Impediments to Fair Housing Choice, September 2015
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Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
186.00	Middle	No	80.81	\$69,100	\$55,840	\$54,286	3531	41.97	1482	1054	1313
187.00	Moderate	No	56.5	\$69,100	\$39,042	\$37,955	6523	75.55	4928	1082	1688
188.01	Middle	No	84.2	\$69,100	\$58,182	\$56,563	4301	65.89	2834	1118	1448
188.02	Moderate	No	58.83	\$69,100	\$40,652	\$39,524	835	55.33	462	172	270
189.00	Moderate	No	67.94	\$69,100	\$46,947	\$45,645	6155	71.75	4416	1081	1876
190.04	Middle	No	85.44	\$69,100	\$59,039	\$57,396	6611	67.57	4467	1355	1934
190.13	Low	No	36.15	\$69,100	\$24,980	\$24,286	5510	94.1	5185	0	154
190.14	Middle	No	81.42	\$69,100	\$56,261	\$54,694	6971	77.49	5402	1336	1766
190.20	Middle	No	108.74	\$69,100	\$75,139	\$73,048	5046	56.72	2862	1275	1444
190.21	Middle	No	80.68	\$69,100	\$55,750	\$54,201	7050	61.53	4338	1535	1928
190.24	Middle	No	112.92	\$69,100	\$78,028	\$75,859	4118	53.64	2209	1120	1402
190.25	Middle	No	119.72	\$69,100	\$82,727	\$80,427	4967	48.12	2390	1450	1689
190.26	Middle	No	95.69	\$69,100	\$66,122	\$64,286	5406	43.08	2329	1643	1827
190.27	Moderate	No	65.89	\$69,100	\$45,530	\$44,267	4950	66.51	3292	897	955
190.28	Middle	No	91.56	\$69,100	\$63,268	\$61,506	3690	64.85	2393	975	1079
190.29	Middle	No	81.75	\$69,100	\$56,489	\$54,921	5905	60.88	3595	1489	1951
190.31	Upper	No	135.02	\$69,100	\$93,299	\$90,701	6186	36	2227	1789	2081

Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
190.32	Moderate	No	69.11	\$69,100	\$47,755	\$46,429	4178	82.46	3445	758	983
190.33	Moderate	No	51.26	\$69,100	\$35,421	\$34,439	4565	83.72	3822	587	837
190.39	Middle	No	87.88	\$69,100	\$60,725	\$59,034	6562	53.49	3510	1307	1857
190.42	Upper	No	136.11	\$69,100	\$94,052	\$91,435	4527	48.73	2206	975	1175
190.43	Upper	No	158.13	\$69,100	\$109,268	\$106,227	7728	25.75	1990	2397	2487
401.02	Upper	No	148.75	\$69,100	\$102,786	\$99,926	6716	21.9	1471	2084	2234

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

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Analysis of Impediments to Fair Housing Choice, September 2015
 City of Garland, TX

Table 54. 2014 FFIEC Census Report - Summary Census Income Information – Garland, TX

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
313.16	Upper	\$67,175	\$69,100	6.06	179.53	\$120,603	\$124,055	\$112,453
320.09	Upper	\$67,175	\$69,100	0.58	170.81	\$114,744	\$118,030	\$111,910
320.11	Upper	\$67,175	\$69,100	0.46	177.04	\$118,929	\$122,335	\$81,250
126.01	Moderate	\$67,175	\$69,100	16.98	69.97	\$47,008	\$48,349	\$41,082
126.04	Moderate	\$67,175	\$69,100	22.67	52.93	\$35,558	\$36,575	\$34,011
127.01	Moderate	\$67,175	\$69,100	24.56	59.93	\$40,259	\$41,412	\$35,716
130.10	Low	\$67,175	\$69,100	23.22	47.12	\$31,658	\$32,560	\$30,640
178.08	Middle	\$67,175	\$69,100	5.26	114.9	\$77,188	\$79,396	\$70,134
181.05	Moderate	\$67,175	\$69,100	22.38	54.51	\$36,620	\$37,666	\$38,773
181.1	Upper	\$67,175	\$69,100	3.27	130.68	\$87,788	\$90,300	\$78,155
181.11	Middle	\$67,175	\$69,100	12.07	82.51	\$55,428	\$57,014	\$57,075
181.18	Middle	\$67,175	\$69,100	9.2	81.7	\$54,888	\$56,455	\$57,301
181.2	Middle	\$67,175	\$69,100	4.89	104.92	\$70,482	\$72,500	\$68,006
181.21	Moderate	\$67,175	\$69,100	9.4	74.3	\$49,914	\$51,341	\$49,434
181.22	Upper	\$67,175	\$69,100	7.05	132.38	\$88,929	\$91,475	\$84,330
181.23	Middle	\$67,175	\$69,100	5.7	103.18	\$69,313	\$71,297	\$65,492
181.24	Upper	\$67,175	\$69,100	2.26	140.4	\$94,318	\$97,016	\$84,969
181.26	Middle	\$67,175	\$69,100	7.79	100.62	\$67,596	\$69,528	\$58,308
181.27	Middle	\$67,175	\$69,100	7.73	86.92	\$58,393	\$60,062	\$50,000
181.28	Moderate	\$67,175	\$69,100	16.94	74.75	\$50,218	\$51,652	\$44,821
181.29	Upper	\$67,175	\$69,100	2.95	120.18	\$80,734	\$83,044	\$55,385
181.3	Moderate	\$67,175	\$69,100	16.47	75.07	\$50,431	\$51,873	\$43,281
181.32	Middle	\$67,175	\$69,100	7.3	101.64	\$68,281	\$70,233	\$62,589
181.37	Upper	\$67,175	\$69,100	1.43	128.64	\$86,417	\$88,890	\$73,400

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
181.38	Middle	\$67,175	\$69,100	13.14	82.06	\$55,125	\$56,703	\$47,144
181.39	Upper	\$67,175	\$69,100	0.12	135.67	\$91,138	\$93,748	\$90,080
181.41	Moderate	\$67,175	\$69,100	24.69	61.05	\$41,016	\$42,186	\$33,441
181.42	Middle	\$67,175	\$69,100	3.91	96.17	\$64,606	\$66,453	\$63,134
182.03	Moderate	\$67,175	\$69,100	16.66	72.82	\$48,922	\$50,319	\$48,772
182.04	Low	\$67,175	\$69,100	35.06	46.52	\$31,250	\$32,145	\$33,275
182.05	Moderate	\$67,175	\$69,100	26.88	53.48	\$35,929	\$36,955	\$38,153
182.06	Moderate	\$67,175	\$69,100	19.28	62.56	\$42,031	\$43,229	\$41,816
183	Moderate	\$67,175	\$69,100	16.32	73.55	\$49,412	\$50,823	\$41,740
184.01	Moderate	\$67,175	\$69,100	14.96	70.17	\$47,143	\$48,487	\$47,581
184.02	Middle	\$67,175	\$69,100	26.52	96.96	\$65,139	\$66,999	\$48,672
184.03	Moderate	\$67,175	\$69,100	20.19	63.12	\$42,404	\$43,616	\$29,338
185.01	Moderate	\$67,175	\$69,100	20.46	78.71	\$52,875	\$54,389	\$49,324
185.06	Low	\$67,175	\$69,100	26.85	42.39	\$28,476	\$29,291	\$32,876
186	Middle	\$67,175	\$69,100	9.17	80.81	\$54,286	\$55,840	\$51,579
187	Moderate	\$67,175	\$69,100	19.51	56.5	\$37,955	\$39,042	\$37,807
188.01	Middle	\$67,175	\$69,100	5.75	84.2	\$56,563	\$58,182	\$49,028
188.02	Moderate	\$67,175	\$69,100	37.53	58.83	\$39,524	\$40,652	\$37,311
189	Moderate	\$67,175	\$69,100	16.26	67.94	\$45,645	\$46,947	\$46,142
190.04	Middle	\$67,175	\$69,100	11.4	85.44	\$57,396	\$59,039	\$49,851
190.13	Low	\$67,175	\$69,100	39.82	36.15	\$24,286	\$24,980	\$25,221
190.14	Middle	\$67,175	\$69,100	11.76	81.42	\$54,694	\$56,261	\$52,530
190.2	Middle	\$67,175	\$69,100	3.46	108.74	\$73,048	\$75,139	\$54,531
190.21	Middle	\$67,175	\$69,100	13.98	80.68	\$54,201	\$55,750	\$50,479
190.24	Middle	\$67,175	\$69,100	7.22	112.92	\$75,859	\$78,028	\$75,859
190.25	Middle	\$67,175	\$69,100	4.37	119.72	\$80,427	\$82,727	\$80,716
190.26	Middle	\$67,175	\$69,100	11.72	95.69	\$64,286	\$66,122	\$54,173
190.27	Moderate	\$67,175	\$69,100	13.1	65.89	\$44,267	\$45,530	\$42,356
190.28	Middle	\$67,175	\$69,100	11.41	91.56	\$61,506	\$63,268	\$53,621
190.29	Middle	\$67,175	\$69,100	10.48	81.75	\$54,921	\$56,489	\$52,574

Analysis of Impediments to Fair Housing Choice, September 2015
 City of Garland, TX

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
190.31	Upper	\$67,175	\$69,100	1.69	135.02	\$90,701	\$93,299	\$84,097
190.32	Moderate	\$67,175	\$69,100	27.88	69.11	\$46,429	\$47,755	\$45,436
190.33	Moderate	\$67,175	\$69,100	33.95	51.26	\$34,439	\$35,421	\$32,577
190.39	Middle	\$67,175	\$69,100	13.76	87.88	\$59,034	\$60,725	\$55,653
190.42	Upper	\$67,175	\$69,100	4.49	136.11	\$91,435	\$94,052	\$71,643
190.43	Upper	\$67,175	\$69,100	2.85	158.13	\$106,227	\$109,268	\$102,215
401.02	Upper	\$67,175	\$69,100	3.33	148.75	\$99,926	\$102,786	\$88,043

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

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Table 55. 2014 FFIEC Census Report - Summary Census Population Information – Garland, TX

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp. White Pop.	Tract Minority Pop.	American Indian Pop.	Asian/Hawaiian/Pacific Islander Pop.	Black Pop.	Hispanic Population	Other Population/ Two or More Races
313.16	6399	60.49	1608	1809	2528	3871	29	2597	666	370	209
320.09	6637	44.45	2035	2492	3687	2950	7	2004	375	406	158
320.11	5971	49.59	1286	2205	3010	2961	18	1991	453	372	127
126.01	5734	88.72	1079	1661	647	5087	11	651	975	3415	35
126.04	5348	78.76	1272	2393	1136	4212	8	290	1722	2114	78
127.01	6128	75.13	1262	1845	1524	4604	37	134	479	3881	73
130.10	4388	81.52	1050	1740	811	3577	12	51	1051	2418	45
178.08	4600	47.09	1227	1669	2434	2166	14	302	744	1015	91
181.05	6086	76.75	1302	1598	1415	4671	20	47	699	3865	40
181.10	4813	21.77	1425	1859	3765	1048	19	138	383	458	50
181.11	6610	66.94	1665	1955	2185	4425	15	154	1683	2462	111
181.18	7493	64.23	1976	2355	2680	4813	28	1056	1835	1739	155
181.20	4668	62.38	1154	1371	1756	2912	16	790	867	1164	75
181.21	5294	70.44	1358	1557	1565	3729	31	379	872	2373	74
181.22	13028	38.32	3134	3623	8036	4992	95	1363	986	2276	272
181.23	8497	57.79	1845	2426	3587	4910	29	1553	1247	1926	155
181.24	17151	42.74	4020	4717	9821	7330	79	1187	2760	2977	327
181.26	6536	59.13	1442	2003	2671	3865	34	130	1192	2431	78
181.27	3179	67.51	722	946	1033	2146	23	51	289	1756	27
181.28	5577	71.1	1384	1919	1612	3965	21	229	1460	2156	99
181.29	4536	43.23	1079	1828	2575	1961	11	193	639	1063	55
181.30	4152	64.35	976	1752	1480	2672	16	99	1495	1001	61

Analysis of Impediments to Fair Housing Choice, September 2015
 City of Garland, TX

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp. White Pop.	Tract Minority Pop.	American Indian Pop.	Asian/Hawaiian/Pacific Islander Pop.	Black Pop.	Hispanic Population	Other Population/Two or More Races
181.32	5097	52.38	1394	1707	2427	2670	14	277	1073	1185	121
181.37	4031	58.37	925	1350	1678	2353	22	628	925	702	76
181.38	4076	64.4	982	1709	1451	2625	31	388	1226	898	82
181.39	7096	45.36	1591	1953	3877	3219	24	871	924	1258	142
181.41	3830	45.9	659	1717	2072	1758	18	62	733	862	83
181.42	3287	55.22	873	1121	1472	1815	5	174	776	780	80
182.03	6463	85.24	1414	1704	954	5509	10	490	1594	3328	87
182.04	4712	95.65	1032	1097	205	4507	11	18	790	3654	34
182.05	4564	82.25	1121	1291	810	3754	10	249	547	2901	47
182.06	4683	79.18	1110	1195	975	3708	10	22	301	3334	41
183	7232	66.73	1334	1969	2406	4826	24	35	386	4297	84
184.01	4731	66.46	1148	1490	1587	3144	12	76	461	2556	39
184.02	3993	44.1	1052	1346	2232	1761	20	49	275	1362	55
184.03	920	75.33	131	449	227	693	2	7	242	425	17
185.01	3709	63.41	859	1115	1357	2352	28	57	292	1912	63
185.06	3265	93.29	742	1351	219	3046	9	34	1390	1578	35
186	3531	41.97	898	1294	2049	1482	11	28	215	1173	55
187	6523	75.55	1448	1870	1595	4928	18	19	344	4499	48
188.01	4301	65.89	997	1354	1467	2834	23	243	329	2179	60
188.02	835	55.33	152	285	373	462	4	26	84	335	13
189	6155	71.75	1556	1879	1739	4416	31	829	644	2780	132
190.04	6611	67.57	1647	2208	2144	4467	15	1079	890	2362	121
190.13	5510	94.1	1238	1652	325	5185	7	474	499	4146	59

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp. White Pop.	Tract Minority Pop.	American Indian Pop.	Asian/Hawaiian/Pacific Islander Pop.	Black Pop.	Hispanic Population	Other Population/ Two or More Races
190.14	6971	77.49	1590	1997	1569	5402	16	1048	858	3379	101
190.2	5046	56.72	1426	2164	2184	2862	18	1244	590	891	119
190.21	7050	61.53	1635	2239	2712	4338	31	865	958	2343	141
190.24	4118	53.64	1160	1416	1909	2209	10	870	688	574	67
190.25	4967	48.12	1450	1689	2577	2390	20	826	760	670	114
190.26	5406	43.08	1498	1979	3077	2329	21	754	569	909	76
190.27	4950	66.51	1195	1863	1658	3292	19	1428	925	793	127
190.28	3690	64.85	933	1204	1297	2393	5	686	600	1009	93
190.29	5905	60.88	1442	2099	2310	3595	19	1083	1110	1272	111
190.31	6186	36	1757	2281	3959	2227	20	582	579	888	158
190.32	4178	82.46	928	1121	733	3445	9	604	259	2523	50
190.33	4565	83.72	828	1051	743	3822	15	476	295	2977	59
190.39	6562	53.49	1616	2133	3052	3510	16	718	746	1903	127
190.42	4527	48.73	1223	1758	2321	2206	8	917	565	617	99
190.43	7728	25.75	2121	2447	5738	1990	24	832	440	588	106
401.02	6716	21.9	1744	2176	5245	1471	32	167	390	776	106

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

Analysis of Impediments to Fair Housing Choice, June 2015
 City of Garland, TX

Table 56. 2014 FFIEC Census Report - Summary Census Housing Information – Garland, TX

Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4-Family Units	Renter Occupied Units
313.16	1889	1879	10	Yes	1768	80	1768	41
320.09	2670	2305	18	Yes	2179	178	2179	313
320.11	2320	1461	11	Yes	1313	115	1313	892
126.01	1976	1063	28	Yes	718	315	718	943
126.04	2798	661	27	Yes	332	405	332	2061
127.01	2076	1611	53	Yes	1231	231	1219	614
130.10	2027	441	28	Yes	290	287	290	1450
178.08	1829	1530	25	Yes	1219	160	1219	450
181.05	1698	1661	42	No	1086	100	1086	512
181.1	1971	1783	29	Yes	1606	112	1606	253
181.11	2121	1789	35	No	1292	166	1292	663
181.18	2535	1929	29	Yes	1281	180	1281	1074
181.2	1516	1505	20	No	1166	145	1166	205
181.21	1609	1601	33	No	1103	52	1095	454
181.22	3738	3738	10	No	3248	115	3248	375
181.23	2658	2477	23	No	2086	232	2064	340
181.24	5193	5193	10	Yes	4274	476	4274	443
181.26	2232	2136	35	Yes	1692	229	1692	311
181.27	1001	806	41	Yes	573	55	573	373
181.28	2141	1482	31	No	955	222	892	964
181.29	1941	1246	25	Yes	942	113	910	886
181.3	2079	908	24	Yes	506	327	506	1246
181.32	1745	1654	33	Yes	1334	38	1334	373
181.37	1733	1092	23	Yes	928	383	928	422
181.38	1873	793	25	No	393	164	393	1316
181.39	2211	2211	19	No	1840	258	1840	113
181.41	2171	487	27	Yes	200	454	137	1517
181.42	1155	1032	26	Yes	893	34	893	228

Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4-Family Units	Renter Occupied Units
182.03	1825	1810	20	No	1346	121	1331	358
182.04	1195	1195	45	No	685	98	685	412
182.05	1429	884	26	No	615	138	615	676
182.06	1272	1266	53	No	859	77	859	336
183	2238	2109	54	No	1399	269	1399	570
184.01	1640	1286	40	No	852	150	852	638
184.02	1457	1253	43	No	981	111	981	365
184.03	498	111	27	No	0	49	0	449
185.01	1234	1202	47	No	771	119	771	344
185.06	1779	107	31	Yes	13	428	0	1338
186	1438	1313	54	No	1054	144	1054	240
187	2095	1688	53	No	1082	225	1082	788
188.01	1448	1448	51	No	1118	94	1118	236
188.02	336	270	56	No	172	51	172	113
189	2021	1876	41	No	1081	142	1081	798
190.04	2263	1934	41	No	1355	55	1316	853
190.13	1783	154	42	No	0	131	0	1652
190.14	2168	1766	35	No	1336	171	1336	661
190.2	2369	1444	24	No	1275	205	1272	889
190.21	2381	1928	34	No	1535	142	1535	704
190.24	1457	1402	0	Yes	1120	41	1100	296
190.25	1689	1689	26	No	1450	0	1450	239
190.26	2021	1827	32	No	1643	42	1643	336
190.27	1909	955	19	No	897	46	844	966
190.28	1236	1079	34	No	975	32	975	229
190.29	2237	1951	31	No	1489	138	1475	610
190.31	2317	2081	32	Yes	1789	36	1789	492
190.32	1197	983	41	No	758	76	758	363
190.33	1236	837	42	No	587	185	576	464
190.39	2292	1857	36	Yes	1307	159	1307	826
190.42	1801	1175	15	Yes	975	43	975	783
190.43	2487	2487	19	Yes	2397	40	2397	50
401.02	2234	2234	13	Yes	2084	58	2084	92

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

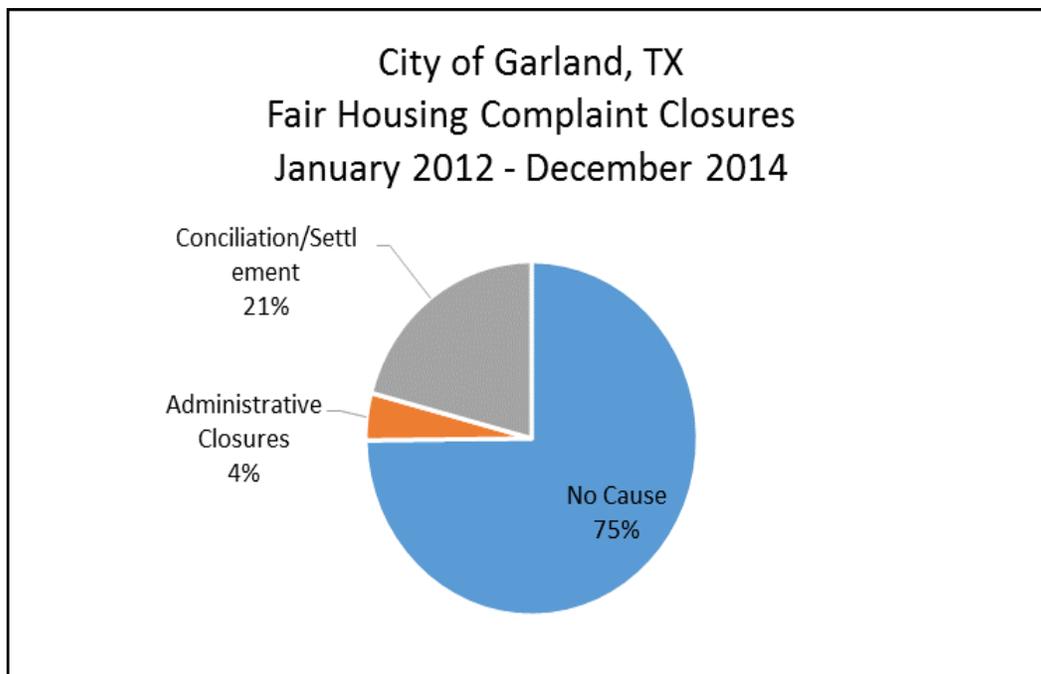
Fair Housing Complaint Data

The Garland Housing Services participated in the HUD Fair Housing Assistance Program (FHAP) meaning that HUD has found the Garland Fair Housing Ordinance is substantially equivalent to the Fair Housing Act.

Garland Fair Housing Services is responsible for educating residents on the fair housing laws and their rights. Garland Fair Housing Services also conducts investigations, conciliation, and resolution services. Residents of Garland can report discrimination by submitting a Housing Discrimination Report Form online at www.ci.garland.tx.us, by calling 972-205-3300, or by visiting the office of 210 Carver Drive, Suite 102A, Garland, TX, 75040.

During the period January 1, 2012 through December 31, 2014, the Office of Fair Housing & Equal Opportunity reported 137 fair housing cases filed by HUD and 5 open cases at the beginning of the three-year period. A total of 139 cases were closed and of the 139 cases, 104 (74.8%) were determined to have no cause, 6 (4.3%) were closed administratively, and 29 (20.9%) were conciliated/settled. The total compensation to claimants was \$8,907. At the end of 2014, 3 cases remained open. Figure 9 shows the breakdown of fair housing complaint closures and Table 57 provides the details on the fair housing cases in Garland.

Figure 9. Fair Housing Complaint Closures – Garland, TX



Analysis of Impediments to Fair Housing Choice, June 2015
 City of Garland, TX

Table 57. Garland Fair Housing Case Inventory from 01/01/2012 to 12/31/2014

Garland Fair Housing Cases	No. of cases
ON-HAND BEGINNING OF PERIOD	5
FILED BY HUD	137
REACTIVATED BY HUD	0
CLOSURES BY AGENCY:	
NO CAUSE	104
ADMINISTRATIVE CLOSURES	6
CONCILIATION/SETTLEMENT	29
UNSUCCESSFUL CONCILIATION*	0
JUDICIAL CONSENT ORDERS	0
JUDICIAL DISMISSALS	0
LITIGATION - DISCRIM. FOUND	0
LITIGATION - NO DISCRIM. FOUND	0
HEARING - DISCRIM. FOUND	0
HEARING - NO DISCRIM. FOUND	0
TOTAL CLOSURES BY AGENCY	139
RELIEF – HOUSING	3
RELIEF – OTHER	24
TOTAL COMPENSATION	\$8,907
OPEN END OF PERIOD	3
31 - 100 DAYS OLD	1
OVER 100 DAYS OLD	0
CAUSE DETERMINATIONS	0

Source: *Office of Fair Housing and Equal Opportunity*

* Applies only to closures prior to certification.

The North Texas Fair Housing Center (NTFHC) is a regional fair housing agency that serves the Garland area. The agency would file fair housing cases with HUD. Any such cases in Garland would be assigned by HUD to the GFHS for investigation and action. Only one Garland case has been referred by NTFHC in the past three years.

Garland 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 or sexual orientation. 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.

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 Garland. Incidents are reported by number of incidents per bias motivation based on the protected classes of race, religion, sexual orientation, ethnicity, disability, gender, and gender identity. There were a total of 17 hate crimes in Garland between 2009 and 2013. The details on each crime is provided below in Table 58. Of the 17 hate crimes, ethnicity and race were the most dominant cases of bias with 9 incidents (53%) and 5 incidents (29%), respectively.

Table 58. Hate Crime Incidents 2009-2013 – Garland, TX

Year	Number of Incidents per bias motivation							Total
	Race	Religion	Sexual Orientation	Ethnicity	Disability	Gender	Gender Identity	
2009	2	0	0	0	0	0	0	2
2010	1	0	0	0	1	0	0	1
2011	2	1	0	9	0	0	0	12
2012	0	0	0	0	0	0	0	0
2013	1	0	1	0	0	0	0	2
Total	5	1	1	9	1	0	0	17

Source: Federal Bureau of Investigation

Legal Cases

As part of the fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues in the City of Garland. 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 shift 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.

On June 25, 2015, the U.S. Supreme Court upheld the disparate impact standard in the legal case of the Texas Department of Housing and Community Affairs v. Inclusive Communities Project (discussed below) which challenged whether disparate impact claims are cognizable under the FHA. The Court ruled that a plaintiff may establish a *prima facie* case under the FHA on the basis of statistical evidence that a government policy results in a disparate impact, without having to offer proof that the discriminatory effect was intentional.

The TDCHA v. ICP case was the third time this matter was 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 Mach 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 based on the following questions:

- 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? ¹⁷

The case was heard by the Supreme Court on January 21, 2015. In his response for the 5-4 majority, Justice Kennedy referenced “*zoning laws and other housing restrictions that function unfairly to exclude minorities from certain neighborhoods without sufficient justification.*” The Supreme Court ruling

¹⁷ Petition of Writ of Certiorari filed by TDCHA (May 13, 2014)

reverses the burden of proof in challenging the substance of a land use regulation or other law in bringing an FHA claim.

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 Garland. 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 Garland 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

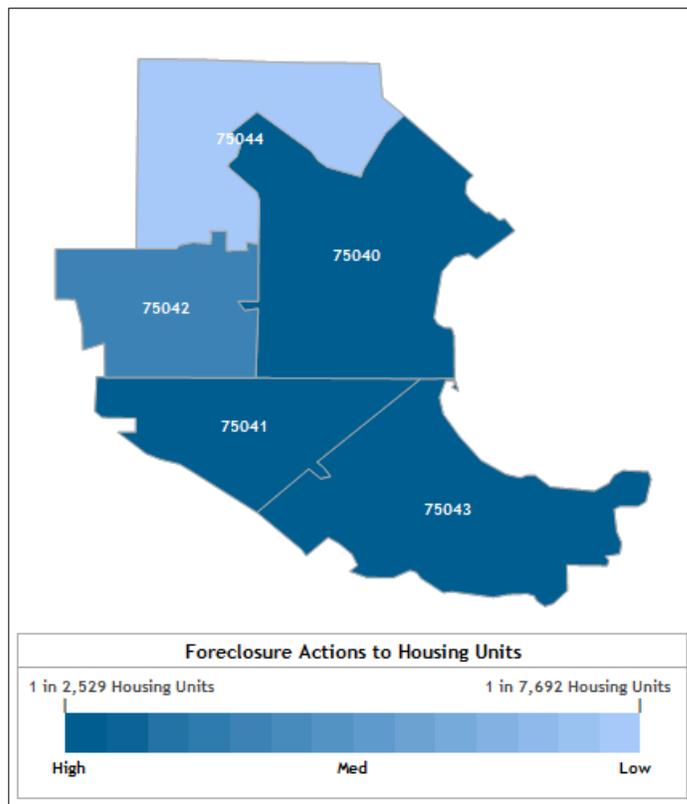
housing issues, REO, short sales, and other areas, and provide \$250,000 to NFHA and its partners to hold seminars on foreclosures and REOs in certain communities.

Wells Fargo also had to provide \$27million 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 Garland that is party to the Agreement is the North Texas Fair Housing Center (NTFHC).

Foreclosure Data

For analysis of foreclosure impacts in Garland, 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 RealtyTrac data for Garland was available for zip codes 75040, 75041, 75042, 75043, and 75044. The information from RealtyTrac represents current data for a snapshot in time (one calendar month), as of December 2014.

Figure 10. Foreclosure Action by Zip Code – Garland, TX

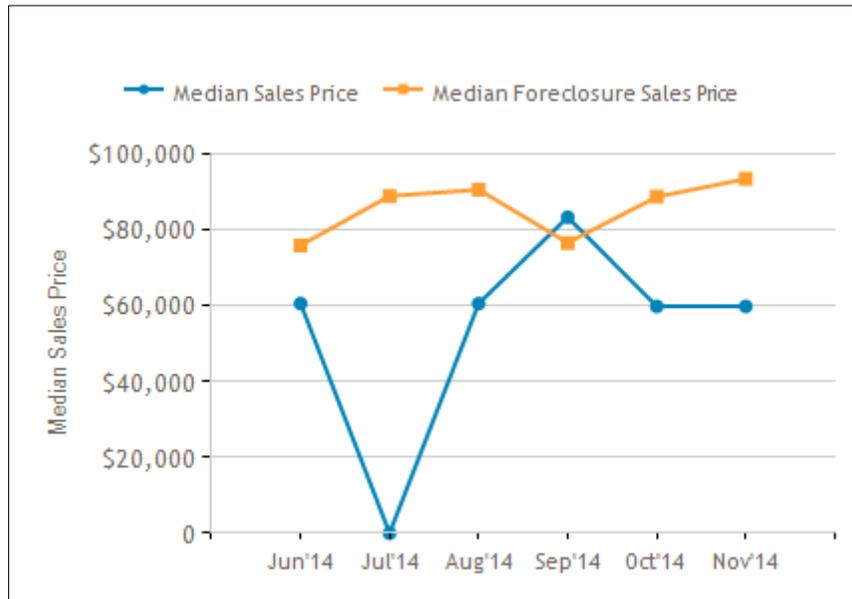


Source: RealtyTrac, 2014

According to RealtyTrac, in December 2014, the number of properties that received a foreclosure filing in Garland was 59% lower than the previous month and 20% lower than the same time last year. Home sales for November 2014 were down 50% compared with the previous month, and down 29% compared with a year ago. The median sales price of a non-distressed home was \$59,750. The median sales price of a foreclosure home was \$93,320, or 56% higher than non-distressed home sales.

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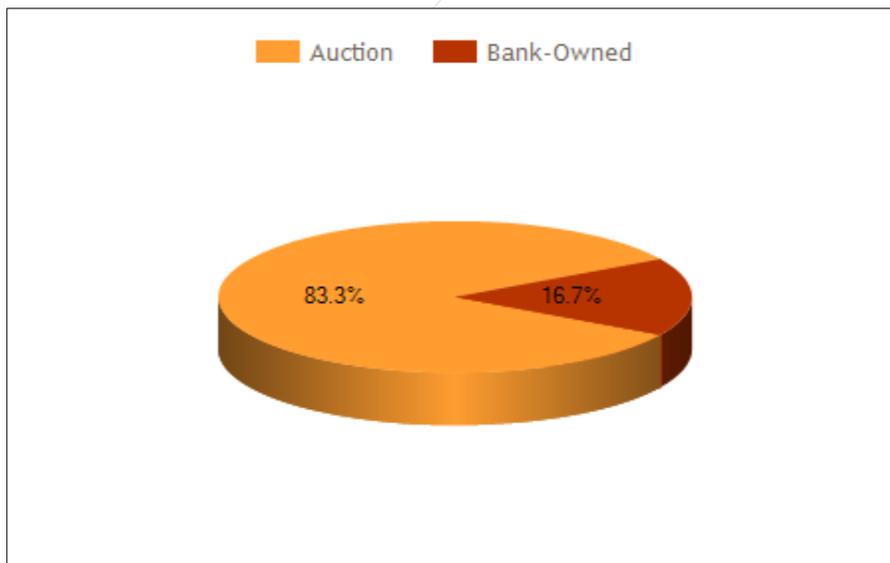
Figure 11. 2014 Median Sales Price – Garland, TX



Source: RealtyTrac, 2014

According to RealtyTrac, there are currently 287 properties in Garland that are in some stage of foreclosure (default, auction or bank owned) while the number of homes listed for sale on RealtyTrac is 177. RealtyTrac shows 83.3% of foreclosed properties in auction status and 16.7% as bank-owned.

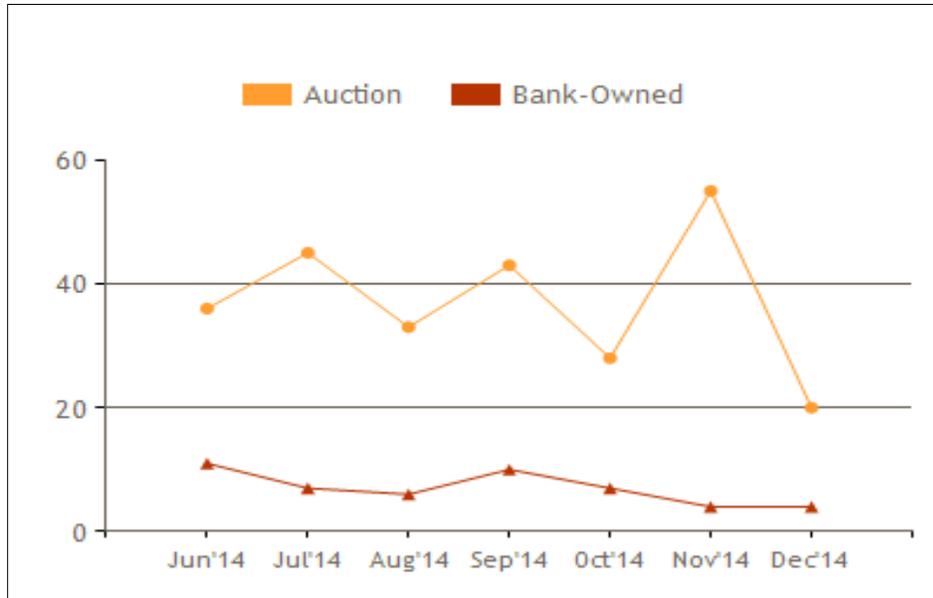
Figure 12. November 2014 Distribution of Foreclosure Type - Garland, TX



Source: RealtyTrac, 2014

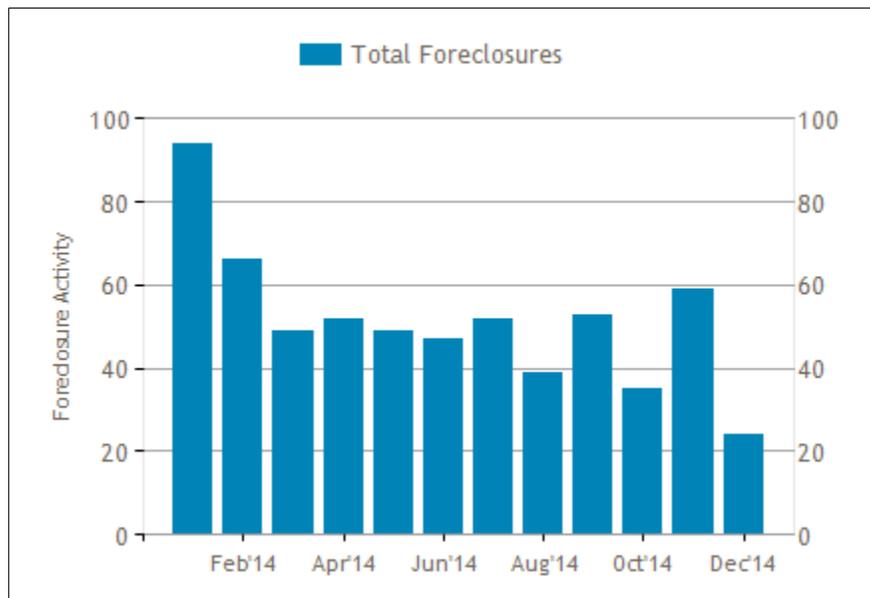
The following figures illustrate the trend in foreclosure filings and sales in Garland over the last year. During 2014, the number of foreclosure filings was highest in January 2014 and has fluctuated between February and October 2014 with a spike in November 2014 due to a significant increase in the number of foreclosed properties in auction status in that month.

Figure 13. Foreclosure Filings - Garland, TX



Source: RealtyTrac, 2014

Figure 14. Total Foreclosure Activity - Garland, TX



Source: RealtyTrac, 2014

The following table compares home sales and median sales price in nearby cities. Like the surrounding communities, home sales in Garland was down in November 2014 by 29% from the previous year. The median list price for a Garland home as of November 2014 was \$136,495 which was 4% higher than the same time the previous year. The median sales price in Garland remained steady at \$59,750, the November 2013 price. Median foreclosure sales prices increased by 5%, to \$93,320 since November 2013. Over 2,200 properties recently sold in Garland.

Analysis of Impediments to Fair Housing Choice, June 2015
 City of Garland, TX

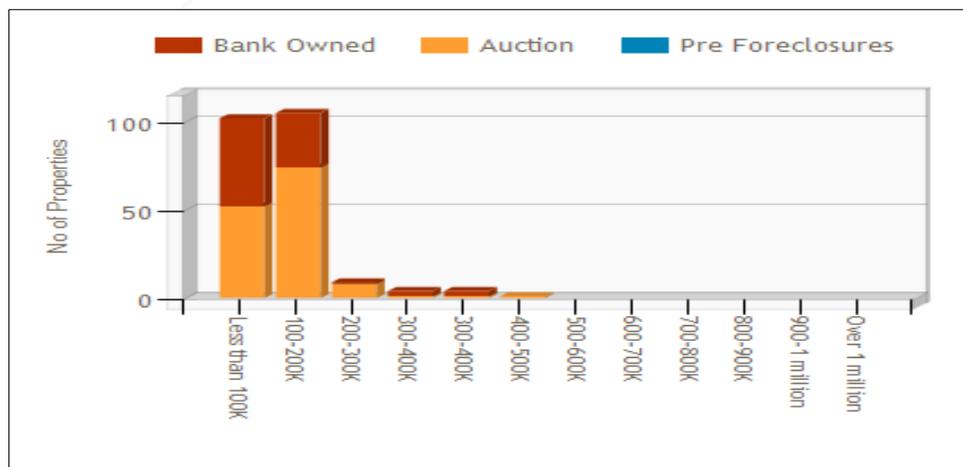
Table 59. Surrounding Area Home Sales and Median Sales Prices

	Nov 2014 Total Sales (change from prior year)	Median Sales Price (change from prior year)
Dallas	986 Down 18.6%	\$40,000 Up 53.8%
Plano	212 Down 6.6%	Data not available
McKinney	185 Down 15.9%	Data not available
Mesquite	129 Down 20.9%	\$43,278 Down 37.6%
Frisco	124 Down 17.3%	Data not available
Rockwall	95 Down 39.1%	Data not available
Irving	90 Down 41.6%	Data not available
Richardson	85 Down 7.6%	Data not available
Allen	73 Down 19.8%	Data not available
Carrollton	70 Down 31.4%	Data not available

Source: RealtyTrac, 2014

RealtyTrac reports on the number of properties available per price, square footage, number of bedrooms, and year built. The following charts show the highest availability of properties by these four factors. RealtyTrac reports that of the 287 Garland properties in some stage of foreclosure, the highest availability rate occurs in the \$100,000 - \$200,000 price range (105 properties). Based on square footage, the highest availability occurs with properties that are between 1,200-1,399 square feet (44 properties). Three-bedroom homes have the highest availability with 141 properties, and properties built between 1970 and 179 (82 properties).

Figure 15. Number of Foreclosure Properties Available Per Estimated Market Dec 2014 - Garland, TX



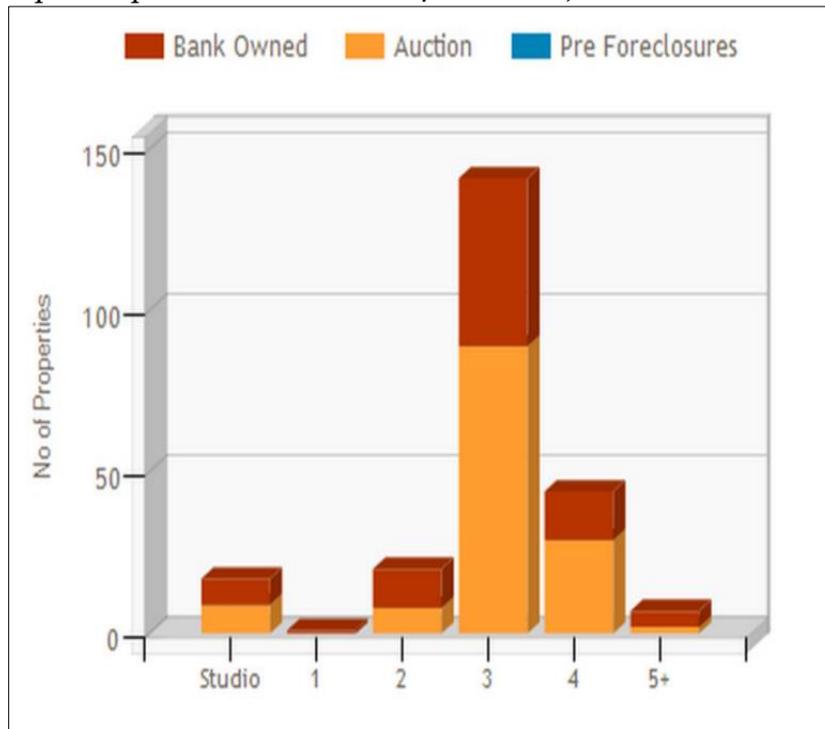
Source: RealtyTrac, 2014

Figure 16. Number of Properties per Square Foot Dec 2014 - Garland, TX



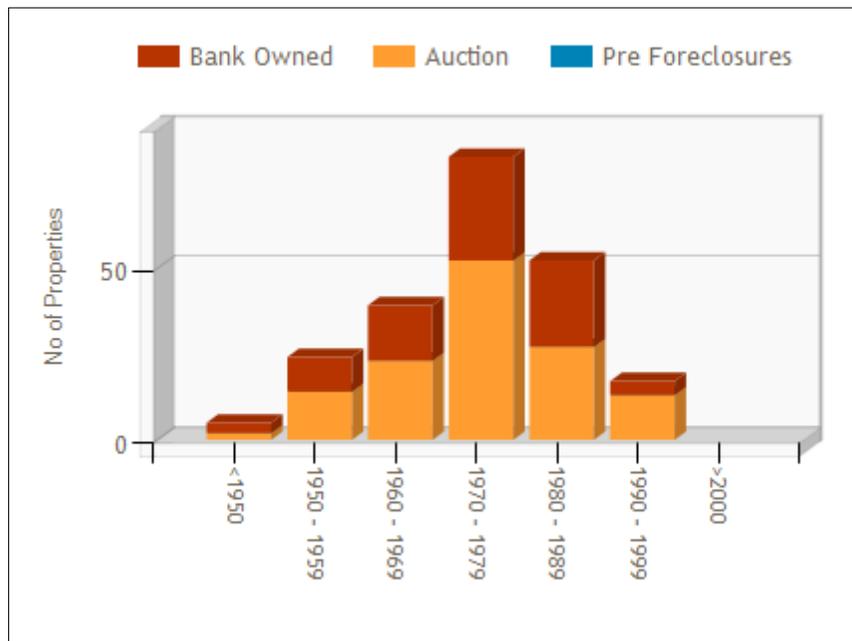
Source: RealtyTrac, 2014

Figure 17. Number of Properties per Bedroom Dec 2014 - Garland, TX



Source: RealtyTrac, 2014

Figure 18. Number of Foreclosed Properties per Year Built - Garland, TX



Source: RealtyTrac, 2014

The following table is an analysis of foreclosure rates by zip codes in the City of Garland. The purpose of this analysis is to determine if there is any correlation between foreclosure rates, minority concentration and low- and moderate-income areas. If a corresponding relationship exists between the variables due to factors other than a homeowner’s personal circumstances, but rather factors such as predatory lending or other discriminatory mortgage practices, this would be a clear impediment to fair housing choice because it would limit the availability of housing based on race, color, and national origin.

The table below shows the number of units in foreclosure as of December 2014 as well as the racial makeup and median household income for each zip code.

Table 60. Foreclosure Rate Analysis, Garland, TX

Zip Code	Racial Composition							Median HH Income	Foreclosed Units as of Dec 2014
	White	Black/African American	Asian	American Indian	Multi-racial	Other	Hispanic		
75040	18.7%	6.1%	17.3%	-	4.0%	-	53.9%	\$65,208	65
75041	22.7%	4.4%	-	1.6%	-	2.0%	69.3%	\$52,446	41
75042	21.4%	11.9%	1.2%	0.3%	-	-	65.2%	\$25,458	35
75043	50.0%	5.7%	3.6%	0.2%	4.4%	-	36.2%	\$47,474	87
75044	31.7%	21.2%	21.4%	0.1%	2.7%	0.2%	22.6%	\$52,358	35

Source: Racial Composition and Median Household Income from City-Data for 2010 Census
 Foreclosure Rate from RealtyTrac as of December 2014

In most areas, high foreclosure rates are often attributable to default due to lower household income, loss of income, or other circumstances that may affect the homeowner's ability to stay current with their mortgage payments. Minority households often earn less and have less savings than non-minority households and are usually the first to lose their homes in tough economic times. Therefore, in many communities where there are areas with high minority concentration there is also a higher foreclosure rate.

A study prepared by the Texas Department of Housing and Community Affairs (TDHCA), Division of Policy and Public Affairs in 2006, titled 'A Study of Residential Foreclosures in Texas' examined the mortgage foreclosure activity in six Texas counties (Bexar, Cameron, Dallas, El Paso, Harris, and Travis) as required by House Bill 1582.

The study had limitations stemming from lack of detailed information on the various causes for foreclosure but arrived at several conclusions based on data gathered from Foreclosure.com, census data, and HMDA data. The study found that there were common trends in the correlation between high foreclosure rate and certain demographic statistics including educational attainment, income level, level of minority population, and level of higher rate loans. High concentrations of minority populations, lower income levels, and greater use of higher rate loans correlated to higher foreclosure rates in most of the counties included in the study. Of the six counties, Dallas County had the highest foreclosure rate in terms of households with a mortgage between June 2005 and May 2006. Based on the data collected, the study found the following trends in Dallas County:

Census tracts where foreclosures were most concentrated were:

- More likely to have high numbers of residents without a high school diploma. Tracts where at least 22% of residents did not graduate accounted for 46% of foreclosures but only 33% of mortgages in the county.
- More likely to have average incomes below the regional median. Tracts with average incomes below 93% of regional median accounted for 50% of foreclosures but only 36% of mortgages in the county.
- More likely to be minority neighborhoods. Tracts where minorities' share of the population was above 53% accounted for 51% of foreclosures but only 36% of mortgages. Conversely, tracts where minorities comprised less than 34% of the population contained 36% of all mortgages but only 20% of foreclosures.
- More likely to include households whose loans are characterized as higher rate. Tracts where at least 24% of loans were high rate loans accounted for 69% of foreclosures, but only 47% of mortgages.

There was no apparent relationship between foreclosures and the linguistic isolation of a neighborhood.

Table 60, provides information on median household income and minority composition in Garland. According to the 2013 ACS, the median household income in Garland was \$51,842. The zip codes with a median household income below \$51,842 are considered lower income areas for this analysis. These zip codes are 75042 and 75043. These zip codes account for approximately 46% of the properties in foreclosure in Garland as of December 2014. Zip code 75043 fits the trend of lower income to higher foreclosure rate since it has the greatest number of foreclosed units however, zip code 75042, has the lowest number of foreclosed units and also has the lowest median household income.

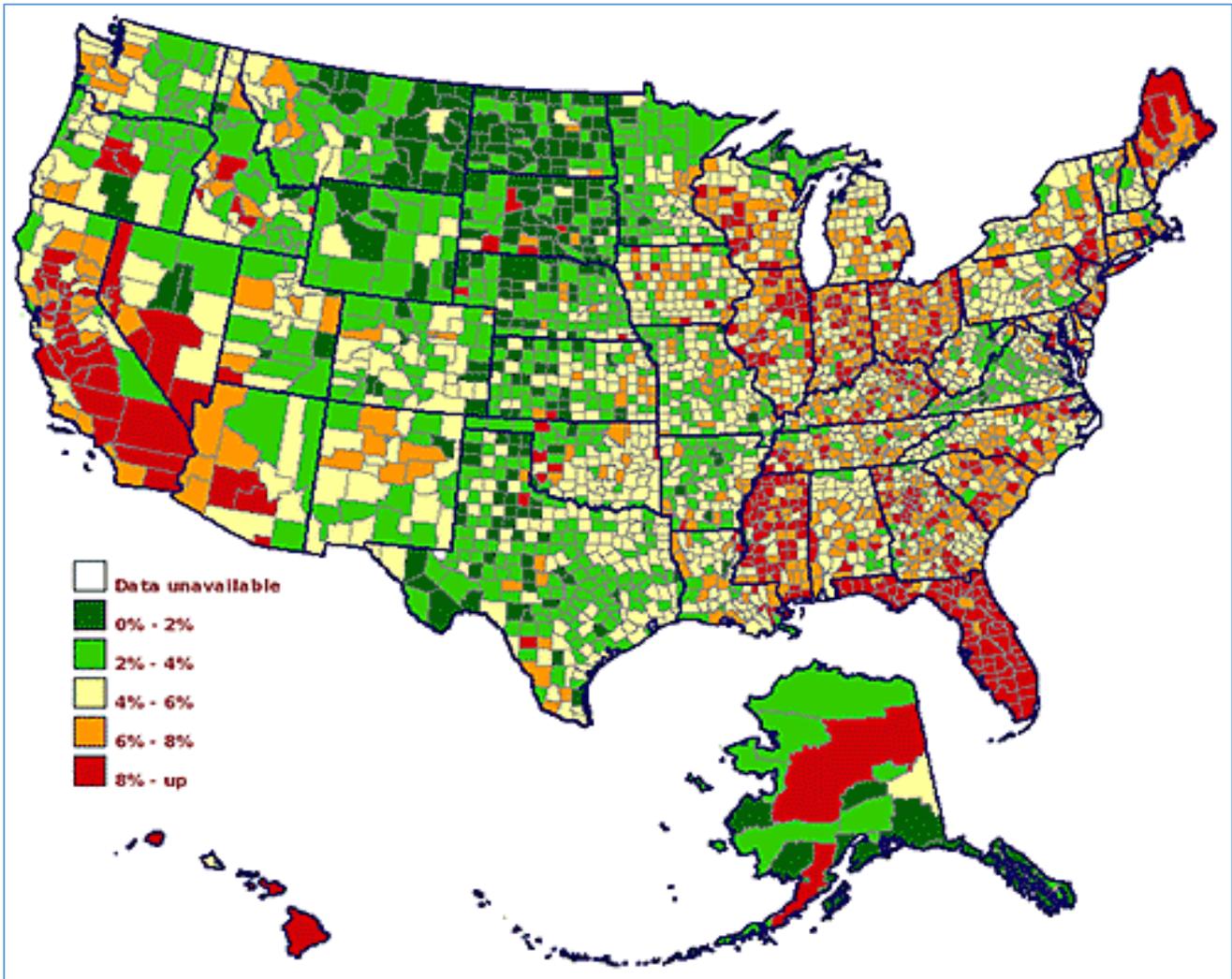
In regards to minority concentration, zip codes 75040 and 75042 had the largest minority populations with 81.3% and 78.6%, respectively. Zip code 75040 has the second highest number of foreclosed properties but also has the highest income for the area, and as stated before, zip code 75042 has the lowest number of foreclosed units, even though it has the lowest median household income and a high concentration of minorities.

The analysis of foreclosure rates for Garland is based on very limited data that does not consider foreclosure trends for the zip codes and does not consider the factors that caused the foreclosures because this information is not available. There is not enough information to conclude whether or not high foreclosure areas are related to discriminatory practices against minorities and/or low- and moderate-income households. However, in recent years, the foreclosure rate nationwide has been on the decline and the same trend has occurred in Garland. According to HUD's Neighborhood Stabilization Program foreclosure data, Dallas County's foreclosure rate is

4.3%. In the census tracts where the City of Garland has carried out NSP activities (190.32, 185.01, 183.00, 187.00, 188.01, and 181.23), the foreclosure rates range from 4.9% to 7.2% which is relatively close to the County's foreclosure rate. This suggests that predatory lending and discriminatory lending practices may not be as significant an issue as it was during the recession because of various legislation at the federal and state level that has improved education and counseling for potential homebuyers and effected tighter lending requirements by banks and other mortgage lenders.

Map 10. Mortgage Delinquency in the United States

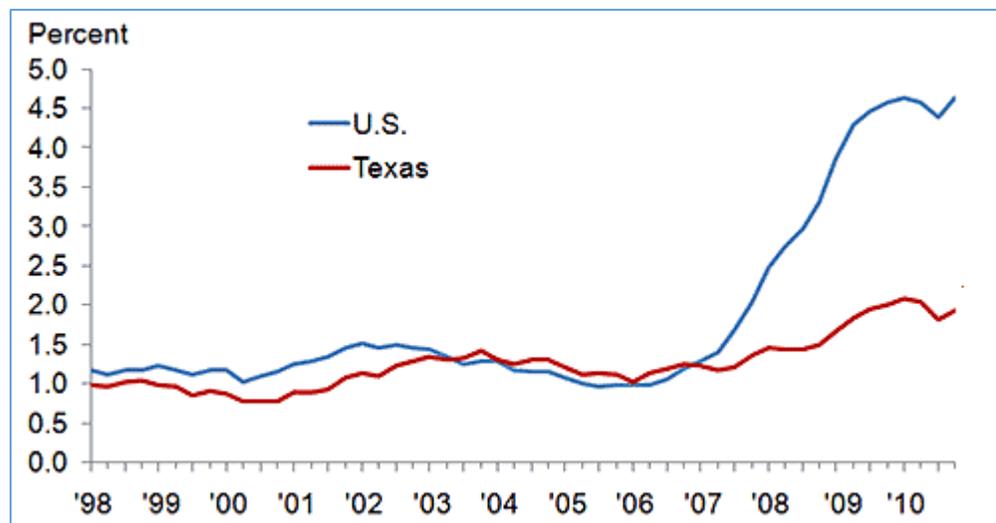
**Seriously Delinquent Mortgages in the United States
December 2010**



Source: Federal Reserve Bank of Garland, 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 19. Foreclosure Inventory, Texas vs. the United States



Source: Federal Reserve Bank of Garland, 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 61. 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
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

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Prime loans				Subprime loans			
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 Garland, 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 Garland, 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 of the 51 individual tract that comprises the City of Garland. Of these 51 census tracts, 36 tracts are contained wholly within the City of Garland, and 15 tracts are split between Garland and some other jurisdiction. 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.

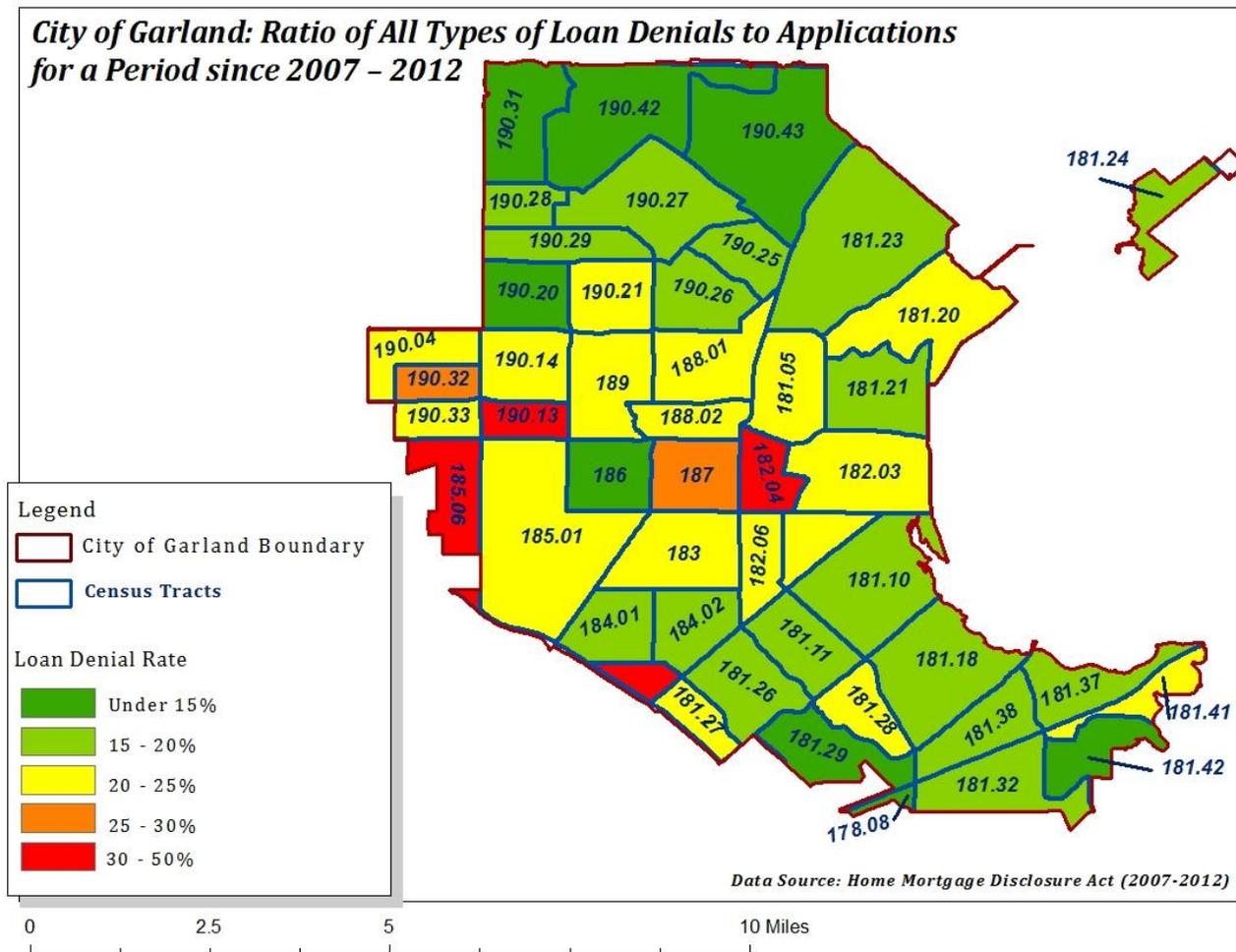
For purposes of this analysis, a "minority" tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Garland as a whole (57.5% based on 2013 ACS 5-Year estimates). Therefore, tracts with a 62.5% or greater minority population would be considered 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. Out of the 51 tracts one tract, 181.24, showed zero population based on an Annual Housing and Population Summary for January 2015 which was produced by the City of Garland's Planning and Community Development Department based on the use of the 2010 Census and the American Community Survey. The tract was primarily located in Garland and as such this tract was not included in the Garland analysis. In addition, while reading through this analysis 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, 2011-2013, were utilized in this analysis (extracted from HMDA Flat Files, 2011-2013).

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Among the 51 tracts analyzed, there were 27,897 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 4,848 (17.4%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Map 11. Total Number of Loan Applications 2007-2013, Garland, TX



Overall Loan Application Comparison Data Analysis by Census Tract

The HMDA analysis focuses on 51 census tracts that are entirely within the corporate limits of Garland, Texas. In 2011-2013, 27,897 total applications were submitted with 10,321 (37.0%) of them coming from minority applicants. Of the minority applications, 2,266 (22.0%) of those applications were denied. This is 4.6% higher than the 17.4% overall denial rate for all applications. In addition, of the 51 tracts, 50 (98.0%) of them had a higher minority applicant denial rate than that of their respective tract. Appendix V, Table V-1- shows a breakdown of the total denial rate of all 51 tracts as well as the minority denial rate by census tract.

Loan Application Comparison Data Analysis by Minority Census Tract

The minority tracts were examined more closely and Appendix V, Table V-2 shows the loan application denial rates for all the minority census tracts in the City of Garland.

As mentioned previously tracts with a 62.5% or greater minority population are considered a “minority” tract. Of the 51 Garland Tracts, 26(51.0%) met the criteria and were designated as minority tracts. When the analysis

looked at the denial rates in these tracts it was noted that 96.2%, or 25 out of the 26, 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. The analysis shows that denial rates in minority census tracts and block groups are comparatively high and suggest that the City should take action among its lending partners who participate in its programs and the general lending community to address these trends.

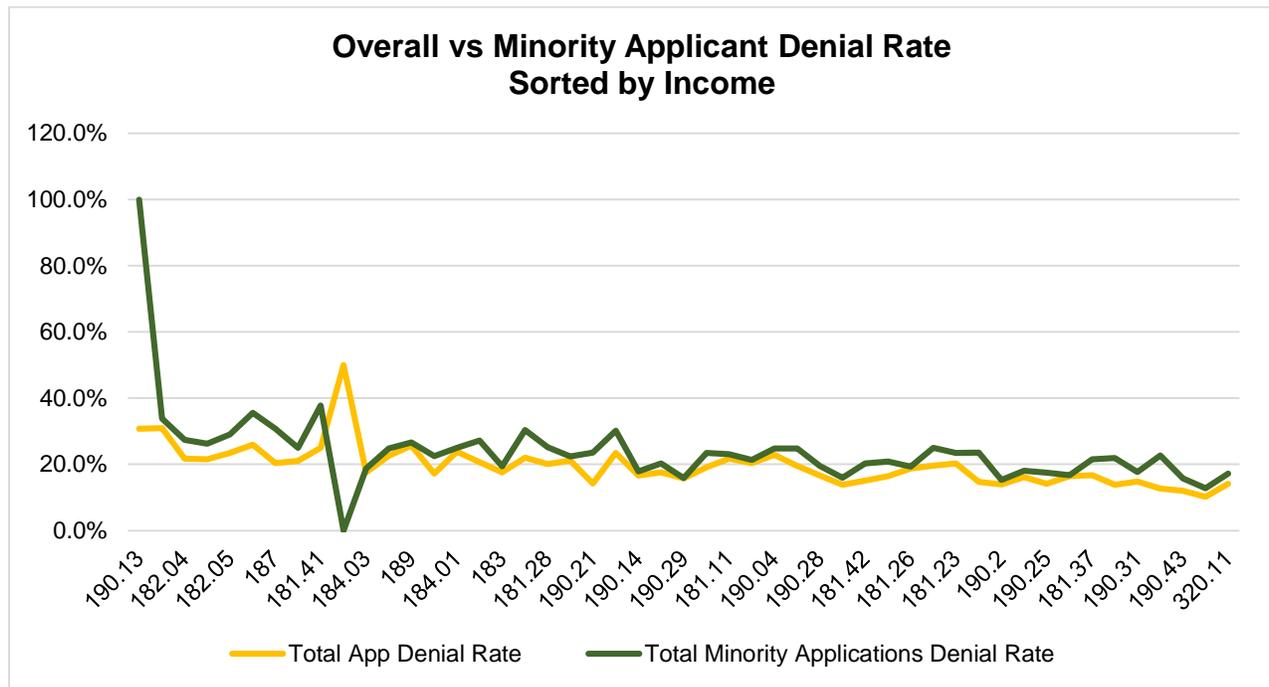
Analysis of Tracts by Income Characteristics

All Tracts by Income

Appendix V, Table V-3 breaks down the median income category for all 51 Garland tracts. The table notes that 16 census tracts within the City of Garland exhibit median incomes that are higher than that of the MSA (those with a median income of >100%). Of these 9 higher income tracts none were minority tracts. Conversely, of the census tracts that met HUD’s definition of low- income (less than 80% AMI) Garland had a total of 20 low-income tracts of which 18 (90.0%) out of the 20 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. Figure 20 (pictured below) lists the Garland Census tracts from lowest to highest median income and we see the same higher minority denial trend which is that the overwhelming majority of Garland tracts, 50 out of 51, have a higher minority applicant denial rate than that of the overall denial rate.

Figure 20. High Income Census Tracts Overall Vs Minority Applicant Denial Rates – Garland, TX



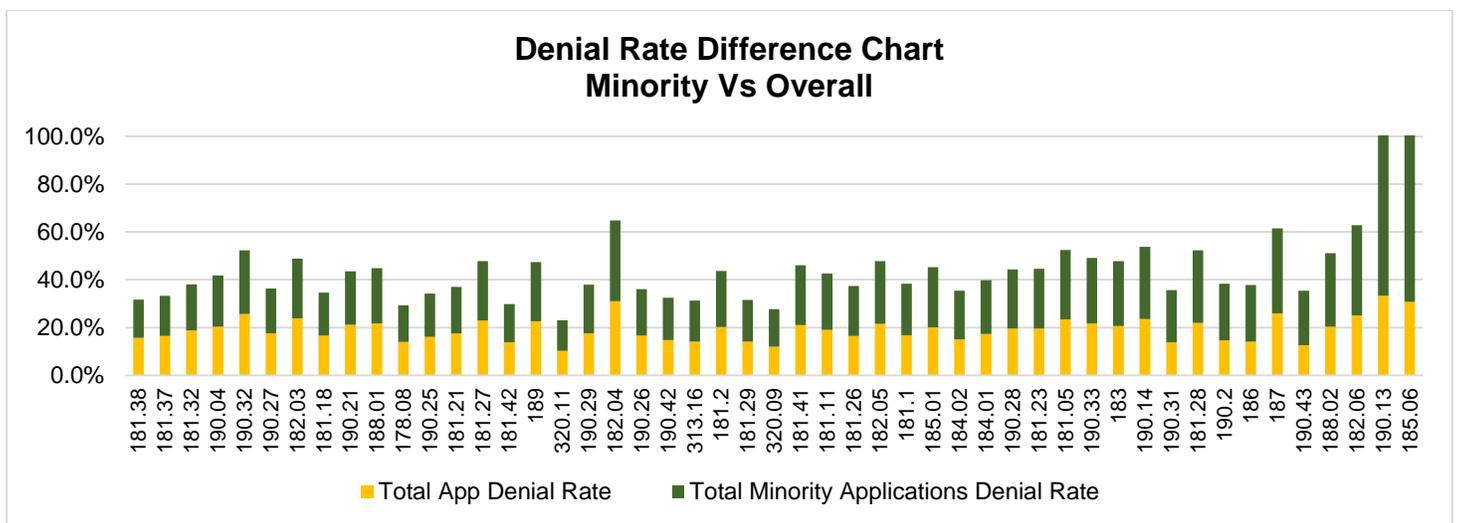
The data shows that as an overall standard it appears minority application denial rates are higher than non-minority applications with the biggest differences in denial rate occurring in tracts with lower median incomes. In addition, the data indicates that there is a higher denial rates among minority applicants at all income levels. The trend of biggest differences in denial rate occurring in tracts with lower median incomes does not necessarily suggest discriminatory practices based on income but could mean that lower income households may be facing

other challenges such as creditworthiness, and higher debt to income ratios in qualifying for loans. Another challenge for minority or non-minority applicants living in low-income census tracts is the loan to value of houses in these areas. If an applicant does not have sufficient equity in their home because of lower housing values, it is difficult for them to get approvals regardless of their creditworthiness or income. The concern about these challenges increase with the fact that Garland’s low income tracts have high minority populations.

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. Figure 21 (pictured below) allows you to see the denial rate differences and shows that minority tracts also make up the majority of those tracts with the highest minority application denial rate/overall rate disparities (those with a denial rate difference of >10%).

Figure 21. Overall vs Minority Applicant Denial Differences – Garland, TX

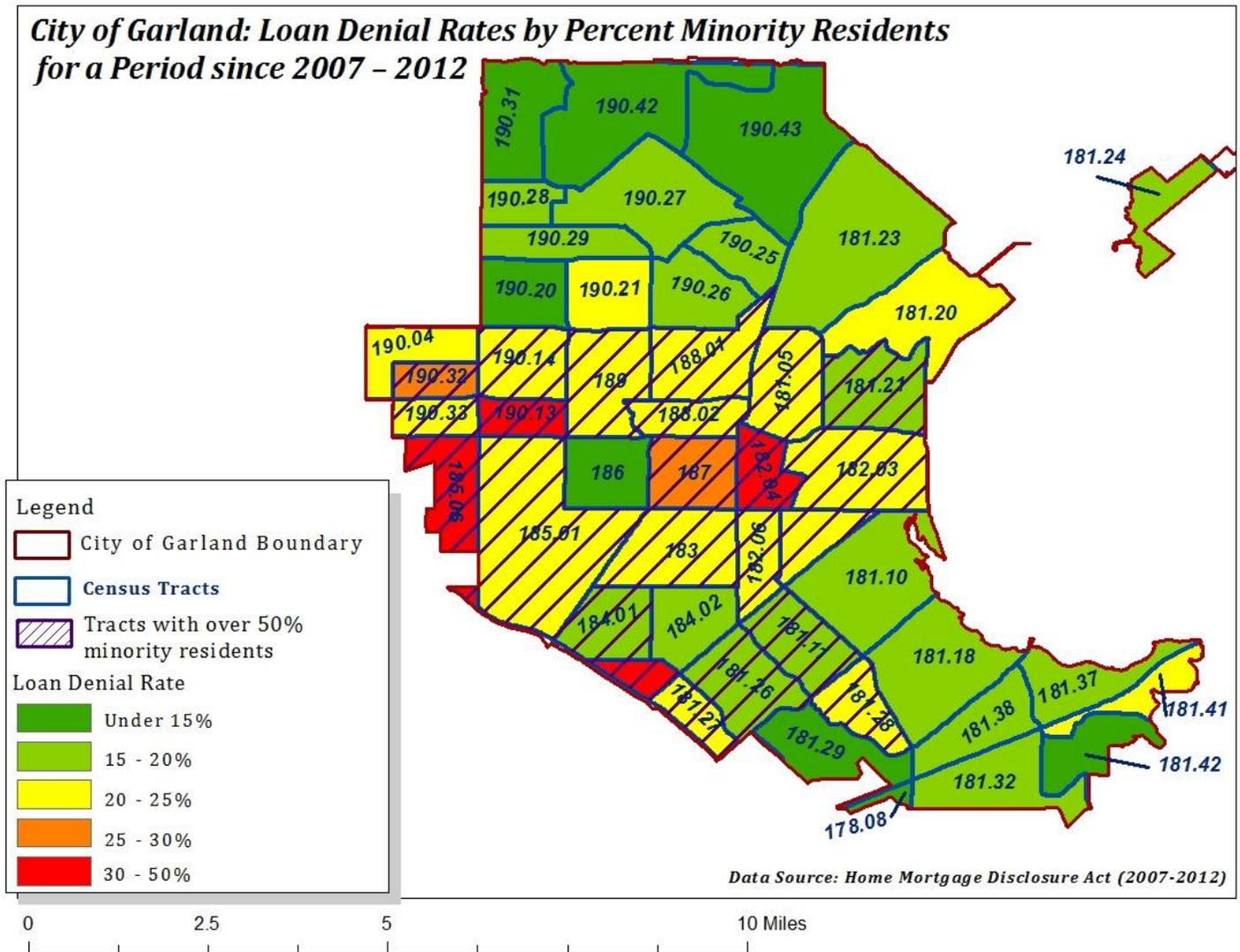


For example, Tract 185.06 has an overall application denial rate of 30.8%, while the minority application rate is 100%. This tract is also the Garland tract with the highest minority concentration. Similarly, Tract 190.13, also a minority tract, has a minority application denial rate of 75.0% while the overall denial rate is the 33.3%, and is the Garland tract with the second highest minority concentration.

Typically, there is a correlation between high denial rates and low median income and Garland conforms to this pattern. Of the 22 tracts with highest overall denial rates (a denial rate of over 25%) 16 (72.7%) are low- and moderate income tracts. Additionally, all the low income tracts were included in this high denial rate group. Appendix V, Table V-4 shows the census tracts by smallest to highest overall denial rates. This trend is also true when you look exclusively at the minority application rates. Of the 17 tracts with the highest minority application denial rates (a denial rate of over 25%), 16 (94.1% are low- and moderate income tracts. These high minority denial tracts also included the 3 low income tracts in Garland. Appendix V, Table V-5 shows the census tracts by smallest to 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 Garland 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 Garland. Map 18 gives a visual presentation of the data analyzed in this section.

Map 12. Loan Denial Rates by Percent Minority Residents: 2011-2013 – Garland, TX



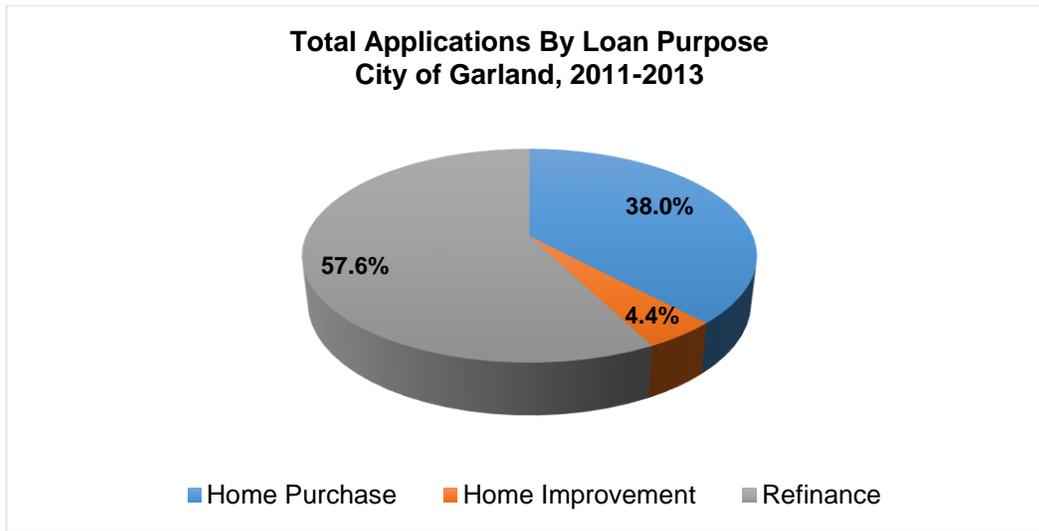
Source: Home Mortgage Disclosure Act (2011-2013)

Loan Application Denials Breakdowns by Loan Purpose

Appendix V, Table V-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 Garland were for refinancing – 16,062 (57.6%), followed by home purchase loans – 10,606 (38.0%) and home improvement loans – 1,229 (4.4%). The loan denial rate for refinancing loans was 20.0% and the denial rate for home purchase loans was 8.9%. Home improvement loans had a denial rate of 56.6% but this is skewed by the relatively small number of home improvement loan applications compared to the other 2 categories. The figure below gives an overview of the loan types sought in Garland between 2011 and 2013.

Figure 22. Total Applications by Loan Purpose 2011-2013 - Garland, 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. Figure 23 breaks these characteristics down by the four loan types. Of the 27,897 loan applications submitted between 2011 and 2013, the majority, 17,907 or 64.0%, were Conventional loans, followed by FHA (31.3%) and VA loans (4.2%). Finally, FSA Loans were a small amount comprising of only .02% of applications.

Figure 23 – Total Applications by Loan Type 2011-2013, Garland, TX

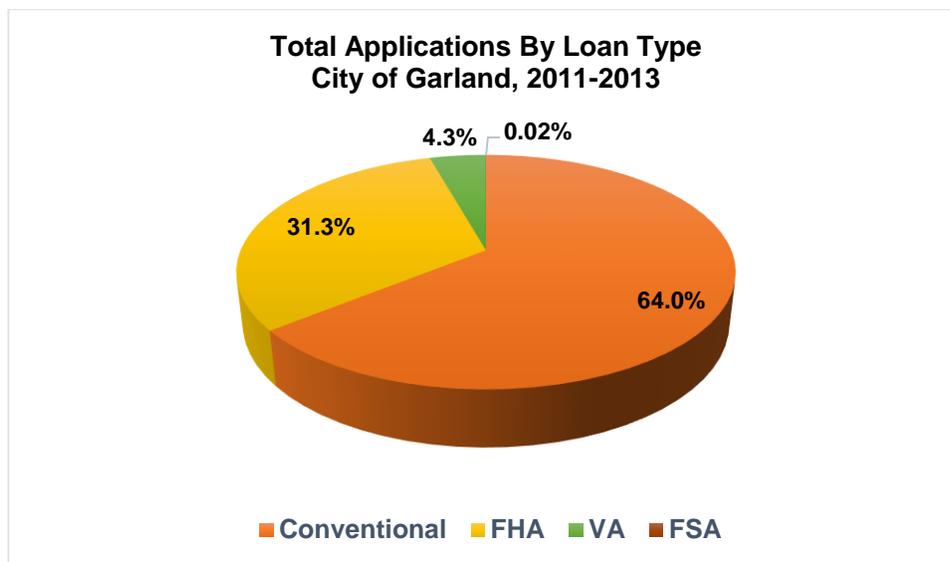


Table 62 looks at the denial and originations rates of whites and minorities. It also looks at origin and denial rates of all of the loan purposes and loan types. For analysis purposes, race and ethnicity were split out with applicants who identified as Hispanic having their own category based on their race selected. Therefore,

households referred to as White Non-Hispanic are comprised of applicants who selected their Race as White and their ethnicity as Not Hispanic. Conversely, those individuals referred to as White Hispanics were applicants that selected their Race as White and their ethnicity as being Hispanic. All subsequent racial categories follow this identification schema.

Table 62. Loan Denials by Loan Source and Race/Ethnicity (2011-2013) – Garland, TX

**Home Mortgage Disclosure Act (HMDA) Analysis
Comparison of Originations within Categories
Garland, Texas
2011-2013**

	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Loan Type					
Conventional	17,907	8,503	47.5%	3,609	20.2%
FHA	8,773	3,270	37.3%	1,091	12.4%
VA	1,211	581	48.0%	146	12.1%
FSA	6	1	16.7%	2	33.3%
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Race & Ethnicity					
White (Not Hispanic)	11,668	6,194	53.1%	1,867	16.0%
White (Hispanic)	3,977	1,851	46.5%	842	21.2%
Black or African-American (Not Hispanic)	2,114	929	43.9%	537	25.4%
Black (Hispanic)	51	23	45.1%	6	11.8%
American Indian or Alaska Native (Not Hispanic)	70	23	32.9%	30	42.9%
American Indian or Alaska Native (Hispanic)	78	39	50.0%	25	32.1%
Asian (Not Hispanic)	3,304	1,724	52.2%	596	18.0%
Asian (Hispanic)	22	7	31.8%	7	31.8%
Native Hawaiian and Pacific Islander (Not Hispanic)	78	33	42.3%	16	20.5%
Native Hawaiian and Pacific Islander (Hispanic)	24	4	16.7%	14	58.3%
Race Not Provided (Not Hispanic)	284	124	43.7%	70	24.6%

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	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Race Not Provided (Hispanic)	309	128	41.4%	114	36.9%
Not Applicable	5,918	1,276	21.6%	724	12.2%
	Number of Applications	Number of Originations	Percent of Originations	Number of Denials	Denial Rate
Loan Purpose					
Home Purchase	10,606	4,803	45.3%	940	8.9%
Home Improvement	1,229	364	29.6%	695	56.6%
Refinance	16,062	7,188	44.8%	3,213	20.0%

The data shows that the majority of loan applications across all loan types in Garland were made by White-Not Hispanic households with 11,668 applications and made up 41.9% of the number of applications. The denial rate of these applications was 16.0%. Comparatively, non-white, non-Hispanic applications were 20.0% of the application size and had a denial rate of 21.2%. Finally, Hispanics (of All Races) applicants were 16.0% of the applications and had a denial rate of 22.5%.

When broken down by conventional loan type it is noted in Table 63 below, that for **home purchase** loans, non-white, non-Hispanic applications made up only 21.2% of the total applications and had a 14.0% denial rate while Hispanics of All Races made up only 19.1% of total applicants with a denial rate of 10.5%. Conversely, White Non-Hispanic households made up 36.7% of the total applications and had only had a 30.0% denial rate. When White Hispanics are included the total applications raises to 54.7% and the denial rate increases to 46.4%.

For **home improvement** loans, non-white, non-Hispanic applications made up only 16.8% of the total applications and had a 20.6% denial rate while Hispanics of All Races made up only 18.9% of total applicants with a denial rate of 22.7%. Conversely, White Non-Hispanic households made up 38.6% of the total applications and had only had a 30.1% denial rate. When White Hispanics are included the total applications raises to 52.3% and the denial rate increases to 46.3%. Home improvement loan data is again skewed by the small number of applications.

Finally, for **refinance** loans, non-white, non-Hispanic applications made up only 19.4% of the total applications and had a 22.5% denial rate while Hispanics of All Races made up only 13.7% of total applicants with a denial rate of 19.8%. Conversely, White Non-Hispanic households made up 45.5% of the total applications and had a 42.8% denial rate. When White Hispanics are included the total applications raises to 57.3% and the denial rate increases to 59.7%.

Table 63. Loan Denial Rates by Loan Type and Race/Ethnicity 2011-2013 – Garland, TX

Home Purchase Loans						
	# Apps.	% of Apps.	# Denied	% Denied	# Orig	% Orig
White (Not Hispanic)	3,889	36.7%	282	30.0%	2,093	43.6%
White (Hispanic)	1,913	18.0%	187	19.9%	1,011	21.0%
Black or African-American (Not Hispanic)	747	7.0%	126	13.4%	336	7.0%
Black (Hispanic)	17	0.2%	1	0.1%	8	0.2%
American Indian or Alaska Native (Not Hispanic)	20	0.2%	9	1.0%	7	0.1%
American Indian or Alaska Native (Hispanic)	21	0.2%	4	0.4%	11	0.2%
Asian (Not Hispanic)	1,452	13.7%	178	18.9%	789	16.4%
Asian (Hispanic)	11	0.1%	0	0.0%	5	0.1%
Native Hawaiian and Pacific Islander (Not Hispanic)	27	0.3%	1	0.1%	12	0.2%
Native Hawaiian and Pacific Islander (Hispanic)	5	0.0%	1	0.1%	2	0.0%
Race Not Provided (Not Hispanic)	77	0.7%	13	1.4%	42	0.9%
Race Not Provided (Hispanic)	62	0.6%	21	2.2%	24	0.5%
Not Applicable	2365	22.3%	117	12.4%	463	9.6%

Home Improvement Loans						
	# Apps.	% of Apps.	# Denied	% Denied	# Orig	% Orig
White (Not Hispanic)	474	38.6%	209	30.1%	208	57.1%
White (Hispanic)	169	13.8%	113	16.3%	42	11.5%
Black or African-American (Not Hispanic)	118	9.6%	85	12.2%	23	6.3%
Black (Hispanic)	3	0.2%	2	0.3%	1	0.3%
American Indian or Alaska Native (Not Hispanic)	6	0.5%	5	0.7%	1	0.3%
American Indian or Alaska Native (Hispanic)	7	0.6%	5	0.7%	1	0.3%

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Home Improvement Loans						
Asian (Not Hispanic)	77	6.3%	50	7.2%	15	4.1%
Asian (Hispanic)	1	0.1%	1	0.1%	0	0.0%
Native Hawaiian and Pacific Islander (Not Hispanic)	6	0.5%	3	0.4%	2	0.5%
Native Hawaiian and Pacific Islander (Hispanic)	4	0.3%	4	0.6%	0	0.0%
Race Not Provided (Not Hispanic)	15	1.2%	7	1.0%	2	0.5%
Race Not Provided (Hispanic)	48	3.9%	33	4.7%	10	2.7%
Not Applicable	301	24.5%	178	25.6%	59	16.2%

Refinance Loans						
	# Apps.	% of Apps.	# Denied	% Denied	# Orig.	% Orig.
White (Not Hispanic)	7,305	45.5%	1,376	42.8%	3,893	54.2%
White (Hispanic)	1,895	11.8%	542	16.9%	798	11.1%
Black or African-American (Not Hispanic)	1,249	7.8%	326	10.1%	570	7.9%
Black (Hispanic)	31	0.2%	3	0.1%	14	0.2%
American Indian or Alaska Native (Not Hispanic)	44	0.3%	16	0.5%	15	0.2%
American Indian or Alaska Native (Hispanic)	50	0.3%	16	0.5%	27	0.4%
Asian (Not Hispanic)	1,775	11.1%	368	11.5%	920	12.8%
Asian (Hispanic)	10	0.1%	6	0.2%	2	0.0%
Native Hawaiian and Pacific Islander (Not Hispanic)	45	0.3%	12	0.4%	19	0.3%
Native Hawaiian and Pacific Islander (Hispanic)	15	0.1%	9	0.3%	2	0.0%
Race Not Provided (Not Hispanic)	192	1.2%	50	1.6%	80	1.1%

Race Not Provided (Hispanic)	199	1.2%	60	1.9%	94	1.3%
Not Applicable	3,252	20.2%	429	13.4%	754	10.5%

All Loans Purpose						
All Loans Purpose	# Apps.	% of Apps.	# Denied	% Denied	# Orig	% Orig
White (Not Hispanic)	11,668	41.8%	1,867	38.5%	6,194	50.1%
White (Hispanic)	3,977	14.3%	842	17.4%	1,851	15.0%
Black or African-American (Not Hispanic)	2,114	7.6%	537	11.1%	929	7.5%
Black (Hispanic)	51	0.2%	6	0.1%	23	0.2%
American Indian or Alaska Native (Not Hispanic)	70	0.3%	30	0.6%	23	0.2%
American Indian or Alaska Native (Hispanic)	78	0.3%	25	0.5%	39	0.3%
Asian (Not Hispanic)	3,304	11.8%	596	12.3%	1,724	14.0%
Asian (Hispanic)	22	0.1%	7	0.1%	7	0.1%
Native Hawaiian and Pacific Islander (Not Hispanic)	78	0.3%	16	0.3%	33	0.3%
Native Hawaiian and Pacific Islander (Hispanic)	24	0.1%	14	0.3%	4	0.0%
Race Not Provided (Not Hispanic)	284	1.0%	70	1.4%	124	1.0%
Race Not Provided (Hispanic)	309	1.1%	114	2.4%	128	1.0%
Not Applicable	5,918	21.2%	724	14.9%	1,276	10.3%

As noted with all total loans, White Non-Hispanic applicants represented the largest number of loan applicants, 41.8%, with 11,688 applications and an origination rate of 38.5%. If White Hispanics are included these totals raise to White applicants making up 56.1% of applications with a denial rate of 55.9% and a 51.4% origination rate. Hispanics (who did not identify as white) were the smallest applicant group with 484 applications submitted and an origination rate of 1.6%.

This review of the HMDA data suggests that there may be discriminatory lending based on race/ethnicity but that Garland overall appears to have a high denial rate for all applications. 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.

V. PUBLIC OUTREACH

Introduction

This section summarizes the results of the surveys, focus groups, public meetings, and agency consultations through key person interviews, document review, and websites conducted as part of the public outreach process for the Garland 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 Garland 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. Input was received from the public and stakeholders prior to the completion of the AI and during the 30-day public comment period for the AI which took place between October 30, 2015 and November 30, 2015. No public comments were received during the 30-day comment period. Public notices included provisions for reasonable accommodation and alternative formats for information for persons with Limited English Proficiency and persons with disabilities, including the hearing-impaired.

Print and Broadcast Media

As outlined in the City's Citizen Participation Plan, the public was educated and informed about the AI requirements through the City's website at the following link: <http://www.garlandtx.gov/gov/hk/housing/fair/default.asp> and a newspaper of general circulation. A public notice was published in the Garland City Press, on the City's cable television station CGTV and through a press release. The AI information on the survey was published in the following newspapers of general circulation: the Greensheet on 9/18/2013, the Garland Examiner on 9/19/2013, and El Heraldo, a Spanish Language paper on 9/20/2013. See attached copies of newspaper ads as Appendix VI - Public Notices and Comments.

Fair Housing Surveys

Four (4) fair housing surveys were created and issued online through SurveyMonkey, an Internet survey service. The surveys were made available to all Garland residents, housing providers/advocate agencies, area Realtors, and lending institutions and were anonymous. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, and experience with City housing assistance and social service programs, fair housing issues, and opinions about housing and social service needs in the City. The surveys were also directly administered in paper formats at events and through social service agencies. A Spanish language version of the survey was also available for residents. Copies of the survey were available in alternative format, upon request. Fair housing survey links were posted on the City's Fair Housing Services web page at <http://www.garlandtx.gov/gov/hk/housing/fair/default.asp> from October 7, 2014 to January 2015. The findings from these activities are discussed in turn.

Resident Surveys

An online, 25-question fair housing survey was available for all residents to complete via <http://www.surveymonkey.com>, and as distributed by City of Garland staff. The survey was opened on October 7, 2014 and received the last response on December 1, 2014. Seventeen (17) Garland area residents completed the survey. No responses were submitted using the Spanish language resident survey. Results of the survey are analyzed based on the questions asked. It must be noted here that responses do not always tally with the total number of respondents as some respondents may have chosen to skip a question. A sample of written comments provided by the respondents is also listed at the end of this section. These were included to get a sense of people's unscripted responses to fair housing issues and it should be noted that these are the opinions of the respondents and do not reflect the views, statements, or stated opinions of the report preparer or the City of Garland. Since the survey is anonymous, the accuracy of the respondents' demographic profile could not be verified.

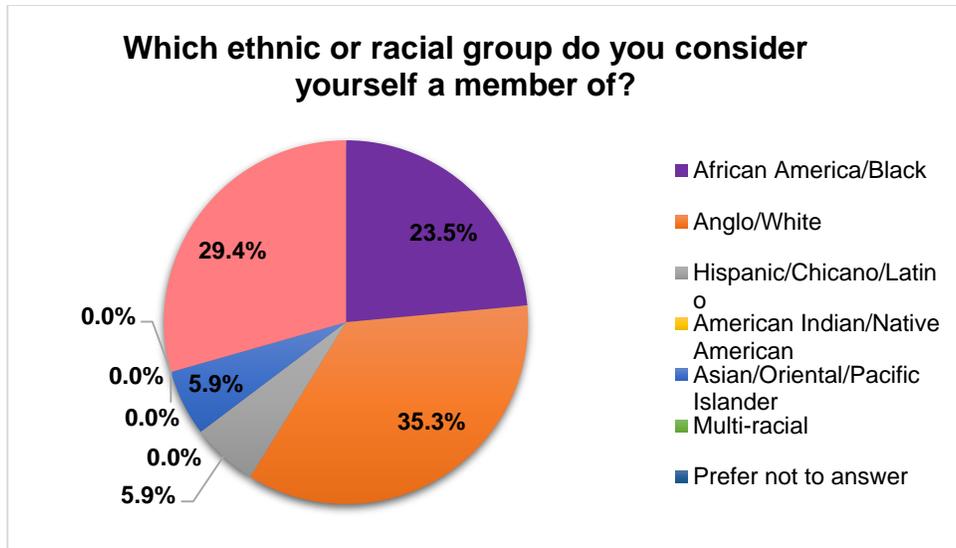
Demographics

Of the residents surveyed, the majority, 12 persons (70.6%), noted that they lived within the limits of the City of Garland. The remaining 29.4% (5 persons) of the sample said they lived outside of the city limits but did not indicate which location. Of this 29.4% who lived outside of Garland, 3 persons worked or operate a business in the City of Garland.

Race/Ethnicity

In the survey we asked responders to self-identify their race and ethnicity.

Figure 24. Race and Ethnicity of Survey Respondents 2014- Garland, TX



Of the residents surveyed, 35.3% (6) of participants identified as Anglo/White; 23.5% (4) identified as African American or Black; 5.9% (1) identified as Asian/Oriental/Pacific Islander; 5.9% (1) identified as being of Hispanic/Latino ethnicity; and no participants identified themselves as American Indian/Native American, Multi-racial, or Other. Finally, 29.4% (5) participants skipped the question altogether.

For analysis purposes this breakdown was then compared to 2010 Census data. According to the 2010 Census, the racial makeup of the Garland community was 57.5% Anglo/White; 14.5% Black or African American; .8% American Indian/Native American; 9.4% Asian; and 0% other races, including two or more (3.3%). Nearly 37.8% of the Garland population identified themselves as being of Hispanic/Latino ethnic origin. The survey respondents identifying themselves as Black showed a slightly higher survey response percentage than their percentage in the general population while persons who identified as Hispanic were significantly lower than their percentage of the population according to the Census.

Marital Status

Of the residents surveyed, 41.2% (7) are married; 11.8% (2) are single head of household; 11.8% (2) are divorced and 5.9% (1) were widowed. In addition, no participants recorded having a domestic partner. Finally, 5.9% (1) of participant's preferred not to answer and 23.5% (4) skipped the question entirely.

Disability Status

Of the residents surveyed, 17.6% (3) stated that they or someone in their household had a disability or handicap. Conversely 58.8% (10) of respondents answered that they or someone in their household did not have a disability or handicap. Finally, 23.5% (4) of respondents skipped the question entirely.

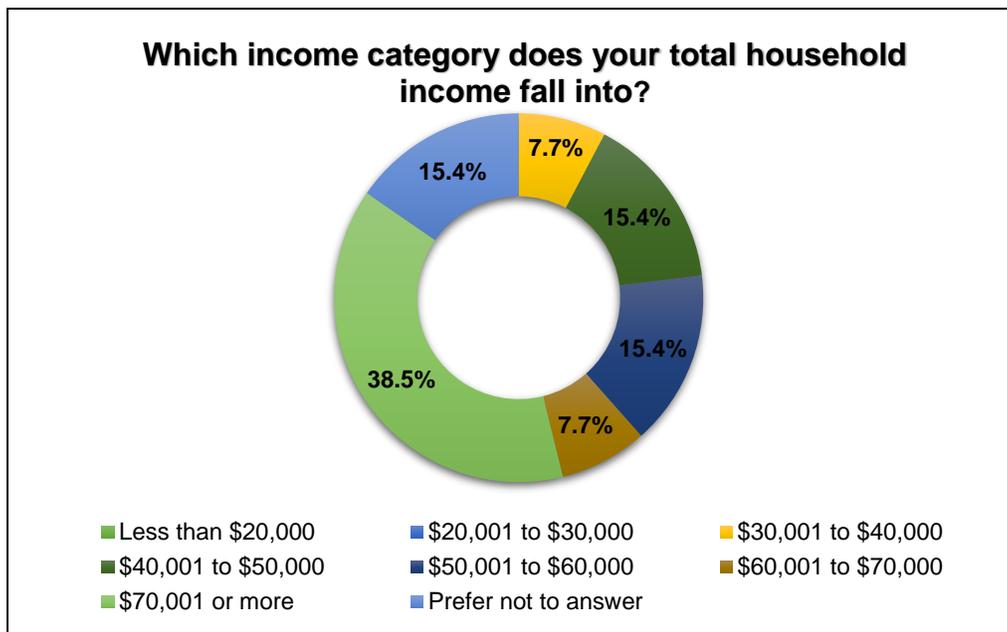
Familial Status

The citizen survey asked respondents to state whether their household included children less than 18 years of age. Of the residents surveyed 17.6% (3) answered that they had children under 18 years of age, and 58.8% (10) answered that they did not. Finally, 23.5% (4) skipped the question entirely.

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 and income is the main indicator of this. The total sample broke down as follows:

Figure 25. Income of Survey Respondents 2014 – Garland, TX



The majority of residents, 38.5% (5 persons), reported having a total household income of \$70,001 or more. Followed by 15.4% reporting have income of \$40,001 to \$50,000 and \$50,001 to \$60,000 respectively. Additionally, the lowest income reported came from the 7.7% (1 person) of participants reported having a total household income of \$30,001 or \$40,000. Finally, 15.4% (2 persons) preferred not to answer the question

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.

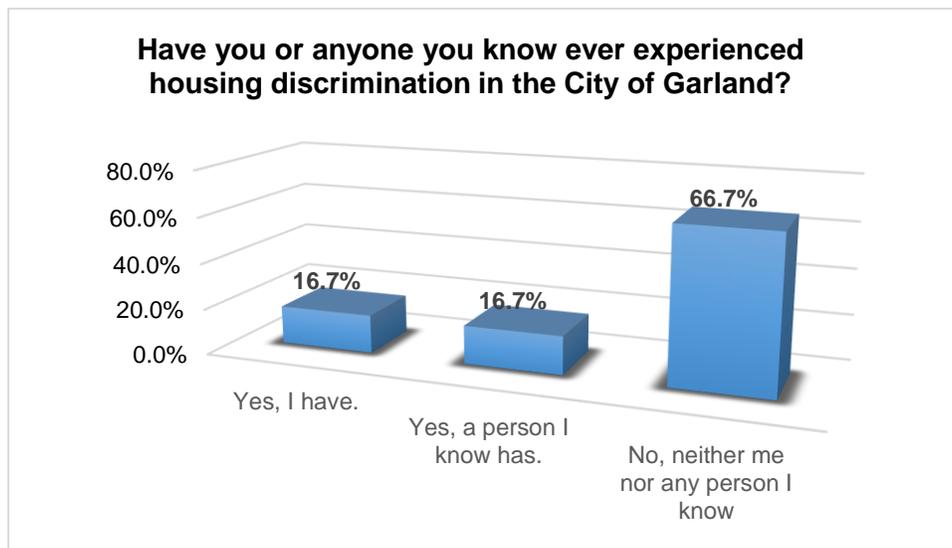
Areas in Which Housing Discrimination Can Occur	# of Respondents	% of Responses
Race	11	91.7%
Color	6	50.0%
Religion	9	75.0%
Sex	8	66.7%
Disability/Handicap	8	66.7%
Familial Status (family with one or more children under 18 years of age)	7	58.3%
National Origin	7	58.3%

Areas in Which Housing Discrimination Can Occur	# of Respondents	% of Responses
Age	9	75.0%
Sexual Orientation	4	33.3%
Poor English Language Skills	2	16.7%
Citizenship Status	2	16.7%
Level of Income	3	25.0%
Source of Income (public assistance)	2	16.7%
Other (please list): n/a	1	8.3%

Survey respondents were asked to identify the basis on which housing discrimination can occur, based on list of the protected classes contained in the FHA and other general categories that are not protected classes but do have an impact on fair housing choice. The majority of survey respondents reported that Race was the most common basis on which housing discrimination can occur, followed by Religion and Age.

These survey responses indicate that the discrimination occurred for reasons based on the protected classes. In addition, to noting that Race, Religion, and Age were the highest areas participants felt that discrimination could occur, it is also important to note that a portion, 16.7%, 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 that should be focused on more to prevent the problem getting any bigger.

Figure 26. Housing Discrimination Experience of Survey Respondents 2014 – Garland, TX



As indicated in Figure 26 above, when asked if they or anyone they knew had experienced housing discrimination in the City, 33.4% of respondents responded that they had or someone they knew had experienced discrimination. Of that number, respondents were equally split with 16.7% (2 persons) of the respondents feeling that they had experienced housing discrimination; while the other 16.7% (2 person) knew of someone who had. Conversely, 66.7% (8 persons) of the respondents had not experienced housing discrimination (did not have first- or second-hand knowledge).

While more people had not experienced discrimination these numbers reflect a significant enough portion of the survey group (33.4%) having first- or second-hand knowledge of housing discrimination. In addition, of the 4 persons who had first or second had experience of discrimination, 50% identified as being a part of a minority group, with 1 being the only participant who identified as Asian/Oriental/Pacific Islander and 1 person who

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identified as African American/Black. The other 50% (2) identified as Anglo/White. Further analysis of responses will show where/how the discrimination occurred, which is important in pinpointing what/where impediments may exist in Garland.

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.

Which of the following best describes the person or organization that discriminated against you or the person you know?	# of Respondents	% of Responses
rental property manager/multi-unit housing	3	75.0%
landlord of a single-family housing unit	1	25.0%
public housing authority	1	25.0%

Respondents were allowed to select more than one answer for this question. Of the four (4) respondents who felt they were discriminated against, three (75.0%) persons indicated the discrimination was from a rental property manager/multi-unit housing. The remaining broke down as follows: 1 person (25.0%) indicated they felt they were discriminated by a landlord of a single family housing and 1 person (25.0%) indicated they felt they were discriminated by a public housing authority.

Respondents were also asked to describe the location where the discrimination occurred. There were 7 responses that listed the location where housing discrimination occurred, and respondents were able to indicate more than one location.

What best describes the location of where the discrimination occurred?	# of Respondents	% of Responses
a rental apartment complex	4	80.0%
an individual housing unit for rent	1	20.0%
an individual housing unit for sale	1	20.0%
a public housing authority	1	20.0%

Respondents selected more than one answer in some cases. Four (4) responses (80%) indicated that discrimination occurred at a rental apartment complex. Additionally, 1 response (20%) indicated the discrimination occurred at an individual housing unit for rent, another response indicated the discrimination occurred at an individual housing unit for sale, and finally there was one response that indicated the discrimination occurred at a public housing authority. Based on the composite answers to this question and the previous questions, discrimination occurring at homes and apartments for rent and for sale are perceived as an impediment to fair housing choice in Garland.

Survey respondents that experienced housing discrimination were asked to state the basis of such discrimination. The following responses were given.

Basis of Housing Discrimination	# of Respondents	% of Responses
Race	3	60.0%
Color	0	0.0%
Religion	1	20.0%
Sex	1	20.0%
Disability/Handicap	2	40.0%
Family Status	0	0.0%
National Origin	0	0.0%

Basis of Housing Discrimination	# of Respondents	% of Responses
Age	2	40.0%
Sexual Orientation	0	0.0%
Poor English language skills	0	0.0%
Citizenship Status	1	20.0%
Level of Income	1	20.0%
Source of Income (public assistance)	0	0.0%
Other (please list):Pet Ownership	1	20.0%

Of the respondents who answered this question, 60% (3) of their responses indicated that Race was the most listed basis for housing discrimination. Followed by Disability/Handicap, and Age which were listed equally as 20.0% of responses respectively. These survey responses indicate that the discrimination occurred for reasons based on the protected classes and other areas of perceived discrimination, such as level and source of income. In addition, while level of income is not a federal protected classes, it has the potential for disparate impact on members of the protected classes.

Familiarity with Housing Programs and Fair Housing Law



Based on the survey results, the majority of Garland residents appear to be aware of fair housing laws, services, and responsibilities. 91.7% (11 persons) surveyed were familiar with fair housing or social services provided by the City. Only 8.3% (1 person) were not familiar with fair housing. Those familiar with services noted the ones they were familiar with included Fire Alarm services, Services, Summer Lunch Program, Garland Fair Housing Office; Code Cares, Community Health and Wellness programs, Neighborhood Services, and First-time Home Buyer services.

In addition, of the 64.7% (11 persons) of respondents who answered the question whether or not they have seen/heard information regarding fair housing programs, laws, or enforcement within the City of Garland the highest amount of responses(10) indicated they had seen fair housing flyers and pamphlets. The second highest number of responses (8) indicated they had seen fair housing information at a public event. It should be noted that 6 participants skipped this question.

Knowledge of Fair Housing Laws

Of the 14 respondents that answered the question regarding knowledge of Fair Housing laws, only 1 (8.3%) considered themselves to be Not Knowledgeable; 4 (33.3%) as Somewhat Knowledgeable; and 7 (58.3%) as Very Knowledgeable.

Effectiveness of Current Laws

When asked if current fair housing laws and enforcement mechanisms are effective, respondents were split with 33.3% feeling they are Very Effective, 33.3% feeling they are Somewhat Effective, and 33.3% feeling that they are Not Effective. Respondents were asked to list the reason for their responses and their reasons are noted below:

- I'm not well informed enough to know how effective the above are in the City of Garland.
- You don't do anything and don't conduct fair investigations!

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- The housing list has been closed for too many years.
- In addition to investigating complaints, public knowledge of the simple existence of the office helps to dissuade would-be parties from discriminating.
- The office is always open to answer citizen inquiries and provide referrals as well as file complaints.

While, the majority of respondents, 66.6%, feel the current laws are effective to some degree, due to a significant enough portion of responses indicating they are not effective, it is still important that the City continues its efforts to educate and address impediments to fair housing choice.

In addition, as mentioned previously over 45% of persons surveyed felt that there was inadequate fair housing information available in other language translations. While 54.5% of respondents said they thought the information available was adequate, given the low minority representation in the sample size and the lack of Spanish responses it is still recommended that the City specifically target fair housing outreach to minorities and persons with English as a second language when planning to address impediments to fair housing choice.

Housing Choice and Housing Supply

When asked about the current impediments to fair housing choice in Garland, five (5) respondents recorded responses. Their answers provided the following as impediments to fair housing:

- Race, Familial Status,
- Decisions that have the effect of restricting housing choices on the protected bases.
- Housing standards seem to be behind the national norm and are mainly reflected in areas that are majority minority.

Geographic Limitations of Housing Choice

Of the residents surveyed, residents were again split with 50% feeling that housing choices are geographically limited to certain areas or neighborhoods in the City of Garland, while 50% did not. The residents that felt that geographical limitations exist named Affordability and higher crime rates in certain areas of town as the main reasons for their answer choice.

In addition, of the 11 respondents asked the majority, 54.5% of respondents (6 persons) felt that affordable housing options are concentrated in certain projects/areas/neighborhoods, while the other 45.5% of respondents (5 persons) felt that affordable housing options are spread throughout the City of Garland. When asked to identify the areas with concentrated affordable housing, one respondent indicated there were newer areas not affordable to them in their response.

When asked if they perceive certain geographic areas or neighborhoods within Garland to be undesirable, the majority (83.3%) of respondents answered affirmatively (10 respondents). In addition, the undesirable areas were identified by those surveyed to include: South and East Garland; 1st, Dairy & Miller, West Walnut; a band running east/west across the mid portion of the city; East and West Garland; the area east of downtown and South of I66; South Garland; and parts of Dairy Road, Kingsley, Miller, and Broadway.

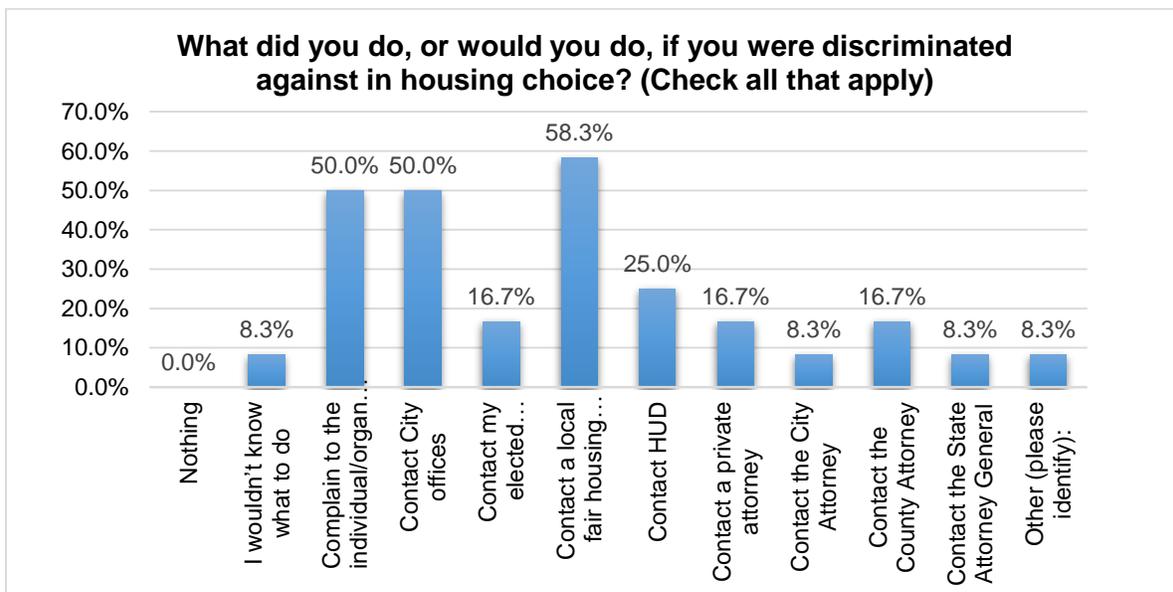
The survey asked if there was an adequate supply of affordable housing available to residents with disabilities, senior citizen residents, and residents with children. For residents with disabilities, 63.6% of respondents (7 persons) felt that there was not an adequate supply of affordable housing while 27.3% (3 person) felt residents with disabilities did have an adequate supply of fair housing. For senior citizen residents, 54.5% of respondents (6 persons) felt that there was not an adequate supply of affordable housing while 27.3% (3 persons) felt residents with disabilities did have an adequate supply of fair housing. Finally, for residents with children's, 18.2% of respondents (2 persons) felt that there was not an adequate supply of affordable housing while 45.5% (5 persons) felt residents with disabilities did have an adequate supply of fair housing. When asked to expand on why they felt this way respondent answers included the following:

- Newer homes are not affordable to seniors or disabled citizens and older homes are not desirable.
- Changing demographics and limited resources reduce options for the “working poor” and those on fixed incomes.
- Lack of pet friendly apartments
- Unable to base an opinion on real information

The majority of respondents felt that Garland did not have adequate housing for residents with disabilities and senior citizens, and that potential impediments exist in Garland that limit access to housing for many of the protected classes. The City of Garland needs to closely analyze its policies and programs that assist the elderly, minorities, disabled, and families with children with the provision of affordable housing choices to increase the provision of more units for these population groups. The City has initiated a program in FY 2015-2016 to

Fair Housing Education and Enforcement

Figure 27. Responses by Survey Respondents to Housing Discrimination 2014-Garland, TX



Of residents surveyed, the largest number of respondents (7 persons, or 58.3% of all responses) answered that they would contact their local fair housing organization. The next largest group (6 persons, or 50%) answered that they would contact their city offices or complain to the individual/organization that discriminated against them. Only one survey respondent selected the “Other” category saying they would **not** contact the City of Garland as the City has not responded in the past.

Residents were asked to indicate the most effective ways to inform residents about fair housing rights and/or responsibilities. The following answers were given.

Most Effective Ways to Inform Residents About Fair Housing Rights and Responsibilities	# of Respondents	% of Responses
Public meeting(s)	6	54.5%
Fair housing literature/information in public libraries and Municipal Center	7	63.6%
Television advertisements/announcements	6	54.5%
Radio advertisements/announcements	3	27.3%
Bilingual advertisements/announcements	9	81.8%
Information on the City's website	7	63.6%
Other (please describe)	2	18.2%

Of the 40 responses to this question (selecting more than one answer was allowed) only 2 respondent selected “Other”. Their answer is recorded below:

- Major media
- City Press and in Utility Bills

The survey concluded by asking what additional actions or changes to fair housing laws and practices could be taken by the City to address impediments and improve fair housing choice for all residents. Six suggestions were included:

- Multi-lingual literature; 2) Prosecution of landlords.
- Make seniors and disabled a priority. The program that assists families for 3-5 years, is too long and seems to be geared toward others than seniors and disabled.
- Hold special event for new city council members to educate them on fair housing issues to help them in creating legislation.
- Sexual orientation should NOT be included in laws or practices.
- Improve housing standards
- stop catering to landlords and HOAs

The above comments in addition to the survey response that 91.7% of respondents were familiar with fair housing and that 91.6% of respondents said they were Somewhat Knowledgeable to Very Knowledgeable about fair housing demonstrate that the current fair housing information dissemination efforts of Garland are proving successful.

Notwithstanding the above, the small size of the survey sample may affect the conclusions drawn here. Additionally, since the majority of the sample size identified as Anglo/White, it would benefit the City to conduct another survey and continue to target its education and awareness efforts towards minority, ethnic, and bilingual populations. These efforts should include increasing public meetings in minority dense areas, the creation and distribution of fair housing literature in multiple languages, and English and bilingual radio and television advertisements.

Realtor Surveys

Garland real estate professionals were invited to attend an informational AI meeting/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for realtors. The survey was available from October 7, 2014 until January 2015. However, no real estate professionals completed the survey. The results of the focus group will be discussed in the Focus Group section below.

Lender Surveys

Garland mortgage lenders were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for lenders. Only one (1) lender completed a survey. The results of the focus group will be discussed in the Focus Group section below.

The lender surveyed felt they were Very Knowledgeable about Fair Housing Law. The survey asked a variety of questions regarding the practices and procedures of their businesses. The lender gave the following responses related to their company’s practices:

- There are written policies addressing Fair Housing Law
- Marketing materials and/or display advertisements for soliciting borrowers include images of people of diverse racial/ethnic backgrounds
- Media marketing includes advertisements in languages other than English?
- Special marketing efforts are used to target minorities or low-income clients?
- The lender intentionally employs bilingual individuals on the lending staff in order to serve clients with poor English language skills

- The company has a specialty/niche market in the City of Garland (niche not indicated)
- The lender doesn't perceive Federal, State, or local banking regulations as impediments to fair housing mortgage lending?

The lender skipped the remaining questions regarding different interest rates, fee structures based on protected class membership, full service branches in minority or low-income neighborhoods, subprime loan products, less desirable borrowers, loan denials based on protected classes, loans to developers of affordable housing in low income neighborhoods, permanent loans for clients receiving subsidies such as section 8 mortgages, and whether any legal actions or complaints were filed against the bank.

Housing Provider Surveys

Garland housing providers were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for housing providers. A total of 10 housing providers completed the survey. The majority of respondent, 50.0% (5 persons) provided services relating to Fair Housing education and training. The remaining providers were distributed as follows: 20.0% provided services related to development and/or rental of housing, including affordable housing; 10% relating to Property management for rental housing and Housing counseling respectively. In addition, the majority of survey respondents, 80.0% (8 persons) felt that they were Very Knowledgeable of fair housing laws, including Texas fair housing law.

Questions for Housing Service Providers	Yes # and %	No # and %
Does your agency assist with fair housing complaints?	6 40.0%	4 40.0%
Do you have any materials displayed to promote fair housing?	8 80.0%	2 20.0%
Have you or your staff received any fair housing training?	10 100.0%	0 0.0%

Of the housing providers surveyed 60.0% (6 persons) assisted with fair housing complaints while 40.0% (4 persons) did not assist with fair housing complaints.

When asked to identify impediments to fair housing choice in Garland, the housing service providers stated that lack of knowledge, sexual orientation, lack of funding, and lack of housing were impediments.

Over 55% of respondents felt that residents perceive certain geographic areas or neighborhoods within the City to be undesirable, and 44.4% of respondents did not. When asked to describe the areas perceived as undesirable, the following answers were provided:

- Certain older neighborhoods have limited lot sizes and do not have newer homes
- Few Affordable Housing Options available in new neighborhoods
- Source of income, limited English, race and national origin

Housing providers were asked to identify appropriate actions for clients who have experienced housing discrimination. The following actions were identified as options:

- File complaint with the individual/organization that discriminated.
- Seek Tenant/Landlord Mediation
- Contact City offices and the City Attorney
- Contact a local fair housing organization and HUD.
- Contact the State Attorney General

When asked for ways for improving fair housing choice the answers given by housing service providers were as follows:

- Increase affordable housing stock and more mixed income projects for multifamily
- Standards closer to the national norms and transitional housing
- More economic development in lower income areas
- Continue provision of Fair Housing Services and make funding less depending on quantity of cases.

Agency Consultations

In conjunction with the surveys, ASK conducted agency consultations with nonprofit and advocacy groups through website and document review, and key person interviews held person-to-person, by teleconference, and via email correspondence.

Agency/Group	Related Services	How Consulted
Dallas Area Agency on Aging	Senior housing and non-discrimination	Website, document review
Garland Housing Agency	Rental assistance (Section 8)	Website, document review
The Arc of Texas	Assistance for persons with intellectual or development disabilities	Website, document review
HUD Field Office	Fair housing enforcement, training, outreach and compliance monitoring	Meeting and document review
Inclusive Communities Project	Fair housing and education, outreach and advocacy	Website, document review
North Texas Fair Housing Center	Housing counseling, housing discrimination complaints, outreach, and education, testing	Website, document review

Consultation Meetings with City Staff

Meetings were held with City staff and officials to get input on fair housing and discrimination issues. Consultations were held with the following persons:

- Jose Alvarado, Fair Housing Administrator, Human Resources Department – Fair Housing Services
- Mona Woodard, Grants Manager, Housing and Community Services
- Scott Bolinger, Business Project Manager, Organization Development
- Rio Orticio, Housing Standards Manager, Code Compliance
- Angela Self, Planning Administrator, Planning and Zoning Department
- Jason Wilhite, Construction Supervisor, Housing and Community Services
- Neil Montgomery, Senior Managing Director, Housing and Development
- Dedra Johnson, Commercial Standards Inspector, Code Compliance

The staff members were asked a number of questions about the status of fair housing, affordable housing and community service needs in Garland. Discussion and responses from City Staff are included in various sections of this report.

Public Meetings, Presentations and Focus Groups

Public meetings and focus group sessions were advertised on the City’s website and in newspapers of general circulation. The public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the City, various industry representatives and service providers, and the public stakeholders at large. 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. Additional information was gathered via teleconferences and email correspondence with nonprofit and advocacy

groups. Staff of the City of Garland's Fair Housing Services and Housing and Community Services departments actively participated in the public meetings and focus groups.

Interviews were also conducted with key individuals from other City Departments, non-profits, HUD, and housing providers to collect additional information about fair housing practices and impediments in the City.

Focus Groups

Focus group meetings were held on November 5, 6, and 7, 2014 with the following groups:

- Realtors, lenders, property managers, and other housing providers.
- Social service providers and advocates, as well as community housing development organizations, persons with HIV/AIDS, homeless, and persons with disabilities.
- City staff

Meetings were held at the Garland City offices. The focus group meetings were advertised on the City's website, via email, in Garland newspapers, publicized on the City's TV channel, the local radio station, as well as the City's Facebook page. Meeting attendance was limited despite the outreach.

At each session, the meeting attendees were educated on the purpose of the AI and the process to be used. Participants were asked to identify housing choice issues that were of particular concern to them and their comments were recorded. In addition, members of the general public, as well as representatives of various community groups were invited to a public meeting held on Thursday, November 6, 2014.

Issues Discussion from Focus Groups, City Officials, and Public Meetings

Discussions regarding fair housing choice in focus groups, key person interviews, public meetings, and with City staff resulted in the following observations. Several issues that limit housing choice but did not fall under the protection of the Fair Housing Act were raised by participants and interviewees. A summary of responses and discussions from the focus group and public meetings are provided below.

General Comments:

- The City of Garland is viewed as a diverse and affordable community.
- The City has a sizeable Asian community. In order to address language challenges within this population, material need to be made available in Vietnamese and Korean languages.
- Materials are currently provided in Spanish to provide fair housing information to the Latino community.
- The GFHS was fully compliant on HUD's most recent review.
- For the most part, people are aware of the existence of the GFHS and the assistance it provides. However, sometimes, persons confuse the Fair Housing Office with Public Housing and make requests accordingly. Effort is being made to clarify through more education on the definition of fair housing.
- Regional training is accessed through HUD's Fair Housing Office – Fort Worth.
- There is a need for more affordable housing.
- There are complaints regarding rentals to non-traditional tenants (example: Williamsburg apartments). Testing would be advisable.
- The City currently has a mandatory rental licensing program for single-family dwelling units with an inspection done by the City upon each change in tenancy.
- There has been an increase in fair housing allegation cases due to foreclosure. In one instance a family was scammed. The City worked with the lender and the case has been referred to the Federal authorities.
- With increase in the Asian population there has been some complaints regarding discriminatory disability terms and conditions being included in leases.
- There have also been some complaints concerning sexual orientation and religious discrimination.
- Tenants are sometimes afraid to file fair housing complaints due to fear of eviction and possible repercussions when they try to relocate.

- No obvious redlining has been noted in the City of Garland.

Focus Group: Realtors, Lenders & Property Managers:

- There are only a few complaints received about housing discrimination from realtors, property management, large rental projects, lenders, etc. More complaints are received from small landlords or single family owners. However, these are isolated and typically involve scamming. The lower level of complaints from larger rental projects is likely due to the City's ongoing fair housing education and awareness activities.
- The City uses qualified lenders and realtors. To avoid predatory and discriminatory lending practices under the City's Housing Programs, the City established limits on interest rate, fees, etc.
- There has been an increase in discrimination complaints related to "source of income." As the market improves, landlords are opting not to accept Section 8 vouchers, which poses an impediment for many renters.
- Realtors are being trained regarding fair housing issues.
- There are more requests for seller financing which are not regulated in terms of potential housing discrimination.
- There is low availability of section 8 vouchers for single-family housing.
- There is low inventory of housing for both home purchase and rentals – a statewide historic trend.
- A "voucher accepted" button should be added to search engine on sites offering rentals.
- Cases are being seen where lenders are restricting housing (S/F) through refinancing. Refinancing by some lenders does not allow subsidized renters (4 houses).
- Tenants are affected by flipping of smaller units leading to displacements.
- Approximately 1,525 vouchers available but 15,000 on waiting list of housing authority. Three (300) hundred names are pulled from list per year. Veteran Affairs does not allow subsidies. The Housing Authority leasing process takes 60 days. Disaster vouchers from Katrina were rolled into the current stock. Garland vouchers also serves Dallas County.

Focus Group: Special needs Housing

- There is lack of knowledge and awareness in the community and among public officials regarding the nature of Section 8 housing (the concepts of affordable housing vs. workforce housing), and this can lead to NIMBYism. There is a need for education on what is considered affordability to counter negative perceptions and preconceived ideas about the tenants or owners of subsidized housing.
- There is scarcity of rental housing
- Homeless individuals with gender identity/expression/orientation designation often do not go to shelters because of fear of harassment and other safety concerns as some shelters are not equipped to assist them. In addition, shelters require approved identification such as driver's license or state identification cards rather than just accepting the names provided by persons who have not concluded formal transition from one gender to another.

HUD Field Office

- HUD encourages cities to reach out to surrounding communities regarding fair housing issues and share best practices. A regional, collaborative approach is recommended.
- North Texas Fair Housing Center is a good regional resource on fair housing.
- HUD will be increasing its ability to provide technical assistance leading up to the Final Fair Housing Rule. The City may need additional technical assistance for cases involving gender identity/expression and to deal with situations of disparate impact.

Focus Group: Housing Authority & Persons with Disabilities

- The Garland Housing Agency conducts briefing meetings for tenants and new landlords

- The GFHS has received a few cases where discrimination has occurred. However, many cases do not meet criteria for litigation to proceed.
- The GFHS offers ongoing workshops regarding tenants' rights and responsibilities. However, attendance is sparse especially for tenants with disabilities. Many such tenants have no leases and often have no one to advocate for them
- The City participates in the Arc of Texas's expo for persons with disabilities. The GFHS refers individuals to this event.
- Strong need for a support system for the homeless, many of whom are persons with mental disabilities.
- City delegates support for persons with disabilities to various non-profits while focusing coordination of resources and provision of referrals.

ADA and Housing for Persons with Disabilities:

- Cases involving persons with mental disabilities losing housing are increasing. An example is where a tenant with a Section 8 voucher loses it because their disability causes non-compliance with recertification or domestic disturbances requirements. It is often difficult to provide assistance to these persons due to federal Health Insurance Portability and Accountability Act (HIPAA) confidentiality provisions and lack of case management. Unlike physical disabilities, mental disabilities are often not detectable and HIPAA and privacy laws limit what housing providers can ask. Tenants would have to self-disclose. Often, awareness of the disability only occurs when the tenant loses housing and is challenged with an appeals process that would take into consideration the tenant's mental disability on the appeal.
- Persons with Intellectual Development Disabilities (IDD) also experience similar impediments.

VII. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Introduction

The City of Garland has identified impediments to fair housing choice and recommendations for specific actions that the City could 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 fair housing actions will be approved by the City's governing Council. This section will also review the impediments and action plan identified in the City's prior 2011 AI and the status of fair housing activities and whether the impediments then are still active impediments.

On July 16, 2015, HUD published the Affirmatively Furthering Fair Housing (AFFH) Final Rule. Through this final rule, HUD provides CDBG grantees with an approach to more effectively and efficiently incorporate into their planning processes the duty to affirmatively further the purposes and policies of the Fair Housing Act, which is title VIII of the Civil Rights Act of 1968. The "affirmatively furthering fair housing" activities will be carried out through the CDBG 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 AFFH Final Rule.

In order to develop a viable fair housing implementation plan, the City will use the recommended actions as a framework for addressing the impediments and a guide for further community dialogue, research, feasibility testing, and fair housing action planning.

Update to 2011 Previous Impediments and Recommendations

The City of Garland'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. The City's GFHS was tasked with coordinating the implementation of the fair housing recommendations and actions. This section will review the 2011 impediments and fair housing actions to determine the status of those efforts, the funding invested in the fair housing activities and determining whether the 2011 impediment still needs further or ongoing action.

The City's GFHS completed a fair housing matrix which is attached as Appendix III – Status of Previous Impediments 2011. The list of completed activities was compared to the list of impediments and the proposed activities/actions to address the impediments. Based on a review of the activities, the City has made significant progress or completed the proposed activities and the impediment while not removed is being adequately addressed. There are some impediments which have not adequately been addressed and the recommendation(s) have been updated in this study.

Previous Impediment #1: Lack of adequate funding for fair housing enforcement and outreach activities.

Action/Goal: Increase efforts to disseminate Fair Housing information.

Current status: The City's CDBG's allocation was used for fair housing and various methods were used to disseminate fair housing information. The City's Fair Housing Services has completed the proposed actions and is still to determine whether this impediment remains. CDBG funds in the amount of \$36,600 was allocated to fair outreach and enforcement activities over two years.

Updated Recommendation(s): Continue efforts to disseminate Fair Housing information.

Previous Impediment #2: Lack of Fair Housing Testing to determine where Fair Housing discrimination is taking place.

Action/Goal: Evaluate existing testing to determine prevalence of Housing Discrimination, and implement/coordinate Fair Housing Testing as needed.

Current status: The City Fair Housing Services Department reviewed the findings of a rental audit by the North Texas Fair Housing Center and national findings and review of fair housing testing programs and literature to assess the need and/or feasibility of a fair housing testing component. The City considers that the goal has been met.

Updated Recommendation(s): City staff determined that no further action is required.

Previous Impediment #3: Need for ADA Education and Evaluation of Accessible/Disabled Housing Needs.

Action/Goal: Evaluate and improve ADA education and evaluate accessible/disabled housing needs

Current status: The City of Garland's building development process requires that plans involving construction in excess of \$50K follows State of Texas applicable laws and the City's Fair Housing Services website links to several fair housing and accessibility/disability resources. The recommendation continues to be reviewed to determine if the objectives can be achieved through the existing process. The City adopted a reasonable accommodation ordinance in 2008.

Updated Recommendation(s): Continue to review the cost and feasibility of the current recommendation and pursue partnerships with the recommended agencies.

Previous Impediment #4: Multifamily and Senior Housing Zoning Ordinances.

Action/Goal: These two ordinances should be monitored and any negative effects of them as well as barriers created by existing development requirements should be addressed with City Council.

Current status: The City of Garland is updating and consolidating its development codes, including the Zoning Ordinance, Subdivision Ordinance and Site Development Standards, into the Garland Development Code (GDC). The GDC will allow for more diverse housing types.

Updated Recommendation(s): City staff determined that no further action is required.

Previous Impediment #5: Price of Vacant Land

Action/Goal: The City should continue ongoing efforts to review and research strategies for acquiring vacant land at affordable prices.

Current status: The City of Garland uses resources such as the Residential Idea Book which provides ideas, tips and information to update and improve smaller, older homes for greater functionality, preserving affordable housing, and enhancing neighborhood stability. The City also adopted the Envision Garland 2030 Comprehensive Plan in March, 2012, with one of its Guiding Principles of providing opportunities for a range of housing types meeting the income, household needs and preferences with a focus on housing and neighborhoods. City staff determined that no further action is required.

Updated Recommendation(s): Review existing policies regarding acquisition of land through auctions and tax foreclosures to determine if these are viable options for reducing the price of land. The City could also encourage its non-profit developers and community housing development organizations (CHDOs) under the HOME program to use resources such as the National Community Stabilization Trust to access foreclosed properties before they go on the open market.

Previous Impediment #6: Lack of Income:

Action/Goal: The City should continue ongoing efforts to develop proactive strategies to increase income potential of residents.

Current status: The City of Garland Economic Development Department works closely with the Garland Chamber of Commerce to recruit new businesses for job creation and job training is provided by Richland College – Garland campus. City staff determined that no further action is required.

Updated Recommendation(s): Continue and expand efforts.

Previous Impediment #7: Cost Burden (Housing Cost vs. Income Available)

Action/Goal: The City should continue ongoing efforts to partner with developers, Realtors, banks and mortgage lenders to provide lower cost housing units.

Current status: The City's GREAT Homes program contributes to affordable housing by purchasing and upgrading existing foreclosed homes with emphasis on energy efficiency and increasing values.

Updated Recommendation(s): Continue and expand efforts.

Current 2015 Impediments and Recommendations

Based on research of available demographic and housing data and feedback from residents and entities involved in the affordable and fair housing, this section reviews the current impediments to fair housing choice identified in 2015 in both the public and private sectors. It must be noted that there are some impediments that were previously identified in 2011 that are also included in this current list due to their continued impact. For each impediment, recommendations were formulated for use in fair housing action planning to address the impediment.

A. Impediment: Lack of affordable housing for Garland residents especially for racial and ethnic minorities.

Action: Increase the production and preservation of affordable housing units.¹⁸

Recommendation #A-1:

Increase the supply of affordable housing for renters by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.

Status: The review of CHAS data and an analysis of housing affordability in the City of Garland 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 the City has focused both its CDBG and HOME funds for housing on addressing the needs of existing or prospective homeowners. The City is almost built out and there are very few large tracts of land to do multi-family housing for renters. The City is currently planning to provide support on a potential multi-family housing project that is converting a downtown office building to residential units, some of which may be affordable. In order to increase the number of affordable rental 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. The City can use CDBG and HOME and Neighborhood Stabilization Program (NSP) funds to incentivize lenders to assist in affordable housing financing.

Recommendation #A-2:

Encourage non-profit developers and community housing development organizations (CHDOs) under the HOME program to use resources such as the National Community Stabilization Trust (NCST) to access foreclosed properties before they go on the open market.

Status: The City has good relationships with experienced nonprofit developers that could have access to foreclosed single family properties from banks through the NCST. Most of the large lenders are part of the trust. Access to the trust will reduce the amount of competition that non-profits receive from investors seeking to purchase and “flip” properties. Being able to bid early would allow more affordable housing for homeownership or rental.

Recommendation #A-3:

Facilitate relationships between non-profit developers and individual banks to have foreclosed properties be transferred to developers and assist in funding rehabilitation costs with other partners.

¹⁸ As previously explained, under the FHA there is no requirement to create affordable housing but affordable housing is linked to fair housing choice.

Status: Banks that are not a part of the NCST could develop relationships with local builders to transfer foreclosed properties to these entities to be used as affordable housing. The City's provision of CDBG or HOME funds or Neighborhood Stabilization Program Income could be an incentive to the banks to provide funds the Community Reinvestment Act for the redevelopment of those properties. Other resources such as Federal Home Loan Bank of Dallas could be leveraged for rehabilitation. The bank provides funds to its members to fund affordable housing. See link to their website: <https://www.fhfb.com/community/Pages/Community-Advance-Programs.aspx>

Recommendation #A-4:

In order to maintain or increase homeownership in Garland, the City should 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.

Status: Some of the affordable homeownership stock in the City of Garland 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 attributable to predatory lending practices or other discriminatory housing practices as well as unemployment, underemployment, or creditworthiness.

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.

Recommendation #B-1:

Based on current supply and projected growth of residents with disabilities and an aging population, the City should determine the need for accessible units and seek out additional resources to fill the gap.

Status: It is clear from the City's Consolidated Plan than there are currently not enough resources available to meet the housing needs of disabled persons. In order to address this issue, the City of Garland should develop a listing of housing units available to disabled persons that are both affordable and accessible. This listing should 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 should establish a reasonable goal to increase the number of accessible units based on available funding.

Recommendation #B-2:

The City should review public awareness, staff capacity, and use of the benefits related to its reasonable accommodation ordinance.

Status: The City adopted a reasonable accommodation ordinance in 2008. City staff should review the response to and awareness of the ordinance and city staff capacity to ensure that covered projects are benefiting from the ordinance and the needs of persons with disabilities are being met in this regard.

C. Impediment: Housing rehabilitation resources available to the City are not distributed between owner and renter households.

Action: The City should expand its rehabilitation programs to cover repairs including accessibility modifications for rental properties.

Recommendation #C-1:

Develop and implement a rental rehabilitation program that provides funding to property owners that provide housing for low and moderate income persons including persons with disabilities.

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. Property owners struggle with financing repairs for families who pay lower rents. The City has started providing funding for rental projects but its initial projects are larger multi-family projects. Smaller projects such as single units, duplexes and less than 10 units are still a need. Renter households with a member with disabilities face greater challenges than owner households with a member with disabilities. However, the City's rehabilitation programs including the programs that target the disabled and the elderly are geared towards owner-occupied units. The City's Fair Housing Services 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 from codes that may limit housing opportunities to individuals with disabilities.

Action: The City should 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.

Recommendation #D-1:

The City should 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.

Status: Chapter 34 of the Garland City Code provides for "a free, easy, and efficient means for persons with disabilities to request such reasonable accommodations..." to allow certain deviations from the City's zoning and land use requirements and development standards "...in order that they should have the same or equal opportunities as individuals without disabilities to enjoy housing of their choice." However, it is not easy to find the application process including forms on the City's website.

E. Impediment: Lending practices may be disproportionately impacting minority and ethnic populations based on loan denial rates and incidences of scamming.

Action: The City should work with lenders in Garland and request that they review their underwriting standards to determine that loan decisions are being made equitably and continue to educate the public on loan scams.

Recommendation #E-1:

The City should coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

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 Garland. If after closer examination of the data racial disparities are found to exist, the City and its partners should provide fair housing training to loan originators and underwriters and consider creating a committee to conduct continuous review and monitoring of residential loan products.

Recommendation #E-2:

The City should continue its education of the public on loan scams and invite lenders to participate in the education process.

Status: There has been an increase of loan scams targeted to ethnic and minority communities. The City's Fair Housing Services has been working with persons who have lodged complaints and is noticing a trend. It would be strategic for banks to partner with the City on the education of residents.

F. 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.

Recommendation #F-1:

The City of Garland should 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.

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.

G. 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.

Recommendation #G-1:

The City should 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.

Status: The City has increased its outreach to minority populations especially persons of Hispanic/Latino ethnicity and the elderly. However, there are other groups that are not commonly using the City's fair housing services.

Recommendation #G-2:

The City should 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.

Status: Input from focus groups and key person interviews suggest that these are effective mediums to disseminate information on fair housing.

H. 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.”

Recommendation #H-1:

Through the preparation of fact sheets and incorporation of NIMBYism as a topic in fair housing training to provide residents an opportunity to learn more about affordable and accessible housing and help dispel negative preconceptions.

Status: The City’s Fair Housing Services does not have a specific NIMBYism component as part of fair housing training.

Recommendation #H-2:

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

Status: The City’s Fair Housing Services currently engages with regional partners through events such as fair housing symposiums. 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.

I. Impediment: A disproportionate number of Section 8 voucher recipients are minority which contributes to segregated housing patterns.

Action: The GHA should conduct periodic analysis of the distribution of vouchers by family type and race/ethnicity to determine if there is a pattern of segregation.

Recommendation #I-1:

The City should take actions to promote housing choices for voucher holders including continuing to educate private landlords in non-minority census tracts about the Section 8 Housing Choice Voucher Program and provide voucher users with information on available rental units outside of predominantly minority areas.

Status: The review of Section 8 voucher use in Garland census tracts demonstrated that there may be a location pattern of minority voucher holders in primarily minority neighborhoods. The finding is derived based on the large minority population receiving public housing assistance and the use of these vouchers in minority census tracts. The GHA should conduct further analysis based on the race/ethnicity of each voucher holder to determine if minorities are located in predominantly minority neighborhoods and Whites in predominantly white neighborhoods. The GHA has existing policies to assist Section 8 voucher holders to locate housing units outside of minority areas and to market the Section 8 Program to property owners outside minority concentrated areas, however, the GHA should consider ways to further assist in the property search process and monitor the outcome of the actions taken.

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.”¹⁹ 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 Garland 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 should be 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 recommendations to address them contained in this report, the City of Garland is required to develop a Fair Housing Action Plan in accordance with Chapter 2 of the HUD Fair Housing Planning Guide: Volume 1. In light of constrained federal, state, and local budgets, Garland, like many other jurisdictions, may not have all of the resources that will be needed to carry out the recommendations contained in this report. The recommendations 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 fair housing choice issues raised in the study.

A list of the impediments and recommendations are included in a matrix identified as Appendix II- City of Garland Fair Housing Planning Matrix. The matrix includes a list of recommended actions and responsible partners (both internal City departments and external parties). A timeframe for implementation of the actions is also included as determined by the City consisting of 1-2 years, 3-5 years, and 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 Fair Housing Action Plan will be developed with input from City Council, City Departments 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 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 with the AI. The City should assign a Department or Division that will be responsible for coordinating the fair housing planning, implementation, and monitoring functions. That unit of the City will be act as liaison between the City and external agencies and other City departments. It is recommended that the

¹⁹ 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

City's Fair Housing Services Department in collaboration with the Housing and Community Services Department serve in the coordinating role.

2. Communicate AI Results

The City should communicate the results of the AI to the public and all stakeholders through the following means:

- Print copies of the AI and place in 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 should 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 partners, subrecipients, 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 should 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."²⁰

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 Garland:²¹

- 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.

²⁰ 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*

²¹ 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*

- 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.

Fair Housing Implementation Tracking

The City's AI Coordinating Function should be responsible for the oversight and tracking of the implementation of the fair housing action plan. The AI Coordinating Function 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 should 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 should 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; 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.

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 should be conducted at the end of the third year of implementation and should 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 should 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.

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. Should 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:

APPENDICES

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Appendix II- City of Garland Fair Housing Planning Matrix

REMEDIAL ACTION RECOMMENDED	RESPONSIBLE PARTIES	TIME FRAME
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS		
<i>A. Impediment: Lack of affordable housing for Garland residents especially for racial and ethnic minorities.</i>		
<i>Action: Increase the production and preservation of affordable housing units</i>		
Recommendation #A-1: Increase the supply of affordable housing for renters by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.	Developers; Lenders; Housing Providers; Housing & Community Services (HCSD), City Council	Check one Ongoing <input checked="" type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #A-2: Encourage non-profit developers and HOME community housing development organizations (CHDOs) to use resources such as the National Community Stabilization Trust (NCST) to access foreclosed properties before they go on the open market.	Developers; CHDOs; HCSD; lenders; NCST; City Manager's Office	Check one Ongoing <input checked="" type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #A-3: Facilitate relationships between non-profit developers and individual banks to have foreclosed properties be transferred to developers and assist in funding rehabilitation costs with other partners.	Developers, HCSD; City Council; City Manager's Office	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input checked="" type="checkbox"/>
Recommendation #A-4: 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.	HCSD; City Council; City Manager's Office; housing counseling agencies, social service providers	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>B. Impediment: Lack of accessible housing limiting housing choices for seniors and persons with disabilities.</i>		
<i>Action: Increase the number of accessible housing units based on need.</i>		
Recommendation #B-1: Determine the need for accessible units and seek out additional resources to fill the gap.	Developers, HCSD; Planning Dept.	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #B-2: Review public awareness, staff capacity, and use of the benefits related to its reasonable accommodation ordinance.	HCSD; Planning Dept.; Fair Housing Office; other fair housing agencies	Check one Ongoing <input checked="" type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>C. Impediment: Housing rehabilitation resources available to the City are not distributed between owner and renter households.</i>		

REMEDIAL ACTION RECOMMENDED	RESPONSIBLE PARTIES	TIME FRAME
<i>Action: The City should expand its rehabilitation programs to cover repairs including accessibility modifications for rental properties.</i>		
Recommendation #C-1: Develop and implement a rental rehabilitation program that provides funding to property owners that provide housing for low and moderate income persons including persons with disabilities.	HCSD; City Manager's Office; City Council	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<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> <i>Action: The City should 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.</i>		
Recommendation #D-1: The City should 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.	Planning Dept.; Fair Housing Services	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>E. Impediment: Lending practices may be disproportionately impacting minority and ethnic populations based on loan denial rates and incidences of scamming.</i> <i>Action: The City should work with lenders in Garland and request that they review their underwriting standards to determine that loan decisions are being made equitably and continue to educate the public on loan scams.</i>		
Recommendation #E-1: The City should coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.	Fair Housing Services; HCSD	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #E-2: The City should continue its education of the public on loan scams and invite lenders to participate in the education process.	Fair Housing Services; HCSD	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>F. 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> <i>Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.</i>		
Recommendation #F-1: The City of Garland should 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.	Garland Housing Agency; Other housing providers; Fair Housing Services; other fair housing agencies	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>G. Impediment: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP)</i> <i>Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian</i>		

REMEDIAL ACTION RECOMMENDED	RESPONSIBLE PARTIES	TIME FRAME
<i>Americans, persons with disabilities including the hearing impaired, the Lesbian, Gay, Bisexual, and Transgender (LGBT) community, and persons with LEP.</i>		
Recommendation #G-1: The City should 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.	Fair Housing Services, other fair housing agencies, social service agencies	Check one Ongoing <input checked="" type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #G-2 The City should 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.	Fair Housing Services; Communications Dept.; other fair housing agencies; social service agencies; HUD	Check one Ongoing <input checked="" type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>H. Impediment: “Not in my Backyard” (NIMBYism) sentiment is an impediment to fair housing choice.</i> <i>Action: Increase education and outreach to dispel myths and false perceptions about affordable housing.</i>		
Recommendation #H-1 Through the preparation of fact sheets and incorporation of NIMBYism as a topic in fair housing training to provide residents an opportunity to learn more about affordable and accessible housing and help dispel negative preconceptions.	Fair Housing Services, Planning Dept., developers, Garland Housing Agency	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
Recommendation #H-2 Work with partners throughout the region to raise awareness of the concepts of “housing affordability” and “affordable financing.”	Fair Housing Services, regional partners and fair housing agencies, Garland Housing Agency	Check one Ongoing <input type="checkbox"/> 1-2 years <input checked="" type="checkbox"/> 3-5 years <input type="checkbox"/>
<i>I. Impediment: A disproportionate number of Section 8 voucher recipients are minority which contributes to segregated housing patterns.</i> <i>Action: The GHA should conduct periodic analysis of the distribution of vouchers by family type and race/ethnicity to determine if there is a pattern of segregation.</i>		
Recommendation #I-1 The City should take actions to promote housing choices for voucher holders including continuing to educate private landlords in non-minority census tracts about the Section 8 Housing Choice Voucher Program and provide voucher users with information on available rental units outside of predominantly minority areas.	Fair Housing Services, Planning Dept., Garland Housing Agency	Check one Ongoing <input type="checkbox"/> 1-2 years <input type="checkbox"/> 3-5 years <input type="checkbox"/>

Appendix III – Status of Previous Impediments 2011

CITY OF GARLAND, TX ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE STATUS OF PREVIOUS IMPEDIMENTS 2011

Date of Completion: 11/12/2014

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
I. IMPEDIMENTS AND RECOMMENDATIONS FROM 2011 AI			
<p>Impediment: <i>Lack of Fair Housing Awareness.</i></p> <p>Action: <i>Increase efforts to disseminate Fair Housing information.</i></p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. <i>The City should earmark additional funding for the Garland Fair Housing Services</i></p> <p>2. <i>The City should use existing resources and programs to disseminate fair housing information, provide fair housing education opportunities, and work with the Community Multicultural Commission to educate the community.</i></p>	<p>The City of Garland received FHAP funding for FY12, 13 and 14 to engage in fair housing enforcement.</p> <p>CDBG Grant Administrative funding provided Fair Housing Services opportunities to engage in outreach and enforcement activities in FY12 and FY14.</p> <p>Completed.</p> <p>The City continued dissemination fair housing resources through existing forums, such as the Garland City Press; City website; CGTV, COGNET City Intranet; VietFace TV; Carver Center marquee, flyers, direct mail and brochures. The City partnered with agencies such as the City of Dallas; Garland Housing Agency; Community Multicultural Commission, the Garland Branch NAACP and other entities to increase awareness of community housing and fair housing opportunities.</p>	<p><u>FHAP:</u> '12- \$243,260 '13- \$266,900 '14 -\$207,203</p> <p><u>CDBG</u> '12-\$18,300 '13 - \$0 '14-\$18,300</p> <p>NA</p>

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
	3. <i>The City's home page, as well as the web pages for City housing programs, should include a direct link to fair housing information.</i>	Complete. A direct link to the filing a complaint is now available at the Garland Fair Housing website, in addition to the Citizen Request Center of the City of Garland website. Other useful web link resources were added.	NA
	4. <i>The Garland Housing Agency web page should include additional information on fair housing law, as well as a direct link for registering Fair Housing complaints.</i>	The Garland Housing Agency now has information and a link to a fair housing complaint form in FAQ - What if I have a fair housing complaint against my current landlord?	NA
	5. <i>The City should use City of Garland Government Access Television (CGTV) programming, City website, and the City newsletter, to reach more citizens with fair housing information.</i>	Complete. The City continued use of CGTV, City website and City Press in its efforts to advise residents of housing and fair housing services.	NA
<p>Impediment: Lack of Fair Housing Testing to determine where Fair Housing discrimination is taking place.</p> <p>Action: Evaluate existing testing to determine prevalence of Housing Discrimination, and implement/coordinate Fair Housing Testing as needed</p> <p>Does the City still consider this an impediment? (Check one below)</p>	1. <i>The City should examine data on regional fair housing testing and trends in housing discrimination, from all sources available, to determine the prevalence of fair housing discrimination. The City should analyze this data annually or bi-annually to ascertain the need for, and feasibility of, conducting fair housing testing.</i>	Complete. The City Fair Housing Services Department has reviewed the findings of a recent rental audit by the North Texas Fair Housing Center and national findings. The Fair Housing Services Department is not staffed to conduct fair housing testing.	NA
	2. <i>The City should research existing HUD, or other funding opportunities, for fair housing testing activities and training necessary to gain expertise in the oversight of a fair housing testing program.</i>	Complete. The City Fair Housing Services Department initiated a review of fair housing testing programs and literature to assess the need and/or feasibility of a fair housing testing component. No funding was identified as a	NA

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/>		regional FHIP would likely be the recipient of testing funding.	
<p>Impediment: Need for ADA Education and Evaluation of Accessible/Disabled Housing Needs.</p> <p>Action: Evaluate and improve ADA education</p> <p>Action: Evaluate Accessible/Disabled Housing Needs</p>	<p>1. <i>The City should continue to make efforts to provide builders with information packets regarding ADA requirements, post requirements on the City’s website, and incorporate ADA requirements in the development review and permitting process of housing construction through its Building Inspections Department.</i></p>	<p>The City of Garland building development process requires that plans involving construction in excess of \$50K be reviewed by Texas Department of Licensing and Regulation (TDLR) for full compliance with applicable laws.</p> <p>The Garland Fair Housing Services website includes links to several fair housing and accessibility/disability for more comprehensive information.</p>	NA
<p>Does the City still consider this an impediment? (Check one below)</p> <p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>2. <i>It is recommended that the City consider addressing the apparent deficit of affordable housing that is ADA accessible by conducting a comprehensive review of the ADA accessible housing unit levels of supply and demand. The City can partner with REACH, Inclusive Communities Project, Easter Seals, and other agencies to create an ADA Committee for the City Garland. The Committee could assist with the review of housing. Using that data, the City can support the development and/or retrofitting of additional ADA accessible housing units. Creation of this Committee can also assist the City in their efforts to provide ADA and fair housing information and education to those involved in the home construction industry.</i></p>	<p>Recommendation continues to be reviewed to determine if the objectives can be achieved through existing Garland community services; and cost and feasibility of recommendation.</p> <p>A public hearing is held by the Board of Adjustment for all “Reasonable Accommodation” requests.</p>	NA

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
UPDATED IMPEDIMENTS AND RECOMMENDATIONS TO 2000 AI (Included in 2011 AI)			
Impediment: Multifamily Zoning Ordinance Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/>	1. Updated Recommendation: <i>The City should monitor the progress of the new Code, and report on the changes/progress in the FY 2010 CAPER. The City's Fair Housing Services should consider presenting information to the City Council regarding the negative impact and barriers of the existing development requirements, particularly since ten years have passed since the original impediment was found to exist.</i>	The GDC will accommodate multi-family development at higher densities, mixed-use development, senior housing, townhomes, and patio home (small lot) residential development – all aimed at allowing for a greater mix of housing products to serve a greater range of housing needs (see Zoning Policies and Practices Questionnaire).	NA
Impediment: Senior Housing Ordinance Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/>	2. Updated recommendation: <i>The City should monitor the progress of the new Code, and report on the changes/ progress in the FY 2010 CAPER. The City's Fair Housing Services should consider presenting information to the City Council regarding the negative impact and barriers of the existing development requirements, particularly since ten years have passed since the original impediment was found to exist.</i>	The City of Garland is updating and consolidating its development codes, including the Zoning Ordinance, Subdivision Ordinance and Site Development Standards, into a cohesive and well-organized document known as the Garland Development Code (GDC). The purpose of the Garland Development Code is to create regulations that will provide a diversity of development types with a variety, balance, and mix of uses. In addition to the draft of the Garland Development Code, the zoning map will be updated to reflect the new zoning classifications proposed within the document (see Zoning Policies and Practices Questionnaire).	NA
Impediment: Price of Vacant Land	1. Updated recommendation: <i>The City should continue ongoing</i>	The City of Garland Residential Idea Book provides ideas, tips and information to	NA

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p><i>efforts to review and research strategies for acquiring vacant land at affordable prices.</i></p>	<p>Garland homeowners on how to update and improve smaller, older homes to make them more functional and better serve contemporary housing needs, thereby preserving affordable housing stock and enhancing neighborhood stability.</p> <p>The Envision Garland 2030 Comprehensive Plan was adopted by City Council in March, 2012, and one of the 8 Guiding Principles of the plan is “Garland provides opportunities for a range of housing types meeting the income, household needs and preferences of those seeking to call the city home.” The Envision Garland Plan also contains a Housing and Neighborhoods chapter, which sets forth goals and policies to achieve this principle.</p>	
<p><i>Impediment: Lack of Income</i> Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>2. <i>Updated recommendation:</i> <i>The City should continue ongoing efforts to develop proactive strategies to increase income potential of residents.</i></p>	<p>The City of Garland Economic Development Department works closely with the Garland Chamber of Commerce to recruit new businesses in an effort to increase the quantity and quality of jobs in Garland. Job training is provided by Richland College – Garland campus.</p>	NA
<p><i>Impediment: Cost Burden (Housing Cost vs. Income Available)</i> Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>3. <i>Updated recommendation:</i> <i>The City should continue ongoing efforts to partner with developers, Realtors, banks and mortgage lenders to provide lower cost housing units.</i></p>	<p>The GREAT Homes program contributes to expanding stock of affordable housing by purchasing and upgrading existing foreclosed homes with emphasis on energy efficiency and increasing potential home value. This program also serves as a catalyst to revitalize neighborhoods, encourages home investment in the community, and provides market rate and below market rate</p>	NA

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
		<p>housing for potential income eligible homeowners.</p> <p>One of the 8 Guiding Principles of the Envision Garland Plan is “Garland provides opportunities for a range of housing types meeting the income, household needs and preferences of those seeking to call the city home.” The Plan contains a Housing and Neighborhoods chapter which sets forth goals and policies to achieve this principle.</p> <p>City partnership with Garland Housing Finance Corporation (GHFC), First-Time Homebuyers Program and Infill program.</p>	
<p><i>Impediment: Cost of Housing</i></p> <p>Does the City still consider this an impediment? (Check one below)</p> <p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>4. <i>Updated recommendation:</i> <i>The City should continue ongoing efforts to partner with developers and financial institutions to expand stock of affordable housing units.</i></p>	<p>The GREAT Homes program contributes to expanding stock of affordable housing by purchasing and upgrading existing foreclosed homes with emphasis on energy efficiency and increasing potential home value. This program also serves as a catalyst to revitalize neighborhoods, encourages home investment in the community, and provides market rate and below market rate housing for potential income eligible homeowners.</p> <p>The Envision Garland 2030 Comprehensive Plan also contains an Economic Development chapter which addresses residential revitalization and investment in the city’s housing stock, in addition to more typical economic development goals and policies related to strengthening the economic base, expanding job opportunities,</p>	<p>NA</p>

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
		work force development and business attraction.	
<p><i>Impediment: Availability of HUD Technical Assistance</i></p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. <i>Updated recommendation:</i> <i>The City should continue ongoing efforts to optimize HUD Technical Assistance.</i></p>	<p>Ongoing technical assistance and training was received from HUD staff through fair housing training about complex, novel, aged and disparate impact housing discrimination cases. A partnership grant was received by HUD to increase awareness of new HUD initiatives. The HUD Regional staff in Ft. Worth maintains contact with the City of Garland Fair Housing Services personnel to address concerns and provide technical assistance.</p>	<p>NA</p>
<p><i>Impediment: Lack of Public Awareness of Fair Housing Issues</i></p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. <i>Updated recommendation:</i> <i>The City should continue ongoing efforts to increase awareness of the Fair Housing Services and its function.</i></p>	<p>On-going fair housing education and outreach activities were conducted as part of the Fair Housing Assistance Program (FHAP) and through a partnership grant component. Fair Housing Services concluded the HUD partnership grant with the Garland Housing Agency and informally with other local entities to offer information and awareness of tenant rights and responsibilities, fair housing laws, protected classes; prohibited acts and other relevant information. Outreach efforts continued through various media, including CGTV; City Press newsletter; Fair Housing website; VietFace TV; news releases, workshop flyers, the Summer Nutrition Program and program brochures.</p>	<p>\$67,000 Partnership Grant-FY12 \$86,183 Partnership Grant-FY14</p>

Appendix IV- List of Acronyms

A

affirmatively further fair housing” (AFFH), 3
American Community Survey (ACS), 7
Analysis of Impediments to Fair Housing Choice (AI), 3

C

Community Development Block Grant (CDBG), 3
Community Reinvestment Act (CRA), 7

E

Emergency Solutions Grant (ESG), 3

F

Fair Housing Assistance Program (FHAP), 5
Fair Housing Initiatives Program (FHIP), 8
fair housing planning (FHP), 8
Federal Fair Housing Act (FHA), 3
Federal Financial Institutions Examination Council (FFIEC), 19

H

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Appendix V- HMDA Loan Applications and Denials Raw Tables for Garland, TX

Table V-1: City of Garland Loan Applications and Denials by Census Tract

Total and Minority Applications and Denial Rates
Garland, Texas
2011-2013

Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applications	Total Minority Applications Denial Rate	Tract Minority %	Tract Median Family Income %
178.08	632	88	13.9%	196	30	31.0%	15.3%	47.09	114.9
181.05	383	90	23.5%	169	49	44.1%	29.0%	76.75	54.51
181.1	949	159	16.8%	195	42	20.5%	21.5%	21.77	130.68
181.11	592	113	19.1%	243	57	41.0%	23.5%	66.94	82.51
181.18	1241	207	16.7%	587	105	47.3%	17.9%	64.23	81.7
181.2	819	166	20.3%	337	79	41.1%	23.4%	62.38	104.92
181.21	569	100	17.6%	257	50	45.2%	19.5%	70.44	74.3
181.23	1323	259	19.6%	576	144	43.5%	25.0%	57.79	103.18
*181.24	*	*	*	*	*	*	*	*	*
181.26	746	123	16.5%	268	56	35.9%	20.9%	59.13	100.62
181.27	249	57	22.9%	145	36	58.2%	24.8%	67.51	86.92
181.28	405	89	22.0%	168	51	41.5%	30.4%	71.1	74.75
181.29	447	63	14.1%	126	22	28.2%	17.5%	43.23	120.18
181.32	751	141	18.8%	254	49	33.8%	19.3%	52.38	101.64
181.37	443	73	16.5%	179	30	40.4%	16.8%	58.37	128.64
181.38	241	38	15.8%	126	20	52.3%	15.9%	64.4	82.06
181.41	109	23	21.1%	32	8	29.4%	25.0%	45.9	61.05
181.42	326	45	13.8%	94	15	28.8%	16.0%	55.22	96.17
182.03	609	145	23.8%	336	84	55.2%	25.0%	85.24	72.82
182.04	100	31	31.0%	68	23	68.0%	33.8%	95.65	46.52
182.05	358	77	21.5%	194	51	54.2%	26.3%	82.25	53.48
182.06	196	49	25.0%	98	37	50.0%	37.8%	79.18	62.56
183	460	95	20.7%	162	44	35.2%	27.2%	66.73	73.55
184.01	423	73	17.3%	160	36	37.8%	22.5%	66.46	70.17
184.02	537	81	15.1%	148	30	27.6%	20.3%	44.1	96.96
184.03	2	1	50.0%	1	1	50.0%	0.0%	75.33	63.12
185.01	274	55	20.1%	107	27	39.1%	25.2%	63.41	78.71
185.06	13	4	30.8%	2	2	15.4%	100.0%	93.29	42.39
186	430	61	14.2%	106	25	24.7%	23.6%	41.97	80.81
187	270	70	25.9%	118	42	43.7%	35.6%	75.55	56.5
188.01	350	76	21.7%	143	33	40.9%	23.1%	65.89	84.2
188.02	54	11	20.4%	13	4	24.1%	30.8%	55.33	58.83
189	553	125	22.6%	270	67	48.8%	24.8%	71.75	67.94
190.04	647	132	20.4%	304	65	47.0%	21.4%	67.57	85.44
190.13	12	4	33.3%	4	3	33.3%	75.0%	94.1	36.15
190.14	519	122	23.5%	278	84	53.6%	30.2%	77.49	81.42
190.2	714	105	14.7%	212	50	29.7%	23.6%	56.72	108.74

Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applications	Total Minority Applications Denial Rate	Tract Minority %	Tract Median Family Income %
190.21	657	139	21.2%	286	64	43.5%	22.4%	61.53	80.68
190.25	878	142	16.2%	244	44	27.8%	18.0%	48.12	119.72
190.26	806	134	16.6%	236	46	29.3%	19.5%	43.08	95.69
190.27	564	99	17.6%	299	56	53.0%	18.7%	66.51	65.89
190.28	415	81	19.5%	169	42	40.7%	24.9%	64.85	91.56
190.29	812	143	17.6%	340	69	41.9%	20.3%	60.88	81.75
190.31	1346	186	13.8%	265	58	19.7%	21.9%	36	135.02
190.32	261	67	25.7%	150	40	57.5%	26.7%	82.46	69.11
190.33	230	50	21.7%	124	34	53.9%	27.4%	83.72	51.26
190.42	614	91	14.8%	175	31	28.5%	17.7%	48.73	136.11
190.43	1382	175	12.7%	264	60	19.1%	22.7%	25.75	158.13
313.16	999	141	14.1%	412	71	41.2%	17.2%	60.49	179.53
320.09	1443	173	12.0%	438	69	30.4%	15.8%	44.45	170.81
320.11	744	76	10.2%	243	31	32.7%	12.8%	49.59	177.04

Table V-2: City of Garland Loan Applications and Denials by Minority Census Tract

**Minority Census Tract Loan Applications and Denials
Garland, Texas
2011-2013**

Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applications	Total Minority Applications Denial Rate	Tract Minority %	Tract Median Family Income %
181.05	383	90	23.5%	169	49	44.1%	29.0%	76.75	54.51
181.11	592	113	19.1%	243	57	41.0%	23.5%	66.94	82.51
181.18	1241	207	16.7%	587	105	47.3%	17.9%	64.23	81.7
181.21	569	100	17.6%	257	50	45.2%	19.5%	70.44	74.3
181.27	249	57	22.9%	145	36	58.2%	24.8%	67.51	86.92
181.28	405	89	22.0%	168	51	41.5%	30.4%	71.1	74.75
181.38	241	38	15.8%	126	20	52.3%	15.9%	64.4	82.06
182.03	609	145	23.8%	336	84	55.2%	25.0%	85.24	72.82
182.04	100	31	31.0%	68	23	68.0%	33.8%	95.65	46.52
182.05	358	77	21.5%	194	51	54.2%	26.3%	82.25	53.48
182.06	196	49	25.0%	98	37	50.0%	37.8%	79.18	62.56
183	460	95	20.7%	162	44	35.2%	27.2%	66.73	73.55
184.01	423	73	17.3%	160	36	37.8%	22.5%	66.46	70.17
184.03	2	1	50.0%	1	1	50.0%	0.0%	75.33	63.12
185.01	274	55	20.1%	107	27	39.1%	25.2%	63.41	78.71
185.06	13	4	30.8%	2	2	15.4%	100.0%	93.29	42.39
187	270	70	25.9%	118	42	43.7%	35.6%	75.55	56.5
188.01	350	76	21.7%	143	33	40.9%	23.1%	65.89	84.2

Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applications	Total Minority Applications Denial Rate	Tract Minority %	Tract Median Family Income %
189	553	125	22.6%	270	67	48.8%	24.8%	71.75	67.94
190.04	647	132	20.4%	304	65	47.0%	21.4%	67.57	85.44
190.13	12	4	33.3%	4	3	33.3%	75.0%	94.1	36.15
190.14	519	122	23.5%	278	84	53.6%	30.2%	77.49	81.42
190.27	564	99	17.6%	299	56	53.0%	18.7%	66.51	65.89
190.28	415	81	19.5%	169	42	40.7%	24.9%	64.85	91.56
190.32	261	67	25.7%	150	40	57.5%	26.7%	82.46	69.11
190.33	230	50	21.7%	124	34	53.9%	27.4%	83.72	51.26

Table V-3: Total Median Income Categories for All Garland Census Tracts: 2011-2013

Census Tract	Tract Median Family Income %	Tract Income Level	2013 Tract Minority %
182.04	46.52	Low	95.65
185.06	42.39	Low	93.29
190.13	36.15	Low	94.1
178.08	114.9	Middle	47.09
181.11	82.51	Middle	66.94
181.18	81.7	Middle	64.23
181.2	104.92	Middle	62.38
181.23	103.18	Middle	57.79
181.26	100.62	Middle	59.13
181.27	86.92	Middle	67.51
181.32	101.64	Middle	52.38
181.38	82.06	Middle	64.4
181.42	96.17	Middle	55.22
184.02	96.96	Middle	44.1
186	80.81	Middle	41.97
188.01	84.2	Middle	65.89
190.04	85.44	Middle	67.57
190.14	81.42	Middle	77.49
190.2	108.74	Middle	56.72
190.21	80.68	Middle	61.53
190.25	119.72	Middle	48.12
190.26	95.69	Middle	43.08
190.28	91.56	Middle	64.85
190.29	81.75	Middle	60.88
181.05	54.51	Moderate	76.75
181.21	74.3	Moderate	70.44
181.28	74.75	Moderate	71.1

Census Tract	Tract Median Family Income %	Tract Income Level	2013 Tract Minority %
181.41	61.05	Moderate	45.9
182.03	72.82	Moderate	85.24
182.05	53.48	Moderate	82.25
182.06	62.56	Moderate	79.18
183	73.55	Moderate	66.73
184.01	70.17	Moderate	66.46
184.03	63.12	Moderate	75.33
185.01	78.71	Moderate	63.41
187	56.5	Moderate	75.55
188.02	58.83	Moderate	55.33
189	67.94	Moderate	71.75
190.27	65.89	Moderate	66.51
190.32	69.11	Moderate	82.46
190.33	51.26	Moderate	83.72
181.1	130.68	Upper	21.77
181.29	120.18	Upper	43.23
181.37	128.64	Upper	58.37
190.31	135.02	Upper	36
190.42	136.11	Upper	48.73
190.43	158.13	Upper	25.75
313.16	179.53	Upper	60.49
320.11	177.04	Upper	49.59
320.09	170.81	Upper	44.45
*181.24			

Table V-4: Total Application Denial Rates Sorted by Total Denial Rates for All Garland Census Tracts

**Total Application Denial Rates
Garland, Texas
2011-2013**

Census Tracts	Total App Denial Rate	Tract Income Level
320.11	10.20%	Upper
320.09	12.00%	Upper
190.43	12.70%	Upper
181.42	13.80%	Middle
190.31	13.80%	Upper
178.08	13.90%	Middle
313.16	14.10%	Upper
181.29	14.10%	Upper
186	14.20%	Middle
190.2	14.70%	Middle
190.42	14.80%	Upper
184.02	15.10%	Middle
181.38	15.80%	Middle
190.25	16.20%	Middle
181.37	16.50%	Upper
181.26	16.50%	Middle
190.26	16.60%	Middle
181.18	16.70%	Middle
181.1	16.80%	Upper
184.01	17.30%	Moderate
190.27	17.60%	Moderate
181.21	17.60%	Moderate
190.29	17.60%	Middle
181.32	18.80%	Middle
181.11	19.10%	Middle
190.28	19.50%	Middle
181.23	19.60%	Middle
185.01	20.10%	Moderate
181.2	20.30%	Middle
190.04	20.40%	Middle
188.02	20.40%	Moderate
183	20.70%	Moderate
181.41	21.10%	Moderate
190.21	21.20%	Middle
182.05	21.50%	Moderate
188.01	21.70%	Middle

Census Tracts	Total App Denial Rate	Tract Income Level
190.33	21.70%	Moderate
181.28	22.00%	Moderate
189	22.60%	Moderate
181.27	22.90%	Middle
181.05	23.50%	Moderate
190.14	23.50%	Middle
182.03	23.80%	Moderate
182.06	25.00%	Moderate
190.32	25.70%	Moderate
187	25.90%	Moderate
185.06	30.80%	Low
182.04	31.00%	Low
190.13	33.30%	Low
181.24*		

Table V-5: Minority Application Denial Rates Sorted by Denial Rate for All Garland Minority Census Tracts: 2011-2013

**Minority Application Denial Rates
Garland, Texas
2011-2013**

Census Tracts	Total Minority Applications Denial Rate	Tract Income Level
320.11	12.80%	Upper
178.08	15.30%	Middle
320.09	15.80%	Upper
181.38	15.90%	Middle
181.42	16.00%	Middle
181.37	16.80%	Upper
313.16	17.20%	Upper
181.29	17.50%	Upper
190.42	17.70%	Upper
181.18	17.90%	Middle
190.25	18.00%	Middle
190.27	18.70%	Moderate
181.32	19.30%	Middle
181.21	19.50%	Moderate
190.26	19.50%	Middle
190.29	20.30%	Middle
184.02	20.30%	Middle
181.26	20.90%	Middle
190.04	21.40%	Middle
181.1	21.50%	Upper
190.31	21.90%	Upper
190.21	22.40%	Middle
184.01	22.50%	Moderate
190.43	22.70%	Upper
188.01	23.10%	Middle
181.2	23.40%	Middle
181.11	23.50%	Middle
190.2	23.60%	Middle
186	23.60%	Middle
181.27	24.80%	Middle
189	24.80%	Moderate
190.28	24.90%	Middle
182.03	25.00%	Moderate
181.41	25.00%	Moderate
181.23	25.00%	Middle
185.01	25.20%	Moderate

Census Tracts	Total Minority Applications Denial Rate	Tract Income Level
182.05	26.30%	Moderate
190.32	26.70%	Moderate
183	27.20%	Moderate
190.33	27.40%	Moderate
181.05	29.00%	Moderate
190.14	30.20%	Middle
181.28	30.40%	Moderate
188.02	30.80%	Moderate
182.04	33.80%	Low
187	35.60%	Moderate
182.06	37.80%	Moderate
190.13	75.00%	Low
185.06	100.00%	Low
181.24*		

Table V-6: Home Purchase Loan Total Application and Denial Rates for All Garland Minority Census Tracts:

**Home Purchase Loan Applications
Garland, Texas
2011-2013**

Home Purchase	Home Purchase Loans Applications	Home Purchase Loan Denials Application Denials	Home Purchase Loan Applications Denial Rates %	2013 Tract Minority %
178.08	229	15	6.6%	47.09
181.05	141	14	9.9%	76.75
181.1	359	28	7.8%	21.77
181.11	238	22	9.2%	66.94
181.18	497	50	10.1%	64.23
181.2	290	31	10.7%	62.38
181.21	213	14	6.6%	70.44
181.23	501	52	10.4%	57.79
181.24	*	*	*	*
181.26	305	17	5.6%	59.13
181.27	101	11	10.9%	67.51
181.28	166	21	12.7%	71.1
181.29	156	5	3.2%	43.23
181.32	323	31	9.6%	52.38
181.37	142	13	9.2%	58.37
181.38	105	11	10.5%	64.4
181.41	42	7	16.7%	45.9
181.42	99	7	7.1%	55.22
182.03	221	16	7.2%	85.24
182.04	27	4	14.8%	95.65

Home Purchase	Home Purchase Loans Applications	Home Purchase Loan Denials Application Denials	Home Purchase Loan Applications Denial Rates %	2013 Tract Minority %
182.05	132	11	8.3%	82.25
182.06	90	7	7.8%	79.18
183	184	15	8.2%	66.73
184.01	194	21	10.8%	66.46
184.02	241	23	9.5%	44.1
184.02	0	0	0.0%	75.33
185.01	102	8	7.8%	63.41
185.06	7	3	42.9%	93.29
186	190	14	7.4%	41.97
187	120	13	10.8%	75.55
188.01	165	13	7.9%	65.89
188.02	18		0.0%	55.33
189	231	23	10.0%	71.75
190.04	270	24	8.9%	67.57
190.13	6	3	50.0%	94.1
190.14	183	17	9.3%	77.49
190.2	247	29	11.7%	56.72
190.21	281	37	13.2%	61.53
190.25	333	23	6.9%	48.12
190.26	292	21	7.2%	43.08
190.27	253	23	9.1%	66.51
190.28	180	21	11.7%	64.85
190.29	320	23	7.2%	60.88
190.31	533	47	8.8%	36
190.32	104	16	15.4%	82.46
190.33	100	11	11.0%	83.72
190.42	230	17	7.4%	48.73
190.43	465	36	7.7%	25.75
313.16	336	32	9.5%	60.49
320.09	424	28	6.6%	44.45
320.11	220	12	5.5%	49.59

Table V-7: Refinance Loan Total Application and Denial Rates for All Garland Minority Census Tracts:

**Refinance Loan Applications
Garland, Texas
2011-2013**

Refinance	Refinance Loans Applications	Refinance Loan Denials Application Denials	Refinance Applications Denial Rates %	2013 Tract Minority %
178.08	378	62	16.4%	47.09
181.05	203	57	28.1%	76.75
181.1	552	115	20.8%	21.77
181.11	316	69	21.8%	66.94
181.18	704	134	19.0%	64.23
181.2	485	106	21.9%	62.38
181.21	327	62	19.0%	70.44
181.23	768	172	22.4%	57.79
181.24	*	*	*	*
181.26	404	82	20.3%	59.13
181.27	138	39	28.3%	67.51
181.28	213	50	23.5%	71.1
181.29	271	50	18.5%	43.23
181.32	396	91	23.0%	52.38
181.37	285	54	18.9%	58.37
181.38	131	22	16.8%	64.4
181.41	64	14	21.9%	45.9
181.42	215	31	14.4%	55.22
182.03	338	97	28.7%	85.24
182.04	58	17	29.3%	95.65
182.05	208	52	25.0%	82.25
182.06	90	32	35.6%	79.18
183	256	68	26.6%	66.73
184.01	214	44	20.6%	66.46
184.02	278	47	16.9%	44.1
184.03	1			75.33
185.01	152	34	22.4%	63.41
185.06	5		0.0%	93.29
186	212	34	16.0%	41.97
187	128	42	32.8%	75.55
188.01	170	51	30.0%	65.89
188.02	36	11	30.6%	55.33
189	290	79	27.2%	71.75
190.04	347	90	25.9%	67.57
190.13	5	1	20.0%	94.1
190.14	307	86	28.0%	77.49
190.2	445	69	15.5%	56.72
190.21	354	88	24.9%	61.53
190.25	507	99	19.5%	48.12
190.26	472	92	19.5%	43.08
190.27	292	67	22.9%	66.51
190.28	219	49	22.4%	64.85

Refinance	Refinance Loans Applications	Refinance Loan Denials Application Denials	Refinance Applications Denial Rates %	2013 Tract Minority %
190.29	450	95	21.1%	60.88
190.31	763	116	15.2%	36
190.32	140	43	30.7%	82.46
190.33	114	29	25.4%	83.72
190.42	362	66	18.2%	48.73
190.43	868	121	13.9%	25.75
313.16	640	96	15.0%	60.49
320.09	981	128	13.0%	44.45
320.11	510	60	11.8%	49.59

Table V-8: Home Improvement Loan Total Application and Denial Rates for All Garland Minority Census Tracts:

**Home Improvement Loan Applications
Garland, Texas
2011-2013**

Home Improvement	Home Improvement Loans Applications	Home Improvement Loan Denials Application Denials	Home Improvement Applications Denial Rates %	2013 Tract Minority %
178.08	25	11	44.0%	47.09
181.05	39	19	48.7%	76.75
181.1	38	16	42.1%	21.77
181.11	38	22	57.9%	66.94
181.18	40	23	57.5%	64.23
181.2	44	29	65.9%	62.38
181.21	29	24	82.8%	70.44
181.23	54	35	64.8%	57.79
181.24	*	*	*	*
181.26	37	24	64.9%	59.13
181.27	10	7	70.0%	67.51
181.28	26	18	69.2%	71.1
181.29	20	8	40.0%	43.23
181.32	32	19	59.4%	52.38
181.37	16	6	37.5%	58.37
181.38	5	5	100.0%	64.4
181.41	3	2	66.7%	45.9
181.42	12	7	58.3%	55.22
182.03	50	32	64.0%	85.24
182.04	15	10	66.7%	95.65
182.05	18	14	77.8%	82.25
182.06	16	10	62.5%	79.18
183	20	12	60.0%	66.73
184.01	15	8	53.3%	66.46
184.02	18	11	61.1%	44.1
184.03	1	1		75.33

Home Improvement	Home Improvement Loans Applications	Home Improvement Loan Denials Application Denials	Home Improvement Applications Denial Rates %	2013 Tract Minority %
185.01	20	13	65.0%	63.41
185.06	1	1	100.0%	93.29
186	28	13	46.4%	41.97
187	22	15	68.2%	75.55
188.01	15	12	80.0%	65.89
188.02	No data avail.	No data avail.	No data avail.	55.33
189	32	23	71.9%	71.75
190.04	30	18	60.0%	67.57
190.13	1	0	0.0%	94.1
190.14	29	19	65.5%	77.49
190.2	22	7	31.8%	56.72
190.21	22	14	63.6%	61.53
190.25	38	20	52.6%	48.12
190.26	42	21	50.0%	43.08
190.27	19	9	47.4%	66.51
190.28	16	11	68.8%	64.85
190.29	42	25	59.5%	60.88
190.31	50	23	46.0%	36
190.32	17	8	47.1%	82.46
190.33	16	10	62.5%	83.72
190.42	22	8	36.4%	48.73
190.43	49	18	36.7%	25.75
313.16	23	13	56.5%	60.49
320.09	38	17	44.7%	44.45
320.11	14	4	28.6%	49.59

Appendix VI - Public Notices and Comments



Remit Payments (with Acct Number) to: The Dallas Morning News, P.O. BOX 660040, DALLAS, TX 75266-0040

Order Confirmation

Customer:	CITY OF GARLAND	Customer Account:	100004666
Ad Order #:	0001347185	PO Number:	CPN 6033
Sales Rep:	Lynda Black	Order Taker:	Lynda Black

Net Amount:	\$248.20	Tax Amount:	\$0.00	Total Amount:	\$248.20
Payment Method:	Check/Money Order	Payment Amount:	\$0.00	Amount Due:	\$248.20

Ad Order #: 0001347185

Ad Number: 0001347185-01

Color: **Ad Size:** 1 X 82.00 Li

Ad Content

NOTICE OF PUBLIC MEETING - ALL GARLAND RESIDENTS ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Garland will hold a Public Meeting on November 5, 2014 at 6:30 p.m. in the City of Garland Municipal Building located at 800 Main Street, Garland TX 75040. This meeting is intended to inform Garland 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.

Entitlement communities like Garland are required by the U. S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

Persons living and working in Garland are encouraged to attend and provide input. Anyone unable to attend this meeting but wishing to make their views known may do so by submitting written comments to Jose Alvarado at City of Garland Fair Housing Office, 210 Carver Suite 102A, Garland TX 75040 or by email to jalvarad@garlandtx.gov .

Individuals with disabilities or persons with Limited English Proficiency requiring auxiliary aids or services should contact the City by writing or calling 972-205-3300. For persons with Hearing Impairments, please contact TDD/TTY/Relay Service: 800-735-2988.

IF REQUESTED THIS DOCUMENTS CAN BE PROVIDED IN AN ALTERNATIVE FORMAT.

CPN 6033 Pub. 10/17/2014

Run Dates		Product	Placement/Classification - Position
Publish Date: 10/17/2014	Stop Date: 10/17/2014	Dallas Morning News	Legals Bids Notices - LN Legal Notices
Publish Date: 10/17/2014	Stop Date: 10/23/2014	DallasNews.com	Legals Bids Notices - LN Legal Notices

DMNmedia

Remit Payments (with Acct Number) to: The Dallas Morning News, P.O. BOX 660040, DALLAS, TX 75266-0040

Order Confirmation

Customer: CITY OF GARLAND Customer Account: 100004666
Ad Order #: 0001471446 PO Number: CPN 6536
Sales Rep: Lynda Black Order Taker: Lynda Black

Net Amount: \$483.05 Tax Amount: \$0.00 Total Amount: \$483.05
Payment Method: Check/Money Order Payment Amount: \$0.00 Amount Due:

Ad Order #: 0001471446

Ad Number: 0001471446-01

Color: Ad Size: 2 X 77 li

Ad Content

PUBLIC NOTICE
30-DAY PUBLIC COMMENT PERIOD FOR INTERESTED RESIDENTS AND ORGANIZATIONS
CITY OF GARLAND'S ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR FY 2015-2019

The City of Garland's Fair Housing Services has completed an Analysis of Impediments to Fair Housing Choice (AI) for FY 2015-2019 for the City. As an "entitlement" recipient of grant funds from the U.S. Department of Housing and Urban Development (HUD), the City is required to "affirmatively further fair housing choice" in the City. As part of that requirement, the City has to complete an AI to identify and address impediments or barriers to fair housing choice for residents based on protected classes of persons in the Fair Housing Act of 1968, as amended. The vision of Garland Fair Housing Services is for everyone to have the opportunity to enjoy his or her home and community as a fundamental human concept, free from discrimination.

All interested residents, agencies, community groups, and other stakeholders are hereby invited to review the AI document and provide written comments. Please select the link below for a copy of the AI document:

<http://www.garlandtx.gov/civicax/filebank/blobdload.aspx?BlobID=25171>

A hard copy of the AI document is also available for review at City Hall or at the main library.

Comments will be accepted through **November 30, 2015**. Please forward your comments in writing to the attention of Jose Alvarado, Fair Housing Administrator, 210 Carver Dr. Ste. 102A, Garland, TX 75040.

You may also e-mail your comments to: JAlvarad@garlandtx.gov

We value your assistance and opinion, and appreciate you spending a few minutes to give us feedback. For additional information regarding this process, please contact Jose Alvarado at 972-205-3316.

IN ACCORDANCE WITH THE PROVISIONS OF THE ADA, THIS NOTICE CAN BE REQUESTED IN ALTERNATE FORMAT.

ACCOMODATIONS FOR PERSONS WITH DISABILITIES, HEARING IMPAIRMENTS OR LIMITED ENGLISH PROFICIENCY ARE AVAILABLE UPON REQUEST.

Asistencia en español : Para que le interpreten la solicitud en español, llame al 972-205-3316.

Publish: Dallas Morning News
[NAME OF NEWSPAPER]
October 30, 2015
CPN 6536 Pub. 10/30/2015

Run Dates

Publish Date: 10/30/2015 Stop Date: 10/30/2015
Publish Date: 10/30/2015 Stop Date: 11/05/2015

Product

Dallas Morning News
DallasNews.com

Placement/Classification - Position

Legals Bids Notices - LN Legal Notices
Legals Bids Notices - LN Legal Notices

NO COMMENTS WERE RECEIVED DURING THE 30-DAY COMMENT PERIOD.

Fair Housing Services

City of Garland, TX
200 N. Fifth Street
Garland, TX 75040

Phone: (972) 205-3300

Fax: (972) 205-3304

